SUPPORTING STATEMENT
Pre-Implementation Planning Checklist Report for State Unemployment Insurance (UI)
Information Technology (IT) Modernization Projects
OMB Control No. 1205-0NEW

A. Justification.

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.*

    Building on lessons learned from previous state implementations of modernized UI IT systems, the U.S. Department of Labor's Employment and Training Administration (ETA) facilitated the development of a UI IT Modernization Pre-Implementation Planning Checklist for states to use prior to "going live" with a new UI Benefits and/or Tax system. The checklist can be used to verify that all necessary system functions are available and/or that alternative workarounds are developed prior to the production launch of the UI IT system to help avoid major disruption of services to UI customers and to prevent delays in making UI benefit payments when due. This comprehensive checklist denotes critical functional areas that states should verify prior to launching a new UI IT system including, but not limited to, technical IT functions and UI business processes that interface with the new system. The list of critical areas identified in the checklist comprises ten (10) distinct topics:

    1. Functionality (Fully Available or Workaround in Place)
    2. External Alternate Access Options and Usability Issues Addressed
    3. Policies/Procedures Development and Dissemination
    4. Technical Preparation
    5. Call Center /Customer Service Operations
    6. Staffing/Staff Training on New System Operations
    7. Staff and Customer Help Desk Support
    8. Management Oversight
    9. Vendor Support
    10. Communications

    ETA believes that the use of this checklist and the report on planning to address these topics will help states ensure the availability of mission critical functions when they launch a new system. The collection will also enable ETA to review the state's report and provide any appropriate technical assistance.

    This collection is authorized under the Social Security Act, Title III, Section 303(a)(6).

2. *Indicate how, by whom, and for what purpose the information is to be used. Except for a*

new collection, indicate the actual use the agency has made of the information received from the current collection.

The information gathered in the Report will be used by states in preparing for the implementation of new UI IT systems and by ETA. The check list and report will help states ensure the availability of mission critical functions as they prepare to launch a new UI IT system. The collection will enable ETA to identify any needed technical assistance as the state prepares for the implementation of a modernized system.

This information will include the UI IT Modernization project title (e.g. Consortium name), Date of Submission, Project name, Contact Information, and a Summary of the Project and the report on each of the associated Pre-Implementation Planning Checklist topic areas. As mentioned earlier, the report itself is comprised of ten (10) distinct topics (listed above) and their associated sub-elements. For every sub-element in the ETA 9177, the SWA will provide supporting content to demonstrate that the SWA has addressed the specific sub-element. For each sub-element, the SWA is expected to address the issue including but not limited to:

- A brief report explaining the status of the project as it relates to the particular sub-element,
- Attach explanations of any workarounds of the processes in the sub-element,
- Attach explanations if implementation of the new system concerning processes for the sub-element will be delayed,
- Mitigation proposals for addressing any problems,
- New project timelines if applicable, and/or
- Any discussion of identified technical assistance needs for the successful completion of the project.

3. *Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

States will use a simple form template (a Microsoft Word 2010 ".doc") provided by ETA to prepare the report, which will be emailed to the appropriate regional office. The use of a simple form which can be submitted electronically is compatible with the report which will be a narrative, and not a statistical, submission.

4. *Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

The information to be collected in this Report is not available from other sources in the detail needed to determine any technical assistance needs of the state prior to implementing a new UI IT system.

5.   *If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.*

There is no impact on small businesses.

6.   *Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

The new collection is a detailed narrative report, provided by the SWA, on pre-implementation preparation of a state's new UI IT system. Without this information, ETA is unable to effectively and consistently monitor states' progress in implementing the UI IT Modernization projects for which the funds were provided.

Many states are addressing antiquated UI IT systems and are developing much needed modernized systems. However, recent efforts by states in launching new UI IT systems have resulted in unexpected disruptions of service to customers, delays in the payments of benefits, and the creation of processing backlogs. ETA designed this report in an effort to avoid future reoccurrences of similar experiences as an increasing number of states will be implementing new systems.

Not providing the implementation status information as proposed would not allow adequate time for ETA to offer technical assistance on projects if necessary to support the state's implementation. Furthermore, unlike burden on businesses or individuals, states are funded to collect and report data through their annual UI administrative grant.

7.   *Explain any special circumstances that would cause an information collection to be conducted in a manner that requires further explanation pursuant to regulations 5 CFR 1320.5:*

No such circumstances exist.

8.   *If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.*

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with the Paperwork Reduction Act of 1995, the public was allowed 60 days to comment through the Federal Register Notice posted on May 1, 2015 (80 FR 24978).

Comments were received by the National Association of State Workforce Agencies (NASWA) on July 20, 2015. NASWA added additional Functionality and Usability clarifications to the Pre-Implementation Planning Checklist.

9.   *Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.*

There are no payments made to respondents.

10.   *Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.*

No assurance of confidentiality is provided. The ETA 9177 reports contain no personal or confidential data.

11.   *Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

There are no questions of a sensitive nature.

12.   *Provide estimates of the hour burden of the collection of information.*

The burden of the collection of information can be divided into three intervals:
   a.   Issuance (1st Year)
   b.   Planning (2nd Year)
   c.   Reporting (2nd Year and beyond)

Issuance:

Upon issuance, in the first year, there is a level of burden to all states to understand and review the Pre-Implementation Planning Checklist Report as it is a comprehensive and detailed report. ETA estimates a 2 hour burden per State agency to review the documentation. However, the State(s) are not responding to the collection of information, per se, but taking the time to review and understand the requirements of the ETA 9177 report. (53 total responses / 3 years = 18 responses per year, rounded.)

Planning:

Beginning the second year after issuance, ETA anticipates each year 4 of the States (i.e. 8 over the term of this clearance) who are in some state of UI Modernization will begin a planning to report phase. The ETA 9177 report will require coordination and interactions among many of the State's UI Modernization entities (e.g. configuration management, quality assurance, system architecture, system administration, software development, UI Staff as well as UI Management, etc.) ETA estimates a 20 hour burden per State agency to review the report and begin planning or collecting the necessary information to develop the ETA 9177 report. (8 total responses / 3 years = 3 responses, rounded.)

Reporting:

All states conducting UI IT Modernization will provide this report 180 days (6 months) prior to implementing their associated UI IT Modernization project. Beginning the second year after issuance, ETA anticipates each year 4 of the States (i.e. 8 over the term of this clearance) will report. Based on previous experience, it is estimated at that it will take a state agency 120 hours to provide this information through the planned reporting format. (8 total responses / 3 years = 3 responses, rounded.)

The following table can be used as a guide to calculate the total burden of an information collection.

Activity	Number of Respondents (Rounded)	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Issuance	18	1	18	2 hrs.	36 hrs.	$55.79	$2,008

Planning	3	1	3	20 hrs.	60 hrs.	$55.79	$3,347
Reporting	43	1	3	120 hrs.	360 hrs.	$55.79	$20,084
Unduplicated Totals ◇	*18*		*24*		*456*		*$25,439*

*Source: The hourly rate is computed by dividing the FY 2016 national average PS/PB annual salary for state operating support staff as provided for through the distribution of state UI administrative grants (http://wdr.doleta.gov/directives/attach/UIPL/UIPL_21-15_Attachment_I.pdf) by the average number of hours worked in a year (1,711). For FY 2016, this calculation was: $95,449 / 1,711 = $55.79.

◇Unduplicated Totals are calculated by utilizing the fact that only 3 – 5 states per year will participate in all three stages (Issuance, Planning and Reporting) of the UI Modernization process. Thus, the summation totals are based upon these 3 – 5 states per year.

13. *Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).*

The agency associates no burden with this collection beyond the value of respondent time.

14. *Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.*

States will use a simple form provided by ETA to prepare this report. The SWA will submit the Report via email to the appropriate regional office, which will be shared with the National Office via email.

Federal costs include the Regional and National Office staff required to manage the data collection and analyze the data. The staff costs are summarized in the following table using FY 2016 OPM Pay Tables assuming a 5% time oversight and management review:

Federal Oversight GS-12 Grade step1 Inc / Locality Pay	Regional Office Staff	Current 5% of time oversight
$76,735	Boston	$3,887.20
$74,884	Philadelphia	$3,795.00
$73,347	Atlanta	$3,713.00
$74,195	Dallas	$3,758.35

$76,919	Chicago	$3,894.95
$83,098	San Francisco	$4,165.10
$76,378	National Office	$3,874.50
	Total	**$27,088.10**
Federal Oversight GS-15 Grade step 1 Inc / Locality Pay	Management	Current 5% of time oversight
$128,503	Boston	$6,425.15
$125,454	Philadelphia	$6,272.70
$122,744	Atlanta	$6,137.20
$124,243	Dallas	$6,212.15
$128,759	Chicago	$6,437.95
$139,342	San Francisco	$6,967.10
$128,082	National Office	$6,404.10
	Total	**$44,856.35**
	Grand Total	**$71,944.45**

Federal ADP costs to maintain the National Office computer and database are estimated to be approximately $130,000 annually.

15. *Explain the reasons for any program changes or adjustments reported on the burden worksheet.*

This is a new information collection request.

16. *For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

The results of the checklist will not be published.

17. *If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

The OMB control number and expiration date are displayed on the ETA 9177 hard copy form. A menu option has been incorporated into the UI electronic reporting system which provides access to a complete listing of OMB control numbers and expiration dates for all required reports, including the new ETA 9177. In addition, ETA will disseminate OMB control number and expiration date information for this report through a UI program letter shortly after OMB action.

18.   Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions.

B.   Collections of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.