

**JUSTIFICATION FOR
NON-MATERIAL CHANGE FOR
OMB CONTROL NO. 1205-0132**

**ET Handbook No. 336, 18th Edition;
Unemployment Insurance (UI) State Quality Service Plan (SQSP)**

BACKGROUND:

The SQSP (State Plan) represents an approach to the UI performance management and planning process that allows for an exchange of information between Federal and state partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. As such, it is the state's formal plan and schedule for improving performance. ET Handbook No. 336 contains general instructions for the SQSP (See UIPL No. 3-10). This Handbook is designed as a permanent instruction for the planning and budget process and provides states with planning guidelines and instructions for reporting UI financial and staff year information.

NON-SUBSTANTIVE CHANGE REQUEST:

SQSP CAP/IAP and Quarterly Reporting Tool: The SQSP Handbook provides specific instructions for completion of SQSPs, including Corrective Action Plans (CAPS) and Integrity Action Plans (IAPs). The Employment and Training Administration (ETA) has enhanced the CAP and IAP forms for better standardization and more users friendly and to provide a tool for states to provide the required quarterly status reports. The proposed enhancement does not pose any additional requirements to the reporting burden for the completion and submittal of the SQSP. However, although states have provided quarterly status updates to CAPs, the burden hours were not included in the approved ICR. The non-substantive change will not change the reporting requirements or the frequency of the collection. However, the burden hours has been updated in this request to reflect the quarterly reporting requirement. Changes were also made to the handbook to provide instructions for the use of the revised forms.

ETA proposes to implement these changes with the FY 2018 SQSP. States will begin planning the FY 2018 SQSP in April 2017, to allow time for plan preparation, submittal, and approval of the SQSP by September 30, 2017. Therefore, ETA is requesting this non-substantive change

now to allow time for the completion of the process prior to the beginning of FY 2018 SQSP cycle.

ETA seeks OMB approval to incorporate the revised CAP/IAP and Quarterly Reporting form. ETA is also requesting a revision to the burden estimate to count for the time states use to prepare quarterly updates on CAP progress as required in ET Handbook No. 336, 18th Edition.

Currently, the average estimated number of responses per 53 respondents is 535; 1,530 hours; and \$0 in other costs. Upon approval of this request, the burden under control number 1205-0132 will be an estimated average of 747 responses, 3,226 hours, and \$0 in other costs. The estimated burden hour allocation is detailed as follows:

Report	Respondents (State)	Reporting Frequency	Reports per Year	Total Responses	Hours per Response	Total Hours
UI-1 (base), ETA 8623A	53	annual	1	53	1	53
UI-3 (contingency), ETA 2208A (Quarterly)	53	quarterly	4	212	2	424
CAPs	27	biennial	8*	216	4	864
UI Program Integrity Plan	27	biennial	1*	27	3	81
State Plan Narrative	27	biennial	1*	27	4	108
Quarterly Reports	53	quarterly	4	212	8	1,696
Total		Various	19	0		0

*For burden estimation purposes each CAP, UI Program Integrity Plan, and State Plan Narrative is considered to be a different report even though they are submitted simultaneously. While CAPs are submitted on a biennial basis, a State may need to submit multiple plans to address various deficiencies.