**Justification for**

**Non-Substantive change FOR OMB Control No. 1205-0132**

**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. The 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. Each year, the SQSP submittal will be initiated with the annual SQSP Unemployment Insurance Program Letter (UIPL). This Program Letter will specify the dates relevant to the SQSP process for the approaching fiscal year (FY); summarize National Priorities and Federal Program Emphasis for the year; and identify any special planning requirements in effect for the Fiscal Year (FY).

**NON-SUBSTANTIVE CHANGE REQUEST:**

**SQSP State Submittal Schedule:** The Biennial SQSP planning cycle provides a 24-month window for states to adequately plan and implement their vision to enhance the UI program, to implement corrective actions as needed to improve program performance, and to achieve performance excellence. The Alternate Year SQSP submittal consists of items included in the state’s request for Federal UI administrative funding, as well as modifications to the Biennial SQSPs.

Currently, within the SQSP cycle, states switch between the Biennial and Alternate Year SQSP each year, but on alternating schedules.

* Half of the states in each region submit a Biennial SQSP (includes a full SQSP package), and
* The other half of the states in each region submit an Alternate year SQSP.

The new schedule changes the time of submittal to require all states to submit the same type of plan on the same schedule. The Employment and Training Administration (ETA) is making this change to reduce the regional workload and confusion among the states on what needs to be submitted each year as part of their SQSP process.

The proposed change will only affect when the SQSP Biennial and Alternate Year plans are submitted; therefore, does not pose any additional requirements to the reporting burden for the completion and submittal of the SQSP.

Each year, the National Office will initiate the SQSP submittal with the annual SQSP UIPL and Field Memorandum (FM). The UIPL provides guidance on the dates relevant to the SQSP process for the approaching FY, summarize Federal Program Emphasis for the year, and identify any special planning requirements in effect for the FY. The FM provides Regional Office staff with SQSP process and review instructions for the upcoming FY. Both the UIPL and the FM will be developed with additional instructions to implement the new schedule change. There is no change to ET Handbook No. 336.

ETA proposes to implement these changes with the FY 2021 SQSP. States will begin planning the FY 2021 SQSP in April 2020, to allow time for plan preparation, submittal, and approval of the SQSP by September 30, 2019. Therefore, ETA is requesting this non-substantive change now to allow time for the completion of the process prior to the beginning of FY 2021 SQSP cycle.