

Supporting Statement A:
OMB Control Number: #####-#####
U.S. Election Assistance Commission
Progress Report (EAC-PR)
(Text in Red will need to be changed when data/input is finalized.)

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The U.S. Election Assistance Commission (EAC) provides grants to the state election offices for the securing of elections. In order to provide oversight on these grants that have an end date of until expended the agency needs to have prudent check in points throughout the lifecycle of the award. EAC also rolls up any information provided by the states and submits it to Congress as requested mid-year and at the end of the year. To meet this requirement we must establish a streamlined process that reduces the burden on states and makes clear what the expected content for this reporting will be. We are also rolling into this report format the existing emergency approval (OMB Control No: 3265-0020) for the CARES Act funding provided to grantees that has its own targets for reporting on the activities and expenditures.

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

Data from these progress report forms will be used for grant monitoring, feedback to grantees, technical assistance, long-term planning, and reporting to Congress. EAC will also use the data collected to meet the reporting requirements set out in the CARES Act.

EAC has developed this form to collect data on program activities such as staffing, voting processes, security and training, communication and other activities unique to the HAVA funding. These reports also collect qualitative data on the status of grantee progress, problems encountered and the grantees' assessments on how they used the funds to improve elections.

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.

The EAC plans to use the same online process the grantees are currently using under the emergency approval for CARES reporting. The electronic format has made the preparation of necessary data, submission by grantees, and turn around to Congress by EAC simpler and more efficient. The pilot for the CARES reporting has led to a reduced response burden associated with the report and improved quality and accuracy of data submissions. We expect the same to carry through for the other grants through this online reporting process.

4. Describe efforts to identify duplication.

EAC does not expect grantees to be reporting on HAVA funding expenditures and activities to any other source. Where possible, EAC has mirrored the federal standardized data elements for progress reporting to reduce variance across federal grants in grantee tracking. The report also rolls in the emergency approved data elements for the CARES

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reporting.

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

This information collection does not impact small businesses or other small entities. Only states and territories are required to submit the reports. The EAC has made efforts to limit the information requested and burden on all participants. The information sought is limited to information necessary to provide grant oversight and response to congressional inquiries.

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.

If the EAC does not collect this information it will be unable to perform oversight for its HAVA grants, including the 2020 HAVA CARES funding. In addition, if the EAC does not collect this information it will be unable to report to Congress any performance data related to HAVA funding.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstances applicable to this information collection.

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 5CFR 320.8(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 in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside of EAC.

No substantive comments were received on our 60 day posting. The 60 day notice in the Federal Register was published on June 17, 2020 - Document Citation: 85 FR 36569, Page: 36569-36570 (2 pages), Document Number: 2020-13032. The 30 day notice was published on August 26, 2020 - Document Citation: 85 FR 52583, Page: 52583 (1 page), Document Number: 2020-18622.

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

The EAC does not provide any payment or gift to respondents.

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

The EAC is intending to collect financial reporting on a semiannual basis using

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the OMB approved government wide collection cited in § 200.327. The terms and conditions of EAC’s HAVA awards will be updated to reflect this requirement for both the financial and performance progress reporting. Providing information will be mandatory. The penalty associated with failing to respond is noncompliance and will require corrective action by the grantee. Public Law 93-573 (Privacy Act of 1974) requires that respondents be informed of the purpose and uses to be made of the information collected. The information collected will be used to oversee grant progress and report that progress to Congress. Progress reports are grant record and currently made public on our website.

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.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

The estimated response burden is based on the similarly-structured progress reports administered by other federal agencies. Using the fillable form, we estimate that the average burden for the complete report is 1 hour.

The table below summarizes the burden estimate for the PNR.

EAC Grant	Instrument	Total number of respondents	Total number of responses per year	Average burden hours per response	Annual burden hours
251	EAC-PNR	43	2	1	86
101	EAC-PNR	29	2	1	58
Election Security	EAC-PNR	56	2	1	112
CARES	EAC-PNR	56	3*	1	168
TOTAL					368

*The total max possible number of reports per respondent is six, however, many grantees will be able to meet the match before the 2-year period due to the

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activities being restricted to the 2020 elections.

The estimated cost of the annualized cost of this burden is: \$8,254.24, which is calculated by taking the annualized burden (368 hours) and multiplying by an hourly rate of \$22.43 (GS-8/Step 5 hourly basic rate).

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information.

There are no capital or start-up costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government.

The estimated annual cost to the Federal Government is \$55,896.

For each data collection iteration, the cost includes: a) \$54,096, for EAC personnel to review each report for data quality and compliance, provide technical assistance to complete the report, clarification on submissions as needed, revision review as applicable, conversion of each report to 508 compliant format, posting each report to our website, and rolling up all the data into a report to Congress. This is calculated by estimating the burden per report to 1 hour of staff effort (368 hours) and multiplying by an hourly rate of \$36.75 (GS-13/Step 1 hourly basic rate) x 4 staff, and b) \$1,800 for online survey software licenses for survey gizmo.

15. Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

This is a new information collection and there are no changes or adjustments to report. The emergency approval for the CARES Act is rolled into this request.

16. For collections whose results will be published, outline the plans for tabulation and publication.

Grantee report submissions will be publicly released on the EAC's website as done in the past for other grants. The EAC will submit to Congress a report rolling up the impact of the CARES funding on the 2020 elections across the United States. The same will be done for the other grants on a mid-year and annual basis.

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

Not applicable to this collection.

18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

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The EAC does not request an exception to the certification of this information collection.

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