SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-NEW:

Assessment of the Collection, Analysis, Validation, and Reporting of SNAP Employment and Training Data project

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A1. 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.

Section 17 [7 U.S.C. 2026] (a) (1) of the Food and Nutrition Act of 2008, as amended, provides general legislative authority for the planned data collection. It authorizes the Secretary of Agriculture to enter into contracts with private institutions to undertake research that will help to improve the administration and effectiveness of SNAP in delivering nutrition-related benefits. Under the Supplemental Nutrition Assistance Program (SNAP), States are required to operate an Employment and Training (E&T) program to help participants gain skills, education, training, and experience that lead to employment and greater economic self-sufficiency.

The U.S. Department of Agriculture, Food and Nutrition Service (FNS) uses several methods to collect information on State SNAP E&T programs: annual State SNAP E&T plans, quarterly FNS-583 SNAP E&T Program Activity Report data forms (OMB 0584–0594, currently undergoing review), and annual outcome reporting measures. FNS has found that reported data are often inconsistent, incomplete, and inaccurate. This makes it challenging for FNS to analyze these data to determine the outcomes of SNAP E&T participants and to assist States in improving their programs.

FNS has contracted with a vendor to (1) identify and describe the current State and Federal systems that collect, validate, and analyze E&T data; (2) assess the current and future E&T data needs of Federal, Regional, and State staff; and (3) recommend a plan to improve how Federal, Regional, and State staff collect and use data for E&T program improvement and reporting.

The assessment will include site visits in seven States to observe their SNAP E&T business, data collection, and analysis processes, and to assess the current and future data needs from the perspective of a range of State and Local staff, including Local organizations that provide E&T activities.

Legal or Administrative Requirements that Necessitate the Collection
There are no legal or administrative requirements that necessitate the collection.

A2. Purpose and Use of the Information.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

Use of Information. The project is a new information collection. The project will provide information on the current Federal, Regional, State, and E&T provider data systems and processes; the current and future data needs and goals of SNAP E&T; and the gaps between the current systems and data needs. In addition, a final report will provide recommendations to address these gaps through changes to data systems and information technology (IT) solutions, improved business processes, and expanded technical assistance. There is currently no other effort that can address the research objectives of the proposed project.

Project Design. FNS will select the States purposely for site visits. FNS will select seven States that vary on a range of characteristics including the (1) size and administration of the E&T program (State versus County); (2) types of data tracking systems (an all-inclusive management information system; a management information system that includes some E&T metrics, but not all; and a management information that does not include tracking of E&T data; (3) type of E&T program (primarily mandatory versus primarily voluntary); (4) approach for providing services (States that administer the program themselves, States that primarily partner with DOL, and States with a number of non-DOL partners), and (5) States that received grants for improving data. Each of these factors could directly affect the complexity of the data needed by the State and the capacity to provide current and future data reporting to FNS.

After the States are selected, the project team will conduct site visits to each to assess current data systems and business processes that are used to collect, validate, and analyze program data for Federal and State reporting; monitor program providers; and track E&T participants. The visits will take place over three days and will include a three-person team: a site lead, a data systems lead, and an analyst. The site lead will primarily lead the discussions and process mapping exercise; the system lead will participate in the discussions and process mapping and lead discussions with data and IT staff. The experienced analyst will help facilitate discussions and take detailed notes. Prior to the site visit, the project team will ask the State for any existing documentation such as policies, reports, or guidance related to the project (we will not ask staff to develop any new documents) and will review any publicly available documents they can collect on their own that could benefit their understanding of the E&T program and data collection systems in use.

The visits will include a (1) individual interviews or small-group discussions and (2) processing mapping exercises with large groups. Due to the data needed for this study, in-person site visits are planned and preferred. Staff will monitor the COVID-19 situation and determine the feasibility of in-person visits relative to the planned project schedule.

The project team will conduct individual interviews or small group discussions using a master interview discussion guide to explore current and future data needs for SNAP E&T. The project team will conduct these with State and local E&T staff including directors, managers, policy staff, direct services staff, and data/IT staff. We will also interview directors, managers, direct services staff, and data/IT staff from private sector for-profit and not-for-profit businesses that are E&T providers. The interviews will describe the current data collection systems and processes, and collect feedback from these stakeholders about what is most challenging about collecting the data, what the pitfalls are, how well they understand the guidance, what additional support will be helpful, and which data will help them better administer their programs. The project team also will discuss how difficult it is when data requests change and what amount of time staff need to implement new changes. During these discussions, we will ask States to provide any additional documents, such as policy, reports, or guidance, which they discussed during the interviews that were not collected prior to the site visit.

The process mapping exercise will lay out each step of the processes for collecting, validating, cleaning, reporting, and submitting E&T data, along with the staff involved, the time required, and the difficulty in completing each step. For best results, the discussion will include a range of staff involved in the various steps of the process and most will have already been interviewed as part of the individual interviews or small group discussions. The process mapping exercise will help us understand and assess how data flow through the systems (such as which data are collected in the SNAP management information system or in other systems) and when in the business process these data are entered into the systems. It also will highlight differences in how policies and procedures are intended to work versus how they actually work.

Many respondents will be asked to participate in both an interview and a group mapping discussion.

However, some respondents from the State, Local, and Tribal agencies may only be interviewed and not included in the mapping discussion. Whereas some respondents from the private sector (SNAP E&T providers) will only be part of a group mapping discussion and not interviewed.

Respondents. The site visits will include discussions with key staff in each State, including State SNAP directors and managers, SNAP E&T policy staff, data systems and IT staff, Local office administrators, E&T providers, intermediaries, and staff responsible for data reporting at all organizations (frontline staff such as eligibility workers, E&T navigators, and clerks). The project team will also interview other State agency staff, when other agencies provide data for the SNAP E&T program in the State (for example, if outcomes data for SNAP E&T come directly from the Department of Labor, it could be important to understand that process). The project team will tailor the respondent list and schedule to each State based on its E&T models and data systems.

Discussion guides. Within each State, the project team will collect data through (1) semi-structured interviews and (2) a process mapping exercise. The project team will use a master interview discussion guide with State, Local, and private sector (E&T providers) staff (Attachment B), and a separate guide for the process mapping exercise (Attachment B1).

Data analysis. The project team will take comprehensive notes on all discussions held during the site visits. After a visit is over, the project team will compile notes. The project team will develop thematic tables based on the topics included in the discussion guide and populate these tables for each State. The project team will review cross-State themes based on the populated thematic tables. The project team will then summarize all of these cross-State themes in the State needs assessment summary report. The project team will also include the process map developed with the State SNAP agency, Local offices, and E&T providers.

A3. Use of information technology and burden reduction.

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.

Due to the nature of the semi-structured interviews, group mapping discussions, and the small sample sizes of the site visits, it is not appropriate to use information technology such as computerized interviewing.

A4. Efforts to identify duplication.

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 Question 2.

The information collection will not duplicate information that is already available. There is no other data source providing detailed information on data collection, reporting, and uses of SNAP E&T data.

Publicly available and State-provided documents, such as policies, reports, or guidance will be reviewed by the team to help guide the discussions and potentially shorten interviews by enabling information to be filled in pre- or post-discussion.

A5. Impacts on small businesses or other small entities.

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

It is possible that some of the organizations, such as service providers, involved in the site visits will be small. However, the project team expects the impact on these programs to be limited. The site visit and interviews will be scheduled in collaboration with the program staff to minimize disruption on daily activities. The project team will conduct group discussions to the extent that it is feasible to do so. Generally, interviews will be no longer than 60 to 90 minutes for any one person, but in some cases a single respondent could be included in interviews and the mapping exercise. In those instances, the project team will spend no more than 180 minutes with the individual.

A6. Consequences of collecting the information less frequently.

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.

All of the data to be collected associated with this specific burden request are one-time in nature. The data collection effort described in this document is designed to provide unique information to answer questions of interest to FNS. It will help FNS improve its data collection systems for the SNAP Employment and Training Program, which is a high priority program in assisting SNAP participants. FNS will then use this data to examine how to collect data most efficiently in order to evaluate how successfully E&T Programs are moving SNAP participants into jobs, improving wages, gaining skills, and retaining employment.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

Explain any special circumstances that will cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

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 years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

1. Federal Register notice and comments

A notice of the proposed information collection and an invitation for public comment was published in the Federal Register, [November 27, 2019] volume 84, number 2019-25639, pages 65777-65779. It is included in Attachment C. FNS received 8 comments via the federal rulemaking portal for this proposed information collection which can be seen in Attachment D.

All comments received were outside of the scope of this information collection.

NASS reviewed this ICR package and did not have any comments or concerns.

2. Consultations outside the agency

In addition to soliciting comments from the public, in 2020 FNS consulted with the following organizations for their expertise in matters such as data sources and availability, research design, sample design, level of burden, and clarity of instructions for this collection.

- Rachel Vilsack, Senior Fellow, National Skills Coalition, (202)223-8991
- Ed Bolen, Senior Policy Analyst, Center for Budget and Policy Priorities, (202)408-1080
- Casey Pheiffer, Manager, Federal Workforce Policy, Center for Employment Opportunities, (202)853-2570

The consultants did not offer any substantive comments and did not have any concerns with the research design, sample design, level of burden or the clarity of instructions for the collection.

A9. Explain any decisions to provide any payment or gift to respondents.

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

This data collection will not provide any payment or gift to respondents for their participation.

A10. Assurances of confidentiality provided to respondents.

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

The Contractor is cognizant of Federal, State, and USDA data security requirements. All Mathematica research staff will comply with relevant policies related to secure data collection, data storage and access, and data dissemination and analysis.

Every effort will be made to maintain the privacy of respondents to the extent permitted by law. All respondents included in the project will be told that information they provide will be used only for the purpose of this research. Individuals will not be cited by name (or other identifying information) as sources of information in prepared reports. Mathematica will keep all papers that contain participant names or other identifying information will be kept in locked areas and any computer documents containing identifying information will be protected with a password. Any data collected that contains personally identifiable information for the project will be housed on secure servers.

The site visit interviews are voluntary. Respondents will be told that all of their responses will be seen only by members of the project team and FNS staff, their names will not appear in any written reports, and that responses to the questions are voluntary.

In addition to these procedures, Mathematica has extensive corporate administrative and security systems to prevent the unauthorized release of personal records, including state-of-the-art hardware and software for encryption that meets federal standards and other methods of data protection (for example, requirements for regular password updating), as well as physical security that includes limited key card access and locked data storage areas.

A11. Justification for any questions of a sensitive nature.

Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

No questions of a sensitive nature will be asked of E&T program staff or providers in interviews during the site visits.

A12. Estimates of the hour burden of the collection of information.

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

The total number of unique estimated respondents is 284; however FNS anticipates 251 will agree to participate. Members of the public affected by the data collection include State, Local and Tribal agencies and the private sector (Business-for-profit and not-for-profit). Most respondents will be asked to participate in both an interview and group mapping discussion (186 unique respondents), some respondents will be asked to participate in the interview only (28 unique respondents), and others will be asked to participate in the group mapping discussion only (70 unique respondents). Respondent groups identified include the following:

State, Local, or Tribal agency (147 unique respondents):

- Directors and managers from State, Local, and Tribal agencies supporting the SNAP E&T programs (35 unique respondents; 32 respondents and 3 non-respondents)
- Policy staff from State, Local, and Tribal agencies supporting the SNAP E&T programs (28 unique respondents; 26 respondents and 2 non-respondents).
- Direct services staff from State, Local, and Tribal agencies providing direct services to SNAP E&T participants (56 unique respondents; 50 respondents and 6 non-respondents).
- Data and IT staff from State, Local, and Tribal agencies supporting the E&T programs (28 unique respondents; 26 respondents and 2 non-respondents).

Private sector (137 unique respondents):

- Directors and managers from private sector for-profit businesses providing SNAP E&T services (21 unique respondents; 18 respondents and 3 non-respondents).
- Direct services staff from private sector for-profit businesses providing SNAP E&T services (21 unique respondents; 18 respondents and 3 non-respondents).
- Data and IT staff from private sector for-profit businesses providing SNAP E&T services (11 unique respondents; 9 respondents and 2 non-respondents).
- Directors and managers from private sector not-for-profit agencies providing SNAP E&T services (35 unique respondents; 30 respondents and 5 non-respondents).
- Direct services staff from private sector not-for-profit businesses providing SNAP E&T services (35 unique respondents; 30 respondents and 5 non-respondents).
- Data and IT staff from private sector not-for-profit businesses providing SNAP E&T services (14 unique respondents; 12 respondents and 2 non-respondents).

The total number of annual responses is 479. The average frequency of response is 1.9. Time for reading data collection materials such as emails, are included in the time estimate in the burden table. Total annual burden hours is 552.54. No respondents will be asked to keep records of data as part of this data collection; therefore, no burden hours have been estimated for recordkeeping. Table A.12 shows sample sizes, estimated burden, and estimated annualized cost of respondent burden for each part of the data collection and for the data collection as a whole.

Table A.12. Estimates of respondent burden

Affected public	Respondents	Instrument	Sample size	Responsive					Non-responsive					Grand total burden hours	Hourly Wage rate	Estimate Total Annual Cost to Respondents
				Estimated Number of Respondents	Estimated Frequency of Response	Total Annual Responses	Number of Burden Hours Per Respon-se	Estimated Total Burden Hours	Estimated Number of Respondents	Estimated Frequency of Response	Total Annual Responses	Number of Burden Hours Per Response	Estimated Total Burden Hours			
State, Local, or Tribal agency	Directors and managers	Recruitment email	8	7	1	7	0.167	1.169	1	1	1	0.167	0.167	1.336	$58.88	$78.66
		Document collection	7	7	1	7	1	7	0	0	0	0	0	7	$58.88	$412.16
		Master interview discussion guide	35	32	1	32	1.5	48	3	1	3	0.167	0.501	48.501	$58.88	$2,855.74
		Mapping group discussion	21	20	1	20	1.5	30	1	1	1	0.167	0.167	30.167	$58.88	$1,776.23
	Policy staff	Master interview discussion guide	28	26	1	26	1.5	39	2	1	2	0.167	0.334	39.334	$24.27	$954.64
		Mapping group discussion	21	20	1	20	1.5	30	1	1	1	0.167	0.167	30.167	$24.27	$732.15
	Direct services staff	Master interview discussion guide	56	50	1	50	1.5	75	6	1	6	0.167	1.002	76.002	$24.27	$1,844.57
		Mapping group discussion	56	50	1	50	1.5	75	6	1	6	0.167	1.002	76.002	$24.27	$1,844.57
	Data and IT staff	Master interview discussion guide	28	26	1	26	1	26	2	1	2	0.167	0.334	26.334	$46.33	$1,220.05
		Mapping group discussion	21	20	1	20	1.5	30	1	1	1	0.167	0.167	30.167	$46.33	$1,397.64
Sub-Totals unique for State, Local or Tribal			147	134	1.923	258	1.40	361.17	13	1.77	23	0.167	3.841	365.01		$13,116.41
Private sector	For-profit business directors and managers	Recruitment email	21	18	1	18	0.167	3.006	3	1	3	0.167	0.501	3.507	$58.88	$206.49
		Master interview discussion guide	7	6	1	6	1	6	1	1	1	0.167	0.167	6.167	$58.88	$363.11
		Mapping group discussion	21	18	1	18	1	18	3	1	3	0.167	0.501	18.501	$58.88	$1,089.34

	For-profit business direct services staff	Master interview discussion guide	7	5	1	5	1	5	2	1	2	0.167	0.334	5.334	$24.27	$129.46
		Mapping group discussion	21	18	1	18	1	18	3	1	3	0.167	0.501	18.501	$24.27	$449.02
	For-profit business data and IT staff	Master interview discussion guide	11	9	1	9	1	9	2	1	2	0.167	0.334	9.334	$46.33	$432.44
		Mapping group discussion	11	9	1	9	1	9	2	1	2	0.167	0.334	9.334	$46.33	$432.44
	Not-for-profit agency directors and managers	Recruitment email	35	30	1	30	0.167	5.01	5	1	5	0.167	0.835	5.845	$35.05	$204.87
		Master interview discussion guide	14	12	1	12	1	12	2	1	2	0.167	0.334	12.334	$35.05	$432.31
		Mapping group discussion	35	30	1	30	1	30	5	1	5	0.167	0.835	30.835	$35.05	$1,080.77
	Not-for-profit agency direct services staff	Master interview discussion guide	14	12	1	12	1	12	2	1	2	0.167	0.334	12.334	$22.55	$278.13
		Mapping group discussion	35	30	1	30	1	30	5	1	5	0.167	0.835	30.835	$22.55	$695.33
	Not-for-profit agency data and IT staff	Master interview discussion guide	14	12	1	12	1	12	2	1	2	0.167	0.334	12.334	$46.33	$571.43
		Mapping group discussion	14	12	1	12	1	12	2	1	2	0.167	0.334	12.334	$46.33	$571.43
Sub-Totals unique for Private Sector			137	117	1.89	221	0.82	181.02	20	1.95	39	0.167	6.513	187.53		$6,936.58
Grand Total Burden for both SLT and Business			284	251	1.91	479	1.13	542.19	33	1.88	62	0.167	10.35	552.54		$20,052.99

B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Annualized cost of respondent burden is the product of each type of respondent's annual burden and average hourly wage rate. The total cost of respondent burden is $26,670. The total annualized cost of this information collection is calculated as the sum of the annualized costs by respondent category ($20,053) and adds a fringe benefit rate of 33 percent on each dollar (total of $6,617) to show a more accurate representation of total costs. For each respondent category, the annualized cost is the product of burden hours (including nonresponsive burden) and an assumed wage rate for a corresponding occupation.

The wage rates for the affected publics were determined using the most recent available data, the May 2019 National Occupational Employment and Wage Estimates data from the Bureau of Labor Statistics. (http://www.bls.gov/oes/current/oes_nat.htm). Using this website, the salaries of State, Local, or Tribal agency director/manager respondents ($58.88) are the average hourly earnings of government workers in management occupations (11-0000). The salaries of State, Local, or Tribal agency direct service staff respondents ($24.27) are the average hourly earnings of workers in community and social services occupations (21-0000). The salaries of the State, Local, or Tribal agency data and IT staff ($46.33) are the average hourly earnings of database and systems administrators and network architect occupations (15-1240).

For the Private sector, the salaries for the for-profit business director/manager respondents ($58.88) are the average hourly earnings of workers in management occupations (11-0000). The salaries of Private sector not-for-profit agency director/manager respondents ($35.05) are the average hourly earnings of social and community services managers (11-9151). The salaries of

Private sector for-profit agency direct service staff respondents ($24.27) are the average hourly earnings of workers in community and social services occupations (21-0000). The salaries of Private sector not-for-profit agency direct service staff ($22.55) are the average hourly earnings of community and social service specialists (21-1099). The salaries of the Private sector for-profit and not-for-profit data and IT staff ($46.33) are the average hourly earnings of database and systems administrators and network architect occupations (15-1240).

A13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

No capital and start-up or ongoing operational and maintenance costs are associated with this information collection.

A14. Provide estimates of annualized cost to the Federal government.

Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that will not have been incurred without this collection of information.

The total cost for these data collection activities to the Federal government will be $353,300 over an 18-month period. This includes the cost of conducting interviews, analyzing data, developing a summary, producing the final report, and conducting the briefing. The largest cost to the Federal government is to pay a contractor $343,160 to conduct the project. The information collection also assumes that a total of 150 hours of Federal employee time for the 18-month period: for a GS-13, step 2 in the Washington-DC Locality, at $50.83 per hour and an added fringe benefit of 33 percent to each dollar, for a total of $10,140. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2020.

A15. Explanation of program changes or adjustments.

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

This submission is a new information collection request as a result of program changes and will add 553 hours of burden to OMB's inventory.

A16. Plans for tabulation, and publication and project time schedule.

For collections of information whose results are planned to be published, outline plans for tabulation and publication.

When the assessment activities are finished, the project team will draft a report that summarizes findings from the State needs assessment site visits and a final report with recommendations to FNS. The summary report will include the methods used for the assessment, the timeline for conducting the assessment, the types of respondents included in the discussions, the data systems and processes reviewed, and key summary findings from the assessment. The project team will deliver the State needs assessment summary report in April 2021.

The project team will produce a comprehensive final report recommending options for FNS to meet its current and future data needs for the SNAP E&T program. The report will describe the current State and Federal data systems and processes, the anticipated data needs and goals of SNAP E&T, and the gaps between the two. The report will include recommendations of ways to address these gaps by changing data systems, implementing IT solutions, improving business processes, and expanding technical assistance. The report will describe the benefits and obstacles for each recommendation, who the changes will affect, the steps needed to implement the recommendations, approximate costs, resources needed, technical and functional systems requirements, estimated timelines, how to measure outcomes, and risks or challenges to Federal or State agencies. The draft final report will be submitted in September 2021, and the final will be delivered in December 2021.

A17. Displaying the OMB Approval Expiration Date.

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

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

A18. Exceptions to the certification statement identified in Item 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

This project does not require any exceptions to the Certification for Paperwork Reduction Act (5 CFR 132).