

**Supporting Statement A:
Former OMB Control Number: 3265-0021
U.S. Election Assistance Commission
2023 EAC Progress Narrative Report (EAC-PR)**

A. JUSTIFICATION

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

The U.S. Election Assistance Commission (EAC) provides grants to state and territorial elections offices for the securing of elections. To provide timely and accurate review of these grants it is necessary to update our current approved Progress Narrative Report (EAC-PR; OMB Control #3265-0021) to be inclusive of all data prudent to the original funding mechanisms provided by EAC.

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

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 will continue use of an established online form submission through the use of their online platform to streamline and facilitate data entry and review. The EAC will offer grantees two process options to record their responses: 1) independently through the online platform and 2) by interview through telephone or virtual meeting format.

In the interview format, EAC staff will ask grantees the same questions as on the online form and record their responses. All interview-based responses will be transcribed by EAC staff into the online form in the online platform. The grantee will subsequently review, certify, and submit the online form. The use of interview-based reporting is being introduced to better respect grantee capacity and cultural practices.

We will post the report access and guidance on our website as well as email notification of this information to our 56 grantees. The online submission format significantly reduces grantee burden and facilitates streamlined data collection directly to the EAC. The modification of this report will provide clarity for grantees when responding and afford the EAC stronger qualitative review of their grant activity progress.

4. Describe efforts to identify duplication.

EAC does not expect its grantees to be reporting on HAVA funding expenditures and activities to any other source. Where possible, EAC has mirrored the federal standardized data elements

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for progress reporting to reduce variance across federal grants in grantee tracking.

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 have 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 meet the requirements listed in response to Question 1. EAC is requesting grantees to use a secure online system to certify and submit the form, thus eliminating paper submissions.

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 necessary oversight for its HAVA grants and the EAC. In addition, if the EAC does not collect this information it will be unable to report to Congress the necessary 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.

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PREVIOUS:

Publication Date: 08/01/2023

Document Citation: 88 FR 50133

Page: 50133-50134 (2 pages)

Document Number: 2023-16268

Public Comments

This proposed information collection was previously published in the Federal Register on August 1, 2023, Document Citation: 88 FR 50133 (Pages 50133-50134, Document Number: 2023-16268) and allowed 60 days for public comment. No comments were garnered from the notice, warranting no outside consultation.

This proposed information collection was also published in the Federal Register on October 2, 2023, Document Citation: 88 FR 67739 (Pages 67739-67740, Document Number: 2023-21683) to allow for an additional 30 days for public comment. Any comments were garnered from this notice will be posted as they are received.

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 may collect the information requested by OMB approved government wide collection cited in § 200.327, 200.328, and 200.329. Providing information is 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 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,

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and an explanation of how the burden was estimated.

The estimated response burden is based on submission times for our previously approved progress report and on similarly-structured progress reports administered by other federal agencies. Using the online form, we estimate that the average burden for the complete report is 1 hour.

The table below summarizes the burden estimate for the EAC-PR.

EAC Grant	Instrument	Total number of respondents	Total number of responses per year	Average burden hours per response	Annual burden hours
251	EAC-PR	30	2	1	60
101	EAC-PR	13	2	1	26
Election Security	EAC-PR	56	1	1	56
TOTAL					142

The estimated cost of the annualized cost of this burden is: \$3,423.62, which is calculated by taking the annualized burden (142 hours) and multiplying by an hourly rate of \$24.11 (GS-8/Step 5 hourly basic rate).

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers 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 \$3,423.62.

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

Per Items 13 and 14 of OMB Form 83-I, the number of reports is reducing for respondents and lessening burden.

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 of expenditures across all HAVA

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funding on an annual basis with an update to the oversight committees at the mid-year mark.

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.

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

DRAFT