

**Supporting Statement A:
U.S. Election Assistance Commission
Help America Vote College Program (HAVCP) Applications**

A. JUSTIFICATION

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

The U.S. Election Assistance Commission (EAC) was provided \$1,000,000 in the Fiscal Year 2023 Omnibus Appropriations Bill to reinstate the Help America Vote College Program (HAVCP) in Fiscal Year 2023 and until the appropriated funds are expended. The purpose of the HAVCP is to:

1. Encourage students enrolled at institutions of higher education (including community colleges) to assist State and local governments in the administration of elections by serving as nonpartisan poll workers or assistants;
2. Encourage college students to become cognizant of the elections process and civic education, and to assist in the administration of elections in their community; and
3. Encourage state and local governments to use the services of the students participating in the program.

The requested information collection is for the application forms required to gather the information required to evaluate applicants and their proposed programs to determine the best organizations for funding. Without the requested forms, EAC personnel would not be able to make the necessary comparisons of proposed applicant programs for goodness-of-fit to program goals or assess the capacity of applicants to successfully implement the grant program.

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

Data from the application forms will be used by EAC personnel to evaluate the quality of applications and applicant organizations. The EAC has developed the applications forms to collect both quantitative and qualitative data on the program proposed by the applicant organization. The information provided by applicants in the application forms will be used to monitor the applicant's progress throughout the program period, including their program activities and use of budgeted funds. The requested information collection is for the application forms required to gather the information required to evaluate applicants and their proposed programs to determine the best organizations for funding. Without the requested forms, EAC personnel would not be able to make the necessary comparisons of proposed applicant programs for goodness-of-fit to program goals or assess the capacity of applicants to successfully implement the grant program.

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.

Application forms and HAVCP information will be available for viewing and download on the EAC website and at Grants.gov. For the HAVCP Poll Worker Grant Program, applications will be submitted through Grants.gov using fillable online forms and/or completing forms and uploading them to the appropriate Grants.gov workspace. For the HAVCP Service Day Mini-Grant Program, the application form and any other necessary supporting documentation will be

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submitted by email as attachments. The use of online submissions of application forms streamlines the submission and tracking of applications for EAC personnel and applicant organizations.

4. Describe efforts to identify duplication.

Applicants are only able to apply for one of the two subprograms, reducing the chance of duplicate information being required of the same applicant. EAC does not expect its grantees to be reporting on HAVCP funding expenditures and activities to any other source. Where possible, EAC has mirrored the federal standardized data elements for grant applications to reduce variance across federal grants in the information requested under this collection.

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, but may impact other small entities should they chose to apply. 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 to properly evaluate applicant proposed programs and applicant organizations for funding. The EAC has designed the HAVCP Service Day Mini-Grant Program with an abridged application to reduce the burden on smaller entities to receive funding under this program.

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 the necessary review and evaluation of the proposed programs and applicant organizations to the HAVCP. Without the requested forms, EAC personnel would not be able to make the necessary comparisons of proposed applicant programs for goodness-of-fit to program goals or assess the capacity of applicants to successfully implement the grant program.

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:

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Public Comments

This proposed information collection was previously published in the Federal Register on July 21, 2023, Document Citation: 88 FR 47133 (Pages 47133-47134, Document Number: 2023-15506) 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 10, 2023, Document Citation: 88 FR 69913 (Pages 69913-69914, Document Number: 2023-22403) 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 in the application forms as outlined in § 75.101. The information collected will not include sensitive personally-identifying information. Providing information is mandatory in order to receive the program benefits. The penalty associated with failing to respond is not receiving program benefits. 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 evaluate program applications and make program awards to the most appropriate applicants.

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.

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The estimated response burden is based on submission times for our previously approved progress report and on similarly-structured application forms administered by other federal agencies.

The table below summarizes the burden estimate for the HAVCP application forms.

EAC Grant	Instrument	Total number of respondents	Total number of responses per year	Average burden hours per response	Annual burden hours
HAVCP Poll Worker Grant	Application and Guidance	50	1	10	500
HAVCP Poll Worker Grant	Budget Worksheet and Instructions	50	1	7	350
HAVCP Poll Worker Grant	Progress Report	20	2	1	40
HAVCP Service Day Mini-Grant	Application and Guidance	40	1	5	200
HAVCP Service Day Mini-Grant	Progress Report	20	1	1	20
TOTAL					1,110

The estimated cost of the annualized cost of this burden is: \$26,762.10, which is calculated by taking the annualized burden (1,110 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 \$26,762.10.

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

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As this is a new information collection process, all submissions will represent an increase in burden.

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

The EAC will not tabulate the data included in the applications forms. Non-sensitive information included in applications that receive awards may be posted on the EAC website to promote/publicize the HAVCP and its achievements.

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.

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