

**Supporting Statement A:
OMB Control Number: 3265-0022
U.S. Election Assistance Commission
EAC Federal Financial Report (EAC-FFR)**

A. Justification

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

The U.S. Election Assistance Commission (EAC) provides grants to state elections offices to support the administration of elections for federal office and improvements to voting and election systems. To provide a timely and accurate review of these grants, it is necessary to authorize the use of a modified SF-425 Federal Financial Report (FFR) for tracking grantee financial activity. Financial reporting is a requirement of federal monitoring per § 2 CFR 200.328.

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

Data from these financial reporting forms will be used for grant monitoring, feedback to grantees, technical assistance, long-term planning, and reporting to Congress.

In addition to the typical information found on the SF425 form, these reports also collect quantitative data regarding costs specific to the formula-driven HAVA awards and their related condition of monitoring accrued interest dollars and program income.

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 requests use of a modified SF-425, which builds upon the form by including elements that enable easier reporting for grantees. We will post the report access and guidance on our website and in our electronic grants management system, GLAS (Grants Lifecycle Application System). Grantees are able to complete the modified SF-425 in GLAS, significantly reducing grantee burden and facilitating streamlined data collection.

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 for financial 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 impact small businesses or other small entities. Only states and territories are required to submit reports. The EAC has made efforts

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to limit the information requested and the burden on all participants. The information sought is limited to information necessary to meet the requirements in response to Question 1. EAC is requesting grantees to use a secure online system, 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 grant funding. In addition, if the EAC does not collect this information, it will be unable to report necessary performance data to Congress related to HAVA.

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.

This proposed information collection was previously published in the Federal Register on May 16, 2025. Document Citation: 90 FR 21027 (Page: 21027-21028, Document Number 2025-08787) and allowed 60 days for public comment. No comments were garnered from the notice, warranting no outside consultation.

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 this report under the authority of the OMB-approved government-wide collection cited in § 200.328. 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 financial activity and report the progress to Congress. Financial reports are grant records and are made public on our website.

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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 financial reports administered by other federal agencies. Using the online form, we estimate that the average burden for the complete report is .5 hours. The table below summarizes the burden estimate for the FFR.

EAC Grant	Instrument	Total number of respondents	Total number of responses per year	Average burden hours per response	Annual burden hours
251	EAC-FFR	35	2	.5	35
101	EAC-FFR	20	2	.5	20
Election Security	EAC-FFR	56	4	.5	112
HAVCP	EAC-FFR	14	2	.5	14
TOTAL					181

The estimated annualized cost of this burden is: \$4,646.27, calculated by multiplying the annualized burden (181 hours) by an hourly rate of \$25.67 (GS-8/Step 5 hourly rate).

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

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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 \$4,646.27.

15. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

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

The burden worksheet has been adjusted to include the Help America Vote College Program, a 2-year discretionary grant, and to reflect quarterly Election Security FFRs. The EAC increased the reporting frequency for the Election Security program to provide improved oversight and monitoring of grant expenditures.

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

18. 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.

19. 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.