SUPPORTING STATEMENT FOR
Pre-Implementation Planning Checklist Report for State Unemployment Insurance (UI) Information Technology (IT) Modernization Projects

OMB CONTROL NO. 1205-0527

This Information Collection Request (ICR) requests a revision for the Pre-Implementation Planning Checklist Report for State Unemployment Insurance (UI) Information Technology (IT) Modernization Projects.

A. JUSTIFICATION

1. Explain the 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.

Building on lessons learned from previous state implementations of modernized UI IT systems, the U.S. Department of Labor's Employment and Training Administration (ETA) facilitated the development of the ETA 9177 - Pre-Implementation Planning Checklist for SWAs to use prior to "going live" with a modernized UI IT system. This comprehensive report denotes critical functional areas that SWAs should verify prior to launching a new UI IT system including, but not limited to, technical IT functions and UI business processes that interface with the new system.

The list of critical areas identified in the checklist comprises eleven (11) distinct topics:

1. Functionality (Fully Available or Workaround in Place)
2. External Alternate Access Options and Usability Issues Addressed
3. Policies/Procedures Development and Dissemination
4. Technical Preparation
5. Call Center/Customer Service Operations
6. Staffing/Staff Training on New System Operations
7. Staff and Customer Help Desk Support
8. Management Oversight
9. Vendor Support
10. Communications
11. LMI Federal Reporting Functions

This collection is authorized under the Social Security Act, Title III, Section 303(a)(6).

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

SWAs use the report to verify that all necessary mission critical system functions are available and/or that alternative workarounds are developed prior to the production launch of the UI IT system to help avoid major disruption of services to UI customers and to prevent delays in making UI benefit payments. ETA 9177 report is a narrative report. Nine states have submitted the ETA 9177 report in last 3 years. ETA reviews the report and provides feedback to the states. The collection enables ETA to identify any needed technical assistance, as states prepare for the implementation of a modernized system, and have an assurance that the state's implementation will have a significant likelihood of being successful. The reporting requirement ends for the state once the modernized UI system is implemented.

This report information includes the UI IT Modernization State Name, Date of Submission, Project name, Scheduled Go-Live Date, Contact Information, and a Summary of the Project, and the report on each of the associated Pre-Implementation Planning Checklist topic areas. The report is comprised of eleven (11) distinct topics (listed above) and their associated sub-elements. For every sub-element in the ETA 9177, the SWA will provide supporting content to demonstrate that the SWA has addressed the specific sub-element. For each sub-element, the SWA is expected to address the issue including but not limited to:

- An overall status report;
- A brief report explaining the status of the project as it relates to the particular sub-element;
- Attach explanations of any workarounds of the processes in the sub-element;
- Attach explanations if implementation of the new system concerning processes for the sub-element will be delayed, or deferred;
- Attach explanations for added clarity and/or to support a narrative;
- Mitigation proposals for addressing any problems;
- New project timelines if applicable, and/or
- Any discussion of identified technical assistance needs for the successful completion of the project.

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, 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.

States will use a simple form template (a Microsoft Word ".docx") provided by ETA to prepare the report, which will be emailed to the appropriate regional office. The use of a simple form which can be submitted electronically is compatible with the report which will be a narrative, not a statistical, submission.

4. 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 Item A.2 above.

The information collected in this report is not available from other sources in the detail needed to determine any technical assistance needs of the state prior to implementing a new UI IT system.

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

There is no impact on small businesses.

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.

The collection is a detailed narrative report, provided by the SWA, as part of the pre-implementation preparation of a state's new UI IT system. Without this information, ETA is unable to effectively and consistently monitor states' progress in implementing the UI IT Modernization projects for which the funds were provided.

Many states are addressing antiquated UI IT systems and are developing much needed modernized systems. However, recent efforts by states in launching new UI IT systems have resulted in unexpected disruptions of service to customers, delays in the payments of benefits, and the creation of processing backlogs. ETA designed this report in an effort to avoid future reoccurrences of similar experiences, as an increasing number of states will be implementing new systems.

States are in different stages of the system modernization. For example, some states are in the initial stage of requirements gathering, while others are in the system development process. States are required to submit the ETA 9177 report 6 months prior to the modernized UI system implementation. In last 3 years, 9 states that were pursuing system modernization efforts, submitted the ETA 9177 report. Based on that, we assume that we will receive about 3 reports annually over a period of 3 years.

Not providing the implementation status information as proposed would not allow adequate time for ETA to offer technical assistance on projects if necessary to support the states' implementation. Furthermore, unlike burden on businesses or individuals, states are funded to collect and report data through their annual UI administrative grant.

7. Explain any special circumstances that would 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 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.**

No such circumstances exist.

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

In accordance with the Paperwork Reduction Act of 1995, the public was allowed 60 days to comment through the Federal Register Notice posted on April 6, 2026 (91 FR 17308).

We received four emails with comments. Unemployment and Workers' Compensation (UWC, Association of Unemployment Tax Organizations (AUTO), Automated Data Processing, Inc. (ADP), and LexisNexis provided recommendations regarding additional operational considerations to the ETA-9177 checklist. UWC, AUTO, and ADP provided suggestions to enhance the checklist to increase benefit payment accuracy, decrease improper payments, and reduce employer burden. LexisNexis provided suggestions to enhance the checklist to include/strengthen the program integrity elements, such as claimant identity verification, eligibility verification, fraud detection and prevention, investigative case management, cybersecurity, post-launch integrity controls, and risk management. We recognize the importance of these issues and, due to time constraints for the current Paperwork Reduction Act approval process, we will evaluate them for the future improvements to the ETA-9177, Pre-Implementation Checklist (OMB Control No: 1205-0527).

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

There are no payments made to respondents.

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

No assurance of confidentiality is provided. The ETA 9177 reports contain no personal or confidential data.

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. 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.

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. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity,**

show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

States are in different stages of the system modernization. For example, some states are in the initial stage of requirements gathering, while others are in the system development process. States are required to submit the ETA 9177 report 6 months prior to the modernized UI system implementation. In last 3 years, 9 states that were pursuing system modernization efforts submitted the ETA 9177 report. Based on that, we assume that we will receive about 3 reports annually over a period of 3 years. The burden of the collection of information can be divided into two intervals:

a. Planning:

ETA anticipates that each year, three of the States (i.e. nine over the term of this clearance) who are in some states of UI Modernization will begin a planning to report phase. The ETA 9177 report will require coordination and interactions among many of the State's UI Modernization entities (e.g. configuration management, quality assurance, system architecture, system administration, software development, UI staff, UI management, etc.) ETA estimates a 20-hour burden per SWA to review the report and begin planning or collecting the necessary information to develop the ETA 9177 report. (9 total responses / 3 years = 3 responses).

b. Reporting:

All states conducting UI IT Modernization will provide this report 180 days (6 months) prior to implementing their associated UI IT Modernization project. ETA anticipates that each year, three of the States (i.e. nine over the term of this clearance) will report. (9 total responses / 3 years = 3 responses). The total burden for an ETA 9177 report submission is estimated to be 160 hours per SWA.

Estimated Annualized Respondent Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Planning	3	1	3	20	60	$62.00	$3,720.00
Reporting	3	1	3	160	480	$62.00	$29,760.00
Unduplicated Totals◇	9	1	6	180	540	$62.00	$33,480.00

*Source: The hourly rate is computed by dividing the FY 2026 national average PS/PB annual salary for state staff as provided for through the distribution of state UI administrative grants (https://www.dol.gov/agencies/eta/advisories/uipl-15-25)by the average number of hours 9*1 worked in a year (1,711). For FY 2026, this calculation is: $104,553/ 1,711= $62.

13. Provide an estimate 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 Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and startup cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

The agency associates no burden with this collection beyond the value of respondent time.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

No costs are associated with this effort.

15. Explain the reasons for any program changes or adjustments.

Four sub-elements are revised in the checklist to meet administration's priorities.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results of the checklist will not be published.

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

The expiration date for OMB approval is displayed.

18. Explain each exception to the certification statement.

There are no exceptions.

B. COLLECTIONS OF INFORMATON EMPLOYING STATISTICAL METHODS.

This collection of information does not employ statistical methods.