PUBLIC COMMENT ON STANDARDIZED EAC PROGRESS REPORT (EAC-PR)

Docket EAC-2026-0232 | OMB Control No. 3265-0026

U.S. Election Assistance Commission - Office of Grants Management

60-Day Paperwork Reduction Act information-collection comment

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September 4, 2026

To the U.S. Election Assistance Commission Office of Grants Management:

I submit this comment on the Election Assistance Commission (EAC) request to extend the standardized EAC Progress Report (EAC-PR), OMB Control No. 3265-0026. I support EAC's continued use of a standardized progress report for HAVA grants. My recommendations are narrow: improve the quality, utility, clarity, and auditability of the information already collected while using structured fields, conditional logic, and GLAS automation to avoid unnecessary reporting burden.

The August 3, 2026 notice states that the EAC-PR is used for interim and final progress reports for grants issued under HAVA authority, that the current format is unchanged from the approved November 2023 standard request, and that EAC seeks comment on ways to improve information quality, utility, and clarity and to reduce burden through information technology. The current form already captures program-category expenditures, subaward information, issues encountered, significant program changes, final assessment, and certification. These are strong foundations. The main opportunity is to make consequential changes, unresolved problems, delegated implementation, and corrective actions easier to reconstruct from the record.

Research basis and analytical approach

I submit this comment as an independent Black governance researcher and public scholar developing the Institutional Authority Dynamics research program. This submission applies a bounded set of components from Institutional Authority and Governance Dynamics (IAGD 2.3) to the information architecture of federal grant reporting. The analytical focus is not election policy or the merits of any state's election-administration choices. It is whether the progress-report record gives EAC sufficient visibility into who exercised consequential grant authority, what materially changed, how implementation problems were handled, and whether corrective action can be traced.

- Authority-Control Alignment - assessed across locational, authorization, accountability, and corrective dimensions.
- Authority Provenance - used here as an evidentiary layer tracing decisions, delegations, material changes, retained responsibilities, and present standing.
- Institutional Boundary Enforcement (IBE) - used to distinguish EAC, state grantee, and subrecipient responsibilities without treating distributed administration as a governance failure.
- This is a bounded public-policy application. It is not empirical validation of IAGD, a conclusion about election outcomes, or an assertion that EAC has adopted the framework.

Executive summary of recommendations

Recommendation	Primary value	Burden control
Add a conditional material-deviation record to Question 12.	Makes changes to State Plans or Program Narratives traceable by decision, authority, date, reason, and approval status.	Appears only when a significant change is reported; use structured fields and prepopulation.

Recommendation	Primary value	Burden control
Structure the unresolved-issue and corrective-action portion of Question 11.	Separates issue detection, responsible entity, corrective action, status, and residual implication.	No additional entry when “no major issues” is selected; reuse narrative already required.
Add minimal subaward-governance fields to Question 9.	Improves visibility into which entity monitors subrecipients and who can require correction or escalation.	Use role-based dropdowns/checkboxes and one short field for exceptions only.
Add automated reconciliation and exception prompts.	Links narrative categories, expenditure tables, subaward totals, and Federal Financial Report amounts.	GLAS performs validation automatically; respondents explain only unresolved mismatches.
Preserve report-version and certification provenance.	Makes amendments, resubmissions, and authoritative certification reconstructable.	System-generated version/date fields; no repetitive narrative.
Use conditional logic and prior-period carry-forward throughout GLAS.	Improves clarity and reduces repetitive entry across recurring reports.	Auto-populate stable grant data, show only fields triggered by current-period activity, and benchmark changes against EAC's one-hour-per-response estimate.

I. Preserve standardization while strengthening reconstructability

The EAC-PR already reduces burden by standardizing the categories in which grantees describe activities and expenditures. Standardization should remain the controlling design principle. The next improvement should not be a longer narrative form; it should be a more reconstructable record. A reviewer should be able to identify, from the report itself, when a material implementation decision occurred, who possessed the relevant grant-administration responsibility, whether the decision required EAC approval or a plan amendment, what corrective action followed a material problem, and whether the matter remains unresolved.

This distinction matters because narrative sufficiency and governance traceability are not the same thing. A report can accurately describe that an issue occurred without identifying who had authority to resolve it, whether the resolution changed an approved program arrangement, or which institution remains responsible for an unresolved condition.

II. Add a conditional material-deviation record to Question 12

Question 12 currently asks grantees to describe significant program changes, including changes to the original State Plan or Program Narrative and favorable developments that improve efficiency or service delivery. The accompanying guidance identifies changes to scope, delivery, timeline, or goals and directs grantees to describe how a plan will be amended when a material change requires revision.

For each material change reported, I recommend that GLAS conditionally request the following structured fields:

- affected State Plan or Program Narrative element;
- date or reporting-period point at which the change became operative;
- decision-making entity or official role;
- whether EAC approval, notification, or formal amendment was required;
- approval/amendment status and date, if applicable;
- brief reason for the change; and
- current implementation status.

These fields would improve Authority Provenance without asking grantees to repeat the narrative they already provide. They would also make later final reports easier to reconcile with the approved program baseline.

III. Structure Question 11 around issue, correction, and unresolved status

Question 11 appropriately asks what issues arose, whether they were resolved, and what implications remain. I recommend preserving that scope while separating the record into four short elements when a major issue is reported: (1) issue; (2) entity responsible for response; (3) corrective action taken or planned; and (4) current status - resolved, partially resolved, unresolved, or escalated.

Where an issue is unresolved, a short conditional field should identify the next responsible action or the reason no corrective action is presently available. This is the minimum information necessary to distinguish a problem that has merely been described from one that has entered a defined corrective pathway.

IV. Make subaward responsibility visible without increasing narrative burden

Section III currently asks grantees to describe the subaward program, number of subawards, local-community needs, and whether funds were advanced or reimbursed. Because HAVA administration frequently operates through state-local relationships, EAC should also be able to identify the monitoring and corrective relationship without requiring a new narrative essay.

For subaward programs, add short structured fields identifying:

- the grantee office or role responsible for subrecipient monitoring;
- the principal monitoring method (for example, reports, reimbursement review, audit, site review, or another specified method);
- the role authorized to require correction, withhold reimbursement, suspend activity, or escalate a material issue under the award terms; and
- whether any material subaward issue remains unresolved at the end of the reporting period.

These fields do not presume that distributed implementation is defective. They make the state-subrecipient accountability boundary visible and allow EAC to focus follow-up on exceptions rather than requiring more reporting from every subaward.

This recommendation also translates responsibilities already embedded in 2 CFR 200.332 rather than creating a new governance obligation. Pass-through entities must monitor subrecipient activities, review financial and performance reports, ensure corrective action on significant developments that negatively affect the subaward, and consider enforcement action where noncompliance persists. A small number of structured Question 9 fields would make those existing monitoring and corrective relationships visible to EAC without requiring grantees to narrate the full subrecipient-management process.

V. Use GLAS automation to reconcile financial and narrative records

The current instrument already auto-fills current-period expenditure amounts into the cumulative expenditure table and requires consistency with the Federal Financial Report. That design should be extended. GLAS should automatically compare the activity categories in Question 6, the subaward expenditure table in Question 10, the cumulative table in Question 13, and applicable Federal Financial Report totals. A respondent should receive a pre-submission exception prompt only when the records do not reconcile or when expenditures appear in a category for which “no activity” was selected.

This would improve data quality and reduce post-submission correction traffic while minimizing respondent burden: the system performs the comparison and the grantee explains only actual exceptions.

VI. Preserve version and certification provenance

Section VII identifies the authorized certifying official. EAC already describes GLAS as an award-management system designed to improve data integrity and provides a workflow for updating an approved progress report. To the extent GLAS already preserves submission, version, correction, and certification history internally, EAC should ensure that the authoritative version and material correction history remain reconstructable in the administrative record and, where appropriate, in the public-facing record. Where those elements are not presently captured, GLAS should generate them automatically: initial submission date, certifying official, version number, amendment/resubmission date, and a short coded reason for resubmission.

The objective is not to duplicate functionality GLAS already provides. It is to ensure that a reviewer can determine which report version is authoritative and reconstruct material corrections or resubmissions without requiring grantees to supply repetitive narrative.

VII. Burden-minimization design rule

I recommend that EAC apply the following implementation rule to every added field:

If information can be derived from existing GLAS data, a prior-period report, the Notice of Award, an approved amendment, or another EAC-held record, the system should prepopulate it. If a field is relevant only after a respondent reports a material change, unresolved issue, subaward exception, or reconciliation mismatch, the field should remain hidden unless triggered.

That approach is consistent with the Paperwork Reduction Act objective identified in the notice: improve the utility of the information while reducing administrative effort through automated collection techniques and information technology.

The notice estimates 194 annual burden hours at one hour per response and $5,028.48 in annualized cost. EAC should test any added structured fields against that existing one-hour-per-response estimate and revise the estimate if implementation materially changes respondent time. Where prepopulation, conditional logic, and automated reconciliation offset additional fields, the final clearance package should document that burden offset rather than assume it.

Consolidated recommendations

1. Retain the standardized EAC-PR and current program-category structure.
2. Add a conditional material-deviation record to Question 12 linking significant changes to the affected approved plan element, decision role, date, approval/amendment status, and current standing.
3. Structure Question 11 so material issues identify the responsible entity, corrective action, current status, and unresolved implication.
4. Add minimal subaward monitoring and corrective-authority fields to Question 9.
5. Automate reconciliation among narrative categories, subaward expenditures, cumulative expenditures, and Federal Financial Report amounts.
6. Preserve system-generated report version, correction, resubmission, and certification provenance.
7. Use conditional logic, prepopulation, and exception-only prompts so stronger oversight information does not become repetitive reporting burden, and test any added fields against EAC's existing one-hour-per-response burden estimate.

Conclusion

The EAC Progress Report already provides a workable standardized record for HAVA grant administration. The strongest improvement is not to require substantially more narrative. It is to make material changes, unresolved problems, delegated implementation, financial reconciliation, and corrective responsibility more visible within the information EAC already collects.

A durable reporting principle follows: grant reporting should make consequential changes and corrective responsibility easier to reconstruct than to infer. Structured, conditional, and automated fields can strengthen oversight while preserving the burden-reduction purpose of the standardized EAC-PR.

Respectfully submitted,

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