

**Supporting Statement A:**  
**OMB Control Number: ####-####**  
**U.S. Election Assistance Commission**  
**2020 CARES Progress Narrative Report (EAC-CARESPNR)**  
(Text in Red will need to be changed when data/input is finalized.)

**A. JUSTIFICATION**

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

The CARES Act requires states to report 20 days after every primary and the general election. The U.S. Election Assistance Commission (EAC) must also roll up the reports and submit them to Congress after the general election. To meet this requirements we must establish a streamlined process that reduces the burden on states and makes clear what the expected content for this reporting will be.

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

EAC will use the data collected to meet the reporting requirements set out in the CARES Act. Data from these progress report forms will also be used for grant monitoring, feedback to grantees and the public, 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 and other activities unique to the CARES funding. These reports also collect qualitative data on the status of grantee progress, problems encountered and the grantees' assessments how they used the funds to address the pandemic and the challenges faced in responding to it.

**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 plans to use a fillable form for data collection. We will post the report form and guidance on our website as well as email it as an attachment to our 56 grantees. We also plan to develop an on-line process the grantees will use to submit their data directly into an EAC system. It is expected that the electronic format will reduce the response burden associated with the report and will lead to higher-quality and more accurate data submissions.

**4. Describe efforts to identify duplication.**

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

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requesting grantees use a fillable form and provide attachments that are transmitted electronically, thus eliminating paper submissions. EAC will build out a Survey Gizmo form requesting the same information as the fillable form, and will return to OMB for approval when that is ready to further ease the burden of reporting.

**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 fully comply with the 2020 CARES Act, which requires this reporting. In addition, if the EAC does not collect this information it will be unable to report to Congress any performance data related to CARES 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. We are following the guidance provided by OMB with regard to emergency justification and clearance under the COVID19 pandemic protocols.

**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.**

Due to the public emergency posed by COVID19, in consultation with OMB, EAC did not post this collection to the Federal Register, EAC plans to submit an extension and regular process request in the near future to enable the use of this instrument through the end of the calendar year as needed for further progress reporting by grantees related to CARES funding.

**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 CARES Act. 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

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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, and an explanation of how the burden was estimated.**

The information collection has two parts: The CARESPNR form which serves as a cover page for the expanded response to item #10 progress narrative. The estimated response burden is based on the similarly-structured progress reports administered by other federal agencies. Using the fillable form, we estimate that the burden for the complete report which includes the cover page and attached progress narrative is, on average, 1 hour.

The table below summarizes the burden estimate for the CARESPNR. The reporting requirement will vary depending on how easily the grantee can meet their 20% match between March 28, 2020 and March 27, 2022. This report will be required after each primary, the general election, with the semi-annual tracking of match, and the final report. As a result, we have calculated and provided both the max number of reports in the two year period and the annualized burden.

<b>Instrument</b>	<b>Total number of respondents</b>	<b>Total number of responses per respondent over a 2 year period</b>	<b>Average burden hours per response</b>	<b>Total burden hours</b>	<b>Annual burden hours</b>
<b>EAC-CARESPNR</b>	<b>56</b>	<b>6*</b>	<b>1</b>	<b>336</b>	<b>168</b>

\*The total max possible number of reports per respondent is six, however, many grantees will be able to meet the match before the 2-year period due to the activities being restricted to the 2020 elections.

The estimated cost of the annualized cost of this burden is: \$3,768.24, which is calculated by taking the annualized burden (168 hours) and multiplying by an hourly rate of \$22.43 (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.**

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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 \$26,496.

The information will be collected three times in the first year and three more times if the match target has not been reached until the expiration of the grant. For each data collection iteration, the cost includes: a) \$24,696, for EAC personnel to review each report for data quality and compliance, provide technical assistance to complete the report, clarification on submissions as needed, revision review as applicable, conversion of each report to 508 compliant format, posting each report to our website, and rolling up all the data into a report to Congress. This is calculated by estimating the burden per report to 1 hour of staff effort (168 hours) and multiplying by an hourly rate of \$36.75 (GS-13/Step 1 hourly basic rate) x 4 staff. b) \$1,800 for online survey software licenses for survey gizmo. These figures sum to \$52,992 for two years, bringing the annualized cost to \$26,496.

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

This is a new information collection and there are no changes or adjustments to report.

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

The EAC will submit to Congress a report rolling up the impact of the CARES funding on the 2020 elections across the United States. Grantee report submissions will be publicly released on the EAC's website as done in the past for other grants.

**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.