

RE: Request for comment, *Agency Information Collection Activities: Employment and Training Performance Measurement, Monitoring and Reporting Requirements*. Federal Register Docket number: 2021-25806

The following comments represent the response from the State of Arizona, Department of Economic Security (DES), SNAP E&T program and Business Analysis staff:

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility;

Although it is not necessary for the proper performance of the state program, this information has practical utility to DES and SNAP E&T program services in determining the effectiveness of program activities and the success of SNAP E&T participants.

(b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used;

The accuracy of the estimate of the burden of the proposed collection of information is in line with actual data collection times, as an average for DES.

(c) ways to enhance the quality, utility, and clarity of the information to be collected; and

A recommendation is to create a centralized data dictionary for specific terminology used by FNS to allow states to align their components with the most accurate classification of activities. It would also be helpful to have ABAWDs defined in a clear and written format that identifies how/where the ABAWDs are/should be counted in the report. Additionally, best practices collected and shared by FNS from other states will be useful in enhancing program effectiveness. Finally, ensuring that the state of Arizona and FNS staff have the opportunity to meet via teleconference or in person, to review all data elements that States submit in their Annual FNS Report, would allow for confirmation and agreement with the data in the Report.

(d) ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Providing a workspace or platform to store previous reports for all states would allow SNAP E&T state staff to compare statistics for activities and services provided by other states. State agencies can review and follow up with other states to improve and refine State Plans.

Agency Impact

How does this impact customers?

If utilized by the state to strengthen program services, data collection will benefit customers by identifying activities that connect them to and help them to maintain employment. If states focus their efforts on activities that have been successful in providing livable wages and assisting individuals to maintain employment, the program will meet the intended goals: For participants to gain skills, training, work, or experience that will increase their ability to obtain regular employment and meet state or local workforce needs.

How does this FR affect your team?

There is little impact to DES, as this is an extension, without change. DES will continue to use this data to drive program services. DES staff looks forward to FNS' consideration of the included recommendations and the implementation of such to streamline and strengthen the data collection for states.