ADVISORY: UNEMPLOYMENT INSURANCE PROGRAM LETTER NO. 11-18
              CHANGE 2

TO: STATE WORKFORCE AGENCIES

FROM: BRENT PARTON /s/
             Principal Deputy Assistant Secretary

SUBJECT: Extension of the Employment and Training Administration (ETA) 9177 Report
             (Pre-Implementation Planning Checklist Report Version 1) for State
             Unemployment Insurance (UI) Information Technology (IT) Modernization
             Projects

1. **Purpose.** To advise states that in accordance with the Paperwork Reduction Act of 1995, the Office of Management and Budget (OMB) has approved the extension of the ETA 9177 Report (Pre-Implementation Planning Checklist Report Version 1) through July 31, 2026. There is no change in the requirements of the approved collection.

2. **Action Requested.** ETA requests that state administrators provide this guidance, including the attached ETA 9177 (Pre-Implementation Planning Checklist Report Version 1) and the accompanying Reporting Instructions to the appropriate staff, including UI Directors and Chief Information Officers.

3. **Summary and Background.**

   a. Summary – The ETA 9177 Report (Pre-Implementation Planning Checklist Report Version 1) assists state UI agencies in preparing to launch modernized UI IT systems that support administration of UI benefits and/or tax systems.

   b. Background – ETA issued Unemployment Insurance Program Letter (UIPL) No. 11-18 on August 17, 2018, to announce the availability of the ETA 9177 Report (Pre-Implementation Planning Checklist Report) and its associated Reporting Instructions. The ETA 9177 Report is a comprehensive checklist denoting critical functional areas that states should verify prior to launching a new IT system including, but not limited to, technical IT functions and UI business processes that interface with new systems. States are required to submit the completed ETA 9177 Report, with any supporting documentation, to ETA approximately 180 days (6 months) prior to a state's projected implementation date. With this information, ETA will be able to identify any needed

RESCISSIONS	EXPIRATION DATE
None	Continuing

technical assistance and have an assurance that the state's implementation will have a significant likelihood of being successful.

ETA issued UIPL No. 11-18, Change 1, on July 16, 2020, to announce the availability of the enhanced report - ETA 9177 Report (Pre-Implementation Planning Checklist Report Version 1) for states to use. This updated version of the ETA 9177 Report improved the document's structure; provided additional clarity on the verification steps for the ten existing project categories; and added a new category to address verification steps for labor market information (LMI) Federal reporting functions. Additionally, the reporting instructions were modified to address comments received from state agencies and other entities.

The list of critical areas identified in the enhanced ETA 9177 Report is comprised of the following eleven (11) Project Categories:

1. Functionality and Workarounds
2. External Alternate Access Options and Usability Issues Addressed
3. Policies and Procedures
4. Technical Preparation for System Implementation
5. Call Center/Customer Service Operations
6. Business Process
7. Help Desk
8. Management Oversight
9. Vendor Support/Communications
10. Communication Processes and Procedures
11. LMI Federal Reporting Functions

The OMB authorization of the ETA 9177 Report expired on June 30, 2023. Recently, OMB extended its authorization of the data collection under the ETA 9177 Report through July 31, 2026.

4. **Reporting.** The information gathered in the ETA 9177 Report must be used by states to prepare for the implementation of new UI IT systems and to ensure the availability of mission critical functions. The ETA 9177 Report is required when a state is modernizing a major component of a UI IT system or systems. A major component can be a full benefits or tax system or it can be a significant component subset, such as continued claims certification or adjudication. States may use a modular approach to modernize a major component.

Any state that is preparing to launch a modernized system must certify that it has reviewed and accomplished the items detailed in the ETA 9177 Report or has a timely plan for doing so. If a section of the ETA 9177 Report is not applicable to the modernization project, states must indicate that it is not applicable. If a section is left blank, then it is deemed missing during ETA's review, and the report will be regarded as incomplete. ETA will provide comments back to the state and will request the state to revise and resubmit the report.

An ETA 9177 Report submission is not necessary when a state is merely upgrading sub-components of a system, such as enhancing the front-end interface for claims intake. Other instances where a state is not required to submit an ETA 9177 Report include ongoing maintenance activities, such as database upgrade, IT server upgrades, replacing any obsolete hardware/software, etc.

As specified previously in UIPL No. 11-18, the ETA 9177 Report information must include a cover page; state general information (state name, date of submission, UI IT Modernization project name, contact information, and a summary of the project); and include the report on each of the UI IT Modernization Pre-Implementation Planning Checklist Project Categories. Each Project Category has associated sub-elements. For every sub-element in the ETA 9177, the state must provide supporting content to demonstrate that it has addressed the specific sub-element. A Certification is required at the end of the report.

For each sub-element, the state must address issues including, but not limited to, the following:

- An overall status report;
- A brief report explaining the status of the project as it relates to the particular sub-element;
- Explanations of any workaround solutions of the processes in the sub-element;
- Explanations if implementation of the new system concerning processes for the sub-element will be delayed or deferred;
- 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.

This report is a narrative, not a statistical submission; therefore, states will use an ETA provided simple form template (a Microsoft Word 2010 ".doc") found in Attachment I to prepare the ETA 9177 Report. Once completed, the ETA 9177 Report must be e-mailed to the appropriate ETA regional office.

The ETA 9177 Report has been approved by the OMB in accordance with the Paperwork Reduction Act of 1995. The OMB Control Number is 1205-0527 with an expiration date of July 31, 2026.

5. **Inquiries.** Questions should be directed to the appropriate ETA Regional Office.

6. **References.**
- Section 303(a)(6), Social Security Act, 42 U.S.C. 503(a)(6);
- Section 911(a), Social Security Act, 42 U.S.C. 1111(a);
- 5 CFR 1320.5;
- UIPL No. 11-18, *ETA 9177 Report - Pre-Implementation Planning Checklist Report for State Unemployment Insurance (UI) Information Technology (IT) Modernization*

Projects, issued on August 17, 2018, https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-11-18;

- UIPL No. 11-18 Change 1, *Employment and Training Administration (ETA) 9177 Report - Pre-Implementation Planning Checklist Report for State Unemployment Insurance (UI) Information Technology (IT) Modernization Projects – Additional Updates to the ETA 9177 Report and Reporting Instructions*, issued on July 16, 2020, https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-11-18-change-1; and
- Training and Employment Notice (TEN) No. 28-14, *Pre-Implementation Planning Checklist for State Unemployment Insurance (UI) Information Technology (IT) Modernization Projects*, issued on March 27, 2015, https://www.dol.gov/agencies/eta/advisories/training-and-employment-notice-no-28-14.

7. **Attachment(s).**

Attachment I: Unemployment Insurance (UI) Information Technology (IT) Modernization Pre-Implementation Planning Checklist Report Version 1
Attachment II: Unemployment Insurance (UI) Information Technology (IT) Modernization Pre-Implementation Planning Checklist Report Instructions