Paperwork Reduction Act Submission Supporting Statement

OVERSEAS SCHOOLS GRANT STATUS REPORT OMB 1405-0033 DS-2028

 The Office of Overseas Schools of the Department of State (A/OPR/OS) is responsible: a) for supporting our overseas missions by determining that adequate educational opportunities exist for dependents of U.S. government personnel stationed abroad and when necessary providing financial and technical assistance to improve elementary and secondary education at post for USG dependents; and b) for assisting American-sponsored overseas schools demonstrate U.S. educational philosophy and practice.

OMB Guidelines contained in A-110, require that financial control reports on federal grants be submitted not less than annually. The Foreign Assistance Act of 1961 (as amended), the Mutual Educational and Cultural Affairs Act of 1961 (as amended), and the Department of State Basic Authorities Act of 1956, as amended by the Foreign Service Act of 1980, PL 96-465, authorize the function of A/OPR/OS. (Copies of the relevant sections are attached.) The regulations under which A/OPR/OS conducts the Consolidated Overseas Schools Program are outlined in 2 FAM 610 (attached). In addition, the need to review information on the status of obligations/expenditures of U.S.G. grant funding is outlined in Comptroller General Decision B-149441, dated December 6, 1962, which ruled that grants to American-sponsored schools are not statutory unconditional grants or gifts and that it is the responsibility of the Department of State for seeing that the funds granted are applied to the purposes and objects for which they were made.

- 2. To comply with the financial reporting requirements under 22 CFR Section 145.52, the form DS-2028 Overseas Schools Grant Status Report (formerly JF-61) is required. Each American-sponsored school submits a completed DS-2028 to embassy officials who approve the report and verifies that the information submitted is consistent with post records. The DS-2028 is required annually and is due by March 31 of each year and a final report is due no later than 90 days after completion of the grant. The information contained in the DS-2028 provides the A/OPR/OS professional and technical staff with the means by which obligations, expenditures and reimbursements of the grant funds are monitored to ensure the grantee is in compliance with the terms of the grant.
- 3. We are planning to send an e-mail link to the software and the form to the grantees. They will be able to complete the

form on-line and e-mail their data to the post. Post will verify their submission and e-mail the form to A/OPR/OS. Once A/OPR/OS receives and verifies the submissions, the paper form will be maintained. While most of the 185 overseas schools have data processing capabilities and

-2-

connectivity to the Internet, the embassy must verify their submission before forwarding to A/OPR/OS. Once A/OPR/OS receives and verifies the submissions, the paper form is archived.

- 4. No other agency gathers information from these schools. There is no duplication of the data. The Department does have access to an automated worldwide financial system (CFMS) which is used to assist in monitoring reimbursement of grant funding but no duplicative system exists for obtaining information on obligation and expenditure of USG grant funding by the schools.
- 5. The information does not have a significant impact on a substantial number of small businesses.
- 6. The DS-2028 provides the embassy and A/OPR/OS with reports, on an annual basis, of obligations, expenditures, and reimbursements under each grant. Without the data provided on the form by the respondents, the embassy and the Department would not be able to monitor the usage of USG funds as required by OMB guidelines, the Comptroller General and U.S. laws.
- 7. Not applicable
- 8. A Notice of Information Collection was published in the Federal Register on November 8, 2006 – [Volume 71, Page 68878] soliciting comments on the collection of information prior to submission to OMB. No comments were received from the public during the 60-day comment period. The information collected from overseas schools is based on the provisions of domestic law previously cited. Accordingly, no consultation took place.
- 9. No payments or gifts are made to respondents, other than remuneration of grantees.
- 10. There is no assurance of confidentiality given other than the Standard Provisions attached to the grant document, which state that the information will be used by Department of State Auditors and Inspectors.

- 11. The form solicits information only related to usage of USG grant funds and does not contain any questions of a sensitive nature.
- 12. Since all information submitted on the DS-2028 by the 185 respondents would customarily be maintained by the schools as part of their normal business practices, there is no separate burden related to collection of

-3-

this information. The Department estimates that the 185 anticipated respondents would spend approximately fifteen minutes each completing form DS-2028 for an estimated total of approximately 46 hours per year.

- 13. No annual cost are attributable to this collection of information since the information is routinely collected and maintained as part of the normal administrative record keeping of educational institutions. The collection imposes no additional capital costs or operation and maintenance costs on respondents.
- 14. The estimated burden to the Federal Government is \$4153.05. The Federal Government estimate is based on the number of responses times the average hourly processing time of half an hour for post and quarter of an hour for Office of Overseas School's staff times the average hourly salary \$28.23 of FS-04/2 Administrative Officer at post and GS-12/2 Program Analyst \$32.21.
- 15. No change.
- 16. Information will not be published.
- 17. Expiration date will be displayed.
- 18. No exceptions requested.

B. Collections of Information Employing Statistical Methods.This information collection does not employ statistical methods.