

Supporting Statement for Paperwork Reduction Act Submissions

U.S. Agency for International Development (USAID)
Information Collection Request for the Partner Vetting System (PVS)

A. JUSTIFICATION

1. Explanation of necessity.

Information is collected from individuals and officers of non-governmental organizations (NGOs) who apply for USAID contracts, grants, cooperative agreements, other USAID funding, or who apply for registration with USAID as Private and Voluntary Organizations (PVO). The collection of this information is used to conduct screening of potential recipients to ensure that USAID-funded assistance does not inadvertently provide support to entities or individuals associated with terrorism.

The authority for this screening is provided in Executive Order 13224; Section 559 of the FY06 Foreign Operations Appropriations Act; 18 USC 2339A and 2339B. EO 13224 and 18 USC 2339A and 2339B apply to all USAID programs while Section 559 specifically addresses the West Bank/Gaza program. Additionally, Homeland Security Presidential Directive-6, "Integration and Screening Information to Protect Against Terrorism" (Sept. 16, 2003) specifically provides the authority for information contained in this system to be shared for terrorist screening purposes.

2. Purpose of collection.

The additional information collected as part of the Partner Vetting System (PVS) will be used to screen NGOs and individuals that have applied for USAID funding assistance or those who apply for registration with USAID as Private and Voluntary Organizations (PVO).

The information will be collected directly from the NGOs that are applying for a USAID contract, grant or other funding assistance. In most cases, the information will be collected electronically via an online form but if the NGO does not have computer access, USAID will accept paper forms. These forms will be collected by the USAID individual responsible for managing that particular grant or contract.

3. Use of information technology.

Wherever possible, USAID applicants will be able to submit application forms in an automated, electronic format. This currently includes the use of fillable application forms that can be emailed or faxed to the USAID contracting officer. In the future, the vetting form may be a web-based application that can be filled out and submitted online. In cases where an NGO is unable to access a computer or the Internet, then a paper form may be submitted.

4. Duplication of effort.

In order to reduce duplication, the vetting form will be submitted as part of the overall USAID grants application package or as part of the bidding package for the contract or other funding mechanism. The information about the grant, the funding mechanism,

and the NGO is already collected as part of the application process and that information will be used for this additional purpose. However, the grants/contract application process does not currently collect information on key officials of the NGOs; therefore, this additional information is needed in order to properly conduct screening.

5. Impact on small businesses or other small entities.

This information collection does not have an impact on small businesses or other small entities.

6. Consequences to the Federal program.

If this information collection is not conducted, then USAID will be unable to adequately screen applicants for federal funding assistance and risks inadvertently giving support to an individual or entity associated with terrorism. As for frequency, the information will be collected at the time of application for USAID funding assistance and will only be collected again if the contract or grant is a multi-year award, in which case it will be collected annually; if the key officials within the NGO change in which case it will be re-collected as soon as possible after the change; or if other unique circumstances warrant.

7. Explanation of special circumstances.

There are no special circumstances that apply to this information collection.

8. Solicitation of public comments.

The first notice dated July 23, 2007 (72 FR 40110), the Agency could not make available a copy of the proposed collection of information and related instructions as required by 5 CFR 1320.8. To remedy this and satisfy the members of the public for comments, the Agency republished and amended notice to include the tool used to collect the information (proposed Partner Information Form) in notice dated October 2, 2007 (72 FR 46041).

9. Explanation of payment or gift to respondents.

USAID does not provide payment or gifts in exchange for a benefit sought.

10. Assurance of confidentiality.

The information collected about the key officials of these organizations is protected by the provisions of the Privacy Act of 1974. Any personally identifiable information will be protected in accordance with these provisions. For additional information, please refer to the Privacy Impact Assessment (PIA) or the Systems of Record Notice (SORN) for the Partner Vetting System.

11. Justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Estimate of hour burden.

Annual Reporting Burden:

a. Number of respondents:	2000
b. Total annual responses:	2000
c. Total annual hours requested	500

During the initial pilot program, it is estimated that approximately 2000 NGOs will apply for USAID funding assistance from pilot missions and will require vetting. Each NGO will submit one vetting form per grant application and each grant is typically for one year. Thus, the total annual responses are also estimated to be 2000. The projected time per response for this information collection is 7 minutes for reporting and 7 minutes for recordkeeping for a total of one-quarter hour per response. The total annual hours requested is 500. These numbers were calculated based on the fact that the NGOs were already providing the majority of information utilized for screening. The calculations take into the account the additional pieces of information required.

13. Estimate of cost burden.

a. Total Capital and Start-up Costs

1. Software Development Labor	\$420,000
2. Development Fees	\$42,000
3. Travel and Training	\$25,000
4. Other Direct Costs	\$13,000
Total Capital and Start-up Costs	\$500,000

b. Operation and maintenance (O&M) costs

1. USAID/SEC Labor	\$99,840
2. Mission Labor	\$90,792
3. Software Development and Integration	\$800,000
Total O&M costs	\$990,632

c. Total cost burden \$1,490,632

The capital and start-up costs were estimated based on the current costs associated with the development of the PVS for our West Bank/Gaza (WBG) Mission. Initially, this system will be used exclusively at the WBG Mission in order to test and evaluate the database. Should the PVS database meet the requirements for this mission, it may be

expanded and used in further pilot projects for other USAID missions. The software development labor, development fees, travel, training and other direct costs are the actual costs incurred during the database development life cycle. Therefore, the total capital and start-up costs of \$500,000 captures all costs associated with gathering requirements, designing, developing, testing and evaluating the PVS database. In addition, this cost also includes the licensing fees associated with the Oracle database used to support PVS, system maintenance, and integration with the USAID intranet. The operation and maintenance costs were based on two components: the costs of labor associated with the vetting process and costs associated with systems integration.

Labor costs were calculated based on one full-time position that resides in the USAID Office of Security (SEC). This position is at the GS 13 level; therefore, we used the hourly rate for a GS-13, Step 1 (\$38) and multiplied by 28 percent to account for benefits which equaled (after rounding) a total hourly rate of \$48.00.

Hourly Rate for SEC Employee	x	Hours per year	x	Positions	=	Total
\$48	x	2080	x	1	=	\$99,840

The labor costs associated with collecting information from the NGO respondents was calculated based on estimates from the WBG Mission. The primary vetting coordinator at WBG spends 30 percent of his time on information collection and recordkeeping; therefore, based on the standard hours per year (2080), the vetting coordinator spends about 624 hours per year. Thus at a wage rate of \$13; the labor costs equal.

Hourly Rate for Vetting Coordinator	x	Hours per year	x	Positions	=	Total
\$13	x	624	x	1	=	\$8112

In addition to the vetting coordinator, the program officers spend about 15 percent of their time on vetting-related information collection. There are two different categories of program officers: Strategic Objective Team Leaders (SOTL) and Foreign Service National (FSN) team members. There are five SOTL at an average wage rate of \$30 and five FSN team members at a wage rate of \$23.

Hourly Rate for SOTL Program Officers	x	Hours per year	x	Positions	=	Total
\$30	x	312	x	5	=	\$46,800

Hourly Rate for FSN Program Officers	x	Hours per year	x	Positions	=	Total
\$23	x	312	x	5	=	\$35,880

The total labor cost for the two types of program officers equals \$82,680. Therefore, the total mission-related costs associated with vetting are \$90,792.

The PVS database will run on our current computer system and no new systems will need to be purchased; therefore, it is assumed that hardware costs will be zero. However, there will be continued systems integration costs as the database is expanded and additional software development costs will be incurred to make the database capable of supporting multiple missions. At this time, we estimate those costs to equal approximately \$600,000.

14. Annualized costs to Federal government.

The estimated costs for FY2006 and FY2007 for the creation and implementation of the vetting program are \$1.2 million as outlined above. The majority of the costs are associated with the IT infrastructure development and designing a database that will allow multiple mission users to access the system. However, these initial start-up and development costs include the functionality and requirements that we envision for the next 2 to 3 years. Therefore, IT costs will decrease substantially in the years after FY2007 and we envision personnel costs to remain roughly stable with slight increases as more missions begin using the system.

Also, it is important to note that this program is the initial pilot and we will need to evaluate the program after this first phase to determine whether or not the current structure and costs are appropriate. After the initial review, we will be better able to estimate the annualized costs of this information collection.

15. Program changes.

The form required to collect information from potential USAID grant applicants is a new collection. The cost burden is calculated taking into consideration the current capital costs associated with software development, labor, hardware and software, and licenses required to deploy and implement the new Partner Vetting System.

16. Published results.

USAID does not intend to publish the results from this collection of information.

17. Waiver of display of expiration date.

USAID is not requesting a waiver of the display of the expiration date of OMB approval.

18. Exception to the certification statement.

USAID does not request an exception to the certification of this information collection. See Item 19 of the attached OMB Form 83-I.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

USAID will not employ statistical methods for this information collection.

C. CERTIFICATION AND SIGNATURES