USAID Security Firm Survey

Supporting Statement for Approval under the Paperwork Reduction Act

Summary: USAID requests that OMB approve the collection of information from U.S. and non-U.S., non-governmental organizations that are providing security services for about 20 USAID missions worldwide, including Iraq and Afghanistan. USAID missions can internally gather a substantial amount of information, however they must ask approximately 20 awardees of USAID grants a limited number of questions as well.

Section A. Justification

1. Why collection is necessary

Mr. Jim Kunder, Acting Assistant Administrator of USAID, has instructed the Office of Acquisition and Assistance ("OAA") to gather information concerning the terms and scope of USAID's grants and contracts with security service providers at its missions throughout the world. This information is required because the unanticipated event involving the use of deadly force by U.S. Government contractors and/or subcontractors or subgrantees in Iraq has resulted in a tremendous amount of interest in how, when and where the Government is using private security firms. This interest has been heightened in recent weeks due to the Government investigation and increased public interest in Blackwater's actions in Iraq.

On October 19, 2007, OAA requested those missions having a contract with a security service firm to answer the seven questions listed below. It was immediately determined from this brief survey that 8 missions have existing security service agreements, 8 missions have both existing security service contracts and agreements, and 1 mission has an active security service contract. Currently, those missions with security service contracts are gathering the requested information and answering the questions listed below. OAA plans to request those missions with security service agreements to contact the awardees to answer questions similar to those listed below once this emergency processing requests is approved. Contacting the awardees individually is necessary as the missions do not have this type of information internally.

Contractor questions that will be adopted for USAID questions for grant recipients:

1. Name of prime/subcontractor:
1.a. Total number of armed contractor personnel (including prime and sub-contracts):
1.b. Total number of U.S. and third country nationals employed (prime and subcontractors):
1.c. Total number of private security contractor and sub-contractor personnel:
1.d. Total number of private security contractor and sub-contractor personnel carrying weapons:
2. Contract number:
3. Summary of the scope of each private security contract and sub-contract:
4.a Number of security incidents with weapons fired:

4.b   To whom and how are security incidents reported?
5.   Does the private security contractor have a host government license, if needed?
6.   Total estimated cost of each private security contract and sub-contract:
7.   Type of each private security contract (fixed-price, cost-plus, etc.):

2. How the information will be collected, by whom and for what purpose
OAA will submit approximately seven questions via email to about 20 USAID missions with security service agreements. These missions will be instructed to contact the grant recipients for assistance in responding to the questions. This information will be used to gain a complete picture of the types of security service agreements/contracts USAID has entered into and how these agreements/contracts have been implemented.

3. Use of information technology for collection
A majority of this collection will take place electronically via email.

4. Duplication
No information is currently available regarding the terms and scope of current USAID security service firms and how these instruments have been implemented.

5. Impact on small entities
Prime awardees are not small entities. However, some organizations assisting in providing this information may be small entities. One purpose of this survey is to better understand the characteristics of security firm sub-grantees and therefore we are uncertain whether or not a few of them would be considered small entities. As the scope, time duration, and level of effort requested in this survey is minimal, there will not be a significant financial impact on their operations, if at all.

6. Consequences if the collection is not conducted
USAID will not be able to respond to U.S. Government inquiries regarding the nature of its security service contacts/grants nor will it be able to analyze and revise current security service firm relationships if this collection is not conducted.

7. OMB guidelines
The collection will be conducted in a manner consistent with OMB guidelines.

8. Notice and public comment
To avoid undue delay in the implementation of the Security Firm Survey, USAID requests approval of the present information collection under emergency procedures. The reasons for use of emergency procedures and the need to waive standard public notice comment requirements are set forth more fully in the Emergency Processing Determination.

USAID will consult with respondents on an informal basis to determine if the survey is burdensome.

9. Payment or gift

No payment or gift will be provided to respondents other than normal remuneration of grantees or recipients.

10. Assurance of confidentiality
USAID will not give respondents any assurance of confidentiality with respect to the information to be collected.

11. Justification for questions of a sensitive nature
Since the inquiries are not directed to individuals, but rather to organizations, they are not matters of personal privacy. Further, since the questions contained in the survey are those that are expected by a USAID appointed Cognizant Technical Officer and required in a monitoring and/or evaluation clause in a grant/contract, this information should not be considered sensitive in nature.

12. Estimate in hours of burden of compliance
USAID estimates its <u>total number of respondents</u> to be approximately 20. Each respondent will answer seven questions and any follow-up, clarifying, questions that may be deemed necessary.

We estimate the time required to research, analyze, prepare, and submit responses to the Security Firm Survey to be about three hours. This estimate includes responding to follow-up questions that USAID may request. Respondent organizations will not require additional staff or equipment to comply with the requirements

(20 organizations X 180 minutes) = 60 hours

We estimate the total cost to respondents and intermediaries of compliance at $600.00 based on the average hour burden shown above and an average hourly wage rate for U.S. organizations of $30.

20 X $30 = $600

13. Annual cost burden to respondents or record keepers
(a) Total capital and start-up cost: The present survey will not require special capital or start-up costs for respondents. Record keepers are not expected to take part in this survey. No new equipment purchases for this purpose should be needed.
(b) Total operations, maintenance, and purchase of services: Respondent organizations are not expected to incur any additional costs in connection with documentation for the standard three-year period for retaining contract and grant-related records.

14. Estimated cost to Federal government
USAID/Washington and field missions may require an average of 3 person hours each for all tasks: research, analysis, reporting.

20 USAID field missions X 3 hours = 60 hours
60 hours X $30 wage =$180

Some USAID headquarters staff time has been and will be consumed in the process of providing guidance and related communications, and fielding questions:

1 person week X 40 hours = 40 person hours

40 X $30 wage = $1,200

No new equipment is needed and no new staff will be hired to assist with this process.

Total cost to the Federal Government:

$180 + $1,200 = $1,380

Total cost to the Federal Government and respondents:

$1,380 + $600 = $1,980

15. Program changes or adjustments
There are no program changes or adjustments associated with this survey.

16. Publication plans
USAID has no plans to publish this information.

17. Display of expiration date
USAID requests approval not to display the expiration date of OMB approval on the survey. USAID is pursuing the present approval under emergency procedures, which is necessary to avoid serious delays in carrying out this survey. In additional, this survey will be completed through informal telephone conversations and short letters via email, making the expiration date display impractical. We are seeking an approval period of six months. USAID will request further approvals as necessary to ensure compliance with the policy.

18. Exceptions to the certification statement
USAID takes no exception to the certification statement in OMB-83-1

19. Burden Statement
USAID proposes the revised format 1 burden statement below. As requested in response 17 above, USAID requests approval not to display the expiration date of OMB approval.

Public reporting burden for this collection of information is estimated to average three hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing and reviewing the collection of information , and to respond to any follow-up questions deemed necessary. The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.   Send comments

regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Acquisition and Assistance, Washington, D.C. 20523-7900.

Section B. Collections of Information Employing Statistical Methods
Not applicable. USAID will not employ statistical methods for the present information collection.