

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION
OMB # 1405-0036
DS-573, DS-574, DS-575, DS-576(GRASP)**

A. JUSTIFICATION

1. The Office of Overseas Schools of the Department of State (A/OPR/OS) is responsible for determining that adequate educational opportunities exist at Foreign Service Posts for dependents of U.S. Government personnel stationed abroad, and for assisting American-sponsored overseas schools to demonstrate U.S. educational philosophy and practice. With a professional staff of six Regional Education Officers to carry out these objectives at more than 230 Foreign Service Posts and involving some 194 overseas schools, it is essential that current comprehensive information regarding the schools be available so that A/OPR/OS can advise the Department of State and other foreign affairs agencies, parents and students, and the private sector regarding overseas schooling and judge the need for, and utility of, various types of assistance to overseas schools.

Section 636(d) of the Foreign Assistance Act of 1961, as amended (22 U.S.C. 2396(d)), Section 102 of the Mutual Educational and Cultural Affairs Act of 1961, as amended (22 U.S.C. 2452), and Section 29 of the Department of State Basic Authorities Act of 1956, as amended (22 U.S.C. 2701), 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.)

2. Availability of adequate educational opportunities for dependents of Government personnel is essential to the task of recruiting, placing, and retaining Foreign Service personnel at overseas posts. The information gathered enables the Office of Overseas Schools to advise the Department and other foreign affairs agencies regarding current and constantly-changing conditions, and enables A/OPR/OS to make judgments regarding assistance to schools for the improvement of educational opportunities. The absence of such information would severely impair the U.S. Government's ability to recruit, place, and retain personnel at overseas posts.
3. Information is now collected via electronic media, which each respondent saves to a disk and mails to post. GRASP software replaces DS-573, DS-574, DS-575 and DS-576 paper forms, and contains 70% fewer data fields than the original forms. A/OPR/OS provides the software to respondents at no cost. The ability to "roll over" static data, and only update changes has resulted in a significant lessening of the burden on respondents. Given the small number of respondents, the return on investment of creating a completely electronic end-to-end process, including electronic submission, would not be high enough for A/OPR/OS to take on the project. Indeed, based on our research, at this time, the cost of further electronic enhancements would far exceed the budget allocated to the program.
4. No other agency gathers information from these schools. Information gathered by A/OPR/OS is used by all Federal foreign affairs agencies. The information is not available from any other source and requires updating on an annual basis.

5. Methods used to minimize burden for small entities are the same as those described in item 3 above. In addition, the ability to “roll over” static data, and only update changes has resulted in a lessening of the burden on respondents.
6. As noted above, current information is necessary for A/OPR/OS to be knowledgeable about schools and school programs. Even with the annual collection of data, whenever a change occurs the information needs to be updated with supplementary information from Foreign Service Posts and on the basis of field trip observations and reports. GRASP provides basic information about a school including its enrollment, staff, programs, and budget, which is necessary for appraisal of each school seeking assistance. This information is used to determine the extent of assistance required, and whether or not criteria governing assistance are met. The task could not be fulfilled if data were collected less frequently.
7. Not applicable. No special circumstances exist with respect to this information collection.
8. A 60-day notice was published in the *Federal Register* to solicit public comments. No comments were received.
9. No payment or gift is made to respondents and no remuneration is provided other than grants awarded based on data contained in respondents’ submissions.
10. The GRASP instructional manual contains the following assurance of confidentiality: “your answers will be kept confidential to the extent permitted by law.” It is the Department’s policy to protect survey information from disclosure to the extent permitted under the Freedom of Information Act.
11. The form solicits information of a commercial nature and does not contain any questions of a sensitive nature.
12. Currently the estimated hour burden on the 194 schools that submit responses annually totals 291 hours. The burden estimate is based on informal consultation with representatives of a number of overseas. The burden on respondents is expected to vary widely due to the great variation in size and complexity of the schools. School populations range from 5 in Kolkata, India to 3650 in Singapore, Republic of Singapore. Once the initial software has been loaded at all 194 schools, approximately 70% of the data remains static, so only annual updates are required. On that basis, the average hour burden per school is estimated to be roughly 90 minutes.
13. The estimated cost to respondents totals \$582 (the mailing cost of \$3.00 per response times 194 respondents). The estimated cost is based on the mailing costs of mailing the disk to post
14. The estimated cost to the Federal government is approximately \$3,900. This estimate is based on the number of responses (194), the average hourly processing time (0.5 hours), the average hourly salary (GS-11/4 \$29.36), and the printing and mailing costs (\$0.26 and \$5.00 respectively). 194 respondents times 0.5 hours equals 97, times \$29.36, equals \$2847.92. The printing cost of \$50.44 (\$0.26 per response times 194 responses) plus the mailing costs of \$970.00 (194 respondents times \$5.00 per response) equals \$1020.44. \$2847.92 plus \$970.00 yields a total cost burden of \$3,868.36, which rounds to \$3,900.

15. Items 13 and 14 of OMB Form 83-I reflects the minimal adjustments in the hour burden and cost burden on respondents. The estimated cost burden and the total hour has increased due to an increase in the number of schools.
16. The results of this collection are not expected to be published
17. Not applicable. The expiration date for OMB approval will be displayed.
18. No exceptions requested.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.