

**SUPPORTING STATEMENT FOR EXPIRING INFORMATION COLLECTION:  
OMB 0412-0570**

**PAPERWORK REDUCTION ACT SUBMISSION  
FOR USAID 22 CFR 226.91, MARKING REQUIREMENTS  
“BRANDING STRATEGY” AND “MARKING PLAN”**

**Section A. Justification:**

1.Explain why you need to conduct the information collection. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide some background information on the program and describe how the collection supports it. Detail any specific program problems you hope to resolve.

Answer: The information requested is a ‘Branding Strategy’ and ‘Marking Plan’ that outlines how successful applicants for USAID grants will convey the message that the grant is foreign assistance from the American People. The Branding Strategy and Marking Plan are required under a new regulation, USAID Marking Requirements, 22 C.F.R. 226.91, which has been approved by OMB and which was published as a final rule on August 26, 2005 as a result of public rulemaking. That regulation fully aligns USAID marking practices with the requirement of the Section 641 of the Foreign Assistance Act of 1961, as amended, which requires that all foreign assistance programs be marked appropriately as ‘American Aid.’ USAID has enhanced its marking requirements because recent studies have shown that foreign citizens’ positive perceptions of the United States and its government are markedly enhanced when foreign assistance is identified as coming from USAID and the American People. Enhancement of the positive perceptions abroad of the United States in turn is a vital part of United States public diplomacy, and the war against terrorism.

The Branding Strategy and Marking Plan are not general requirements for all applicants for USAID grants and cooperative agreements, but are limited to those who have been technically evaluated as appropriate for award (Apparently Successful Applicants). The USAID agreement officer asks Apparently Successful Applicants to submit a Branding Strategy, outlining how the USAID-funded program will be named and positioned, including use of the USAID Identity as part of the title, as well as how the program will be promoted and communicated to host country beneficiaries and other recipients of U.S. foreign assistance. The agreement officer will also request the Apparently Successful Applicant to submit a Marking Plan, detailing the type (for example, a plaque or label) and level (for example, every computer or just the schoolhouse) for deliverable items that will

bear the USAID Identity. The Branding Strategy and Marking Plan will not be evaluated competitively. The Agreement Officer will review both for adequacy, negotiate, and approve both for inclusion in the award.

2. Explain how, by whom, and for what purpose the information will be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Answer: As above, the Branding Strategy and Marking Plan are used by the Agreement Officer as a basis for an award provision ensuring that the marking requirements of 22 CFR 226.91 are implemented by recipients of USAID funded grants and cooperative agreements. USAID also uses the agreed upon Marking Plan incorporated the award for monitoring performance of marking requirements by recipients. Finally, the Marking Plan may be waived, either at the request of recipients or at USAID's initiative, by USAID Principal Offices due to political, safety or security concerns, or because of adverse reaction in the host country.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology (e.g. permitting electronic submission of responses), and the basis for the decision for adopting this means of collection. Also describe any consideration you gave to the use of improved information technology to reduce the burden on the public.

Answer: The Branding Strategy and Marking Plan are submitted by the Apparently Successful Applicant in either paper or electronic format, and are usually not more than two pages in length. Collection will not be automated or mechanical. The collection is not data in the sense of measurements, statistics, or factual or numerical information. The collection is a customized strategy or plan specific to an individual award, not universal submission of data for collection.

4. Describe your efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Answer: There is no available information similar to the required Branding Strategy and Marking Plan. Each Strategy and Plan is different - customized - to further the goals of U.S. public diplomacy by marking US foreign assistance effectively to communicate to host country audiences that they are receiving assistance funded by the American People, in each individual case.

5. If the collection will have a significant impact on small entities such as small businesses, organizations, or government bodies (see the instruction above for Item 5 of the OMB 83-1), describe any methods used to minimize the burden on them.

Answer: USAID does not believe the requirement of submitting a Branding

Strategy and Marking Plan will have a significant impact because it places limited demands on recipients - two pages or less of a strategy and plan - and because all reasonable costs of producing the Branding Strategy and Marking Plan are allowed under the regulation. In an attempt to minimize any burden, USAID is requiring submission of the Branding Strategy not from all applicants for USAID funding but only by those applicants who have been recommended by award after technical evaluation of their applications (Apparently Successful Applicants).

6. Described the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden. .

Answer: If the Branding Strategy and Marking Plan are not required, recipients will not be able to customize their implementation of the marking requirements to their individual applications for funding to carry out individual foreign assistance programs. A Branding Strategy and Marking Plan required by USAID in order to avoid using a 'one size fits all' approach to public diplomacy. In USAID's judgment, seconded by OMB/OIRA, the requirement of a Branding Strategy and Marking Plan is the least burdensome, most effective way to implement comprehensively statutory marking of U.S. foreign assistance requirements. The requirement of a Branding Strategy and Marking Plan also responds to comments in public rulemaking that recommended greater grant and cooperative agreement recipient input into branding and marking.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the OMB guidelines (see Attachment 2).

Answer: None

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting public comments on the information collection prior to this submission to OMB. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Specifically address comments received on cost and hour burden.

Answer: USAID published a 60 day advance notice of the information collection renewal at Federal Register, Volume 74, No. 48, Friday March 13, 2009, pp. 10877 [FR Doc. E9-5143 Filed 3-12-09; 8:45 am].

The 60 day comment period closed May 30, 2009. USAID received one comment. This comment stated USAID should be shut down and the funds used for domestic programs. Since the comment is outside the scope of this notice and does not comment on any aspect of the information collection, there is no plan for any actions to be taken in response to this comment. No comments the cost or hour burden of this information collection were received.

Describe your efforts to consult with persons outside the agency to obtain their

views on the availability of data, the frequency of collection, the clarity of instructions, the amount of burden to be imposed, and ways to minimize the burden.

Answer: See answer to #8, above. USAID previously engaged in rulemaking and extensive dialogue with affected parties concerning the marking requirements, and consulted OMB on the proposed and final rules, with OMB participating in some meetings with affected parties.

Consultation with representatives of those being affected should occur at least once every three years, even if the collection has not changed. If circumstances prevent this consultation, describe them, but please note that OMB is emphasizing the need for such consultations.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Answer: None.

10. Describe any assurance of confidentiality provided to respondents and the basis for this assurance in statute, regulation, or agency policy.

Answer: None. Again, the Branding Strategy and Marking Plan do not collect personal or business data of any kind – they request submission from a very limited number of grant applicants of what effectively is a special program proposal for marking of foreign assistance by the recipient, customized in the individual application. The Branding Strategy and Marking Plan are not proprietary information in any sense, given that they are based on marking requirements and will not be evaluated competitively.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private. The justification should include the reasons why the questions are necessary, the specific uses for the information, the explanation to be given to the respondents, and any steps taken to obtain their consent.

Answer: There are no questions of a sensitive or private nature required by submission of the Branding Strategy and Marking Plan. By their nature, both are public – public relations—type documents, not questions requiring responses on matters of private belief.

12. Provide an estimate in hours of the burden of the collection of information. The statement should:

- Provide the number of respondents expected annually, the frequency of their response, the total number of responses expected, the average response time per respondent, and the total annual response time (in

hours) for the collection. Response time includes not only the time necessary to complete the form or answer the questions, but also the time needed to gather the information (unless it was already being gathered for other purposes), have it reviewed by lawyers or accountants, etc. Explain how you arrived at these estimates.

Consultation with a few respondents is desirable, but larger surveys to obtain response data are not necessary. If the burden per response is expected to vary widely, show the expected range of responses and explain the variance.

- If the collection will involve more than one form, provide burden estimates for each form.
- Provide estimates of annualized cost to respondents for the hour burden for the collection, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for the collecting the information should not be included here (see Item 14 below).

Answer: USAID estimates that it will take about 3500 hours annually to complete the requirement of submitting a Branding Strategy. This estimate is based on the fact that USAID awards about 1000 grants annually; the Branding Strategy must be submitted only by those applicants who have been recommended for award after technical evaluation (each of the 1000); and USAID estimates that it will take about one and one half hours (1.5) to complete the Branding Strategy and two hours (2.0) to complete the Marking Plan, based on the fact that the requirements of the final rule are straight forward: what the USAID funded project will be named, how it will be positioned and publicized, how the USAID Identity will be incorporated in publicity efforts; what is to be marked with the USAID Identity; what will not be marked; do any of the established exceptions to the regulatory requirement apply. The answer does not need to be reviewed by lawyers and accountants - it is a customized strategy, not a legal interpretation of a regulatory requirement. Once approved, the Branding Strategy and Marking Plan do not need to be updated ever, or annually, unless circumstances warrant a bilateral amendment.

13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection. Do not include the cost of the burden hours described in Items 12 and 14.

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operations, maintenance, and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate

major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which the costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, present ranges of cost burden and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to 10/01/95, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business of private practices.

Answer: There are no foreseen capital/start up or operations and maintenance cost components, because the Branding Strategy and Marking Plan can be completed by existing word processing technology or by hand if need be. It is conceivable but unlikely that applicants could 'purchase services' of word processing or even public relations staff, but the use of such staff would overlap substantially for services rendered for the applicant's own benefit - applicants generally would have to name the USAID funded project and position/publicize it on behalf of the applicant.

The Cost Estimate for compliance is approximately \$350,000 annually, based on 3500 hours at \$100 per hour of staff time to complete the Branding Strategy and Marking Plan.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate costs, which should show the quantification of hours, operational expenses (such as equipment, overhead, printing, and staff support), and any other expense which would not have been incurred without this collection of information. You may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Answer: The annualized cost to the Federal Government is the cost for the Agreement Officer to review the submitted Branding Strategy and Marking Plan for

adequacy, negotiate any details and approve the Branding Strategy and Marking Plan in the award. The Agreement Officer will be performing very similar or identical functions with other elements of the Apparently Successful Applicant's application, such as reviewing small business utilization plans for adequacy, negotiating and approving such plans in the award, so any cost will be incremental. The total cost to the Federal Government estimate is \$350,000, based on seven (7) hours of review, negotiation and approval of Branding Strategies and Marking Plans for five hundred (500) annual grant awards, and an estimated hourly rate for Agreement Officers of fifty dollars (\$50) per hour (\$100,000 annual salary divided by 2000 hours per year equals \$50 per hour).

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

Answer: none.

16. For collections whose results will be published, outline the plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates and other actions.

Answer: No publication of 'results' is anticipated. The Branding Strategy and Marking Plan will be reflected in a provision in a grant or cooperative agreement award, but that is the only 'next step' use of the required information that is anticipated.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Answer: N/A

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

Answer: N/A