

# **SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION**

## **OMB Number 1405- Overseas Schools Grant Status Report OMB Number 1405-0033 DS-2028**

### **A. JUSTIFICATION**

1. 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 overseas school submits a completed DS-2028 to embassy officials who approve the report and verify 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. A/OPR/OS plans to automate this process as funding for IT upgrades is obtained. A/OPR/OS is currently considering sending an e-mail link to the software and the form to the grantees. They will be able to download the software, 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.
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. 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. The Department of State (Office of Overseas Schools) solicited public comments in the 60-day request for comments in the *Federal Register* dated September 10, 2009, page 46636. No comments were received.
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 available for use 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 respondents would customarily be maintained by the schools as part of their normal business practices, there is no separate burden related to collection of this information. The Department estimates that the 196 anticipated respondents would spend approximately fifteen minutes each completing form DS-2028 for an estimated total of approximately 49 hours per year.
13. No annual costs are attributable to this collection of information since the information is routinely collected and maintained as part of the normal operation and administrative record keeping of educational institutions.
14. The estimated burden to the Federal Government is \$5,100. The Federal Government estimate is based on the number of responses (196), the average hourly processing time (0.5 hours) for post and (0.25 hours) for Office of Overseas Schools, the average hourly salary of an FS-04/2 Administrative Officer (\$25.77) and GS-12/2 Program Analyst (\$39.16). 196 respondents times 0.5 hours equals 98, \$39.16 equals \$3,837.68 and 196 respondents times 0.25 equals 49 times \$25.77 equals \$1,262.73. \$3,837.68 plus \$1,262.73 equals \$5100.41, which rounds to \$5,100.
15. There are no program changes associated with this collection.
16. Information will not be published.
17. The Department will display the OMB expiration date.
18. No exceptions requested.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

This information collection does not employ statistical methods.