SUPPORTING STATEMENT FOR REQUEST FOR APPROVAL
UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR 1320

Section A. Justification

1. The U.S. Agency for International Development, under the Foreign Assistance Act of 1961, as amended, engages in a broad range of sustainable economic assistance activities that provide technical and academic training in the United States and abroad for foreign nationals. These foreign nationals have been selected for training by USAID in order to advance U.S. foreign policy objectives by supporting: economic growth, agriculture and trade; global health; and democracy, conflict prevention, and humanitarian assistance. Training can consist of long-term academic degree programs, short-term technical courses, seminars, workshops, or other learning activities intended to impart certain knowledge and information.

USAID must track training data for all foreign nationals who receive training funded by USAID. In cases where foreign nationals must travel to the U.S. to participate in training or invitational travel, the approvals for the eligibility to obtain the J visa are captured in the Visa Compliance System. The Visa Compliance System (VCS) has two purposes: first, to secure a J-1 visa for these foreign nationals traveling to the U.S.; second, to enable USAID to be in compliance with external requirements of the Department of Homeland Security. With certain exceptions, the foreign nationals that USAID sponsors for travel to the U.S. are considered exchange visitors. The VCS provides an audit trail regarding each exchange visitor, his or her training program or circumstances, as well as other relevant documentation.

2. Operational requirements for the utilization of the Visa Compliance System are stated in the Automated Directives System chapter focused on visa compliance (ADS 252). The Visa Compliance System interacts with another USAID system called TraiNet. TraiNet collects, stores, and reports data on all Agency participant training based on operational requirements stated in the Automated Directives System chapter focused on participant training (ADS 253). When travel to the U.S. is involved, participants' information and their training data are passed from the TraiNet system to the Visa Compliance System. Visa Compliance System users then review and approve or reject the participant for J visa eligibility. If approved, the participant's data moves forward to the Department of Homeland Security's Student and Exchange Visitor Information System where form DS-2019 Certificate of Eligibility for Exchange Visitor Status is generated. Exchange visitors must submit form DS-2019 and other supporting documents to the U.S. consulate in order to apply for a J visa.

3. The Visa Compliance System is a web application, and most of the information contained in it is passed to it through the TraiNet system, which is also a web application. Some scanned documents and images are uploaded to the Visa Compliance System which may have been collected through a manual process.

4. The Visa Compliance System does not duplicate effort. Any information currently stored in the TraiNet system that is necessary for the processing of the J visa is pushed into the Visa Compliance System through an automated process initiated by TraiNet users.

5. The Visa Compliance System will not have an adverse impact on small business entities except insofar as they enter into a written agreement with USAID to administer and manage exchange visitor activities consistent with uniform, standard USAID requirements. Data collection is the same for all organizations managing data in the Visa Compliance System. There is a minimum amount of data to be collected and this cannot be reduced for a small business.

6. USAID cannot reduce the accuracy or frequency of collecting this information without losing its ability to properly monitor and account for USAID-funded exchange visitors travelling to the U.S. Exchange visitors must be processed through VCS to gain approval and ultimately, the J-1 visa. If this process is not followed, the participants will very likely be unable to travel to the US and participate in the training.

7. Data is collected on an as needed basis and for US training must be done well in advance of the training event. This is necessary for timely issuance of form DS-2019.

8. There is regular and frequent contact with the user community regarding data collection. The management continues to consider changes to reduce the data collection burden as much as possible. Notice of this information collection was published in the Federal Register on October 8, 2010, Volume 75, Page 62366.

9. Not applicable.

10. Information will be disclosed outside USAID only as provided by law.

11. No sensitive information is being collected.

12. All information collected in the Visa Compliance System is already gathered, and reviewed as appropriate (lawyers, accountants, etc.), for other required purposes by the respondents. No time has been estimated for gathering and reviewing data, therefore, as an additional burden for Visa Compliance System usage and reporting.

Based on the number of users and the total number of actions in the Visa Compliance System during fiscal year 2009 as well as previous years, we estimate annual averages as follows:

- Number of respondents: 600
- Frequency of responses: every 2-30 days, depending on volume of U.S.-based training activities
- Total number of responses expected: 8,000
- Average response time per full effort response: 15 minutes
- Average response time per respondent: 8,000 times 15 minutes divided by 600 respondents divided by 60 minutes = 3.4 hours annual average per respondent
- Total annual response time: 8,000 times 15 minutes divided by 60 minutes = 2000 hours

The average annualized cost to respondents for the hour burden for the collection can be estimated as:

- $70,000 annual salary divided by 260 days divided by 8 hours = $33.65 per hour x 3.4 hours annually = $70.67 times 2 benefits and overhead burden = $228.82

13. There is no cost to respondents for using the Visa Compliance System beyond the cost of the burden of hours described in sections 12 and 14. Visa Compliance System software and technical operations support will be provided without charge by USAID/EGAT to all qualified users.

14. There are no other expenses which would have not been incurred without the collection of information through the Visa Compliance System beyond the burden of hours described in section 12.

15. Not applicable.

16. Not applicable.

17. Not applicable.

18. Provision 5 CFR 1320.9(i) does not apply and cannot be certified. A statistical survey methodology is inappropriate because information must be collected for all exchange visitors.

Section B. Collections of Information Employing Statistical Methods
The collection of this data does not employ statistical methods.

ATTACHMENT 1

USAID Automated Directives System Chapter 252, Visa Compliance for Exchange Visitors is attached.