

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

## **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 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.

OMB Guidelines contained in Circular A-110, require that Financial Status Reports on federal grants be submitted not less than annually. 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. The policy under which A/OPR/OS conducts the Consolidated Overseas Schools Program is outlined in 2 FAM 610. GAO decision B-149441, December 6, 1962, 42 Comp. Gen. 289, states that grants to American-sponsored overseas schools are not statutory unconditional grants or gifts. It further states that it is the responsibility of the Department of State for seeing that the grant funds are applied to the purposes and objects for which they are made.

2. To comply with the financial reporting requirements under 22 CFR Section 145.52, the form DS-2028, Overseas Schools Grant Status Report, 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. Information from the DS-2028 has provided 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. We continue to enhance our electronic form capabilities. Currently, we have placed the form DS-2028 in an excel spreadsheet. Form DS-2028 is sent as a link to the school along with the grant documents. School officials can complete the form electronically and forward the form to post for forwarding to A/OPR/OS. Because of security concerns with schools accessing the Department of States' domain, they cannot access the Department's internal forms database to complete the DS-2028.
4. No other agency gathers information from these schools. There is no duplication of the data. The Department does have access to an automated worldwide financial system (GFMS), which is used to assist in monitoring reimbursement of grant funding, but no duplicative system exists for obtaining information on obligation and expenditure of USG grant funding by the schools.
5. The information does not have a significant impact on a substantial number of small entities.

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. No special circumstances exist with respect to this information collection.
8. Public Notice: 8096, Vol. 77, No. 228, page 70873 was published in the *Federal Register* November 27, 2012, soliciting public comments. 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.
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. There is insufficient data for overseas wages, and the Department assumes that the clerical staff completes the form. Therefore, we used domestic statistics and a general office clerks wage category to monetize the annual time burden.

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c)* Estimated Average Income per Hour	(d) Estimated Cost to Respondents
Status of grant funds	49 hours	\$14.71	\$721
Totals	49 hours	---	\$721

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 \$5,256.00.

The Federal Government estimate is based on the number of responses (196) and the average hourly processing times and average hourly salaries for Post and the Office of Overseas Schools.

**Post:**

Average hourly processing time (0.5 hr) x 196 = 98 hrs

Average hourly salary of an FS-04/5 Administrative Officer (\$33.30) x 98 = \$3263.40

**Office of Overseas Schools:**

Average hourly processing time (.25 hr) x 196 = 49

Average hourly salary of a GS-12/5 Program Analyst (\$40.66) x 49 = 1992.34

Total = \$3263.40 + \$1992.34 = \$5255.74, rounded up to \$ \$5,256.

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 collection does not employ statistical methods.