SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION

NEA/AC Online Performance Reporting System (ACPRS) & State Assistance Management System (SAMS) Domestic Results Monitoring Module

OMB Number 1405- 0183, Form DS-4127

A.   JUSTIFICATION

1.   The President of the United States has the authority, under 22 U.S.C. § 2395(b) (Section 635(b) of the Foreign Assistance Act of 1961), to give grants to individuals, governments, businesses, and other organizations in furtherance of the Foreign Assistance Act. Executive Order 12163 delegates this authority to the Secretary of State.

United States policy is to support freedom and democracy in the Middle East. The Bureau of Near Eastern Affairs, Office of Assistance Coordination (NEA/AC) is one of the administration's primary tools to advance this policy. Founded as the Middle East Partnership Initiative (MEPI), NEA/AC is designed to support economic development, good governance, education, democracy programs, and human rights efforts in the Middle East and to increase opportunity for all people of the region, especially women and youth. The Department of State provides funding to U.S. and foreign organizations in the form of grants and cooperative agreements to support U.S. foreign policy goals. Recipient organizations are primarily non-governmental organizations (NGOs), institutions of higher education, international organizations, and other federal agencies. In a few instances, commercial firms are also grant recipients.

As a normal course of business and in compliance with Office of Management and Budget (OMB) Guidelines contained in 2 C.F.R. § 200, recipient organizations are required to provide, and the U.S. State Department required to collect, periodic program and financial performance reports. The responsibility of the State Department to track and monitor the programmatic and financial performance necessitates a database that can facilitate this in a consistent and standardized manner.

2. NEA/AC, established in June 2014, coordinates United States government foreign assistance in the Middle East and North Africa region for the Department of State, and manages the implementation of all the assistance functions within the Department of State's Bureau of Near Eastern Affairs. In fiscal year 2017, NEA/AC will obligate over $142 million in support of political, economic, education and women's rights reform in 20 countries of the Middle East and North Africa. The responsibility of the Department to track and monitor the programmatic and financial performance necessitates a database that can help facilitate this in a consistent and standardized manner. The NEA/AC Performance Reporting System (ACPRS) enables enhanced monitoring and evaluation of grants through standardized collection and storage of relevant award elements, such as quarterly progress reports, workplans, results monitoring plans, grant

agreements, and other business information related to AC implementers. The ACPRS streamlines communication with implementers and allows for rapid identification of information gaps for specific projects.

Representatives of each grantee organization enter their required performance report information on a quarterly basis through a password protected website (https://acprsdatabase.com/). Using a standard quarterly reporting template, grantees report against the established objectives and performance indicators of the projects. The major workplan activities are automatically listed in the report and enable grantee organizations to easily notify the State Department of progress, delays and requested changes to the workplan.

Each grantee organization can also submit relevant supporting documentation as attachments, including the OMB-required SF-425 financial status report.

With the introduction of a results monitoring module within the domestic version of the State Assistance Management System (SAMS domestic) in April 2018, NEA/AC will exclusively use SAMS domestic to track and monitor programmatic and financial performance of awards and phase out ACPRS. The results monitoring module will incorporate all facets of ACPRS, in addition to enhancing monitoring and evaluation and integrate a previously-existing system.

3. This collection of information is completely electronic, but a paper version of the information collection is available for organizations that are unable to submit their reports online. Nonetheless, quarterly reports that are submitted outside of the system are uploaded to the system in order to ensure quarterly reports are accessible to all relevant State Department officials in Washington and overseas. At this time, 95% of U.S.-based grantees are using the electronic submission method. The same will be true of SAMS domestic.

4. The information in ACPRS is not duplicative of information maintained elsewhere or otherwise available, nor will the information collected in SAMS domestic. While hardcopy versions of all quarterly reports are saved in the official grant files, there is not an existing system of electronic record keeping for these reports; the same will be true of SAMS domestic. In addition, the standardized format and cumulative results reporting features make the ACPRS and upcoming SAMS domestic unique.

5. This collection does not have a significant impact on small businesses.

6. OMB regulations require that grantees provide regular progress reports during the period of performance (See Item 1). The use of the ACPRS serves to streamline the process for grantees and to improve monitoring and evaluation capabilities of the U.S. Department of State. With over $142 million set to be obligated in Fiscal Year 2017, NEA/AC's ability to effectively assess the performance of individual projects and a broader portfolio of programs necessitates standardized reporting in an electronic format. This ability will be enhanced with the introduction of SAMS domestic with no additional burden on the public.

7. No such circumstances exist.

8. A 60-day notice, entitled NEA/AC Online Performance Reporting System, soliciting public comments was published in the Federal Register (82 FR 23125) on May 19, 2017. One comment was received recommending that NEA/AC consider reforming the reporting templates to provide for further analysis and discussion of challenges/constraints, lessons learned, and success stories in order to allow recipients to provide more context to projects, their activities and their goals; and to demonstrate how the grantees adapt their approach in response to political developments and the needs of local partners.

NEA/AC has accepted this recommendation and is in the process of reforming the structure of the quarterly reports to ensure that qualitative data is being captured alongside quantitative information. ACPRS is also being reformed to improve the quality of quantitative data by restructuring the organization of the data and ensuring that changes to this data is being tracked. Grantees should see changes to the system within the next six months. Additionally, NEA/AC policies and procedures have been revisited and now require Grants Officers and Grants Officer Representatives to provide particular analysis regarding programmatic activities as a condition for accepting or rejecting quarterly reports. Improvements reporting in the ACPRS system will be sustained during the transitions to the more-dynamic, ILMS-based SAMS domestic.

9. No payment or gift is provided to respondents.

10. The ACPRS is a password protected, web-based portal. SAMS domestic will also be a password protected, web-based portal. However, there are no assurances of confidentiality given other than in the Terms and Conditions attached to each grant document, which state that the information will be used by Department of State auditors and inspectors.

11. No questions of a sensitive nature are asked.

12. It is estimated that writing a quarterly report, whether through the ACPRS system or not, takes each implementer an average of 20 hours per report. (This ranges anywhere from 4 to 40 hours, depending on the size of the project; larger projects require more extensive information gathering and analysis. Also, some organizations have multiple rounds of editing and review, while others do not.) NEA/AC estimates that an average of 240 grantees per year will report quarterly through the ACPRS system, and later through SAMS domestic. The average annual burden for reporting via the ACPRS system is 19,200 hours (20 hours per report x 4 reports per year x 240 grantees). We anticipate that the average annual burden for reporting via SAMS domestic will be the same. The total hour cost burden for this collection is $518,208 ($26.99 x 19,200). The hour cost was calculated using the Bureau of Labor Statistics (**www.bls.gov**) wage rate for an Information and Record Clerk. The wage rate for this occupation is $19.28 x 1.4 = 26.99.

13. The collection imposes no additional capital costs or operation and maintenance costs on respondents.

14. The estimated cost burden to the federal government is $104,159 per year. The federal government estimate is based on the cost to NEA/AC contractor Pillar Systems Corporation to maintain and update the database, as well as the number of hours NEA/AC staff devote to maintaining and updating the ACPRS Database. The average number of hours devoted to this purpose is 2,640 per year. The average hourly salary of $37.07 (GS-12/2 Program Analyst) was used in making this calculation. The total employee costs are $97,865 (rounded) and the total contract cost is $104,159 (rounded) so the total government cost is $202,024 (rounded).

15. Due to the increase in total average number of grantees reporting quarterly through ACPRS (+115 grantees), the average annual burden for reporting via ACPRS has increased from 10,000 hours in 2014 (20 hours per report x 4 reports per year x 125 grantees) to 19,200 hours (20 hours per report x 4 reports per year x 240 grantees). There has also been a decrease in the total government cost from $298,677 (rounded) per year in 2014 to $202, 024 (rounded) per year currently due to a $96,653 decrease in the total contact cost.

16. Information collected from these progress reports is not intended for publication, though NEA/AC may highlight results from specific projects in published reports in the future. If results of a specific project are published, the grantee organization will be consulted to confirm the results.

Quarterly report information is used by the State Department to monitor and evaluate the performance of its programs. The information is used to evaluate current projects, assess future programming needs and maximize the effective use of resources. While primarily for internal use, information from these quarterly reports may be shared in part or whole with non-State Department stakeholders such as the U.S. Congress.

17. The OMB approval information and expiration date for this collection will be displayed.

18. No exceptions are being requested.

B. STATISTICAL METHODS

This collection does not employ statistical methods.