

**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 to ensure 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 State 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 collection of this information does not impact small entities or 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. No special circumstances exist with respect to this information collection
8. The Department published a notice in the Federal Register (83 FR 58806) on November 21, 2018, soliciting public comments. No comments were received.
9. No payments or gifts are made to respondents, other than remuneration of grantees.
10. There are no assurances 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 192 respondents will spend 15 minutes annually completing the DS-2028. The annual time burden will be 48 hours (192 x 0.25). Based on consultation with 10 potential respondents, the estimated average hourly wage¹ for a school administrative services manager is \$43.95, multiplied by 1.5 multiplied by the annual burden (48) gives a monetized time burden of \$3,164.00 (rounded).

13. No annual costs will be attributed to respondents.
14. The estimated burden to the Federal Government is \$5,850.00.

The Federal Government estimate is based on the number of responses (192) and the average hourly processing times and average hourly salaries for Post and the Office of Overseas Schools.

Post:

Average hourly processing time half an hour (0.5) x 192 = 96 hours

Average hourly salary of an FS-04/5 Administrative Officer (\$38.80) x 96 = \$3,724.80

Office of Overseas Schools:

Average hourly processing time fifteen minutes (0.25) x 192 = 48 hours

¹ Source: Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook*, Administrative Services Managers, on the Internet at <https://www.bls.gov/ooh/management/administrative-services-managers.htm> (visited April 30, 2019)

Average hourly salary of a GS-12/5 Program Analyst² (\$44.28) x 48 = \$2,125.44
Total = \$3,724.80 + \$2,125.44 = \$5,850.24, rounded to \$ \$5,850.00.

15. This collection represents a decrease in the number of respondents as there were fewer schools requesting a grant.
16. Information gathered by this collection is not published.
17. The Department will display the OMB expiration date.
18. The Department is not seeking exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.

² Source: Office of Personnel Management, “2018 General Schedule (GS) Locality Pay Tables,” <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule>