

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

State Assistance Management System Domestic Results Performance Monitoring Module for the Bureau of Educational and Cultural Affairs (ECA) **OMB Number 1405-XXXX**

A. JUSTIFICATION

1. *Why is this collection necessary and what are the legal statutes that allow this?*

The Department of State's Bureau of Educational and Cultural Affairs (ECA) regularly monitors and evaluates its programs through the collection of data of program performance in order to enable staff to assess the impact of its programs, where improvements may be necessary, and to modify and plan future programs.

As a normal course of business and in compliance with OMB Guidelines contained in Circular A-110, recipient organizations are required to provide, and the U.S. State Department required to collect, periodic program and financial performance reports (See A-110: www.whitehouse.gov/omb/circulars/a110/a110.html). 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.

Parts of this process--from the application review to the creation and approval of a funding package--are already being managed by ECA using the State Assistance Management System Domestic (SAMS-D) database, which was deployed to all State Department bureaus in FY18. The Results Performance Monitoring Module (RPM) is an extension module within SAMS-D that will provide ECA with a bureau-wide, uniform monitoring and evaluation tool that will:

- 1) centralize program data and documentation;
- 2) provide the capability to record, search, sort, and disaggregate detailed quantitative and qualitative data to evaluate programs and functional strategies;
- 3) more easily respond to information request from Congress, OMB, and ECA senior leadership;
- 4) provide the functionality to conduct strategic reviews, and create data visualizations and custom reports based on bureau needs; and
- 5) address several monitoring and evaluation deficiencies at the Department as identified by GAO in their report to Congressional Committees (GAO-19-77)

Legal authorities and administrative requirements that necessitate the collection of these data can be found below:

1. OMB Circular A-110 (.51 and .52)
2. Government Performance and Results Act of 1993 (GPRA)
3. Government Performance and Results Modernization Act of 2010 (GPRAMA)
4. Mutual Educational and Cultural Exchange Act of 1961, as amended, 22 U.S.C. 2451 *et seq* (also known as the Fulbright-Hays Act)

2. What business purpose is the information gathered going to be used for?

The primary users of the collected data will be ECA and its implementing partners. The information collected will be used to monitor performance at the project, program, and bureau levels in order to inform any beneficial program adjustments to strengthen the utility and cost-effectiveness of the projects, programs, and the bureau.

Representatives of the implementing partners are already required to enter grant data through SAMS-D. The RPM module will allow ECA to collect performance monitoring data by expanding on an existing system that implementing partners are required and trained to use already. This will allow ECA to have all of its implementing partners report against the established objectives and performance indicators of their projects using standardized reporting templates that will be linked to other award data that are easily accessible to staff across ECA. The major workplan activities as well as indicator data will be automatically listed in the module and will enable implementing partner organizations to easily notify the State Department of progress, delays, and requested changes to the workplan. The module also provides ECA with a tool to systemize its data collection and to enhance and streamline its regular bureau-wide and department-wide reporting and responsiveness to ad hoc taskers and other inquiries.

3. Is this collection able to be completed electronically (e.g. through a website or application)?

This collection of information is completely electronic, but for organizations that are unable to submit their reports online, they will be able to submit a word document or PDF as the report. Nonetheless, performance reports that are submitted outside of the system will be uploaded to the system in order to ensure all reports are accessible to all relevant State Department officials in Washington and overseas.

4. Does this collection duplicate any other collection of information?

The information in SAMS-D RPM is not duplicative of information maintained elsewhere or otherwise available. The standardized format and cumulative results reporting features make SAMS-D RPM a completely new and vital way to capture performance monitoring data, as it will provide the Bureau with a snapshot of the progress of the program at the time of reporting – versus ECA staff needing to find previous reports and compare data provided in a narrative format.

5. Describe any impacts on small business.

Small businesses that are currently ECA implementing partners will be requested to use the system to report their data as well. However, we do not envision that this will be more burdensome than the reporting that they are currently required to do, as only the delivery mechanism for the performance monitoring data section of the report is changing, not the reporting itself.

6. What are consequences if this collection is not done?

The ability to effectively assess the performance of individual exchanges and a broader portfolio of programs necessitates standardized reporting in an electronic format. OMB regulations require that implementing partners provide regular progress reports during the period of performance. The use of the SAMS-D RPM serves to streamline the process for implementing partners and to improve monitoring and evaluation capabilities of the U.S. Department of State – which furthers the improvement of our program management processes and adaptability.

7. Are there any special collection circumstances?

This data collection involves no special circumstances.

8. Document publication (or intent to publish) a request for public comments in the Federal Register

The 60-day Federal Register Notice was published on Monday, December 9, 2019 (84 FR 10950). One comment was received in that period. In summary, the commenter requested further information regarding the obligation to respond, methodology for calculating burden estimates and whether respondents could respond electronically or on paper. In response, ECA has modified the supporting statement and Federal Register notice where necessary.

9. Are payments or gifts given to the respondents?

No payments or gifts are proposed for respondents.

10. Describe assurances of privacy/confidentiality

The RPM is an extension module of SAMS-D, which is a password protected, web-based database (https://mygrantstrain.service-now.com/grants/portal_login.do). However, there are no assurances of confidentiality given. ECA and its external contractors follow all procedures and policies stipulated under the Privacy Act of 1974 to guarantee the privacy of the respondents.

11. Are any questions of a sensitive nature asked?

There are no questions that are of a sensitive nature.

12. Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection

There are no additional hours added to customary and usual business practices. It is estimated that writing a semi-annual report takes each implementer an average of 20 hours per report. (This ranges anywhere from 4 to 30 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). Implementing partners already include performance monitoring information in their semi-annual reports; the RPM provides an easy-to-use format to input and calculate performance monitoring data, thus replacing the need to report in narrative format. ECA estimates that the Department will on average provide grants to approximately 100 implementing partners per year in the future, in which all will be requested to report through the RPM. The average annual burden for reporting via the RPM system is 5,000 hours (20 hours per report x 2 reports per year x 100 implementing partners; plus an additional estimated 50 responses for those implementing partners that may report more frequently than semi-annually). The Department used the Performance Management and Evaluation Services Indefinite Delivery Indefinite Quantity (PMES – IDIQ)¹ – a contract mechanism designed to provide Department of State bureaus with a streamlined contracting process to acquire monitoring and evaluation services – to estimate the burden hour cost for mid-level performance monitoring specialist, which is \$147.06 in 2017 USD. The Department adjusted that to 2019 USD by increasing the rate by five percent², bringing the cost to \$154.41. Annually, the estimated cost is \$77,050.00 (\$154.41 per hour x 5,000 hours annually).

13. Describe the monetary burden to respondents (out of pocket costs) needed to complete this collection.

There are no costs incurred by respondents, as respondents are currently required to use the SAMS-D database for reporting.

14. Describe the cost incurred by the Federal Government to complete this collection.

The estimated cost burden to the Federal government is \$95,340 per year. The Federal Government estimate is based on the cost to ECA for the SAMS-D RPM system as well as costs to customize, maintain, and update the database, as well as the number of hours ECA staff devote to maintaining and updating the RPM. The average number of hours the Department estimates being devoted to this purpose is 1,000 per year. The average hourly salary of \$47.67 (GS-13 Social Science Analyst) was used in making this calculation. The

¹ <http://cas.state.gov/evaluation/step-1-what-is-the-pmes-idiq/>

² https://www.bls.gov/data/inflation_calculator.htm

Department estimated that the cost of fringe benefits using a rate of 69 percent³ and an overhead rate of 31 percent⁴ leading to an hourly rate of \$95.34 with benefits and overhead.

The SAMS-D RPM was funded by the Department of State's Bureau of Near Eastern Affairs prior to the request for this collection and final costs are unknown. For this specific collection, ECA paid a one-time, up-front cost of \$67,000 to gain access to the system. There are no expected ongoing maintenance costs to ECA (as the Department's Acquisitions Bureau maintains the system and has a budget line item); costs will only be incurred in relation to this collection if ECA determines modifications need to be made for the system to further suit its needs. The necessity for potential modifications and the costs of them are unable to be estimated.

15. Explain any changes/adjustments to this collection since the previous submission

This is a new submission.

16. Specify if the data gathered by this collection will be published.

Information collected is not intended for publication, although ECA may share data in part or whole with external stakeholders such as the U.S. Congress or through social media posts to highlight results from specific programs in published reports in the future. Program report information is used by the State Department to monitor and evaluate the performance of its programs. The information is used to evaluate current programs, assess future programming needs and maximize the effective use of resources.

17. If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.

The Department will display the OMB expiration date.

18. Explain any exceptions to the OMB certification statement below.

The Department is not seeking exceptions to the certification statement.

³ Source: Congressional Budget Office, "Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015" (April 2017), <https://www.cbo.gov/publication/52637>. The wages of Federal workers averaged \$38.30 per hour over the study period, while the benefits averaged \$26.50 per hour, which is a benefits rate of 69 percent.

⁴ Source: U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis" (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 69 percent from the recommended rate of 100 percent.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.