

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

SECTION A. JUSTIFICATION

1. Need for the information collection.

USAID is implementing the Development Information Solution (DIS) Pilot to consolidate reporting, improve efficiencies, and facilitate evidence-based decision-making.

The purpose of this information collection is to require USAID contractors and grant recipients from 15 pilot missions to 1) submit information to request access to the DIS and 2) to submit indicator information to the DIS, which is collected under special award requirements unique to each award. The Agency will also permit contractors and recipients implementing awards issued by other missions to request access to DIS and submit indicator information on a voluntary basis. The burden estimates are based on the Agency's awards worldwide that are most likely to contain requirements for the submission of indicator information.

In order to request access to the DIS, contractors and recipients of grants and cooperative agreements will need to submit the following information to USAID using either the Development Information Solution System Access Request Form, AID 545-11 (11/2020) or, when available, an electronic form integrated into DIS: Name, Contact Telephone Number, Name of Organization, Login.gov Username (address used for Login.gov access), Award Number, Award Expiration Date, Activities for Which Access is Requested, and a signature and date to acknowledge agreement to the listed Rules of Behavior.

Contractors and recipients will use this access during the pilot to submit indicator data and narratives, including on the deviation between targets and actuals. This indicator information is a subset of award performance information collected under special award requirements. As the DIS pilot progresses, USAID will use information from the pilot to inform rulemaking under Regulation Identifier Number (RIN) 0412-AA90, which will require contractors and grant recipients to submit all digital information collected under other award terms to be submitted to USAID through the DIS. This information collection request will be updated in conjunction with the rulemaking to capture digital information submission requirements for information collected under such other award terms. The Agency acknowledges that it is necessary to follow the guidelines of PRA and are currently working to bring the collection into compliance as needed.

The Development Information Solution (DIS) is a suite of IT tools that integrate into a unified portfolio management system. It will be used Agency-wide to standardize collection of information across the Agency and to improve business and operational efficiencies. The solution will also meet the requirements of the Foundations for Evidence-Based Policymaking Act of 2018 (P.L. 115-435) and OMB's Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018 (M-19-23) by increasing interoperability and information accessibility by employing machine readable and open formats, data standards, and common core and extensible metadata. The DIS affords the Agency with a scalable solution while fulfilling executive mandates to ensure information privacy, confidentiality, and security.

## 2. Use of the Information.

The information collection will be used to create a user account in DIS - using [www.login.gov](http://www.login.gov) authentication service - to enable contractors and recipients to submit indicator information and interface with their Agreement Officer Representative (AOR) or Contracting Office Representative (COR) directly through the DIS. The GSA System of Records Notice (SORN) is entitled "[login.gov](http://www.login.gov)" (GSA/TTS-1). The GSA SORN was published in the Federal Register on August 10, 2017 (82 FR 6552) <https://www.federalregister.gov/documents/2017/08/10/2017-16852/privacy-act-of-1974-system-of-records>.

The Agency has not collected information to facilitate the creation of DIS user accounts previously, because contractors and recipients used alternate methods to submit information to the Agency, including delivery in hard copy, electronically by email or, in some cases, to other systems. The development of the DIS will enable users to submit reports electronically to the Agency, however, in order for contractors and grantees to use the system they're required to obtain a user account through <https://www.login.gov> to access the portal. Indicator information will be used by the Agency for portfolio management.

## 3. Use of Information Technology.

The information required from contractors and recipients to register for access to DIS is currently on a paper form which has been in internal use, however USAID is in the process of designing an electronic method for contractors and recipients to submit the information required on the form directly into the DIS. Information technology must be used in order to access DIS through [dis.usaid.gov](http://dis.usaid.gov), which redirects implementing partner users through <https://www.login.gov> for authentication. The DIS pilot will provide a standardized way for

contractors and recipients to submit indicator information, which is currently submitted with other performance reporting to USAID via alternate methods.

The DIS solution will provide an authoritative platform from which users can extract data and will incorporate tagging and taxonomies to facilitate compliance with OMB Bulletin 12-01, *Guidance on Collection of U.S. Foreign Assistance Data* and the *Foreign Aid Transparency and Accountability Act*. The solution will also meet the requirements of the *Foundations for Evidence-Based Policymaking Act* by increasing interoperability and information accessibility by employing machine readable and open formats, data standards, and common core and extensible metadata. The DIS affords the Agency with a scalable solution while fulfilling executive mandates to ensure information privacy, confidentiality, and security.

#### 4. Non-duplication.

We have reviewed these requirements to ensure that they are not duplicated by other agency-specific or Government-wide policies.

#### 5. Burden on Small Business.

The collection of the information does not have a significant impact on a substantial number of small businesses or other small entities.

The estimated cost to the public is based on reports from USASpending.gov for Fiscal Years (FY) 18-20. Data was filtered to exclude contracts in support of the Agency's operations and those performed in the U.S., which are unlikely to require performance reporting with indicator data, which is associated with the delivery of foreign assistance. The cost per hour is based on the May 2019 U.S. Bureau of Labor Statistics wage data for the mean hourly cost of Occupation Code 13-1198, Project Management Specialists and Business Operations under NAICS Code: 541990 - All Other Professional, Scientific, and Technical Services. The mean wage for this Occupation Code is \$37.62 per hour, as reported at: [https://www.bls.gov/oes/current/naics4\\_541900.htm](https://www.bls.gov/oes/current/naics4_541900.htm)

The Estimated Burden for the DIS Access Request is based on the average number of new contracts, including delivery/task orders, awarded to small businesses each year in the following fiscal years (FY) that are likely to require performance reporting. In FY20 there were 22 contracts, in FY19 there were 36 contracts and in FY18 there were 21 contracts for a total of 79 over three FYs. When averaged, we determined that approximately 26 new contracts were likely to be impacted annually. We estimated that each small business would create two user accounts per contract, even though only one user will report indicator data quarterly. We estimated that initial registration would take approximately 30 minutes per account. We estimated that the

annual public burden on small businesses to submit a DIS access request will be approximately \$978.

Estimated Burden on Small Businesses: DIS Access Request (Frequency: One Time)	
Number of respondents (average)	26
Responses per respondent (creation of 2 user accounts)	2
Annual number of responses	52
Initial Registration Calculated at 30 Minutes per account	.50
Total Estimated hours annually	26
Cost per hour (hourly wage)	\$37.62
Annual public burden (reporting)	\$978.12

We calculated the average period of performance for an award to small businesses as 3.4 years. Therefore, we extrapolated that based on an average of 26 new awards to small businesses each year, about 88 awards are active at any given time, for which indicator information would be reported.

We estimated that each submission of indicator information should take 150 minutes (2.5 hours) per small business, totalling 10 hours annually. We estimated the annual public burden on small businesses to submit indicator information would be approximately \$33,106.

Estimated Burden on Small Businesses: Indicator Information Submission (Frequency: Quarterly)	
Number of respondents (average)	88
Average reporting responses per respondent (4 per year)	4
Annual number of responses	352
Submission Calculated at 150 Minutes per response (approximately)	2.5
Total Estimated hours annually	880
Cost per hour (hourly wage)	\$37.62
Annual public burden (reporting)	\$33,105.60

The total Annual public burden for small business compliance with both the DIS Access Request and Indicator Information portions of this information submission will be approximately \$34,084.

6. Less frequent collection.

The data to initiate DIS account access will be collected when the contractor or grantee applies for an account. Once the account has been created, the user will be able to login into the system through [dis.usaid.gov](https://dis.usaid.gov) (users' access will be authenticated through [https://www/login.gov](https://www.login.gov).)

7. Explain any special circumstances.

N/A. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. Consultation and public comments.

USAID published a 60-day notice in the Federal Register at 85 FR 83027 soliciting public comments on the proposed information collection. USAID received 46 comments in total from four different entities. A discussion of the comments relevant to the 60-day notices is provided in the 30-day notice. The estimated burden was increased as the result of one comment which suggested that the Agency had underestimated the amount of time that would be required for the quarterly submission of indicator information. The Agency did not address comments unrelated to, or outside the scope of, the notice at 85 FR 83027. USAID published the 30-day notice in the Federal Register at 86 FR 28053.

9. Gift to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents, only remuneration to contractors under their contracts.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

This information is disclosed only to the extent consistent with prudent business practices and current regulations.

11. Additional justification for any questions of a sensitive nature.

No questions of a sensitive nature are included in this information collection.

12. Provide estimates of the hour burden of the collection of information.

a. (1) Estimation of Respondent Burden for acquisition awards.

The estimated cost to the public is based on reports from USASpending.gov for Fiscal Years (FY) 18-20. Data was filtered to exclude contracts in support of the Agency’s operations and those performed in the U.S., which are unlikely to require performance reporting with indicator data, which is associated with the delivery of foreign assistance. The cost per hour is based on the May 2019 U.S. Bureau of Labor Statistics wage data for the mean hourly cost of Occupation Code 13-1198, Project Management Specialists and Business Operations under NAICS Code: 541990 - All Other Professional, Scientific, and Technical Services. The mean wage for this Occupation Code is \$37.62 per hour, as reported at:

[https://www.bls.gov/oes/current/naics4\\_541900.htm](https://www.bls.gov/oes/current/naics4_541900.htm)

The Estimated Burden for the DIS Access Request is based on the average number of new contracts, including delivery/task orders, awarded to contractors each year in the following fiscal years (FY) that are likely to require performance reporting. In FY20 there were 111 contracts, in FY19 there were 118 contracts and in FY18 there were 131 contracts for a total of 360 over three FYs. When averaged, we determined that approximately 120 new contracts were likely to be impacted annually. We estimated that each contractor would create two user accounts per contract, even though only one user will report indicator data quarterly. We estimated that initial registration would take approximately 30 minutes per account. We estimated that the annual public burden on contractors to submit a DIS access request will be approximately \$4,514.

Estimated Burden on Contractors: DIS Access Request (Frequency: One Time)	
Number of respondents (average)	120
Responses per respondent (creation of 2 user accounts)	2
Annual number of responses	240
Initial Registration Calculated at 30 Minutes per account	.50
Total Estimated hours annually	120
Cost per hour (hourly wage)	\$37.62
Annual public burden (reporting)	\$4,514.40

We calculated the average period of performance for an award to contractors as 3.9 years. Therefore, we extrapolated that based on an average of 120 new contracts awarded each year,

about 468 awards are active at any given time, for which indicator information would be reported.

We estimated that each submission of indicator information should take 150 minutes (2.5 hours) per contractor, totalling 10 hours annually. We estimated the annual public burden on contractors to submit indicator information would be approximately \$176,062.

Estimated Burden on Contractors: Indicator Information Submission (Frequency: Quarterly)	
Number of respondents (average)	468
Average reporting responses per respondent (4 per year)	4
Annual number of responses	1,872
Submission Calculated at 150 Minutes per response (approximately)	2.5
Total Estimated hours annually	4,680
Cost per hour (hourly wage)	\$37.62
Annual public burden (reporting)	\$176,061.60

The total annual public burden for contractor compliance with both the DIS Access Request and Indicator Information portions of this information submission will be approximately \$180,576.

While the burden for these information collections falls on the public, the cost for these collections falls under the federal cost burden, since they are either direct or indirect expenses reimbursable under federal contracts.

12 (a)(2) Estimation of Respondent Burden for federal assistance awards (grants and cooperative agreements).

The estimated cost to the public is based on reports from USASpending.gov for Fiscal Years (FY) 18-20. Data was filtered to exclude assistance awards performed in the U.S., which are unlikely to require performance reporting with indicator data, which is associated with the delivery of foreign assistance. The cost per hour is based on the May 2019 U.S. Bureau of Labor Statistics wage data for the mean hourly cost of Occupation Code 13-1198, Project Management Specialists and Business Operations under NAICS Code: 541990 - All Other Professional,

Scientific, and Technical Services. The mean wage for this Occupation Code is \$37.62 per hour, as reported at: [https://www.bls.gov/oes/current/naics4\\_541900.htm](https://www.bls.gov/oes/current/naics4_541900.htm)

The Estimated Burden for the DIS Access Request is based on the average number of new assistance awards, including grants and cooperative agreements, awarded to recipients each year in the following fiscal years (FY) that are likely to require performance reporting. In FY20 there were 1,129 awards, in FY19 there were 1,021 awards, and in FY18 there were 1,041 awards for a total of 3,191 over three FYs. When averaged, we determined that approximately 1,064 new assistance awards were likely to be impacted annually. We estimated that each recipient would create two user accounts per award, even though only one user will report indicator data quarterly. We estimated that initial registration would take approximately 30 minutes per account. We estimated that the annual public burden on recipients to submit a DIS access request will be approximately \$40,028.

Estimated Burden on Recipients: DIS Access Request (Frequency: One Time)	
Number of respondents (average)	1,064
Responses per respondent (creation of 2 user accounts)	2
Annual number of responses	2,128
Initial Registration Calculated at 30 Minutes per account	.50
Total Estimated hours annually	1,064
Cost per hour (hourly wage)	\$37.62
Annual public burden (reporting)	\$40,027.68

We calculated the average period of performance for an assistance award to recipients as 2.2 years. Therefore, we extrapolated that based on an average of 1,064 new assistance awards awarded each year, about 2,341 awards are active at any given time, for which indicator information would be reported.

We estimated that each submission of indicator information should take 150 minutes (2.5 hours) per recipient, totalling 10 hours annually. We estimated the annual public burden on recipients to submit indicator information would be approximately \$880,684.

Estimated Burden on Recipients: Indicator Information Submission (Frequency: Quarterly)	
Number of respondents (average)	2,341
Average reporting responses per respondent (4 per year)	4



Annual number of responses	9,364
Submission Calculated at 150 Minutes per response (approximately)	2.5
Total Estimated hours annually	23,410
Cost per hour (hourly wage)	\$37.62
Annual public burden (reporting)	\$880,684.20

The total annual public burden for recipient compliance with both the DIS Access Request and Indicator Information portions of this information submission will be approximately \$920,712.

While the burden for these information collections falls on the public, the cost for these collections falls under the federal cost burden, since they are either direct or indirect expenses reimbursable under federal assistance awards.

**b. Total Estimation of Respondent Burden**

Based on the estimated burden set forth for contractors in 12(a)(1) and for recipients of Federal assistance awards in 12(a)(2), the summary charts below show the combined estimated burden for contractors and recipients.

Estimated Burden on Contractors and Recipients: DIS Access Request (Frequency: One Time)	
Number of respondents (average)	1,184
Responses per respondent (creation of 2 user accounts)	2
Annual number of responses	2,368
Initial Registration Calculated at 30 Minutes per account	.50
Total Estimated hours annually	1,184
Cost per hour (hourly wage)	75.24
Annual public burden (reporting)	\$89,084.16

Estimated Burden on Contractors and Recipients: Indicator Information Submission (Frequency: Quarterly)
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Number of respondents (average)	2,809
Average reporting responses per respondent (4 per year)	4
Annual number of responses	11,236
Submission Calculated at 150 Minutes per response (approximately)	2.5
Total Estimated hours annually	28,090
Cost per hour (hourly wage)	\$75.24
Annual public burden (reporting)	\$2,113,492.00

13. Respondent Costs Other Than Burden Hour Costs.

There are no capital, start-up costs, or operation and maintenance costs associated with this collection.

14. Cost to the Federal Government.

The estimate of the annualized cost to the federal government is the sum of the cost of federal employee effort for each collection (“Estimated cost to the Federal Government” for both creating logins to the partner portal) and monitoring contractor and recipient submissions and the cost of the Annual Public Burden under both acquisition and assistance awards as it will be reimbursed by the government through contracts, grants and cooperative agreements. The annualized cost of federal employee effort is \$692,415.

<b>Estimation of Burden Hours: Agency Portfolio View Creation</b>			
<b>Estimated Cost to USAID to Create Partner Portal Account</b>	<b>Estimated Number</b>	<b>Estimated Level of Effort for USAID</b>	<b>Estimated Cost to the Federal Government</b>
	1,184 awards	1 hour per portal account	GS-13 Step 5: \$55.75 * 1,184 hours = \$66,008

Estimated Cost to	11,236 responses	1 hour per	GS-13 Step 5:
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USAID to Monitor Contractor and Recipient Submissions		quarterly response	\$55.75*11,236 hours=\$626,407
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Based on the tables in Item 12, the annualized cost of the burden on contractors and recipients is \$1,101,288. Therefore, the estimate of the annualized cost to the federal government, including the cost of federal employee effort and burden on contractors and recipients reimbursed through awards, is \$1,793,703.

15. Reason for change in burden estimates from the previous approved clause.

This submission requests OMB approval for a new information collection requirement.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This information collection will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable.

18. Explain each exception to the certification statement identified in item 19, "certification for paperwork reduction act submissions," on OMB Form 83-1.

There are no exceptions to the certification statement identified in item 19.