



## Supporting Statement for Request for Approval under the Paperwork Reduction Act

### A. JUSTIFICATION

1. While the field of international education has made great strides in recent years with raising the number and the quality of impact evaluations, their results are incomplete without cost data for these interventions. USAID country Missions cannot make fully informed decisions about the best way to invest Congressionally approved USAID education funds without information about the costs of achieving outputs and outcomes desired. With the passage of the READ Act, the need for an improved evidence base to drive USAID investment decisions is more urgent than it has ever been before. USAID Education Policy emphasizes the need for collection, analysis, and use of comprehensive cost data in order to inform our own investments as well as decisions in partner countries pertaining to scaling and replicating programs. Detailed data on costs of intervention components are also necessary for program design, budgeting, and management, to ensure that taxpayer money is well-spent and achieve intended results. The proposed form addresses the current gap in USAID financial and technical reporting in capturing data on contributions of third parties to USAID-funded interventions, and details of implementation of these interventions, such as dosage per recipient and characteristics of the beneficiaries.
2. USAID Center for Education within the Development, Democracy and Innovation Bureau (USAID/DDI/EDU) will aggregate and analyze data at the portfolio level and report to Congress and wider stakeholders. USAID Missions will use the information provided from the form to inform management of current awards and support planning and budgeting for future awards. USAID Implementing Partners will use data to inform planning for sustainability of existing USAID activities. Implementing partners are responsible for using the form to collect data and submit it to their AOR/COR.
3. The form will be housed at the Edulinks website: <https://www.edulinks.org/resources/usaid-cost-measurement>. Partners can download the form from the website using Microsoft Excel or .csv format, fill it out and submit it to the USAID/Mission AOR/COR managing the award.
4. There is no similarly available dataset in existence, to our knowledge.
5. Respondents will be recipients of USAID education funds via Mission-held award mechanisms. Such awards are large in size (almost always over \$10 million) and organizations receiving such awards are typically large international for-profit or non-for-profit organizations. Small organizations are sometimes selected as subgrantees; there are clauses for waivers in the reporting requirement if the overall value of the subgrant is less than 5% of the total award. Therefore, the form is not likely to impact small companies.

6. If the collection is not conducted, USAID's education sector that manages over 800 million every year, will continue not to have access to essential information on costs and effects of USAID-funded interventions in the education sector. The purpose of the initiative is to fill this gap and provide needed data to USAID staff and their partners for effective management of Congressionally authorized development assistance funds.
7. Special circumstances:
  - a. Under no circumstances the form will need to be submitted more frequently than quarterly. A general recommendation is to collect the data using the form annually.
  - b. The reporting requirement is included as part of the USAID Mission award so respondents will always have ample time to prepare a submission. USAID does not intend to make this reporting requirement retroactive or apply to existing awards that do not have established procedures for gathering these data.
  - c. All submissions will be electronic.
  - d. There is no requirement to retain records for more than 3 years.
  - e. n/a
  - f. n/a
  - g. It is not expected that confidential or proprietary data will be collected. However, all data will be handled in compliance with USAID privacy regulations. USAID/DDI/EDU will also ensure data security including "need-to-know" access to data, using secure channels for internal transfer of files for analysis, etc. Most importantly, USAID/DDI/EDU will report the results of data analysis in aggregate to protect privacy of individual companies and projects submitting data.
8. The 60-day notice for the proposed information collection was published in the Federal Register on 07/18/2019 under Document Citation #84 FR 34332. One response was received asking to share the form in question. The form was shared and no additional questions were received. Consultation around the proposed form occurred both within USAID as well as amongst the implementing partners to ensure the questions were reasonable and appropriate and not unduly burdensome. Furthermore, the form was piloted with nine respondents over the course of two years to ensure the burden was minimal and data collected were useful.

A 30-day notice was originally published on 12/03/2019 under Document Citation #84 FR 66146. Due to the amount of time that has elapsed since the original publication, a new 30-day notice was published on 09/28/21 under Document Citation #86 FR 53628.
9. N/A. No payment or gift will be made available to respondents. Data will be collected as part of USAID Mission award technical reporting requirements.
10. All data submitted by USAID award recipients will be handled in compliance with USAID privacy regulations. USAID's Office of Education will also ensure data security including "need-to-know" access to data, using secure channels for internal transfer and storage of files, and appropriate training on appropriate handling of data for data analysts. USAID/DDI/EDU will analyze all collected data annually and report the results of data analysis in aggregate to protect privacy of individual companies and projects submitting

data. This data collection does not require a system of records notice (SORN) or privacy impact assessment (PIA).

11. N/A, there are no sensitive questions included in the form.
12. The estimate of burden was made based on consultations with a small group (fewer than 10 individuals) of representatives of would-be-respondents - organizations that receive USAID education funds to implement education programming in USAID partner countries. The estimate for the total labor burden on the public was based on an assumption of 120 USAID-funded education activities eligible for reporting using the form each year.
  - a. Estimated 120 respondents per year = 120 annual respondents
  - b. Estimated time to complete the form per respondent = between 6 and 10 hours, averaging 8 hours.
  - c. Total number of annual hours for form completion =
    - i. 120 respondents x 8 hours = 960 hours
  - d. Estimated annual hour burden = 960 hours
  - e. The submission of the form is part of the award technical reporting requirement and therefore paid for by the US government.
  - f. n/a
13. There is no annual cost burden to respondents. The submission of the form is part of the existing annual reporting packet and therefore does not incur any additional costs.
  - a. Zero. There is no capital equipment cost dedicated to this data collection.
  - b. Zero. There is no operations and maintenance cost dedicated to this data collection.
14. The main costs incurred were the development costs of the form: the initial drafting, piloting and subsequent adaptations. The anticipated annual cost to the Government for the annual data collection include time for USAID contractor staff to populate and transmit the forms:
  - i. Annual labor to collect and transmit data: \$64.85 (based on Bureau of Labor Statistics hourly rate for general and operations managers) x 960 = \$62,256
  - ii. G&A: \$23,034 (industry average of 37%)
  - iii. Computer and Network Services: \$0 since transmission is made as part of the annual project reporting already accounted for.TOTAL annual anticipated: \$85,290
15. N/A. New collection.
16. USAID anticipates annual analysis and publication of general trends in costs of USAID-funded education activities. The analysis will include data from the proposed form alongside with data from other sources, such as financial data and evaluation results. The analysis approach is presented in USAID/Washington publication *Cost Analysis Guidance for USAID-Funded Education Activities* currently planned for publication by USAID in December of 2019. Both analysis and reporting parameters are presented in

this document. Data will be analyzed using 4 different approaches. These include cost economy, cost-efficiency, cost-effectiveness, and scaling. Disaggregated data allows for more rigorous analysis including adjusting for inflation, discounting, and amortization and depreciation. Data will be analyzed by USAID and reported annually in a report released in April of each year.

17. We would like not to include the expiration date. Including the expiration would signal to the partners that they may not need to collect this data after the date, while USAID intends to request the renewal at the expiration time. This data is essential for USAID programming.

18. N/A.

## **B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

N/A.