SUPPORTING STATEMENT FOR REQUEST FOR APPROVAL UNDER
THE PAPERWORK REDUCTION ACT AND 5 CFR 1320
USAID Acquisition Regulation: United States Agency for International Development (USAID)
Acquisition Regulation (AIDAR): Planning, Collection and Submission of Digital Information
as well as submission of Activity Monitoring, Evaluation, and Learning Plans to USAID.
RIN#0412-AA90

SECTION A. JUSTIFICATION

1. <u>Need for the information collection</u>.
The outlined information collection is an element of a proposed rule that implements USAID
requirements for managing digital information data as a strategic asset to inform the planning,
design, implementation, monitoring, and evaluation of the Agency's foreign assistance programs.
The proposed rule will incorporate a new subpart 727.70, Digital Information Planning,
Collection and Submission Requirements and the corresponding clause, as well as a new clause
entitled "Activity Monitoring, Evaluation, and Learning Plan Requirements" into the USAID
Acquisition Regulation (AIDAR). This rule is intended to streamline and standardize certain
contract requirements, increase efficiency, and improve the use of data and other forms of digital
information across the Agency's programs and operations.

2. <u>Use of the Information.</u>

USAID uses digital information gathered via its contracts to design, implement, monitor, and
evaluate its international development and humanitarian assistance programs. This information
facilitates the Agency's ability to collaborate, learn, and adapt while building a solid foundation
for evidence based decision making.

USAID expects that this rule will reduce the total number of web-based portals through which
contractors submit digital information under the terms of their awards to USAID, with the
preponderance of those submissions directed through a single portal called the USAID Digital
Front Door (DFD). By implementing these changes, USAID intends to reduce administrative
burden on contractors and USG staff. USAID will conduct a rigorous risk assessment of digital
information that contractors submit to USAID to determine the appropriate permissions and
restrictions on access to the digital information. USAID may release the data publicly in full,
redact or otherwise protect aspects of the information prior to release, or hold the information in
a non-public status.

3. <u>Use of Information Technology.</u>

The proposed rule requires that contractors use only digital methods to the extent practicable to
produce, furnish, acquire, collect and submit information to USAID in performance or their
contracts. Digital information should be, to the extent practicable, in machine readable,
nonproprietary formats. Prior to this rule contractors could submit information in analog (e.g.
paper) formats. Contractors must submit digital information (digital data entered directly into a
computer) through the Digital Front Door (DFD) a single sign-on, electronic portal. Currently
there are multiple portals for submission of information. The exclusive use of digital, automated

technology for the production, collection, and submission of information will reduce the burden and increase the efficiency of both contractors and Agency staff.

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. Data was pulled from the internal financial and contract writing systems, Federal Procurement Data System, and USAspending.gov for USAID with funding accounts affected by this rule for FY2018-FY2020 to determine the number of contracts, entities and total spend. Based on these data, USAID determined that on an annual basis, 287 small business contracts will be impacted. Over a 20-year period, this will result in a total undiscounted cost of $24,969,546 for small business contracts, or $4,350 per contract per year.

6. Less frequent collection.

Collecting data less frequently than specified in the rule has the potential to significantly disrupt programmatic and operational performance for USAID.

7. Explain any special circumstances.

There are no special circumstances as described in the guidelines.

8. Consultation and public comments.

In this publication, USAID is soliciting public comments in a 60-day Federal Register Notice of Public Information Collections. USAID will respond to any comments it receives.

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.   Data management plan preparation, submission, and maintenance

According to data from the Federal Procurement Data System (FPDS) for years 2018 to 2020, USAID awards an average of 679 new applicable prime contracts per year. The average period of performance for an applicable contract is 1.9 years.

Preparation: In order to determine what percentage of contracts will need a fully detailed data management plan, USAID used data from the FPDS. Based on these data, USAID determined that only 60% of all applicable contracts will need a fully detailed data management plan. Based on discussions with subject matter experts, we estimate that the average contract that requires a fully detailed data management plan generates five evaluation data assets, five data quality assessment assets, three field-based monitoring assets, and one GIS dataset. Subject matter experts estimate that a contractor will spend three hours developing a data management plan for every data asset. Therefore, USAID estimates that the average contract that requires a fully detailed data management plan will spend 42 hours developing a data management plan in the first year of the contract. For the other 40% of contracts, USAID estimates that contractors will spend two hours filling out a very limited data management plan. USAID estimates that all contractors will spend two hours being trained on data management planning in the first year of the contract.

(40% * 2) + (60% * 42)= 26 hours in the first year + 2 hours of training in first year = 28 hours

Maintenance: In subsequent years, USAID estimates that the annual maintenance of the data management plan should take half of the time originally spent in developing the data management plan, or 21 hours per year, for full data management plans. General tasks will include checking to confirm that nothing has changed between years, adding any additional data assets as necessary, and modifying data assets that may have changed between the previous year. For those who did not need to develop a detailed data management plan, USAID estimates that contractors will spend no hours on maintenance.

(40% * 0) + (60% * 21)= 12.6 hours in subsequent years

Submission: USAID also estimates that submitting the DMP to the COR should not take more than 30 minutes (0.5 hours), since it will involve emailing the DMP to the COR for review.

Estimated time spent on DMP preparation, maintenance, and submission

Year	Actions Per Year	Number of New Contracts	Hours per Action (New Contracts)	Number of Ongoing Contracts	Hours Per Action (Ongoing Contracts)	Total Hours Per Year
1	1	679	28.5	0	13.1	19,351
2	1	679	28.5	619	13.1	27,460

…	1	679	28.5	619	13.1	27,460
20	1	679	28.5	619	13.1	27,460

   b. AMELP preparation, submission, and maintenance

According to data from the Federal Procurement Data System (FPDS) for years 2018 to 2020, USAID awards an average of 196 applicable prime contracts per year. The average period of performance for an applicable contract is 4 years.

Preparation: Based on discussions with subject matter experts, we estimate that the process of writing an AMELP should take approximately 64 hours of labor.

Maintenance: After the first year, the AMELP will need to be maintained on an annual basis, since it is a living document subject to changes based on new knowledge. We estimate that after the first year, the annual time spent maintaining the AMELP will be 32 hours per year.

Submission: Every time that the AMELP is revised, it will need to be submitted to the contracting officer's representative for approval. We estimate that this submission process will take approximately one hour per year to complete.

Estimated time spent on AMELP preparation, maintenance, and submission

Year	Actions Per Year	Number of New Contracts	Hours per Action (New Contracts)	Number of Ongoing Contracts	Hours Per Action (Ongoing Contracts)	Total Hours Per Year
1	1	196	65	0	33	12,740
2	1	196	65	196	33	19,208
3	1	196	65	392	33	25,676
…	1	196	65	588	33	32,144
20	1	196	65	588	33	32,144

   c. Registration on USAID's Digital Front Door

According to data from the Federal Procurement Data System (FPDS) for years 2018 to 2020, USAID awards an average of 679 new applicable prime contracts per year. The average period of performance for an applicable contract is 1.9 years. USAID estimates that each contractor will create two user accounts per contract, even though only one user will report indicator data

quarterly. USAID estimates that initial registration would take approximately 30 minutes per account. After the first year, USAID estimates that contractors will create no additional accounts.

Estimated time of registration on USAID's Digital Front Door

Year	Actions Per Year	Number of New Contracts	Hours per Action (New Contracts)	Total Time Per Year
1	1	679	1	679
2	1	679	1	679
…	1	679	1	679
20	1	679	1	679

    d. Data submission

According to data from the Federal Procurement Data System (FPDS) for years 2018 to 2020, USAID awards an average of 679 new applicable prime contracts per year. The average period of performance for an applicable contract is 1.9 years. Estimates are based on contractor and staff experience during 2015, during user experience testing, and confirmed by SMEs as still relevant in 2021. Time estimates for each of the data processing steps are as follows:

Development Experience Clearinghouse: 7.5 submissions per year per contract (on average) x 15 mins per submission = 1.875 hours per year per contract

Development Data Library:

Detailed time estimates broken down by the standard steps of the process are as follows:

1. Create Codebook = 250 minutes
Assumes a spreadsheet with 50 columns, requiring 5 minutes of documentation per column)
2. Convert to Non-Proprietary Format = 2.5 minutes
3. Complete Submission Form = 20 minutes
4. Upload Dataset = 12.5 minutes

Total Time Estimate = 4.75 hours (285 minutes) (summation of the five steps above)

1.08 datasets per year per contract (on average) x 4.75 hours per dataset = 5.13 hours per year per contract

USAID Digital Front Door

Based on the pilot, USAID estimates that USAID contractors will spend 15 mins per quarter (1 hour per year) submitting indicators to the USAID Digital Front Door = 1 hour per year per contract for indicators

USAID also estimates that USAID contractors will spend 15 mins per quarter (1 hour per year) submitting geospatial activity location data for every activity/contract via the USAID Digital Front Door = 1 hour per year per contract for geospatial data

For all data submission, the total components sum to:

9 hours per year per contract

23.56 actions per contract per year

Therefore, USAID estimates that contractors will spend 0.38 hours per action per contract per year.

Estimated time for data submission

Year	Actions Per Year (New and ongoing)	Number of New Contracts	Hours per Action (New Contracts)	Number of Ongoing Contracts	Hours Per Action (Ongoing Contracts)	Total Hours Per Year
1	23.6	679	0.38	0	0.38	6,089
2	23.6	679	0.38	619	0.38	11,640
…	23.6	679	0.38	619	0.38	11,640
20	23.6	679	0.38	619	0.38	11,640

e. Plan for the regular and systematic collection of feedback from beneficiaries

According to data from the Federal Procurement Data System (FPDS) for years 2018 to 2020, USAID awards an average of 196 applicable prime contracts per year. The average period of performance for an applicable contract is 4 years. Based on discussions with subject matter experts, we estimate that the process of planning for the regular and systematic collection of feedback from beneficiaries will take eight hours in the first year and four hours per year thereafter.

Estimated time for the regular and systematic collection of feedback from beneficiaries

Year	Actions Per Year	Number of New	Hours per Action (New	Number of Ongoing	Hours Per Action (Ongoing	Total Time Per

		Contracts	Contracts)	Contracts	Contracts)	Year
1	1	196	8	0	4	1,568
2	1	196	8	196	4	2,352
3	1	196	8	392	4	3,136
…	1	196	8	588	4	3,920
20	1	196	8	588	4	3,920

    f. Collection of standard indicator data

According to data from the Federal Procurement Data System (FPDS) for years 2018 to 2020, USAID awards an average of 196 applicable prime contracts per year. The average period of performance for an applicable contract is 4 years. Based on discussions with subject matter experts, USAID estimates that the process of collecting data for one standard indicator will take 21 hours. USAID estimates that the average applicable contract involves data collection for 6.4 standard indicators. This estimate is based on review of Activity MEL plans retrieved from the USAID Development Experience Clearinghouse (DEC). USAID searched the DEC for documents with "MEL plan" in the title that were uploaded from 2018 and 2020. In total, USAID included fifteen MEL plans in the calculation after excluding documents that were not actually MEL plans, not MEL plans for contracts, duplicates, or MEL plans that did not provide sufficient information on the number of standardized indicators.

Therefore, it will take 6.4 indicators per contract per year x 21 hours per contract = 134.4 hours per year per contract to collect standard indicator data.

Estimated time for the collection of standard indicator data

Year	Actions Per Year	Number of New Contracts	Hours per Action (New Contracts)	Number of Ongoing Contracts	Hours Per Action (Ongoing Contracts)	Total Time Per Year
1	1	196	21	0	21	4,116
2	1	196	21	196	21	8,232
3	1	196	21	392	21	12,348
…	1	196	21	588	21	16,464
20	1	196	21	588	21	16,464

13. <u>Respondent Costs Other Than Burden Hour Costs.</u>

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

14. Cost to the Federal Government.

    a. COR review and approval of data management plan

According to data from the Federal Procurement Data System (FPDS) for years 2018 to 2020, USAID awards an average of 679 new applicable prime contracts per year. The average period of performance for an applicable contract is 1.9 years. To read through and evaluate the DMP in the first year, USAID estimates that CORs will need to spend between 1 and 4 hours with it (average 2.5). CORs will also likely need 2 hours of training in order to be comfortable reviewing DMPs. After the first year, CORs will probably only spend 1 hour per year at most reviewing any changes to the DMP.

Estimated cost of COR review and approval of data management plan

Year	Actions Per Year (New and ongoing)	Number of New Contracts	Hours per Action (New Contracts)	Number of Ongoing Contracts	Hours Per Action (Ongoing Contracts)	Total Time Per Year
1	1	679	4.5	0	1	72,110
2	1	679	4.5	619	1	86,718
…	1	679	4.5	619	1	86,718
20	1	679	4.5	619	1	86,718

    b. COR review and approval of submissions to the USAID Digital Front Door

According to data from the Federal Procurement Data System (FPDS) for years 2018 to 2020, USAID awards an average of 679 new applicable prime contracts per year. The average period of performance for an applicable contract is 1.9 years.

USAID Digital Front Door: Based on discussions with subject matter experts, USAID estimates that CORs will spend 1 hour per quarterly response for the Digital Front Door x 4 submissions per year = 4 hours per year per contract

DDL: Based on discussions with subject matter experts and historical data from the DDL, USAID estimates that CORs will spend 1 hour to review submission and make sure it contains all necessary artifacts per dataset for DDL for 1.08 submissions per year on average = 1.08 hours per year per contract

DEC: Based on discussions with subject matter experts and historical data from the DEC, USAID estimates that CORs will spend 15 minutes to review every submission for (5-10) 7.5 submissions per year per contract (on average) = 1.875 hours per year per contract

Overall, USAID estimates that CORs will 6.955 hours per year per contract over 15.58 submissions per year = 0.45 hours per year per contract per submission

In the initial year, we also estimate an additional 1 hour for the COR to receive training on the specifics of the clause.

Estimated time for COR review and approval of submissions to USAID Digital Front Door

Year	Actions Per Year (New and ongoing)	Number of New Contracts	Hours per Action (New Contracts)	Number of Ongoing Contracts	Hours Per Action (Ongoing Contracts)	Total Time Per Year
1	15.6	679	1.45	0	0.45	15,359
2	15.6	679	1.45	619	0.45	19,704
…	15.6	679	1.45	619	0.45	19,704
20	15.6	679	1.45	619	0.45	19,704

    c. COR review and approval of AMELP

According to data from the Federal Procurement Data System (FPDS) for years 2018 to 2020, USAID awards an average of 196 applicable prime contracts per year. The average period of performance for an applicable contract is 4 years. Based on discussions with CORs, USAID estimates that in the first year, CORs and other SMEs will spend about 64 hours reviewing, discussing, and getting to the point of approval with contractors on their AMELPs. After that, the time will be significantly less, with USAID estimating an average of 32 hours a year spent reviewing AMELPs in subsequent years.

Estimated time for COR review and approval of AMELP

Year	Actions Per Year	Number of New Contracts	Hours per Action (New Contracts)	Number of Ongoing Contracts	Hours Per Action (Ongoing Contracts)	Total Time Per Year
1	1	196	64	0	32	12,544
2	1	196	64	196	32	18,816
3	1	196	64	392	32	25,088
…	1	196	64	588	32	31 360
20	1	196	64	588	32	31,360

15. <u>Reason for change in burden estimates from the previous approved clause.</u>

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

16. <u>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.</u>

This information collection will not be directly published publicly, though some of the digital information will be published subject to internal USAID policy.

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

Not applicable.

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

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