



MEMORANDUM

DATE: 11/23/2022

TO: Michael McManus, USAID Desk Officer Office of Information and Regulatory Affairs Office of Management and Budget (OMB)

FROM: Beth Tritter, Director, COVID-19 Response Team, Bureau for Global Health at the U.S. Agency for International Development (USAID)

SUBJECT: Justification for Emergency Processing

Summary

USAID is seeking emergency consideration of its Information Collection Review that aims to require a subset of contractors and NGOs receiving USAID funds for COVID-19 global health programming to collect and report performance data on a regular basis through USAID's web-based Development Information Solution (DIS). USAID cannot reasonably comply with the normal clearance procedures under the Paperwork Reduction Act because they would delay the Agency's efforts to monitor activities that further the Administration's Initiative for Global Vaccine Access—thus hindering USAID's ability to save lives, preserve livelihoods, and mitigate risks to critical infrastructure around the world.

Background

The United States is committed to ending the acute phase of the COVID-19 pandemic, both at home and abroad, and has been instrumental in the global response to fight the virus. The emergence of COVID-19 hotspots and variants, including Omicron and its sub-lineages, underscores the importance of this global fight. Vaccinating the world is the best way to prevent future variants that could threaten the health of Americans and undermine our economic recovery.

As part of the U.S. Government's commitment to global frontline efforts to get shots into arms and save lives around the world, USAID Administrator Samantha Power announced the U.S. Government's Initiative for Global Vaccine Access, or Global VAX for short. This initiative expands assistance and enhances interagency and international coordination to identify and overcome vaccine access barriers and save lives now, with a specific emphasis on scaling up and sustaining vaccination support in sub-Saharan Africa. Global VAX brings together a whole-of-government effort, through which the United States has already committed more than \$1.3 billion for vaccine readiness.



As the U.S. Government coordinating Agency for executing the [Initiative for Global Vaccine Access \(Global VAX\)](#), USAID and its implementing partners (IPs) are at the frontlines of delivering shots into arms and saving lives. As the coordinating agency, USAID leads interagency reporting and analysis on progress on this important effort. With widespread availability of vaccines since mid-2021, global vaccination rates have soared, but many countries remain stalled at low rates, particularly among populations at greatest risk of severe disease and death.

This important effort—countering stalled progress to vaccinate the world—requires close coordination across a range of actors and careful tracking of performance indicators for adaptive management, strategic decision-making, and accountability. USAID IPs play a vital role in the collection and reporting of performance indicators that facilitate adaptive management and strategic planning, and ensure that COVID-19 response activities are continually aligned with the Agency and Administration’s primary objectives. Tracking these metrics and timebound targets allow the Agency to systematically monitor and respond to changes in an ever-evolving crisis—in Washington and overseas—including the COVID-19 Task Force (CTF), Technical Bureaus, Regional Bureaus, and field-based Missions.

Proposed Information Collection Activity and Justification

At present, USAID relies on IPs to voluntarily report these data. While many IPs have voluntarily provided rich performance data, reporting rates remain low and limit our ability to comprehensively assess progress and inform decision-making. Incomplete data impedes USAID efforts to use performance data for adaptive management, strategic resource allocations, or to provide an accurate picture of our achievements to key USG and non-governmental stakeholders. Moreover, it compromises efforts to aggregate USAID implementing partner data with that collected by Interagency partners as required by USAID’s role as the Global VAX reporting and analysis lead. The current system of voluntary reporting is not fit-for-purpose under USAID’s lead Global VAX role.

Accordingly, USAID requests emergency OMB approval to conduct this essential information collection activity on a mandatory basis utilizing the web-based Development Information Solution (DIS) platform. Emergency approval is being sought under 5 C.F.R. § 1320.13(a)(2) which allows for emergency processing of collections of information in instances where an agency cannot reasonably comply with the normal clearance procedures because (ii) an unanticipated event – the COVID-19 pandemic – has occurred and (iii) normal procedures would likely prevent or disrupt the timely collection of this information or cause a deadline to be missed.



The information collected would not only guide how USAID implements the Administration's COVID-19 response strategy, but also feed into key evaluations, promote Agency-wide learning, and inform future pandemic planning. USAID cannot reasonably comply with the normal clearance procedures under the PRA because, given the programmatic timeline of Global VAX activities, they would derail the Agency's efforts to collect this critical information.

- **Current voluntary reporting is inadequate.** Since the beginning of the pandemic, USAID has relied on partners to voluntarily report COVID-19 global health indicators. While many IPs submit rich and informative data, it is incomplete. An analysis for this ICR found a historic reporting rate of under 70 percent for a subset of partners that have received Global VAX funding since January 2022 and also received earlier ARPA funds, leaving tens of millions of dollars of assistance without reported results. Given the composition of recipients of recent Global VAX funds—with proportionally more money going to bilateral mechanisms, which have lower reporting rates—we may expect lower reporting rates in key Global VAX countries in 2023. USAID has devoted significant resources to encourage IPs to report voluntarily, but these voluntary efforts have proven insufficient to boost reporting to acceptable levels. An expedited review will allow us to quickly increase reporting rates on GVAX efforts in FY2023—including in the countries in which USAID is making its most significant investments to boost vaccinations and advance the U.S. COVID-19 Global Response and Recovery Framework.
- **New interagency responsibilities for GVAX reporting and analysis.** In the first quarter of 2022, USAID was designated as the lead agency for coordinating Global VAX implementation and reporting interagency progress. Fulfilling this responsibility requires USAID to regularly collect complete COVID-19 performance information from its own IPs through a centralized reporting system, and to collect data from interagency partners such as the CDC and State Department. USAID rapidly developed a COVID-19 health module in the web-based Development Information Solution (DIS) for IPs to enter COVID-19 results. DIS is a web-based, Agency-wide portfolio management system designed to meet the need for high-quality, readily available data by integrating program funding, awards, contract information and development results into a single platform. Full roll-out of the DIS across the Agency is included in an ongoing rule-making process, a decision on which is not expected until mid-2023 at the earliest—much too late to inform the evolving COVID response. As of June, 2022, USAID has trained most GVAX IPs in using the DIS, and a number of partners have begun voluntarily submitting C19 health data through the system. The centralized, streamlined reporting through DIS will significantly improve adaptive management and reporting—if complete data are



submitted. Given low reporting rates detailed above, this will only happen if USAID can require reporting from its Global VAX IPs.

- **Funding timeline.** More than \$250 million of Global VAX funding was obligated in September, 2022. These funds will enable USAID to intensify its efforts to boost vaccination rates in countries with a significant Global VAX investment, and will be used to pay for the cost of data collection proposed herein. The standard ICR process will not be complete before those funds are obligated or before a significant portion of them are spent. The obligation and programmatic times require an expedited review that will allow USAID to incorporate those costs into obligations and capture performance results from its 2023 Global VAX programming.

The Paperwork Reduction Act of 1995 requires that agencies obtain OMB approval before requesting most types of information from the public ("information collections" include forms, interviews, and record keeping). USAID seeks emergency approval of information collection associated with this performance monitoring effort. USAID cannot reasonably comply with the normal clearance procedures under the PRA because complying would delay the Agency's efforts to monitor ongoing activities designed to advance the Administration's global vaccination goals. This request meets the standard for emergency processing as the COVID-19 crisis is an unanticipated event with ongoing risks to lives, livelihoods, and critical systems worldwide. Failure to collect and analyze performance data on the COVID-19 response would hobble the Agency's ability to engage in accountable programming, provide proper oversight for more than half a billion dollars of resources, and wholly undermine efforts to facilitate operational tracking and continuous learning. The Agency will issue a Federal Register Notice notifying the public of this request, and will provide 1 week for public comment.

SIGNED BY:

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11/23/2022