

SUPPORTING STATEMENT – Part A
REQUEST FOR APPROVAL UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR 1320
OMB 0412-XXXX

Collection Title: USAID Information Collection Pursuant to Activities Conducted Under the Foreign Assistance Act (FAA)

PART A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

USAID implements approximately \$20 billion of foreign assistance programs outside of the U.S. on an annual basis at global, regional, and country level, with activities in over 100 countries around the world. In partnership with the State Department, USAID contributes to national security and foreign policy priorities as the Agency primarily responsible for international development assistance programs conducted under the Foreign Assistance Act (FAA). USAID expends significant resources carrying out monitoring, learning and evaluation of its programs to ensure accountability to taxpayers, improve program effectiveness in achieving US development objectives overseas, and to be compliant with the Foreign Assistance and Accountability Act (FATAA) which only applies to foreign assistance programs. In addition, since 2019 Congress has also required USAID and State to ensure the regular and systematic collection of feedback obtained from beneficiaries of programs funded for Development Assistance, International Disaster Assistance and Migration and Refugee Assistance purposes of the State and Foreign Operations Appropriations Act (for example, see FY2022 Consolidated Appropriations Act, Sec 7034(m)(1)).

Recognizing the unique mission and environment for U.S. activities conducted pursuant to the Foreign Assistance Act, Congress provided a limited exemption to the Department of State In Section 5603 (d) of the National Defense Authorization Act of 2022:

Chapter 35 of title 44, United States Code (commonly known as the "Paperwork Reduction Act") shall not apply to the collection of information directed at any individuals conducted by, or on behalf of, the Department of State for the purpose of audience research, monitoring, and evaluations, and in connection with the Department's activities conducted pursuant to any of the following:

- (1) The Mutual Educational and Cultural Exchange Act of 1961 (22 U.S.C. 2451 et seq.).
- (2) Section 1287 of the National Defense Authorization Act for Fiscal Year 2017 (Public Law 114-328; 22 U.S.C. 2656 note).
- (3) The Foreign Assistance Act of 1961 (22 U.S.C. 2151 et seq.).

To effectively manage foreign assistance, USAID needs to be able to regularly and on an emerging, sometimes urgent, basis, conduct research, monitoring, and evaluation, including information collection through interviews, focus groups and surveys of participants and stakeholders. Additionally, the Agency needs to be able to quickly send out surveys related to programmatic shifts and operational security to its implementing partners (IP) for quick adaptation in urgent and crises situations and to monitor the operational security of IP staff and programs in rapidly changing contexts.

This generic clearance will improve USAID's ability to quickly implement meaningful research, monitoring and evaluation processes outside of the U.S., even during unexpected and rapidly changing circumstances, and to monitor the operational security of implementing partner staff and projects and conduct safety accountability during a crisis. USAID wishes to use surveys and interview information to conduct research, and monitor and evaluate USAID programs, respond to urgent changes, and assess the extent to which those programs are achieving planned results in cost-effective ways. This information would be collected in person, by phone, on paper or via digital survey form.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

This information will be used by USAID operating unit program managers to monitor and evaluate programs, and to discern how programs are affected by crises and other unexpected changes in context. This will allow agency staff to more rapidly monitor, evaluate, learn and adapt programs. This will help the Agency make better decisions to improve the effectiveness of programs and achieve development and foreign assistance objectives through activities pursuant to Foreign Assistance Act, including under rapidly changing conditions. This will also help safeguard U.S. National Security interests and ensure accountability to the U.S. taxpayer. Information collected from USAID stakeholders and program participants is a valuable resource to ensure the Agency programs and operations remain safe, relevant, efficient and effective.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

For the surveys, the collection of information would include paper surveys, phone-based surveys, electronic surveys conducted by enumerators, electronic surveys emailed or texted to respondents, interviews and focus groups. Per USAID's Digital Strategy, digital methods will be prioritized where appropriate and available for collecting information and to reduce burden. Interviews and focus groups will be used to reach respondents

who may lack regular access to digital technologies, and typically occur at program sites or in easy to access locations in communities to reduce time burden and increase the inclusion of marginalized populations.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

While there are other generic clearances available to USAID related to workforce surveys and customer service experience, this generic clearance request is for information collections done to advance research, monitoring, and evaluation related to the outcomes and results of USAID activities and programs conducted pursuant to the Foreign Assistance Act. These activities are subject to the Foreign Aid Transparency and Accountability Act (FATAA), which requires monitoring and evaluation of US foreign assistance programs conducted outside of the US. To meet these legal requirements, USAID must collect information from federal contractors and grantees implementing these activities and the participants and stakeholders in the international communities where these activities are conducted to understand program results, program effectiveness, and program impact. After reviewing generic clearance examples on the ICR Documents website, USAID did not find any that are clearly appropriate for the purposes mentioned in this supporting statement.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

As part of federal and agency goals to ensure small businesses get their fair share of work, USAID may set aside some portion of contracts for research, monitoring and evaluation for small business entities. Small Businesses will benefit from this generic clearance in that they may be the holders of research, monitoring, and evaluation contracts and as federal contractors may need prior PRA clearance to collect information depending on the specific circumstances. This generic clearance will reduce the burden on those contractors.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the collection is not conducted, USAID would not be able to conduct in a more timely manner sufficient oversight of USAID program and policy activities and would be impeded in the appropriate management of U.S. taxpayer dollars. USAID and our contractors would also face significant legal obstacles to meet the requirements of the Foreign Aid Transparency and Accountability Act, the Foundation for Evidence-based Policy Making Act while also meeting PRA requirements. USAID and our contractors would be unable to quickly pivot programs and ensure partner safety during times of

crisis and rapidly changing contexts. This would impede overall Agency efficiency and effectiveness.

7. Explain any special circumstances for the information collection.

USAID operates under special circumstances as our program and policy activities are conducted entirely outside of the United States, pursuant to the Foreign Assistance Act. Unlike federal domestic activities, almost all of USAID's activities are also subject to the Foreign Aid Transparency and Accountability Act which requires certain research, monitoring, and evaluation actions. In addition, while the Department of State recently received an exemption to PRA for monitoring and evaluation of activities pursuant to the Foreign Assistance Act, USAID implements more of these activities, and in some cases does so in collaboration with the Department of State. Not having the same exemption creates an additional hurdle on USAID and USAID federal contractors operating overseas that State and their contractors are no longer subject to.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

On June 7, 2024, a 60-Day Federal Register Notice was published at 89 FR 48550, 2024-12478, page 48550 (1 page).

One comment from the public was received, but was not relevant to the information collection and no changes were made.

On August 13, 2024, a 30-Day Federal Register Notice was published at 89 FR 65836, 2024-18018, page 65836 (1 page).

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Unless otherwise indicated in the individual clearances requested under this generic clearance, there is no blanket intention to provide payments or gifts to respondents for USAID surveys under this clearance.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a Systems of Records Notice (SORN) or Privacy Impact Assessment (PIA), those should be cited and described here.

Along with many other Federal Agencies, USAID has adopted the Common Federal Policy for Protection of Human Subjects (sometimes referred to as the “Common Rule”) as USAID regulation (referred to herein in this document as the Policy – see 22 CFR 225).

In addition, the USAID privacy program supports the safeguarding of personally identifiable information (PII) in the possession of USAID and preventing its misuse are essential to ensure that USAID retains the trust of the American public. The USAID responsibility to the American public is a function of the Privacy Act of 1974 and the federal privacy authorities that flow from it, including the E-Government Act of 2002, Section 208.

USAID’s Privacy Program incorporates privacy analysis into each stage of the data lifecycle (i.e., collection, use, retention, processing, disclosure, and destruction), from the early design stage to start up, use, and disposal. The Privacy Program strives to implement substantive privacy protections, such as notice and consent, limitations on data collection and retention, data accuracy, and procedural safeguards aimed at integrating FIPPs into USAID’s everyday business operations. The Privacy Program supports USAID missions and business functions by assisting the Agency in balancing its need to maintain information about individuals, with the rights of individuals to be protected against unwarranted invasions of their privacy resulting from the collection, maintenance, use, and dissemination of their personal information.

Any information collection should include a confidentiality statement and how the information will be summarized and used and whether with or without attribution as part of the informed consent of those responding. Respondents may have the option of providing their name and contact information if they wish to offer additional context for their responses. The collection of PII will be restricted to the bare minimum necessary.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

For certain programs such as those working to support Maternal and Child Health, Family Planning, and prevent and treat HIV/AIDS and Gender-Based Violence, there may be some questions of a sensitive nature that will be used to understand and improve program effectiveness. The requirement to obtain informed consent, with a clear explanation for how the information will be used, and the option to withdraw from participation in responding to questions with no negative consequences should always be in place when collecting information from human subjects, no matter the question content.

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

According to data from usaspending.gov, USAID awarded approximately 3,000 acquisition and assistance awards in FY2022. Almost every award will be to conduct activities pursuant to the Foreign Assistance Act, with activities conducted overseas. Not every award will require an information collection, and the number of awards will vary each year.

Collections of information through surveys, focus groups and interviews to meet legal requirements to collect program participant feedback, and conduct research, monitoring and evaluation for accountability and learning purposes and is estimated to take place at least once per award per year. It is collected from a total of approximately 150 members of the public on average (representing program participants, stakeholders or federal contractor/grantee implementers), with average individual burden per collection estimated at 30 minutes per respondent, coming to 75 hours of burden per award per year, or a total of 225,000 burden hours per year across all awards.

Category of Respondent	# Of Respondents	# Of Responses Per Year	Participati on Time	Annual Burden Hours
Members of the Public (program participants, federal contractor/grantee implementing partners, other program stakeholders).	150/ award*3000 awards per year = 450000 respondents	1	30 minutes	225,000 hours

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

There is no annual cost burden to respondents in addition to any hour burden already reflected. There is no additional cost for record keepers and data analysts as a result of collecting this information as these costs are built into USAID awards.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. If there will be no costs beyond the normal labor costs for staff, state that here.

There is no additional cost to the Agency beyond the normal labor costs for staff.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

These processes are part of regular program planning, management, evaluation, and adaptation. The requested information collection is needed to inform those decisions. USAID is submitting this generic request to help streamline the process of PRA approval for the Agency whereas in the past individual offices and bureaus would have sent ICRs for these purposes.

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.

Information collected as part of USAID research and monitoring and evaluation are required to be submitted to USAID's Development Data Library for review and potential publication after the removal of any Personally Identifiable Information and other information security considerations are considered. All USAID evaluations are required to be published on the Development Experience Clearinghouse (DEC), accessible via website, barring principled exceptions that are documented in USAID policy and conform with OMB guidance on evaluations.

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 topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." (See Pg. 2 of the OMB 83-I form)

There are no exceptions to be explained.