

SUPPORTING STATEMENT - Part A
REQUEST FOR APPROVAL UNDER THE PAPERWORK REDUCTION ACT
AND 5 CFR 1320
OMB 0412-0520

Collection Title: Information Collection Requirement per (48 CFR) Chapter 7, AIDAR 701.106

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.**

Response: Section 635(b) of the Foreign Assistance Act (FAA) (Pub. L. 87-165,) authorizes USAID to contract with any corporation, international organization, or other body or persons in or outside of the United States in furtherance of the purposes and within the limitations of the FAA. Flowing from that, Section 752 (specifically 752.7001 Biographical data.) of the Agency for International Development Acquisition Regulation (AIDAR) which authorizes the dissemination and collection use of Form 1420-17, "Contractor Employee Biographical Data Sheet", to obtain biographical information on the following individuals to be employed in the performance of its contracts for: (1) All individuals to be sent outside the United States, or (2) any employees designated as "key personnel". See Attachment 1 below, the last page of this document.

- 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.**

Response: The collection is required by the cognizant Contracting Officer to award and administer USAID contracts. The Employee Biographical Data Sheet, AID Form 1420-17 is used by Offerors (at the pre-award stage) and contractors (during contract administration) for employees and consultants who will work on the contract and whose salaries are reimbursable under the contract. The contracting officer uses the biographical information provided to determine if the individual meets the contract requirements and if the salary is reasonable for the work to be performed.

Contractor employees/consultants under USAID cost-reimbursement contracts must submit personal, employment history, and educational data, and the contractor must provide the basis and rationale for the proposed salary as specified in the form. Providing personal information is voluntary.

However, failure to provide any of the requested information may delay or prevent approval of the individual proposed under the specific contract. The personal information is used by USAID to maintain administrative records and to perform other administrative functions inherent to the administration of the contract. This information will be used by USAID Contracting Officers and will not be disclosed outside USAID.

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.

Response: USAID strongly encourages the use of email, internet, or other electronic technologies. All AIDAR information collections can be submitted and reviewed electronically through email. USAID is continually reviewing the AIDAR to simplify and streamline the submission requirements to the most efficient methods available wherever practicable.

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.

Response: We have reviewed these AIDAR requirements to ensure that they are not duplicated by other agency-specific or Government-wide policies. USAID has no similar information collection already available within the Agency, or from any other source known to us, which can be used or modified for our purposes.

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

Response: As we have reported in the past and further explained in item #12 below, while the hourly burden for the information collections under this submission falls on the public, the cost for most of these collections are reimbursable as either direct or indirect contract expenses. Thus, the public burden, including that for small businesses, is limited to costs related to submission of Biodata forms in accordance with AIDAR section 752.7001. Given that these costs can be reimbursed when included in the offeror's indirect costs and only affect offerors that do not have existing federal contracts, as we have done in the past, we are estimating that 25 percent of the submissions under the Item #5 constitute a cost to the public.

Based on the active awards data for FY 2023, USAID has an estimated 44 cost-reimbursement contracts with small businesses. Given our estimate of approximately eight submissions per award and the hourly rate of \$112.50, we anticipate that the total burden on the small businesses will be \$19,796. And 25% of that is \$4,949, so we conclude that the collection of the information will not have a significant impact on a substantial number of small businesses or other small entities.

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.

Response: USAID cannot eliminate or reduce the frequency of the information collection requirement without losing its ability to properly award and administer contracts using public funds. The minimum collection

requirement (frequency) by the Agency is one time per identified individual (proposed) to work under the contract. A USG contract may have a performance duration of up to 5 years.

7. Explain any special circumstances for the information collection.

Response: Not applicable

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.

Response: With this action, USAID is published a 30-day notice (89 FR 91313, dated November 18, 2024) for this collection in the Federal Register. USAID previously published a 60-day notice (89 FR 68849, dated August 27, 2024). In addition to these notices, we routinely communicate with our contractors through semi-annual "Partners Days" sponsored by the USAID Acquisition Ombudsman. USAID contractors fully participate in these sessions.

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

Response: Not applicable since any payments are in the form of remuneration to contractors.

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.

Response: USAID shares or protects information as required by law.

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.

Response: Information of a sensitive nature is not requested in the collection.

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

Collection Name	# Of Respondents	# Of Responses Per Year	Average Participation Time (in hours)	Total Annual Burden (in hours)
1420-17 Biodata form	1,308 (CRs) x 8 (individuals)	10,464	0.50	5,232
All other Items	9,744	64,546	0.70	91,976
Totals	11,052	75,010	0.77	97,208

Also see Attachment 2.

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).

Response: There are no capital and start-up costs, or operation, maintenance, or purchase of services components associated with the information collection. The total annual cost burden to respondents is addressed in either Item 12 or Item 14.

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.

Response: The estimate of the annualized cost to the federal government is the sum of the cost of federal employee effort for the collection ("Annual Federal Burden") is \$670,583.66 and the part of the cost of the "Annual Public Burden" that is reimbursed by the government through contracts \$588,495.36. The Total Public Annual Cost Burden not reimbursed through contracts (25% of public burden) is \$147,123.84. The total annualized cost to the federal government is the sum of the Annual Federal Burden (\$670,583.66) plus the Annual Public Burden (\$588,495.36) minus the Total Public Annual Cost Burden not reimbursed through contracts (\$147,123.84). The total annualized cost to the federal government is therefore \$ 1,111,955.18.

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

Response: There are no program changes or adjustments reported under Item #13. The difference in hours is due to variation in the number of

contracts the Agency has at any given time.

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.

Response: Not applicable.

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.

Response: 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)

Response: Since the information must be collected for a specific individual transaction, statistical survey methodology is not appropriate.

Supporting Statement - B. “Collections of Information Employing Statistical Methods” *is not applicable. The collection does not employ statistical methods.*

Attachment 1 -

Section 635(b) of the Foreign Assistance Act (FAA) (Pub. L. 87-165)

SEC. 635. ø22 U.S.C. 2395ç GENERAL AUTHORITIES.—(a) Except as otherwise specifically provided in this Act, assistance under this Act may be furnished on a grant basis or on such terms, including cash, credit, or other terms of repayment (including repayment in foreign currencies or by transfer to the United States Government of commodities) as may be determined to be best suited to the achievement of the purposes of this Act, and shall emphasize loans rather than grants wherever possible. (b) The President may make loans, advances, and grants to, make and perform agreements and contracts with, or enter into other transactions with, any individual, corporation, or other body of persons, friendly government or government agency, whether within or without the United States and international organizations in furtherance of the purposes and within the limitations of this Act.

<https://www.govinfo.gov/content/pkg/COMPS-1071/pdf/COMPS-1071.pdf>

Agency for International Development Acquisition Regulation (AIDAR)

752.7001 Biographical data.

The following clause is to be inserted in all USAID cost reimbursement contracts.

Biographical Data (JUL 1997)

The Contractor agrees to furnish to the contracting officer on USAID Form 1420-17, “Contractor Employee Biographical Data Sheet”, biographical information on the following individuals to be employed in the performance of the contract: (1) All individuals to be sent outside the United States, or (2) any employees designated as “key personnel”. Biographical data in the form usually maintained by the Contractor on the other individuals employed under the contract shall be available for review by USAID at the Contractor's headquarters. A supply of USAID Form 1420-17 will be provided with this contract. The Contractor may reproduce additional copies as necessary.

[https://www.acquisition.gov/aidar/752.7001-biographical-data.](https://www.acquisition.gov/aidar/752.7001-biographical-data)