

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

My Grants Application

OMB Number 1405-0036

A. JUSTIFICATION

1. *Why is this collection necessary and what are the legal statutes that allow this?*

The Office of Overseas Schools of the Department of State (A/OPR/OS) is responsible for determining that adequate educational opportunities exist at Foreign Service Posts for dependents of U.S. Government personnel stationed abroad, and for assisting American-sponsored overseas schools to demonstrate U.S. educational philosophy and practice. With a professional staff of eight Regional Education Officers (REOs) to carry out these objectives at 234 Foreign Service Posts and involving 193 assisted schools, it is essential that current comprehensive information regarding the schools be available so that A/OPR/OS can advise the Department of State and other foreign affairs agencies, parents and students, and the private sector regarding overseas schooling, and judge the need for and utility of various types of assistance to overseas schools.

The legal requirements that authorize the function of A/OPR/OS and thereby authorize the collection of information are the Foreign Assistance Act of 1961 (as amended), and the Mutual Educational and Cultural Affairs Act of 1961 (as amended), and the Department of State Basic Authorities Act of 1956, as amended by the Foreign Service Act of 1980, PL 96-465.

2. *What business purpose is the information gathered going to be used for?*

Availability of adequate educational opportunities for dependents of Government personnel is essential to the task of recruiting, placing, and retaining Foreign Service personnel at overseas posts. The information gathered enables the Office of Overseas Schools (A/OPR/OS) to advise the Department and other foreign affairs agencies regarding current conditions and enables A/OPR/OS to make judgments regarding adequacy and assistance to schools for the improvement of educational opportunities. All forms, gathered from all associated schools that have been previously notified of their qualified "assisted" status, are requested at the beginning of each school year, and given a deadline of December 15. The information obtained from the grant application process provides data that A/OPR/OS uses to establish program quality benchmarking. It is the intention of A/OPR/OS to ensure publications, namely the Fact Sheets and Special Needs Profiles, are derived from information collected via the MyGrants application. As an example, requesting staffing in special needs categories provides a snapshot of service availability at post and is published annually on the A/OPR/OS website in accordance with the statutory regulations on special needs information. These publications would be shared with families who are under Chief of Mission authority with school-aged dependents to assist in future bidding processes and in the selection of an appropriate school for their children.

Recently, A/OPR/OS implemented the MyGrants platform. The Department notes that no respondents use the physical paper forms. Instead, the grantees utilize the MyGrants platform, the Department of State's proprietary software, to report the information captured on these forms. Use of the MyGrants platform fulfills the requirement of a grant application, so no information is uploaded to SAMS by the school. The collected application data is used in several ways. The data is used to evaluate post educational "adequacy" for that current school year, which allows the opportunity to then request grant support (see 2 FAM 615). The designation of "adequacy" is similar to an accreditation, where school programs must meet certain educational standards. In this case, these standards should be consistent with what can be expected in American schools within the continental United States, allowing a student to transfer between an overseas school and a US public school with minimal complications. Adequacy is an ongoing assessment, changing over time based on circumstance, and use of collected data supports the rationale for granting assisted school status. Collected data is for internal use with Regional Education Officers working with individual overseas schools within their respective region. Also, in accordance with the Paperwork Reduction Act, we sought to streamline the grant application process, emphasizing data gathering of only what we continue to find useful in support of assessing school quality.

3. *Is this collection able to be completed electronically (e.g., through a website or application)?*

Information is collected via electronic media, rather than the physical paper forms, and has been done so for many years. Currently all schools submitting requests for assistance, do so via the MyGrants platform which fully accounts for all data needed by A/OPR/OS staff. The

program is nestled within the Department of State platform to make accessibility easier for respondents. The MyGrants program allows for respondents to submit all the information without having to print, hand-sign, or otherwise use physical documents to complete the information collection. Additionally, the MyGrants platform retains responses, which allows for pre-populating all relevant fields with previous data so that respondents need only to update changed data, which has resulted in a lessening of the burden on respondents.

4. *Does this collection duplicate any other collection of information?*

No other agency gathers information from these schools. Information gathered by A/OPR/OS is used by all Federal foreign affairs agencies. The information is not available from any other source and requires updating on an annual basis.

5. *Describe any impacts on small business.*

Methods used to minimize burden for small entities are the same as those described in paragraph 3 above.

6. *What are consequences if this collection is not done?*

As noted above, current information is necessary for A/OPR/OS to make informed decisions about schools and school programs. The MyGrants platform provides basic information about the school, its enrollment, staff, program, and budget, which is necessary for appraisal of each school seeking assistance to determine the extent of assistance required and whether the criteria governing assistance are met. The task could not be fulfilled if data were collected less frequently than annually.

7. *Are there any special collection circumstances?*

There are no special circumstances.

8. *Document publication (or intent to publish) a request for public comments in the Federal Register*

On December 12, 2024, the Department of State published a 60-day request for comment in the Federal Register (89 FR 100589). No public comments were received.

9. *Are payments or gifts given to the respondents?*

No payment is made to respondents other than grants awarded based on data contained in submission.

10. *Describe assurances of privacy/confidentiality*

The data collected by grantees in the MyGrants platform is used to provide U.S. government personnel and their families with current data regarding to department assisted schools around the world. Information obtained on the MyGrants platform shall be used for internal official use and is therefore only accessible to a limited number of individuals within the Department who require access to make determinations regarding adequacy and placement of students.

11. *Are any questions of a sensitive nature asked?*

The collection does not contain any questions of a sensitive nature.

12. *Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection*

Currently there are 193 respondents, the frequency of response is annual, the time burden for a school applying for the first time is between 90-180 minutes, and the annual hour burden is 289.5 minutes (4.8 hours). Upon the completion of a first-time grantee, the grantee can expect renewal applications will be significantly less because previous data entered in the platform shall be pre-populated in the MyGrants platform. Basic demographic data is repopulated from one year to the next (ex. school address), but

program questions, salary and benefits, tuition rates and other such data must be updated by the grantee on an annual basis. The burden estimate for the DS-573 is 15 minutes, the DS-574 is 25 minutes, the DS-575 is 25 minutes, and the DS-576 is 30 minutes. The estimated average hourly wage for a school business manager (Other Office and Administrative Support workers) is \$19.82ⁱ, multiplied by 1.4 (loaded/weighted wage calculator = \$27.75) , multiplied by burden (1.4 hours) = \$41.62), multiplied by the number of respondents (193), gives a monetized time burden of \$8,033.

13. Describe the monetary burden to respondents (out of pocket costs) needed to complete this collection.

There is no monetary burden on the respondent.

14. Describe the cost incurred by the Federal Government to complete this collection.

The estimated burden to the Federal Government is \$6,780.00, based on the number of responses (193) and the average hourly processing time (15 minutes for Post +30 minutes for Office of Overseas Schools = 45 minutes) for a total of 144.75 minutes, times the average hourly salaries for Post and the Office of Overseas Schools.

Post:

Average hourly processing time (15 minutes = .25 hour) x 193 = 48.25 hours
Hourly salary of an FS-03/5 Management Officer (\$46.75)ⁱⁱ x 48.25 = \$2,256 rounded

Office of Overseas Schools:

Average hourly processing time (30 minutes) x 193 = 96.5
Hourly salary of a GS-12/5 Program Analyst (\$46.88)ⁱⁱⁱ x 96.5 = \$4,524 rounded

Total = \$2,256 + 4,524 = \$6,780.00

15. Explain any changes/adjustments to this collection since the previous submission

The data collection included in the MyGrants platform reflects A/OPR/OS's current strategic goals (special needs, good governance, and social emotional well-being). This collection represents a decrease in the number of respondents as there were fewer schools requesting a grant. Furthermore, once a grantee has completed the initial entry into the MyGrants platform, the time commitment of future applications is significantly reduced. The platform is pre-populated in the MyGrants platform. Basic demographic data is repopulated from one year to the next (ex. school address), but program questions, salary and benefits, tuition rates and other such data must be updated by the grantee on an annual basis.

16. Specify if the data gathered by this collection will be published.

Data gathered by this collection is published on the A/OPR/OS website via the Assisted School Fact Sheets and Special Needs Profiles. All data included in this report would be aggregate statistics, not specific to any individual person.

17. If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.

The Department will display the OMB expiration date.

18. Explain any exceptions to the OMB certification statement below.

There is no exception to the OMB Statement

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.

ⁱ This information was obtained from the Bureau of Labor and Statistics

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