

**SUPPORTING STATEMENT PART A FOR THE INFORMATION COLLECTION
REQUIREMENTS OF SOLICITING AND ASSESSING FEEDBACK
FROM IAF GRANTEES**

ABSTRACT: The IAF works to promote sustainable development in Latin America and the Caribbean by offering small investments directly to civil society organizations through funding actions, such as grants and cooperative agreements. By gathering perceptions from grantees on how the IAF works as a funder, the IAF is able to assess its performance and identify opportunities for improvements. The IAF seeks to work with a contractor to independently carry out this survey with IAF grantees. The contractor will use an online survey with a set of standardized questions focused primarily on grant processes, such as the approach to grant selection, the time lapse between selection and commitment, and reporting and evaluation. The contractor will also apply these standardized questions to other funders, thus providing the IAF with findings relative to that of other comparable organizations.

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.

The IAF works to promote sustainable development in Latin America and the Caribbean by offering small investments directly to civil society organizations through funding actions, such as grants and cooperative agreements. By gathering perceptions from grantees on how the IAF works as a funder, the IAF will be able to assess its performance and identify opportunities for improvements.

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.

The IAF seeks to work with a contractor to independently carry out a survey with IAF grantees. The contractor will use an online survey with a set of standardized questions focused primarily on grant processes, such as the approach to grant selection, the time lapse between selection and commitment, and reporting and evaluation. The contractor will also apply these standardized questions to other funders, thus providing the IAF with findings relative to that of other comparable

organizations. This will allow the IAF to see how it is performing both across the various segments of the grantmaking process and among funders and make strategic improvements to its programming as necessary.

The IAF has gathered feedback from grantees on how the IAF performs as a donor every three years since 2011. The agency has used this feedback to guide improvements in how we work. Grantee input, for instance, has stressed the importance of our hand-on approach for grantee learning on financial and performance management, while also inspiring us to develop more user-friendly tools for grantee reporting.

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.

The IAF intends to use an online survey to collect feedback and information from IAF grantees. This approach has been effective over the years, contributing to a response rate of 85% over the previous survey.

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.

There is no recent evidence that exists which relates to grantee perceptions of IAF's performance as a funder.

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

The survey is designed to demand no more than one individual's time, and is only carried out every three years to minimize burden.

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.

The IAF is a unique foreign assistance agency that supports community-led development by giving grassroots groups and civil society organizations leading

roles in designing and implementing development projects. As such, those best positioned to inform on the strengths and weaknesses of the IAF as a funder are the grantees themselves.

Not conducting the collection of information would hamper the Agency's efforts to acquire that valuable grantee perspective to assess its service delivery and make necessary adjustments.

This survey is to be conducted once every three years (once during this ICR) to cause minimal burden on grantees while at the same time allow the IAF to evaluate how changes to its programming or operations influence grantee perspectives and experiences over time. New ICRs will be submitted for subsequent data collection efforts.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;

This process would not require respondents to report to the IAF more often than quarterly.

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

This process would not require respondents to prepare a written response to a collection of information within 30 days.

- requiring respondents to submit more than an original and two copies of any document;

This process would not require respondents to submit more than an original and two copies of any document.

- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;

This process would not require respondents to retain any records.

- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

This information collection is designed to produce valid and reliable results that can be generalized to the universe of study, something the IAF feels confident about given our high response rates (85% in our most recent survey, in 2020).

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

The only classification we use in the survey is the grantees' self-identified Organization Type (which can be Grassroots organization, Grassroots supporting NGOs, Community Foundations, or Other).

- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

The grantee survey includes confidentiality pledge, which is shared by the contractor with survey respondents in all communications about the survey and in the body of the survey itself. This pledge is supported by the contractor's data privacy policy that is also shared with all survey respondents.

- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This process would not require respondents to submit proprietary trade secrets or other confidential information.

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.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The IAF submitted an agency notice soliciting public comments in response to the proposal to solicit and assess feedback from IAF grantees.

Pursuant to the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)), the IAF published a 60-day notice in the Federal Register on August 30, 2022 (87 FR 52990, Document Number 2022-18603), soliciting comments from the public and other interested parties on soliciting and assessing feedback from IAF grantees.

On November 4, 2022, the IAF published a follow-up, 30-day notice (87 FR 66743, Document Number 2022-23998).

These documents are part of a preclearance consultation program that provides interested parties with an opportunity to comment on the IAF's request for a PRA approval by the Office of Management and Budget (OMB). The Agency has not received any public comments regarding this information collection requirement.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

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

This item does not apply, as respondents will not be remunerated or rewarded for their participation.

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.

As a federal agency, the IAF is bound by the Privacy Act of 1974, which prohibits the disclosure of any personal information and requires that precautions be taken to keep personal information confidential.

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.

The IAF will not ask respondents to disclose sensitive information, such as sexual behavior and attitudes, religious beliefs, and other matters commonly considered private.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- Provide estimates of cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.

Estimated *One-Time* Cost of the Information Collection

<i>Type of Respondent</i>	<i>Number of Respondents</i>	<i>Average burden time</i>	<i>Total Hours</i>	<i>Average Hourly Wage</i>	<i>TOTALS</i>
---------------------------	------------------------------	----------------------------	--------------------	----------------------------	----------------------

		<i>per form</i>			
<i>Member of an IAF grantee</i>	400	37 minutes	246.67	\$15.62	\$3,852

IAF staff consulted the Center of Effective Philanthropy (CEP) to determine the average number of burden hours to complete the survey form. CEP has carried out similar surveys in the past to gauge grantee perceptions which have consisted of the same number and type of questions as the IAF proposes to do in this data collection effort. Using their past survey metadata, they found that the average estimated time that respondents would spend on filling out the survey form is 37 minutes.

The average hourly wage of \$15.62 is based on the grantees' budgets submitted to the IAF as part of the Grant Agreement package using the average salary for a project director at \$43,000 and the average salary for an administrative assistant at \$22,000.

Note: Since this information collection request consists of a single information collection (e.g. survey) that will be conducted only once, estimates are not annualized but rather reflect the total burden over the entire period. The table submitted in ROCIS will, similarly, reflect the one-time cost of this information collection rather than the annualized costs.

13. Provide an estimate for the total 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).
 - The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no additional costs to the respondents or recordkeepers resulting from this information collection.

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. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The IAF will hire a contractor to carry out the information collection, gather and synthesize data, and disseminate findings to the IAF. The total estimate for this contract solicitation is about \$50K.

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

This is a new ICR and figures are new and do not reflect adjustments to previously reported information.

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.

As in past years, the IAF is committed to publishing the results of the survey through at least one blog on our website.

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.

The IAF will display the expiration date for OMB approval.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

The IAF is not seeking an exception to the certification statement.