



February 5, 2020

VIA WWW.REGULATIONS.GOV AND EMAIL

Natalie Donahue
Chief of Evaluation
Bureau of Educational and Cultural Affairs (ECA)
United States Department of State (USDOS)
DonahueNR@state.gov

RE: SAMS-Domestic Results Performance Module (SAMS-D RPM), DOS-2019-0017, as noticed at 84 Fed. Reg. 67333-4 (December 9, 2019).

Dear Ms. Donahue:

Humentum hereby submits comments in response to the Department of State's Proposed Information Collection: SAMS-Domestic Results Performance Module (SAMS-D RPM), Docket Number: DOS-2019-0017, as noticed at 84 Fed. Reg. 67333-4 (December 9, 2019).

Humentum is a non-profit social enterprise dedicated to advancing the operational excellence of international development and humanitarian assistance organizations across the globe. Humentum is comprised of over 300 member organizations who are among USAID's largest and most productive implementers of US foreign assistance. On our membership's behalf, Humentum undertakes targeted outreach and advocacy with US Government donor agencies, including USAID and USDOS. We seek to identify obstacles to the effective implementation of US foreign assistance, articulate our member's first-hand experiences, and propose dialogue and solutions that enable positive change. It is in this spirit that Humentum submits these comments.

In its notice, DOS/ECA articulates that the purpose of the information collection is to "track and monitor the programmatic and financial performance" of its implementing partners using a "database that can help facilitate this in a consistent and standardized manner." DOS/ECA identifies the potential respondents of this "voluntary" information collection as the implementing partners of ECA grants and cooperative agreements. DOS/ECA estimates that approximately 100 implementing partners will proffer responses to the collection, resulting in an estimated 250 responses annually as "most respondents report on a semi-annual basis; though there are some that will report more frequently". The average response time is estimated at 20 hours, for a total of 5,000 hours per year. Finally, USDOS/ECA states that the frequency of response will be "at least twice a year".

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Upon review, Humentum believes the notice inadequately provides a basis upon which the public can assess the reasonableness of the estimated burden on respondents or the utility of the collection in meeting DOS/ECA's stated objectives. Without access to the actual collection module, it is difficult for us to assess either fully. We recommend that DOS/ECA provide interested commenters access to the proposed module to facilitate more informed and accurate responses to this notice.

Based on the information that is provided, we believe the time burden of this collection to be significantly higher than estimated. First, the calculations used to estimate the number of responses appear incomplete. For instance, although the notice states that most respondents will report on a semi-annual basis, it also states, under methodology, that "non-respondents will submit their quarterly reports on paper". We request clarification on whether the number of estimated responses is based on quarterly or semi-annual reporting, or some variation thereof. Similarly, the abstract implies that the collection module is for "...relevant award elements, such as quarterly progress reports, workplans, results monitoring plans, grant agreements, financial reports, and other business information..." However, it is unclear whether these "award elements" are counted as individual responses for the purpose of this information collection. If so, the total response time burden would be substantially higher than is anticipated in this notice. Indeed, the calculus could seemingly include four quarterly progress reports, one annual workplan, and one annual monitoring plan at a minimum (6 responses x 100 estimated respondents x 20 hours estimated per response = 12,000 hours per year, more than twice the estimated time burden of 5,000 per year). Kindly clarify.

Finally, while the notice states that the obligation for implementing partners to respond is voluntary, it also references the quarterly paper reporting by "non-respondents". It is unclear from the published notice if these non-respondents are additional entities who *do not* meet the stated definition of a "respondent" – implementing partners of ECA cooperative agreements and grants – or if they are implementing partners who may opt to submit their reports on paper, outside of the online database. For greater clarity, we request that DOS/ECA define "non-respondents" and explain specifically how they are accounted for in the overall burden calculation. Furthermore, we respectfully request that DOS/ECA explain if: (a) the reporting under this information collection is voluntary in its entirety, whether online or on paper; and/or (b) the reporting is mandatory, with a voluntary option to report online instead of on paper, and/or (c) the estimated burden is based on the paper reporting or online reporting or both.

Thank you for your attention to this matter.

Sincerely,



Dr. Christine Sow
President & CEO

CS/cms

CC: Humentum membership