



February 18, 2020

**VIA ELECTRONIC MAIL**

Alexander Cumana  
Deputy Budget Director  
Office of the U.S. Global AIDS Coordinator and Health Diplomacy  
U.S. Department of State, SA-22  
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Washington, DC 20006  
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**RE: Proposed Extension of Currently Approved Information Collection: PEPFAR Program Expenditures, DOS-2019-0041, OMB Control Number: 1405-0208, Form Number: DS-4213, as noticed at 85 Fed. Reg. 2227 (January 14, 2020).**

Dear Mr. Cumana:

Humentum hereby submits comments in response to the 60-day notice of the proposed extension of currently approved information collection on PEPFAR Program Expenditures, as noticed at 85 Fed. Reg. 2227 (January 14, 2020).

Humentum is a non-profit social enterprise dedicated to advancing the operational excellence of international development and humanitarian assistance organizations across the world. Humentum is comprised of over 300 member organizations that are among the US Government's largest and most productive implementers of US foreign assistance. On our membership's behalf, Humentum undertakes targeted outreach and advocacy with USAID and USDOS, among other US Government donor agencies. 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.

As part of the U.S. President's Emergency Plan for AIDS Relief (PEPFAR) program monitoring of results, PEPFAR requires reporting of expenditures by program area. Data are

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collected from implementing partners with PEPFAR programs using a standard tool (DS-4213) via an electronic web-based interface into which users upload data. Per the notice of proposed extension of this information collection, this “expenditures data is analyzed by partner for all PEPFAR program areas. These analyses then feed into partner and program reviews at the country level for monitoring and evaluation on an ongoing basis. Summaries of these data provide key information about program costs under PEPFAR on a global level.” In its notice, DOS estimates the number of PEPFAR funding recipient respondents to be 1,100. The estimated time per mandatory annual response is an average of 16 hours per respondent.

Humentum is concerned that DOS has underestimated the true reporting burden of this collection on PEPFAR funding recipients. This is particularly true for global, multi-country PEPFAR awards with multiple program areas and subrecipients per country. Based on our member organizations’ feedback, implementers and their subrecipients spend an average of 15 - 20 hours each per program area on data collection and compilation. In fact, Humentum members have experience spending over 100 hours total to generate the annual report on one global award. This is because completing the form annually includes: (1) the participation of PEPFAR passthrough entities and subrecipients in annual PEPFAR coding guidance training; (2) the alignment of recipient accounting systems with PEPFAR guidance at all levels of program funding; (3) the requirement to distinguish subtypes of expenses which necessitates a review of transaction-level detail to sub-classify travel, personnel, supplies, and equipment into sub-classes; and (4) the collection, compilation, validation, and submission of data (including system glitches and troubleshooting related to data upload). Because DOS underestimates the full burden of this data collection, it and the public cannot conduct a realistic cost-benefit analysis to determine its necessity.

In addition to this substantial time burden, the shifting guidance on how to complete the form has undermined its accuracy, and thus quality and utility. Indeed, although the form has remained the same, implementers frequently receive changing guidance on how to classify expenses documented in the form. This results in data that are not comparable across reporting periods because the same expense may be coded differently between years. Even in the same fiscal year, different consultants and awarding agency staff in various countries have provided contradictory guidance on how to report expenses for the same award. Among the guidance that often differs from country to country and over various years is: (1) the aspects of travel which are international versus local (airfare, per diem, hotel); (2) whether sub-recipient expenses should be reported based on when the Prime paid the partner or when the partner paid the expense; and (3) how to classify a sub-recipient whose primary role is Program Management (the report prevents the designation of Program Management for sub-recipients). Because of this frequently changing guidance, Humentum recommends issuing standardized methods of classification and reporting for expenses.

Furthermore, DOS’s expenditure reporting categories on form DS-4213 differ from standard federal budgeting categories outlined in SF-424. Yet, the donor-approved budget authorizing expenditures strictly reflects the categories of the SF-424. The purpose of a budget is to plan for expenditures. Unfortunately, form DS-4213 is diminishing the utility of the budget while adding a significant financial management and reporting burden to recipients at all levels. For instance, facilities expenses are classified as Contractual for PEPFAR but are planned and

approved as Other Direct Cost on the SF-424. Similarly, in the DS-4213, Indirect Costs are required to be categorized as Program Management which is normally attributed to the same category as its associated Direct Costs. This distorts the Program Management costs reported. Finally, certain allowances have historically been approved in Other Direct for budget expense approval, but in the DS-4213 form they are required to be separated and aggregated in Fringe Benefits. All told, these differing methods of categorizing expenses creates unnecessary confusion and work. Humentum respectfully requests that DOS consider adopting the same standards of reporting for the DS-4213 as are used for the SF-424.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'CS', with a large loop at the beginning and a trailing flourish.

Dr. Christine Sow  
President & CEO

CS/cms

CC: Humentum membership