



February 19, 2021

VIA ELECTRONIC MAIL

Marcelle Wijesinghe
US Agency for International Development
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mwijesinghe@usaid.gov

RE: USAID Notice of Proposed Information Collection – Development Information Solution, as published at 85 Fed. Reg. 83027 (December 21, 2020).

Dear Ms. Wijesinghe:

Humentum hereby submits comments in response to USAID/M/OAA's Notice of Information Collection, published at 85 Fed. Reg. 83027 (December 21, 2020).

Humentum is a global nonprofit organization that strengthens humanitarian and development organizations and advocates for data-driven policies and standards that benefit the entire sector. Working in over 100 countries, and with staff and associate consultants in 26 countries across the globe, Humentum partners with the global development community to be an equitable, accountable, and resilient force for social good. Our network of over 300 member and client organizations include the world's largest and most productive implementers of US foreign assistance. It is on their behalf that we submit these comments.

In the Notice, USAID states that it is "implementing [a] Development Information Solution (DIS) Pilot to consolidate reporting, improve efficiencies, and facilitate evidence-based decision-making." USAID articulates the "purpose of this information collection is to require USAID contractors and grant recipients who collect indicator data under their award terms to: (1) Submit information to request access to the DIS, and (2) to submit indicator information to the DIS, which is collected under special award requirements unique to each award." USAID estimates the burden of the proposed information collection to rest only on those recipients/contractors required to do so as a part of their performance reporting pursuant to special award requirements articulated in their agreements with the Agency. Of those who are so required in this pilot phase, up to two individuals per implementing organization will be responsible for entering indicator data and narrative on the deviation between indicator results and targets on a quarterly basis.

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 USAID/M/OAA's stated objectives.

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First, without further information in the Notice on the DIS system itself and how it exists within the landscape of other MIS data collection efforts already underway by USAID's various bureaus and offices, it is unclear how it will be able to "consolidate" and, eventually, replace all of them. Given the decentralized nature of USAID and the myriad award mechanisms it employs, there are countless requirements for how and when indicator data and deviations are already reported. And, those requirements are dictated on an award-by-award basis in lieu of a donor-wide requirement of all implementing organizations. As a result, each award has its unique language and expectations. As a result, the reporting requirements for one implementing organization can be myriad due depending on the number of different awards they have and who their awarding office/bureau might be. USAID has not made clear how this DIS system will - even at a very high level - effectively replace this current reality.

Second, we believe that the Notice inadequately articulates who the pilot implementing contractors and recipients will be, the length of the pilot phase, and the representative nature of such a pilot in terms of geographic location and information technology capacity levels. Without such information, it is impossible to accurately assess the true burden of this proposed information collection. Similarly, because USAID does not explain if the special award requirements it refers to will supersede the current standard award reporting requirements for paper-based submission of indicators and deviation narratives, it is impossible to determine whether these pilot provisions will result in duplicative reporting for the pilot participants, whoever they may be.

Third, and finally, it appears that USAID has significantly underestimated the annual burden hours for indicator submission. USAID has estimated a scant 15 minutes for the indicator information response. While USAID MIS systems vary, as noted above, and as awards and their indicator types vary - while some awards have 10 reporting indicators, others may have up to 100 - the experience of our member organizations suggests that it takes between 10 and 20 minutes time to report *per indicator*. A more reasonable estimate is an average of 10 indicators for one award. This would then be a response burden of 150 minutes, or 2.5 hours (15 minutes x 10 indicators). Using USAID's estimate of 11,236 responses, this would be an annual burden of 28,090, or a 1,000% increase over USAID's annual burden hours estimate for indicator information submission. And, again, without clarification by the Agency, it appears these burden hour estimates are *in addition* to the current reporting burden for pilot contractors and recipients. If so, and even in this pilot phase, such an information collection would prove unduly burdensome.

Thank you for your attention to this matter.

Sincerely,



for Dr. Christine Sow

Dr. Christine Sow
President & CEO

CS/cms

Cc: Humentum membership

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