



September 12, 2019

**VIA ELECTRONIC MAIL**

Elena Walls  
Bureau of Economic Growth, Education and Environment (E3)  
Office of Education  
United States Agency for International Development (USAID)  
[ewalls@usaid.gov](mailto:ewalls@usaid.gov)

**RE: USAID Proposed Information Collection, 84 Fed. Reg. 32783-8 (July 9, 2019)**

Dear Ms. Walls:

Humentum hereby submits comments in response to USAID's proposed education cost reporting form, as noticed in 84 Fed. Reg. 32783-8 (July 9, 2019).

Humentum is a global, membership-based 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 USAID and 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.

The stated purpose of USAID's information collection is to facilitate the sustainability of USAID-funded education programs beyond the life of USAID funding. USAID also seeks to assist USAID Missions in their budgeting and planning processes. To achieve these objectives, USAID is proposing the requirement of a new education cost reporting "form" to gather data on the specific "dosage" of "interventions" and in-kind or monetary "contributions" (over US\$1,000 in value) made by implementing partners to achieve the education-related objectives of their USAID funding.

While these are laudable objectives, it is impossible to discern the necessity, impact or burden of this proposed information collection without including the proposed form in the formal information collection notice. Presently, for reasons that are not specified, only the most basic of

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categories of the form are referenced, but the form itself is not included. Moreover, neither the frequency and scope of information collection nor the data aggregation formulas are explained. The notice only states that implementing partners will submit their data in a “spreadsheet file” to their respective USAID Mission. However, whether the spreadsheet is a portion of or separate from the “form” is unclear. And, USAID does not specify the frequency with which it will collect such data in a given fiscal year.

The purpose of information collection requests under the Paperwork Reduction Act (PRA) of 1995, as amended, is to provide the public with advance notice of proposed collections and an opportunity to provide input. The information collection notice estimates that some 90 respondents will be responsible for completing this data collection. Since what constitutes “education” programs and costs is not defined in the notice, our member organizations have no basis to assess the accuracy of this estimate. Additionally, given the lack of the above-referenced information and clarification, we are unable to comment on the reliability of the estimated burden of between two and 14 hours per respondent per year. Since this is a new data collection requirement, we do not know if or how it could fold into existing data collection systems and activities of implementing partners. We also do not know how or if this data collection requirement is uniquely necessary for USAID-funded education programs. Indeed, although USAID references the Reinforcing Education Accountability in Development (READ) Act of 2018, the READ Act does not require the specific data identified in this collection notice. Without more information, it seems the same logic and basis for this data collection could apply to all USAID programs. The new requirement therefor could exact a time and cost toll on partner organizations well beyond what is envisioned in the information collection estimate. We simply cannot know without further detail.

Humentum respectfully requests that USAID re-issue its information collection notice to include any collection modalities it intends to use to gather the stated data – including any forms and spreadsheets – along with the terms, scope, and scale of the data collection. Without more information, the information collection notice – and any responsive comments – will prove incomplete, thereby defeating the statutory purpose of the exercise. Our members stand ready to review a revised notice and furnish suggestions based on decades of practical, on-the-ground experience implementing USAID-supported programs. Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Proulx", with a stylized flourish at the end.

Chris Proulx  
Interim President & CEO  
Humentum

CP/cms

CC: Humentum membership