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Development Essentials LLC
E.O. 12866 Meeting 0412-AA90, USAID AIDAR
June 21, 2021, 2:00 pm

Topic	Dec 21, 2020 Federal Registry Notice	May 25, 2021 Federal Registry Notice (Comments & Questions)	Impact
1. What is the timeframe or effective period of the information collection/rulemaking?	Not mentioned	The Agency stated the timeframe will be included in the rulemaking.	The Agency requirement could be open ended or beyond necessary period to collect information.
2. Which contractors and grantees will be included?	Not mentioned	The Agency stated the requirement is mandatory for some USAID missions and voluntary for other missions.	Agency guidance and information could be confusing because of a mandatory and optional participation. Contractors and grantees may interpret voluntary requirement as mandatory.
3. How will the success of the information collection/rulemaking be measured?	Not mentioned	The Agency stated it will be measured primarily by whether data is entered into the Development Solution System.	Only states primary factor of success and infers there are other factors not disclosed. Unknown compliance factors may be used for contractor evaluations.
4. How will the Agency ensure quality of information collected?	Not mentioned	The Agency stated quality of information entered will be verified on a contract-by-contract basis.	Verifiers of information entered will be different for each contract; no consistent guidance provided to verifiers or secondary verifiers leading to confusion.
5. How will contractors and grantees know which information to enter?	Not mentioned	A special requirement will be added to effected awards. Response to comments uses undefined terms to explain what information is to be collected e.g., deliverables, indicators, outputs, and outcomes which are interpreted different across the Agency.	The language of the special requirement (i.e., clause) is not provided in the notice of information collection or rulemaking. This is the purpose of the Federal Registry and rulemaking process. Only vague guidance is provided as to what information is going to be collected from contractors and grantees.

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6. How will the Agency determined which contracts and grantees will be required to enter information?	Not mentioned	The Agency stated it does not know which contracts and grant will be required to enter information. The Agency states the Contracting Officer/Agreement Officer will make the determination.	The Contracting Officer/Agreement Officer do not possess the knowledge to determine the requirement to enter technical information. The response alludes to there is no standard information collected in contracts and grants which can vary by award.
7. How many contracts and grants will be included in the information collection pilot period?	Not mentioned	The Agency stated it does not know.	The Agency is launching a new computer information system and does not know the true application or impact of the system. See attached OIG USAID audit and findings.
8. How will the information collection/ rulemaking effect other systems for collecting information?	Not mentioned	The Agency stated it will not affect information reporting of two other systems (DEC and DDL).	The Agency has more than 2 information collection system across 131 countries and the response does not mention them or the impact on them. The purpose of the Development Solution System is to increase efficiency and reduce redundancy of systems, yet it is not mentioned.
9. Comments raised questions about different guidance to contractors and grantees on the Agency web site versus the Federal Registry announcement	Not mentioned	The Agency stated comments are beyond the scope of the 60-day notice.	Agency is posting conflicting information on the purpose of the Development Solution System, roll out and responsibilities of contractors and grantees. These are the basics of system design and roll-out.
10. One comment asked about whether baseline and targets entered (into the Development Solution System) are the same as those in the contract or grant.	Not mentioned	The Agency responded, the baseline and targets are not included in the contract and grant document. They will be determined between the Contracting Officer Representative/Agreement Officer Representative.	Agency guidance for the information collections is not consistent across all contracts and grants. If there is not consistency in the source and the process of entering information, the system's use is problematic.

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11. One comment asked if contractors and grantees will be required to enter geographic information of activities.	Not mentioned	The Agency responded, contractors and grantees may be required to enter information i.e., disaggregated results of geographic information at the national or sub-national level.	The Agency is providing confusing information on what information will be collected by contractors and grantees.
12. One comment repeated comment 8 above.	Not mentioned	The Agency responded USAID operating units will be required to migrate their data from current systems to the Development Information System. Missions that have existing databases, data repositories, or applications used to manage Monitoring and Evaluations may choose to migrate their data. Plans to decommission of any affected systems will be discussed with deployment.	The Agency provided a confusing response stating will be required to migrate, may choose to migrate, and will be discussed with deployment. The purpose of the Development Information System was to consolidate reporting and improve efficiency, yet this response does not align with that objective.
13. One comment repeated comment 8 and 12 again.	Not mentioned	The Agency responded no agency-wide official reporting systems will be eliminated. In tandem the Agency is pursuing rulemaking to reduce the number of digital information portals for contractors and grantees.	The Agency provided a confusing response, stating no agency reporting systems will be eliminated and the Agency will be reducing portals. The Federal Registry notice does not mention which portals will be eliminated.
14. Two comments asked for more information on rulemaking under RIN 0412-AA90 and information collection.	Not mentioned	The Agency responded to the comment, the collection of information will be updated with rulemaking to cover a full range of information to be submitted under the Development Information Solution.	The Agency provided a confusing response, that the information collection under the Federal Registry notice is incomplete. It did not mention the other information to be collected.

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15. One comment identified poor alignment with the Development Information Solution and indicators (to be entered).	Not mentioned	The Agency responded, to contact the Contracting Officer Representative and Agreement Office Representative.	There is no consistent guidance on resolving data entry problems and requirements. Every problem with data entry will be resolved on a contract-by-contract and grant-by-grant basis and individual basis with the Contracting Officer Representative and Agreement Office Representative.
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