



## Foreign Assistance.gov

A Mandatory Reference for ADS Chapter 579

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## Introduction

In November 2011, the United States became a signatory to the International Aid Transparency Initiative ([IATI](#)). IATI is a voluntary, multi-stakeholder initiative that includes donors, partner countries, and civil society organizations whose aim is to make information about foreign aid spending easier to access, use, and understand. Through the [ForeignAssistance.gov \(FA.gov\) Web site](#), the U.S. Government implements a whole-of-government approach to reporting IATI data by submitting a unified report from all U.S. agencies that manage and/or implement a foreign assistance portfolio.

USAID, in partnership with the Department of State, Office of Foreign Assistance Resources (State/F), is leading the effort to ensure greater transparency of U.S. Government (USG) foreign assistance funding through the launch and expansion of FA.gov and IATI reporting. The USG is committed to making foreign assistance more useful for development, increasing its efficiency, and increasing international accountability. The goal of FA.gov is to give a wide variety of stakeholders, both internal and external, the ability to examine, research, and track USG foreign assistance investments in an accessible and easy-to-understand format.

The first release of USAID data on FA.gov in December 2010 consisted of joint Department of State and USAID budget and appropriation data from FYs 2006-2011, as available in the Congressional Budget Justification. In June 2012, USAID's FA.gov release displayed obligations and disbursements by Operating Unit and sector for FYs 2009-2011. In December 2012, FA.gov updated this data for FY 2012, and released USAID data for download in XML format, which is the IATI common data standard.

In July 2013, USAID released transaction-level data for FY 2013 quarters one, two, and three on FA.gov, consisting of approximately 53,000 records. For the first time, members of the public could search and visualize expanded, timely information about what, where, how, and with whom USAID spends its development dollars. Publication of this data is part of USAID's commitment to increasing transparency and accountability. This detailed release signified the first time that USAID released disaggregated financial data.

In late 2015, USAID began implementation of its [IATI Cost Management Plan](#) in order to improve upon the commitment to fully comply with the greater IATI standard to the extent permitted by U.S. federal law and regulation. In 2016, USAID first reported IATI data to FA.gov in the XML format.

Also in 2016, the Foreign Aid Transparency and Accountability Act became law and required the publication of comprehensive, timely, and comparable information on ForeignAssistance.gov or a successor website, similar to what USAID had been doing previously under [OMB Bulletin 12-01, Guidance on Collection of U.S. Foreign Assistance Data](#).

## Principled Exceptions

[OMB Bulletin 12-01, Guidance on Collection of U.S. Foreign Assistance Data](#), states that, “A core principle of the U.S. assistance transparency policy is a ‘presumption in favor of openness.’” However, at times, public disclosure of foreign assistance data may undermine other USG priorities and interests. For this reason, the following principled exceptions to the presumption in favor of openness are established.

USAID restricts public disclosure of foreign assistance data under the following circumstances:

- a. When public disclosure threatens national security interests;
- b. When public disclosure is likely to jeopardize the personal safety of U.S. personnel or recipients of U.S. resources;
- c. When public disclosure would interfere with the Agency's ability to effectively discharge its ongoing responsibilities in foreign assistance activities;
- d. When there are legal constraints on the disclosure of business or proprietary information of nongovernmental organizations, contractors, or private sector clients;
- e. When the laws or regulations of a recipient country apply to a bilateral agreement and restrict access to information; or
- f. When data reveals private information about individuals that must be kept confidential consistent with ethical guidelines and federal regulations.

When examining information that falls within these categories, USG agencies have sufficient flexibility to protect sensitive information from disclosure, on a case-by-case basis, in order to protect against potential harm while maintaining transparency. To ensure that these exceptions are rarely applied, and are used appropriately and consistent with the presumption of openness, agencies will maintain specific case-by-case justifications for all instances of reliance on the principled exceptions noted above. Agencies will provide these redactions and justifications to the Congress in accordance with the Foreign Aid Transparency and Accountability Act.

## Quarterly Schedule

Bureaus and Independent Offices need to participate in the FA.gov redaction process each quarter. It is important that Bureaus and Independent Offices institutionalize a process for reviewing their data and redactions. Generally, the quarterly timeline does not significantly vary. While exact dates are not included in the timeline below, the Foreign Assistance Data (FAD) team specifies due dates each quarter. Please use this schedule as a general timeline for planning purposes.

1. Phoenix closes at the end of each quarter.
2. Two weeks later, approximately by the 15th of the following month, the FAD team uploads the data into the [Foreign Assistance Data Redaction System \(FADRS\)](#), the USAID tool for reviewing the quarterly data and requesting redactions of specific data fields, and opens the tool for review.
  - i. For FADRS, approved users will be signed in through USAID single sign-on. New users should contact FADRS user administrators in M/MPBP or PPL/DE, by emailing [FADRS@usaid.gov](mailto:FADRS@usaid.gov), for access to the tool based upon the user's role in the review and redaction process.
    1. Roles pertaining to FADRS include:
      - a. Proposer – Proposer of redactions in Bureaus or Independent Offices. If a Bureau or Independent Office only has one user, then the Proposer and Coordinator role are combined.
      - b. Coordinator – Bureau or Independent Office coordinator who may request access for more users. The Coordinator may also reject redaction proposals from users in the Bureau or Independent Office (but the system will not allow for formal approval by the Coordinator). The Coordinator is the point of contact for M/MPBP and PPL/DE in the quarterly review process.
      - c. First Approver – General Counsel or Regional Legal Officer who approves or rejects the redaction proposals.
      - d. Final Approver – M/MPBP and PPL/DE, who manage the process for USAID, and provide final approval or rejection of the redaction proposals.
    - ii. USAID will maintain up-to-date user manuals and make them available for download from the FADRS, which will describe how to navigate through FADRS and propose redactions.
3. Bureaus and Independent Offices review their data. Bureaus and Independent Offices should only review six fields to ensure they do not fall under a principled exception. These fields are shown to users of FADRS as available for redaction to ensure ease of review. The first four fields come from Phoenix, the Agency's

financial system of record: 1) Award Number, 2) Vendor Name, 3) Award Description, and 4) DUNS Number. The last two fields come from Operational Plans: 5) Mechanism Name, and 6) Implementing Mechanism (IM) Narrative. No other field will contain sensitive information. Generally, Bureaus and Independent Offices have two weeks to review their data, propose redactions based upon principled exceptions, receive approval from the First Approver, and note the review is complete in FADRS. FADRS will specify the exact due date each quarter.

4. Bureaus and Independent Offices review all their previous redactions to ensure that the data are still sensitive. If the data are no longer sensitive, users remove redactions in FADRS by following the instructions included in the FADRS user manual.
5. Final Approvers approves or rejects redaction proposals. The FADRS will then remove the final-approved specific data points and produce a downloadable XML dataset for USAID's FA.gov and IATI reporting.
6. Approximately 45 days after the close of the quarter, State/F publishes the most recent data on FA.gov and registers it to IATI.

## **General Counsel (GC)/Regional Legal Officer (RLO) Clearance**

The Bureau or Independent Office GC backstop or RLO clearance is part of FADRS. GC/RLO approval is required for redaction proposals to be reviewed by the FAD team. GC/RLOs are responsible for ensuring that the data fall under a principled exception and Bureaus and Independent Offices are applying the correct principled exception. The FAD team will not accept redaction proposals without GC/RLO clearance.

## **Redactions FAQs**

### **What Do I Review?**

#### New Quarterly Data

USAID is responsible for all of the data in the file, so users need to review everything for their Operating Unit.

Always review the Award Description field carefully for personally identifiable information (PII) inadvertently entered. USAID does not publish PII on FA.gov, as it falls under principled exception (f).

#### Previous Redactions

Users review all previously redacted information each quarter. The FADRS user manual contains specific instructions for accessing previous redactions. Data will remain redacted until otherwise specified by the Bureau or Independent Office. Bureaus and

Independent Offices should confirm previously redacted information is still sensitive and falls under the corresponding principled exception. As situations evolve, Bureaus and Independent Offices should update the status of previously redacted information accordingly in FADRS.

### **What is Already Redacted?**

Each quarter, data fields that USAID redacted in previous quarters continue to be redacted by FADRS until Bureaus and Independent Offices specify that USAID can publish the data.

### **What Must I Redact?**

When contemplating whether a redaction is appropriate, Bureaus and Independent Offices should consider if USAID has made data fields for a particular award available previously on FA.gov or other public Web sites.

POCs must ensure they remove PII from the Award Description field. As defined in [ADS 508](#), PII is information which can be used to distinguish or trace an individual's identity, alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual. PII can include personal address or social security number. Names of government employees are not considered PII if the employee is named while acting in their official capacity, such as the POC for the award or the contracting officer and their title is included. However, certain otherwise public information (i.e. the AOR/COR name) can be considered sensitive in insecure environments like critical priority countries and can be redacted under principled exemption (b).

If a Bureau or Independent Office needs to redact a vendor name because it falls under a principled exception, it should verify that the vendor name does not reappear in other descriptive fields such as Award Description, Mechanism Narrative, or Mechanism Name.

Users can make partial redaction requests in FADRS. If only part of the Award Description, OP Mechanism Name, or OP Mechanism Narrative is sensitive, request that the FAD team only remove the sensitive information from the description. Please do not request to remove the entire field unless absolutely necessary.

- **Partial Redaction Example:**

- Original Award Description/Mechanism Name/IM Narrative before Request:
  - Modification to grant to FA.gov associates for health services.
- Requested Award Description/Mechanism Name/IM Narrative:

- Modification to grant for health services.
- **Full Redaction Example:**
  - Original Award Description/Mechanism Name/IM Narrative:
    - Grant for ABC Associates to continue Sensitive Activity XYZ in Sensitive Area XYZ.
  - Requested Award Description/Mechanism Name/IM Narrative:
    - Remove entire descriptive field because its sensitive and falls under a principled exception.

In February 2014, [GLAAS Guidance](#) went out to all GLAAS users and an Agency Notice went out to the entire Agency that specified the appropriate information to enter into the Award Header and Description fields. By following this guidance, award description fields and award titles should not contain PII or sensitive vendor information.

- If USAID redacts the vendor name, FADRS will automatically redact the DUNS Number. This ensures that users cannot locate sensitive vendor information using other public Web sites.
- USAID will only redact the DUNS Number if the vendor name falls under a principled exception. The DUNS Number alone is not proprietary information.

### **What Can I NOT Redact?**

FADRS only allows Bureaus and Independent Offices to redact specific fields. Bureaus and Independent Offices may not redact the program area and program element fields, as these are reported in the Congressional Budget Justification and/or the annual submission on U.S. foreign assistance to the Organization for Economic Cooperation and Development, Development Assistance Committee (OECD/DAC). Therefore, they are public information. In rare circumstances, if official U.S. policy states that a certain program is not taking place, then Bureaus and Independent Offices may redact the information.

Bureaus and Independent Offices may not redact the names of government employees from the award description unless the information is sensitive or is combined with other information that may be sensitive (i.e., home address). The name of a government employee alone is not sensitive information. Only if releasing the name of an individual falls under principled exception (b) may an Operating Unit redact the name.

### **What About Post-Publication Redactions?**



The FAD team will not accept post-publication redactions, unless extraordinary circumstances warrant removal. Due to the way FADRS manages the data as well as the way State/F ingests the data into FA.gov, post-publication redactions are an exceptionally laborious process. Additionally, because USAID has already registered the data to the IATI Web site, the data are already in the public domain in multiple places and USAID cannot redact data from IATI. If the award appears in subsequent quarters, USAID can accommodate the redaction request assuming it fits a principled exception.

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