



**USAID**  
FROM THE AMERICAN PEOPLE

## Article I. **USAID PROCUREMENT EXECUTIVE**

### Section 1.01 **PROCUREMENT EXECUTIVE'S BULLETIN NO. 2015-04**

SUBJECT: Partner Vetting For Assistance: A Guide for Agreement Officers

**1. Scope:** This Bulletin applies to all USAID Agreement Officers (AOs) and Assistance staff worldwide.

**2. Purpose:** The purpose of this PEB is to provide Agreement Officers and Assistance staff with guidance on their roles and responsibilities when partner vetting is conducted during an assistance award process and during the performance of a Federal assistance award.

**NOTE: AT THE PRESENT TIME, PARTNER VETTING AS DESCRIBED IN THIS PEB AND AS SET FORTH AT 2 CFR PART 701 IS BEING CARRIED OUT ONLY AS A PILOT PROGRAM FOR AWARDS IN GUATEMALA, KENYA, LEBANON, PHILIPPINES, AND UKRAINE, INCLUDING WASHINGTON-BASED AWARDS WITH ACTIVITIES IN THOSE COUNTRIES**

### **2. Background:**

USAID (in conjunction with a joint program at the Department of State) is conducting a Partner Vetting System pilot program for USAID assistance and acquisition awards. The purpose of the Partner Vetting System pilot program is to help mitigate the risk that USAID funds and other resources could inadvertently benefit individuals or entities that are terrorists, supporters of terrorists or affiliated with terrorists, while also minimizing the impact of the vetting process on USAID programs and its implementing partners. Information collected during the vetting process will be used to conduct national security screening of key individuals and organizations to help mitigate the risk that USAID funds inadvertently or otherwise provide support to entities or individuals associated with terrorism.

USAID is conducting a pilot program in five missions: Guatemala, Kenya, Lebanon, Philippines, and Ukraine. While this pilot program will help establish best practices and resource implications for the potential use of a Partner Vetting Systems Agency-wide, no decision has been taken to deploy partner vetting agency-wide. Results of the pilot program will be reported to Congress in accordance with relevant legislative requirements.

U.S. Agency for International Development  
1300 Pennsylvania Avenue, NW  
Washington, DC 20523 [www.usaid.gov](http://www.usaid.gov)

Section 1.02      The steps involved in vetting for an assistance award are:

- 1) The Agreement Officer's Representative (AOR) completes the Program Description and then conducts the pilot Risk-Based Assessment (RBA).
- 2) The AOR notifies the vetting official at the Mission-based Vetting Support Unit (VSU) that the RBA is ready for review. The vetting official reviews the RBA for completeness and determines whether vetting is required. (Note: For the pilot program, vetting is required for all awards.)
- 3) If vetting is required, the vetting official notifies the Agreement Officer (AO), and the AO includes the notice of the vetting requirement in the funding opportunity announcement. In the notice, the AO identifies when applicants are required to submit PIFs and if USAID intends to vet beneficiaries under that award.
- 4) The AO notifies applicants to submit the OMB-approved Partner Information Form (PIF). Organizations applying for Federal financial assistance (2 CFR Part 200.40(a)) with USAID must submit personally identifiable information on their key individuals via the PIF.
- 5) When all applicants will be vetted, the AO submits the list of applicants that are subject to vetting to the VSU after the deadline for receipt of applications. When the apparently successful applicant is vetted, the AO submits the name of the apparently successful applicant to the VSU before award. The VSU reviews the PIF for completeness and submits it to SEC for vetting.
- 6) The VSU reviews the PIF for completeness and submits it to SEC for vetting.
- 7) USAID's Office of Security (SEC) vets the key individuals listed on the PIF by checking their personally identifiable information against public and non-public databases.
- 8) If there is an encounter, SEC evaluates the encounter by analyzing the reliability, relevance, and timeliness of the information.
- 9) SEC submits a vetting recommendation to the vetting official.
  - a) If SEC's recommendation is "eligible," the vetting official notifies the AO, who proceeds with the procurement process.
  - b) If SEC's recommendation is "ineligible," the vetting official drafts a decision memo and sends it to Mission management for a determination. Secondary review may take place in the event that the appropriate parties do not concur with SEC's recommendation. The vetting official notifies the AO and the applicant of the final determination.
- 10) Within seven calendar days after the date of the vetting official's notification, the prospective recipient or subrecipient may appeal a determination of ineligibility by submitting a reconsideration request in writing to the vetting official.
- 11) The vetting official sends the final decision to the applicant within seven calendar days after the reconsideration request is received.

### 3. Responsibilities and Requirements:

The AO's responsibilities and requirements are specified in the attached guidance.

**4. Effective Date.** This Bulletin is effective and will remain in effect until cancelled by the Procurement Executive.

11/20/2015

Date

/s/

Mark Walther

Senior Procurement Executive

Attachments:

1. Partner Vetting For Assistance - A Guide for Agreement Officers
2. Selection Non-Disclosure Agreement for Vetting Officials
3. Partner Vetting System Pilot Program - Frequently Asked Questions

## Attachment 1 - Partner Vetting For Assistance - A Guide for Agreement Officers

### Purpose

The purpose of this document is to provide Agreement Officers (AOs) with guidance on their roles and responsibilities for Partner Vetting under assistance actions. Currently, Partner Vetting is being conducted in five Partner Vetting System (PVS) pilot countries: Guatemala, Kenya, Lebanon, Philippines, or Ukraine. Similar vetting procedures are being conducted in West Bank/Gaza, Afghanistan, and Syria.

### Partner Vetting

In April 2012, USAID amended AIDAR parts 713, 714, 715, and 716 and added a new subpart, 704.40, to implement the Agency's Partner Vetting System (PVS) for acquisition. On July 27, 2015, USAID added 2 CFR Part 701 to its regulations to implement the Agency's Partner Vetting System (PVS) for assistance. The PVS will complement the Agency's other requirements for terrorist financing clauses, terrorist financing certifications, and review of public lists of designated groups and individuals.

Partner vetting is conducted on the organization's "key individuals." "Key individuals" means

- Principal officers of the organization's governing body (for example, chairman, vice chairman, treasurer and secretary of the board of directors or board of trustees);
- The principal officer and deputy principal officer of the organization (for example, executive director, deputy director, president, vice president);
- The program manager or chief of party for the USG-financed program; and
- Any other person with significant responsibilities for administration of the USG- financed activities or resources, such as key personnel regardless of whether or not they are employees of the prime recipient.

Although all "key personnel" under an award are "key individuals" for the purpose of vetting, "key individuals" is a broader category that also includes persons who are not key personnel. Key personnel are those employees of the recipient, or any subrecipient, affiliates, joint venture partners, or consultants considered to be essential to the work being performed under the award, while key individuals also includes principal officers and directors as described above.

### Planning

During the planning phase of an assistance action, USAID determines whether a particular assistance action is subject to vetting using the pilot Risk-Based Assessment (RBA), in accordance with the *USAID Guidance for Preparing RBAs for the Joint Partner Vetting System Pilot Program*. The Agreement Officer's Representative (AOR) conducts an RBA for all new programs or activities in a pilot country that may result in an award. If the Vetting Support Unit (VSU) determines that vetting is warranted for an assistance action based on the outcome of the RBA, the VSU directs the AO to include the requirement for vetting in the notice of funding opportunity. **To the extent practicable, for all awards in the pilot missions for the duration of the pilot, the RBA will be conducted for each assistance action and vetting will be conducted for each assistance award to gather data on the effectiveness of the RBA.**

Section 1.03 Requirements and Terms for Vetting. The AO must include the Pre-Award Requirements and Award Term found in Appendix B to Part 701 in the notice of funding opportunity.

Determining the Stage for Conducting Vetting. When drafting the notice for funding opportunity, the AO, in consultation with the AOR that conducted the RBA, must specify at what stage of the award selection process Applicants must submit the USAID Partner Information Form, USAID Form 500-13 (PIF).

In determining the appropriate stage for vetting, AOs should consider the following factors:

- The benefit of knowing whether all applicants or just those more likely to receive the award have passed vetting prior to making the selection decision;
- The resource impacts, both on applicants and USAID, of vetting multiple applicants;
- The urgency of the action;
- The number of applications anticipated;
- The reconsideration timelines;
- Any other factors that may have an impact on the vetting timeline.

Typically, the appropriate stage for vetting is just prior to award, vetting the apparently successful applicant. However, after considering the factors that affect the timing of the vetting process, the AO may decide to conduct vetting at a different stage in the award process.

When the AO requires vetting at the submission stage, all applicants will be required to submit the completed PIF. The AO should require vetting at the application submission stage only in rare situations, such as when the urgency of the program precludes waiting just prior to award for vetting.

As provided in Appendix B to Part 701, the AO must also include the contact information for the vetting official or mailbox for submissions of vetting information.

## **Pre-award**

**Selection proceeds separately from vetting.** The AO makes the award determination separately from the vetting process and without knowledge of vetting-related information other than that the apparently successful applicant is either eligible or ineligible for award based on the vetting process.

The person responsible for the vetting process is the designated vetting official. The vetting official has the primary responsibility for receiving vetting information from applicants, responding to questions about information to be included on the PIF, coordinating with the USAID Office of Security (SEC), and conveying the vetting determination to the AO and to each applicant that is subject to vetting, as well as to the AO. The vetting official is not part of the Office of Acquisition and Assistance or the Mission's acquisition and assistance office and has no involvement in the selection process.

**Selection Non-Disclosure Agreement for Vetting Officials.** The designated vetting official must sign the attached non-disclosure agreement prior to receiving the names of the Applicants, key individuals or any other information related to the award process. The AO will provide the agreement to the vetting official for signature and must have a signed copy of the agreement in the award file. The vetting official, any vetting support staff, and SEC are prohibited from releasing any recipient or applicant information or selection information to anyone other than within the vetting process without the AO's approval.

**Directing Applicants to Submit the PIF.** The announcement of funding opportunity notifies prospective Section 1.04 applicants of the vetting requirements and procedures. At the stage designated, the AO instructs applicants who are subject to vetting to submit the completed PIF to the vetting official identified in the notice of funding opportunity.

Applicants with any questions about the PIF must contact the vetting official, not the AO, negotiator, or AOR. The AO provides the vetting official with a list of the applicants and “key individuals” of applicants, appropriately marked as “Sensitive But Unclassified Information,” who have been asked to submit the PIF. The vetting official, any vetting support staff, and SEC are prohibited from releasing any recipient or applicant information or selection information to anyone without the AO’s approval.

**Communications with Applicants Regarding Vetting.** The vetting official is responsible for notifying applicants that they are either eligible or ineligible for award based on vetting. For applicants who have not been found eligible as a result of vetting, the vetting official provide a written explanation of the basis of the vetting determination using the template approved for mission use in coordination with the Partner Vetting Working Group at USAID/Washington. Any proposal to provide notification by other means must receive prior, written approval from both the Office of the General Counsel and SEC at USAID/Washington. SEC determines which details of the vetting determination the vetting official may include in the written explanation. Only the vetting official can directly communicate with an applicant regarding the vetting process and determination.

**Vetting the Apparently Successful Applicant.** When vetting the apparently successful applicant prior to award, the AO will direct only the apparently successful applicant to submit its PIF to the vetting official. The vetting official will notify the applicant and the AO that the vetting determination is complete and that the applicant is either eligible or ineligible as a result of vetting. If the applicant is eligible, the AO may proceed with award. If the applicant is ineligible, the AO must allow the apparently successful applicant to request reconsideration as described below. If the applicant does not request reconsideration of the vetting determination within the required number of days after being notified, or if reconsideration does not change the vetting decision, the AO will award to the next best applicant in accordance with the merit and risk review and who also is found eligible as a result of vetting.

**Vetting all Applicants.** Vetting all of the applicants is not recommended. Vetting of all applicants should only occur when research suggests that very few applications will be submitted and the urgency of the program precludes waiting conducting vetting just prior to award for vetting. When the notice of funding opportunity states that vetting will occur at submission of applications, the AO must direct applicants to submit their forms directly to the vetting official by the date specified for submission of proposals in the notice of funding opportunity. After all vetting determinations have been made, the vetting official notifies applicants that they are either eligible or ineligible for award based on vetting. Concurrently, the vetting official also notifies the AO that all vetting determinations have been provided to the applicants. The vetting official indicates to the AO whether or not all applicants have been found eligible but must not provide the AO with specific information on which the applicant(s) have not passed vetting.

**Changes to Key Individuals.** The AO must require applicants who change any key individuals prior to award for any reason, including but not limited to failure to pass vetting, to submit their revised PIFs to the vetting official as soon as possible to allow for vetting of all key individuals not previously vetted. The AO will proceed with the selection independently from the vetting process. The AO must confirm with the vetting official that the apparently successful applicant is eligible as a result of vetting. If the applicant is eligible, the AO may proceed with award. If the applicant is found ineligible as a result of vetting, the AO must award to the eligible applicant next in line for award based on the merit and risk review.

**Reconsideration.** Within seven (7) calendar days after the date of the vetting official's notification, any applicant that has been found ineligible as a result of vetting may request in writing to the vetting official that the Agency reconsider the vetting determination. Within seven (7) calendar days after the vetting official receives the request for reconsideration, the vetting official will provide the reconsideration decision to the applicant. The Agency's vetting determination after reconsideration is final.

**Award.** After vetting has been completed, the vetting official will notify the AO that vetted applicants are either eligible or ineligible for award based on the vetting process. The AO must only award to an applicant who is eligible for award after the completion of vetting.

### **Post-award Process**

For all awards that the agency has determined are subject to vetting, the recipient must submit to the vetting official the completed PIF any time it changes key individuals (and all key individuals will be vetted or vetted again, at the same time). For those awards where the agency has determined that subawards will be vetted, the prime recipient must submit to the vetting official the completed PIF when the recipient anticipates that it will require prior approval for a subaward in accordance with 2 CFR 200.308(c)(6). The recipient must notify the AO that it has submitted the PIF to the vetting official but must not provide the PIF itself to the AO. The recipient must comply with the terms of the award regarding changes to Key Personnel or approval of a subaward. If the recipient requests approval to change Key Personnel or a subaward but has not notified the AO that it has submitted the PIF to the vetting official, and then the AO must remind the recipient of the post-award vetting requirements in the award AND notify the vetting official of the proposed change in Key Personnel or proposed subaward. The AO must not approve either key personnel changes or subawards until vetting is completed. Key Personnel are "key individuals" for vetting purposes. "Key individuals" is a broader category and includes persons who are not Key Personnel.

USAID may vet key individuals of the recipient and any required subrecipients at any time during performance using the information already submitted on the PIF.

## Attachment 2 - Selection Non-Disclosure Agreement for Vetting Officials

I acknowledge and agree to the following:

1. I will not disclose nor seek to obtain selection information, including but not limited to proposed costs submitted in response to a notice of funding opportunity, selection plans, merit review plans, merit review of applications, risk reviews including review of cost, rankings, reports, information concerning the assistance award process, information marked as sensitive but unclassified information or information used to prepare for an award, before the assistance award to which the information relates, without advance written authorization from the Agreement Officer.
2. If I obtain selection sensitive information without prior written authorization by the Agreement Officer, I will: (i) promptly notify the Agreement Officer; (ii) return all information in either “hard” or “soft” (i.e., electronic) form to the Agreement Officer; (iii) neither copy nor retain any copies; and (iv) not disclose the information, except as permitted herein.
3. I will only use selection information for official/authorized Government purposes.
4. I am aware that unauthorized disclosure of the selection information could damage the integrity of award action and award, and that transmission or revelation of such information to unauthorized persons or use for other than the intended governmental purposes could subject me to penalties, prosecution and suspension and debarment under applicable laws.
5. I will safeguard all materials pertaining to selections, including following all directions from the Agreement Officer, and promptly return them to the Agreement Officer upon completion of the vetting process.
6. I will not participate personally and substantially in an official capacity in any selection activity which I am aware will have a direct and predictable effect on my financial interest or those persons whose interest are imputed to me under laws, regulations or contractual obligations. I will not use the selection information for my private gain or the private gain of others, either by my direct or indirect action or by giving counsel, recommendations, or suggestions to others.
7. I am not aware of any matter which might reduce my ability to participate in any of the abovementioned activities in an objective and unbiased manner or which might place me in a position of a conflict, real or apparent, between my responsibilities as a participant and other interests.
8. If after the date of execution of this agreement, an actual or potential conflict occurs, I will notify the Agreement Officer in writing and thereafter, until advised by the Agreement Officer to the contrary, will not participate further (by rendering advice, making recommendations, voting, or otherwise) in any activities.
9. The non-disclosure requirements under the provisions of this agreement are to be interpreted and applied consistently with, and they do not supersede, conflict with, or otherwise alter the employee obligations, rights, or liabilities created by existing statute or Executive order relating to (1)

classified or national security information, (2) communications to Congress, (3) the reporting to an Inspector General of a violation of any law, rule, or regulation, or mismanagement, a gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety, or (4) any other whistleblower protection. The definitions, requirements, obligations, rights, sanctions, and liabilities created by controlling Executive orders and statutory provisions are incorporated into this Agreement and are controlling.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

## Attachment 3 - Frequently Asked Questions

### USAID/State Partner Vetting System Pilot Program Frequently Asked Questions September 2015

#### **1. What is the Partner Vetting System pilot program?**

ANSWER: The U.S. Agency for International Development (USAID) and the U.S. Department of State (State) are implementing a coordinated Partner Vetting System (PVS) pilot program that was congressionally mandated in the FY 2012 Appropriations Act. USAID is implementing the pilot program in Guatemala, Kenya, Lebanon, the Philippines, and Ukraine. USAID's pilot program includes the vetting of U.S. and non-U.S. persons, and applies a risk-based approach. Under the pilot program, USAID will test vetting policies and procedures, evaluate the resources required for vetting, and seek input from implementing partners, Congress, and other stakeholders about the impact of vetting on USAID-funded delivery of foreign assistance. The FY 2012 Appropriations Act, and related acts, also requires a joint USAID/State report to Congress following completion of the pilot program that evaluates the estimated timeline and criteria for evaluating PVS for expansion.

#### **2. How did USAID choose the 5 pilot countries?**

ANSWER: State and USAID considered a range of factors during the selection of Guatemala, Kenya, Lebanon, Philippines, and Ukraine as the pilot countries, including the following:

- Geographic diversity;
- Range of terrorist threat levels; and
- Countries where State and USAID have comparable programs.

#### **3. What lessons does USAID aim to gain from the pilot?**

ANSWER: The purpose of the PVS pilot program is to help assess the extent to which the pilot's partner vetting approach adds value as a risk mitigation tool, and if so, under what circumstances vetting should occur. USAID's objectives in establishing the PVS pilot program are as follows:

- Assess the pilot's risk-based approach to test certain assumptions related to levels of risk, types of awards, and the nature of proposed activities, vetting both U.S. and non-U.S. citizens;
- Evaluate the efficiency of the vetting process by assessing internal and external business processes; and
- Gather information regarding the cost effectiveness of using partner vetting as an additional means to prevent the inadvertent funding of terrorism.

#### **4. Has USAID decided to implement a worldwide partner vetting program?**

ANSWER: No. USAID has made no decision to implement partner vetting on a global basis. USAID intends to complete the pilot, submit the joint report to Congress, and consult with Congress and Agency partners before assessing how the pilot findings should impact Agency vetting programs going forward.

#### **5. Does USAID employ a clear definition of individuals to be vetted?**

ANSWER: Yes. "Key individual" is a term describing who will be vetted and is defined in the published final rules for Partner Vetting of USAID acquisitions and assistance, which can be found at 48 CFR 752.204-71 and 2 CFR 701.1. Under the PVS pilot program, key individuals of potential awardees and sub-awardees will be vetted. Key individuals are defined as: (i) principal officers of the organization's governing body (e.g., chairman, vice

chairman, treasurer and secretary of the board of directors or board of trustees); (ii) the principal officer and deputy principal officer of the organization (e.g., executive director, deputy executive director, president, vice president); (iii) the program manager or chief of party for the USG-financed program; and (iv) any other person with significant responsibilities for administration of the USG-financed activities or resources.

#### **6. What is the Risk-Based Assessment and how does it impact the pilot?**

ANSWER: The PVS pilot Risk-Based Assessment (RBA) is a tool that establishes a risk profile for new USAID programs or activities to be implemented in a pilot country. Under the RBA, the pilot utilizes a risk-based approach to test certain assumptions. In order to test these assumptions against baseline data, generally all programs and activities will be vetted regardless of the RBA outcome. Some exceptions, such as grants to Public International Organizations, are being made in the pilot. USAID staff conducts the RBA at the program or activity level and document certain information, including the following:

- Program/activity location(s);
- Country risk rating provided by USAID’s Office of Security;
- Nature of the assistance provided (e.g., emergency goods and services, food assistance, capital investment, cash-for-work, cash assistance, microfinance loans, scholarships, security services, training, technical assistance, health services, and commodities);
- Anticipated nationality of prime (U.S. or non-U.S.);
- Likelihood that sub-contractors or sub-grantees will be required to implement the program/activity;
- Anticipated monitoring and evaluation (M&E) of the program/activity (Offsite or Remote M&E, Third Party M&E, or Onsite M&E by USAID);
- Amount of proposed award (\$150,000 or under; \$150,001 to \$25 million; or over \$25 million);
- The VSU may also assess supplemental threat information, and/or any additional risk mitigation procedures above and beyond standard USAID anti-terrorism contracting and procedural controls that may reduce the risk of diversion.

In addition, USAID will provide implementing partners with the option to submit information to the VSU that they believe may impact the risk profile of the program/activity.

#### **7. Will USAID offer “direct vetting” as part of the PVS Pilot?**

ANSWER: Yes. USAID is offering “direct vetting” as an option for acquisition and assistance awards under the PVS pilot program. Under the pilot’s direct vetting approach, at the option of the prime awardee, USAID would communicate directly with the potential sub-awardee solely for the purposes of vetting, including the transmittal of eligibility and ineligibility notices. However, the prime would remain responsible for verifying that the information provided by the potential sub-prime organizations to USAID for the purposes of vetting is accurate and complete to the best of the prime’s knowledge. In evaluating the direct vetting approach, USAID will consider the extent to which the approach is utilized and analyze its impact on USAID and partner organizations.

#### ***Verification Language for Direct Vetting***

*[Name of prime inserted by VSU] certifies that it has taken reasonable steps in accordance with sound business practices to verify the accuracy of the information contained in the attached Partner Information Form for [Name of key individual(s) inserted by VSU].*

*[Name of prime inserted by VSU] understands that the U.S. Government may rely on the accuracy of such information in processing this vetting request.*

**8. Can USAID clarify which beneficiaries will be vetted under the pilot?**

ANSWER: Yes. Beneficiaries will be vetted under the pilot. There are a number of contexts in which USAID provides foreign assistance to beneficiaries, and the policies and procedures for the pilot program attempt to address these multiple contexts. Clarification on which beneficiaries are vetted under the PVS pilot is provided as follows:

- USAID will vet individuals for whom the pilot Mission finances scholarships, fellowships, or other structured training, but only where the Mission specifically approves the individual participants and where (i) such scholarship, fellowship, or other training is in the U.S. or in third countries, or (ii) such other training in the pilot country that lasts more than five consecutive work days.
- USAID will vet organizations that are direct recipients of cash or in-kind support (e.g., a hospital receiving pharmaceuticals, a company whose manufacturing will be repaired or replaced, or a Non-Governmental Organization whose recreational facilities will be renovated). Vetting is not required for persons or entities that benefit from such assistance indirectly (e.g., patients of the hospital, customers of the manufacturer, or users of the recreational facilities).
- Vetting is not required for individuals who receive jobs under employment generation activities, including incidental job training; or ultimate beneficiaries of cash or in-kind assistance, such as food, water, medical care, micro-enterprise loans, or shelter.
- Refugees and Internally Displaced Persons will not be vetted under the pilot.
- Participant trainees who have obtained J-1 Visas in order to participate in U.S.-based training are exempt from vetting.

USAID will notify potential awardees in the solicitation if the Agency intends to vet beneficiaries under that award.

**9. Will PEPFAR-funded activities be vetted under the pilot?**

ANSWER: Yes. USAID will vet PEPFAR-funded activities under the PVS pilot program.

**10. Does the PVS pilot program take account of protections provided by the Privacy Act and due process considerations?**

ANSWER: Yes. USAID's PVS pilot vetting policies and procedures are in compliance with the Privacy Act. USAID has completed all appropriate regulatory steps and provides for notice and appeal in the event of denial of an award based on the outcome of the vetting process. Personal identifying information (PII) collected by USAID under the pilot program is maintained in secure databases, and there are role-based limitations on USAID staff's access to information in the Partner Vetting System. Consistent with the Privacy Act, all information submitted to USAID on an individual will be available for that individual to request, review, or correct.

Throughout the design of the PVS pilot program, USAID has been committed to protecting national security while complying with all administrative requirements and protecting privacy, civil liberties, and other rights,

including due process, of partners and their employees. PII is required for proper identification of those vetted. Retention of the information provides for appropriate audit and follow-up. It also provides for efficiency in that individuals will not need to resubmit data or forms each time they apply for an award. USAID plans to determine an appropriate retention cycle for the PII in the database through implementation of the pilot.

**11. Is USAID categorically exempting humanitarian assistance from vetting in the PVS pilot program?**

ANSWER: In order to prevent delays in the provision of urgently needed humanitarian assistance in the pilot, USAID does not require pre-award vetting of urgent humanitarian assistance in the pilot program. USAID reserves the right to vet post award and once the immediate need has been addressed.

**12. Who retains the personal identifying information that partners provide to USAID as a part of vetting in the pilot program, for what period of time, and subject to what safeguards?**

ANSWER: PII submitted by USAID partners applying for pilot acquisition or assistance awards that are subject to vetting in the pilot program is maintained by USAID in the vetting database that is utilized by the agency for processing, management and record-keeping. As noted above, USAID plans to determine an appropriate retention cycle for the PII in the database through implementation of the pilot. The PVS database resides behind the USAID firewall and meets Federal Information Security Management Act (FISMA) requirements for retention of such information. Only USAID staff with specific duties related to vetting and a need-to-know are provided access to the data. In those instances in which a “match” occurs, additional identifying information may be submitted to the record that already exists in the non-public database.

**13. Are organizations that are found ineligible barred from applying for USAID acquisition or assistance awards in the future?**

ANSWER: No. Entities or individuals found ineligible in the PVS pilot program may apply for new pilot funding opportunities, and each application for funding will be considered on its own merits.

**14. At what points in the procurement process and award administration will vetting occur?**

ANSWER: In the PVS pilot program, vetting of an organization will occur at the appropriate point in the procurement process each time a potential awardee is in consideration for an award subject to vetting. Recipients will still be required to submit a Partner Information Form any time key individuals change and before issuance of qualifying sub-awards but will not be required to resubmit the form annually if no information has changed or expired.