

**Johnson, Beverly(M/AS/IRD)**

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**From:** Nancy Yuan [nyuan@asiafound-dc.org]  
**Sent:** Monday, December 03, 2007 7:14 PM  
**To:** Denale, Jeffrey A(SEC/OD)  
**Subject:** Comment on October 2, 2007 Federal Register Notice: Republication Federal Register Notice July 23, 2007 (72FR 40110)  
**Attachments:** DB-TAF\_PVS\_Comments\_91207.pdf

Mr. Jeff Denale  
Coordinator for Counterterrorism, Office of Security  
U.S. Agency for International Development  
Ronald Reagan Building  
1300 Pennsylvania Avenue N.W.  
Washington D.C. 20523

Dear Mr. Denale

The Asia Foundation, in response to earlier Federal Register notices regarding the proposed Partner Vetting System, has previously filed formal comments expressing a range of concerns we have that are raised by this proposed USAID program. The Foundation stands by those comments (attached), particularly in light of the proposed "partner information form" that was published along with the October 2 request for comment regarding the estimated public burden of the paperwork that would be required by the proposed vetting system.

In addition, the Foundation submits these comments on the paperwork burden issue itself, as provided for in the Oct. 2, 2007 FR notice:

The Public Burden Statement in the October 2 FR notice suggests that the information sought in the proposed "vetting" form would require 15 minute per response. But the definition given of who is a "key individual" whose identifying information would be required itself has four sub-categories. Given the nature of that definition, this form would appear to call for personal identifying information on a minimum of four persons per grant or project, and in fact would appear likely to call for such information on a dozen or more "key individuals" for each grant, sub-grant, project or instance of technical assistance.

Thus each form (assuming one form per project, grant, or sub-grant) would require the gathering of such personal identifying information on anywhere from four to dozens of individuals. Even assuming the willing compliance on the part of all recipients of grants, the gathering of this volume of information about so many individuals would itself require considerably more than the 15 minutes estimated. Moreover, there are attendant recordkeeping burdens associated with the protection of this personal data. In addition, the inclusion of "in-kind assistance" such as technical assistance increases the number of individuals who would be included in the form. A data collection system, in addition to the procedures that the Foundation already has in place for reporting under the voluntary guidelines for the U.S. Treasury Department and NGO certification requirements under which we already report, would have to be devised at the Foundation to ensure that this database of private information was properly handled and protected from unintended or unauthorized disclosure to third parties. This would add to the bureaucratic and paperwork burden.

The "public burden statement" also suggests that approximately 2000 individuals' personal identifying information may be called for under the proposed partner vetting system. In fact, The Asia Foundation alone makes an average of 800 grants per year, a substantial fraction of which include some AID funds. Assuming again that the number of individuals that would in fact be covered with respect to each grant or sub-grant made by the Foundation would be at least four and probably in the range of a dozen or more, then the total number of individuals covered, and who would have to be reported on by The Asia Foundation alone, would number well in excess of 2000. Our best estimate is that a minimum of some 3000 people would be covered with respect to Asia Foundation activity alone in a year, not counting the rest of the NGO community.

In conclusion, The Asia Foundation respectfully requests that the proposed Partner Vetting System that is described in the FR and the proposed information collection be withdrawn and not implemented. The current

system, of compliance with the "voluntary guidelines" of the Treasury Department and the NGO certification requirements of USAID are sufficient to achieve the appropriate objective of preventing the inadvertent funding of terrorists with USAID funds.

Sincerely,

Nancy Yuan  
Vice President  
The Asia Foundation

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