

Johnson, Beverly(M/AS/IRD)

From: Elliott, Evan [EElliott@INTERACTION.ORG] on behalf of Worthington, Sam [SWorthington@INTERACTION.ORG]
Sent: Friday, September 21, 2007 5:10 PM
To: Denale, Jeffrey A(SEC/OD); USAID Privacy; Johnson, Beverly(M/AS/IRD)
Cc: drostker@omb.eop.gov; sdudley@omb.eop.gov; afraas@omb.eop.gov
Subject: InterAction's response to the July 23 Notice
Attachments: InterAction response to July 23 Federal Register Notice (PVS).pdf

Please find attached InterAction's official response to the July 23 Federal Register Notice regarding USAID's new Partner Vetting System.

Thanks,

Samuel A. Worthington
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Ron Sconyers, *Physicians for Peace*
Kathy Spahn, *Helen Keller International*
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September 21, 2007

Jeff Denale
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Philip M. Heneghan
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Beverly Johnson
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Re: Notice of Public Information Collections
Partner Vetting System
72 Fed. Reg. 40110
Doc. 07-3555

To Whom It May Concern:

I am writing to you on behalf of InterAction, the largest alliance of international humanitarian and development organizations working overseas. Our members receive about \$7 billion in annual private donations from the American people to support their activities in every developing country in the world, and approximately half of InterAction's members are USAID implementing partners.

On July 17, 2007, USAID announced its intention to establish a system of records known as the Partner Vetting System (PVS) requiring, as condition of receiving USAID funds, non-governmental organization (NGOs) applicants to provide the personal information of their Boards of Trustees, senior officers and other employees. Subsequently, on July 20, 2007, USAID published a proposed rule to exempt the PVS from the protections of the Privacy Act of 1974 (Proposed Rule). As indicated in our responses to the previous USAID publications (attached via email), InterAction believes USAID has failed to establish any sufficient reasons to make the PVS

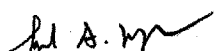
process necessary and has not adequately supported its application to exempt the PVS from the Privacy Act

The third Federal Register Notice, as referenced above, seeks comments from the NGO community, including InterAction member organizations, on the efficacy of and burden estimates related to the PVS. For the following reasons, InterAction believes that USAID is premature in seeking any form of qualitative or quantitative comments on the PVS:

USAID has not provided any substantive information regarding the PVS. There have been no schematic or process descriptions of how and when the PVS information will be collected from applicant NGOs and there are no formalized definitions as to the types of entities and individuals that will be covered or types of employees for which an entity will be required to report. Further, the proposed form for PVS information collection has not been published. Without this type of basic information and without having received any indication as to why the PVS is necessary, the NGO community is rendered unable to provide meaningful comment. USAID has clearly ignored the appropriate rule-making processes.

We again urge USAID to withdraw the PVS and Proposed-Rule and to engage in a dialog with the interested and impacted parties. Finally, if USAID decides that a vetting system is desirable, InterAction respectfully requests that the agency engage in a transparent and appropriate rule-making process.

Sincerely,



Samuel A. Worthington
President & CEO
InterAction

Attachments:

InterAction response to July 17 Federal Register Notice
InterAction response to July 20 Federal Register Notice

cc: Henrietta Fore, Acting Administrator, USAID

Susan Dudley, Administrator, Office of Information and Regulatory Affairs, OMB
Dr. Arthur Fraas, Branch Chief, Office of Information and Regulatory Affairs, OMB
David Rostker, Desk Officer, Office of Information and Regulatory Affairs, OMB