

Higginbotham, George (M/MPBP/POL)

From: Bashadi, Sarah <Sarah_O._Bashadi@omb.eop.gov>
Sent: Wednesday, January 25, 2012 10:48 AM
To: Higginbotham, George (M/MPBP/POL)
Subject: FW: DS form 500-13 Partner Information Form

Please respond as appropriate. Thanks.

-----Original Message-----

From: FN-OMB-OIRA-Submission
Sent: Wednesday, January 25, 2012 10:05 AM
To: Bashadi, Sarah
Subject: FW: DS form 500-13 Partner Information Form

-----Original Message-----

From: Martha Thompson [mailto:MThompson@uusc.org]
Sent: Thursday, January 05, 2012 10:36 PM
To: FN-OMB-OIRA-Submission
Subject: RE: DS form 500-13 Partner Information Form

Dear Sirs or Ma'am

I am writing from the Unitarian Universalist Service Committee to comment on the Partner Information form, DS Form 500-13 OMB 0412-0577.

While we do share the goal of protecting USAID and State Department resources from diversion to terrorist groups, we believe that the Partner Vetting System (PVS), is not the right approach to accomplish this goal. The PVS requirement for grant applicants to collect detailed personal information on its board members, key staff and partners, as well as for sub-grantees and contractors, for submission to the U.S. government is neither an appropriate nor effective prevention strategy.

Unless there are significant changes in the design of PVS, the fundamental problems that lead 175 nonprofits to file comments opposing it in 2007 remain. Among the groups opposing PVS were InterAction, the Global Health Council, the International Center for Not for Profit Law and OMB Watch. In addition, in 2010 the President's Advisory Council on Faith-Based and Neighborhood Partnerships recommended that the government work with nonprofits to create an alternative to PVS.

The U.S. charitable sector is acutely aware of the dangers and challenges of working in conflict zones and areas where terrorist groups operate, and is constantly updating and adapting its due diligence efforts to address these threats. That is why we believe that due diligence conducted by NGOs is a superior approach to the proposed U.S. government's Partner Vetting System (PVS). PVS would require USAID and State Dept. grant applicants to submit detailed personal information on "key individuals" to be shared with U.S. intelligence agencies. This threatens to undermine the NGO credibility with grantees and partners around the world, endanger aid worker safety and divert aid resources to pay unnecessary administrative costs.

Systems such as PVS tend to create barriers to effective delivery of aid programs, discourage small NGOs from applying for grants and alienate international partners without effectively addressing national security concerns. The pool of effective local partner organizations is likely to shrink due to their withdrawal based on objections to turning their personal information over to the intelligence agencies of a foreign government. We feel that this is the PVS as proposed will work against the very goals we find ourselves mutually pursuing,

Sincerely,

Martha Thompson

Program manager Rights in humanitarian crisis