



February 6, 2023

U.S. Agency for International Development
Bureau for Management
Office of Management Policy, Budget, and Performance
500 D Street NW
Washington DC 20547

Subject:

Response to request for public comment regarding Partner Information Form (PIF) (88 Fed. Reg. 1,039 (Jan. 6, 2023)).

To Whom it may concern:

Please find below DAI Global LLC's comments to the request by the U.S. Agency for International Development (USAID) for public comment on the Partner Information Form (PIF) published in Volume 88, Number 4 of the Federal Register on Friday, January 6, 2023.

- **Evaluate whether the proposed information collection is necessary for the proper functions of the Agency.**

Yes, the PIF allows the Agency to gather more details about individuals and entities with which a contractor may partner than may otherwise be obtained through a general background check or search on SAM.gov (for example, the Key Individual information under Part 4). This operates as an additional line of defense for the Agency to ensure that U.S. Government funds do not inadvertently provide support to individuals or entities associated with terrorism.

- **Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used.**

The estimated time of 90 minutes per response is generally accurate as the amount of time it takes to complete the PIF. However, there is additional time required on the part of the prime contractor to confirm that the information provided is accurate, which is the prime contractor's responsibility, and to train subcontractors/ subawardees on how to complete the form. DAI has experienced delays in project implementation due to the amount of time spent waiting for partners to complete and submit an accurate PIF. Many partners have shown to be unfamiliar with the PIF process and its key terms including, in particular, "key individuals." Incomplete or inaccurate submissions by subcontractors/ subawardees were the main cause of delay and extension of time far beyond the estimated 90 minutes that DAI faced.

- **Enhance the quality, utility, and clarity of the information to be collected.**

A well-designed online PIF with an encrypted database and auto-save features can enhance productivity and the quality, utility, and clarity of the information. Additionally, providing the PIF instructions and guidance in languages specific to the particular country would greatly enhance these factors.

- **Minimize the reporting burden on respondents, including the use of automated collection techniques or other forms of information technology.**

Similar to the above, the reporting burden can be minimized greatly by the provision of additional resources to the dedicated units within the Agency to assist respondents, instructions in languages relevant to the respondents, and an online PIF with an encrypted database, well-performing software, and auto-save features.

Sincerely,



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