

PART A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

USAID utilizes the Partner Information Form (AID 500-13, or PIF) in conjunction with the Partner Vetting System (PVS), its information technology (IT) system of records, to collect and maintain records for vetting purposes to help ensure that USAID funds, USAID-funded activities, or other resources will not be used to provide support to entities or individuals deemed to be a risk to national security.

The PIF is completed by organizations, entities, or individuals applying for USAID contracts, grants, or other funding. In addition to collecting data on entities applying for funding and the type and purpose of the award, USAID utilizes the PIF to collect data on key individuals of prospective awardees and subawardees. Information collected on such key individuals includes the following: name; other names used; date and place of birth; gender; citizenship(s); country of issuance; address; phone number(s); email address(es); current employer and project title; organizational rank or title; occupation; and professional licenses and certifications.

USAID derives its authority to collect information for vetting purposes from, among other sources, Executive Order 13224; Section 7034(e) of the Consolidated Appropriations Act, 2018 (P.L. 115—141), and subsequent appropriations acts; and 18 U.S.C. 2339A, 2339B, and 2339C.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Based on information provided on the PIF, USAID personnel analyze information collected from public and U.S. government databases to determine the risk that the organization, entity, or individual applying for Agency funding could divert Agency resources to those deemed to be a risk to national security.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

To reduce burden on the Agency's implementing partners and personnel, USAID encourages prospective awardees to submit information in an automated, electronic format through USAID's Partner Vetting System secure portal, unless Internet access is unavailable, in which case a hard copy PIF may be submitted to USAID. Information provided to USAID should be the same regardless of whether it is submitted via the portal or the PIF.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

USAID does not have any other means to collect the information requested on the Partner Information Form. USAID personnel use the information collected on this form to identify entities or individuals who are a risk and to help mitigate the risk that USAID funds, USAID-funded activities, or other resources could be diverted to those deemed to be a risk to national security.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection does not have a significant economic impact on a substantial number of small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

If this information collection is not conducted, then USAID may not be able to mitigate the risk that Agency funds, Agency-funded activities, or other resources could purposefully or inadvertently benefit individuals or entities deemed to be a risk to national security.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

No special circumstances exist.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

On October 31, 2022, a 60-Day Federal Register Notice was published in 87 FR 65568. Comments were received and addressed. On January 6, 2023, the 30-Day Federal Register Notice was published in 88 FR 1039.

USAID received comments including those focused on direct vetting. We appreciate the comments, and USAID will provide findings of the direct vetting test in the coming months.

We also appreciate the comments on revising the administrative burden on Implementing Partners to complete the Partner Information Form (PIF) and USAID will further examine this prior to the next PIF update. USAID based the 90 minute completion time for the PIF on the average length of time it would take to complete the form. We recognize there may be variables that contribute to exceeding the 90 minute average including response time from subawardees, collection of data, etc. However, of the 64 edits to the PIF, 13% of edits represent a potential additional burden for IPs, 66% of edits represent burden reduction due to clarification, removal of cells, and providing guidance, and 21% represent edits that will have neither a burden increase nor a burden decrease.

Therefore, we do not anticipate the average length of time of completing the PIF to exceed 90 minutes. USAID will review this estimate the next time the PIF is updated.

In order to provide a more streamlined, consistent form, we determined that all boxes in the form should be mandatory to include photo ID requirements across all programs for all awards.

Finally, we received a comment related to providing vetting waivers in contexts that may pose a security risk. According to ADS 319, *Partner Vetting*, “an ‘exception to policy’ (ETP) is a variance from Agency-level policy or procedure...any ETP must receive prior, written approval from the SAVO [Senior Agency Vetting Official], with mandatory clearance by the AA [Assistant Administrator] or IOD [Independent Office Director] who manages the partner vetting activity in question, the M [Management] Bureau, SEC [Office of Security], and GC [Office of the General Counsel].” USAID considers ETPs on a case by case basis, but per policy, USAID conducts vetting for contracts and assistance agreements in the Islamic Republics of Pakistan and Afghanistan; the Republics of Iraq and Yemen; the Lebanese Republic; Syria; and the West Bank and Gaza.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

USAID does not provide any payment or gift to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

This form includes a Privacy Act Statement explaining the routine uses of the information collected under the Act. Other than provisions for confidentiality in the Privacy Act, no assurances of confidentiality have been made to the respondent.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

No questions of a sensitive nature are included on the information collection form.

12. Provide estimates of the hour burden of the collection of information. The statement should:

USAID estimates that an average of about 3,600 PIFs will be completed annually and that the average form will include information on five key individuals. Based on feedback from our implementing partners and on our experience implementing vetting programs, we estimate that requirements for partner vetting will add 90 minutes to an USAID acquisition or assistance award application. The estimated annual burden to applicants amounts to 5,400 hours (3,600 forms multiplied by 90 minutes per form, divided by 60 minutes). We calculated this burden estimate under the assumptions that the average form submitted will include information on five key individuals and that it would take approximately 90 minutes to gather the necessary information, complete the form, submit the form to USAID, and respond to requests by USAID for additional information, if necessary. This burden estimate includes the amount of time for proposed awardees to inform proposed subawardees of their responsibility to complete and submit the form and for those proposed subawardees to complete and submit the form to USAID. This burden estimate does not include the amount of time required for an implementing partner to provide additional vetting information on new key individuals or new subawardees.

USAID estimates the cost per submission to be \$73.32. This amount is based on the average hourly wage of an Executive Administrative Assistant employee in the Washington, D.C. Metro area, as calculated by the U.S. Department of Labor, Bureau of Labor Statistics as of May 2021 , multiplied by the time required for the administrative support employee to collect the information, complete the form, submit the form to USAID, and follow up with USAID on information related to the form (hourly wage rate of \$37.60, multiplied by a loaded wage factor of 1.3 to account for benefits, excluding indirect labor costs), multiplied by 90 minutes per form, divided by 60 minutes).

Form Name	Form Number	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Partner Information Form	AID 500-13	3,600	1	90	5,400	\$ 73.32	\$395,928
Total						\$ 73.32	\$395,928

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information.

Other than labor costs, no other costs are attributed to this information collection.

14. Provide estimates of annualized costs to the Federal Government.

USAID estimates that its annualized costs related to this information collection amount to \$5,265,000. This amount includes costs to maintain the information technology system used for vetting, in addition to the salaries, benefits, indirect costs, and overhead attributed to Washington-based and field-based personnel supporting USAID's vetting programs.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

USAID proposes to update the form previously approved by OMB by (1) simplifying the format; (2) improving the instructions to make the document easier to read and complete.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Results of this collection will not be published.

17. If you are seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The expiration date for OMB approval of the information collection will be displayed on the form.

18. Explain each exception to the topics of the certification statement identified in Certification for Paperwork Reduction Act Submissions.

USAID does not request any exceptions to the certification of this information collection.

PART B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.