

Johnson, Beverly(M/AS/IRD)

From: Johnson, Eric D. [ejohnson@care.org]
Sent: Monday, September 24, 2007 9:15 AM
To: Johnson, Beverly(M/AS/IRD); drostker@omb.eop.gov
Subject: FW: Papwerwork Reduction Act and Proposed Partner Vetting System (PVS)
Importance: High
Attachments: Sep2107_Paperwork Reducation Act.pdf

Dear Ms. Johnson and Mr. Rostker:

You were inadvertently left off of CARE's submission week in response to Paperwork Reduction Act and USAID's Proposed Partner Vetting System (PVS) published as FR Doc. 07-3555 appearing in Federal Register on July 23, 2007.

Thanks for your thoughtful consideration.

Sincerely,
Eric

Eric D. Johnson
Associate General Counsel and
Compliance Officer
CARE USA
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From: Gabriel, Danielle
Sent: Friday, September 21, 2007 4:31 PM
To: 'jdenale@usaid.gov'
Subject: Papwerwork Reduction Act and Proposed Partner Vetting System (PVS)
Importance: High

Hello Mr. Denale,

Eric Johnson, Associate General Counsel of CARE asked me to forward the attached letter to your attention. Please contact him directly via email ejohnson@care.org or telephone 404.979.9410 with any further needs.

Regards,

Danielle Gabriel
Sr. Executive Assistant
Secretary to the Board/General Counsel
care, 151 Ellis Street, 5th Fl., Atlanta, GA 30303-2440
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September 21, 2007

Submitted via email to jdenale@usaid.gov

Mr. Jeffrey Denale
Coordinator for Counterterrorism
United States Agency for International Development
1300 Pennsylvania Avenue, N.W., Office 2.06-005, RRB
Washington, DC 20523

**Re: Paperwork Reduction Act and the Proposed Partner Vetting System (PVS)
FR Doc. 07-3555 appearing in Federal Register on July 23, 2007
(Volume 72, Number 140)**

Dear Mr. Denale:

The Cooperative for Assistance and Relief Everywhere ("CARE") respectfully submits the following comments on the above-identified notice (the "Notice") relating to the Paperwork Reduction Act and the proposed USAID Partner Vetting System ("PVS"). As explained more fully below, we conclude that USAID has greatly underestimated the burden of the proposed information collection. CARE thus implores USAID to re-consider its proposal, taking into consideration the actual burdens that the system will impose on its partner community.

USAID estimates that it will take 2000 individuals 500 hours to comply with the information requested. Based on what is known of the proposed collection system, please consider the following:

- (a) New Grants and Cooperative Agreements. Let us assume conservatively that CARE applies for 50 new grants or cooperative agreements from USAID in the next fiscal year. Based on USAID's proposal, vetting will be conservatively required in each instance for CARE's 22 board members, and approximately 5 executive officers and 10 management-level program staff both in the US and in the field. This would require responses of 1850 individuals from

CARE alone. If CARE were to be awarded 10 of those awards, and vetting were conducted only in those instances, vetting would be required for 370 individuals from CARE alone. In either case, based on the fact that USAID awards hundreds of awards each year, USAID's estimate would be quickly exceeded.

- (b) PVO Registrants. According to USAID's website, there are currently 541 US organizations and 68 non-US organizations registered with USAID as Private Voluntary Organizations ("PVO").¹ Conservatively, if each of those organizations have on average 10 board members and 5 officers, then the information request would be required of over 9,135 individuals, far exceeding USAID's estimates.
- (c) Time to Complete Data. USAID has estimated that it will take 15 minutes per individual to submit the information. USAID has not supplied the data collection form required to implement the program, so we are not able respond to the time and effort it will take to complete the form per individual. CARE again feels that this time estimation is greatly understated, particularly because we will need to design internal systems, policies and procedures to implement the data collection, and likely develop employee consent forms, mechanisms for collection, employee policies, and data storage capability, among other things.
- (d) Operational Concerns. We are concerned that the reporting burdens highlighted in this letter will have an impact on our operations as well. Most important, if we are required to undertake a prolonged vetting process, any delays in the delivery of services to beneficiaries or the provision of emergency humanitarian assistance would be tragic, and serve as a distraction to our overall organizational mission.

Finally, we reiterate our previous submissions relating to this matter dated August 23, 2007 and September 18, 2007, in which CARE provided additional substantive comments to the form, content and basis for USAID's proposed PVS.

Thank you for your thoughtful consideration of these comments.

Sincerely,


Steve Hollingworth
Chief Operating Officer
Cooperative for Assistance and Relief Everywhere, Inc. (CARE)

cc: Beverly Johnson, Office of Administrative Services, USAID (via email to bjohnson@usaid.gov)
David Rostker, OIRA, OMB (via email to drostker@omb.eop.gov)

¹ <http://pvo.usaid.gov/usaid/pvocount.asp> as of September 19, 2007.