

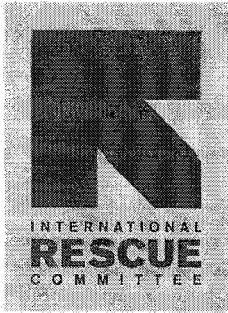
Johnson, Beverly(M/AS/IRD)

From: George Rupp [George.Rupp@theirc.org]
Sent: Monday, December 03, 2007 3:47 PM
To: Denale, Jeffrey A(SEC/OD)
Cc: Paskar, Joanne M(M/AS/IRD); Johnson, Beverly(M/AS/IRD); sdudley@omb.eop.gov; afraas@omb.eop.gov; drostker@omb.eop.gov; USAID Privacy
Subject: Comments on Federal Register Notice, Vol. 72, No. 190, October 2, 2007
Attachments: denale 12-3-070001.pdf; Heneghan 8-24-07.pdf; Heneghan 9-18-2007.pdf; Denale USAID 9-21-07.pdf

Please see the attached letter dated 12-3-07 in response to Federal Register Notice, Vol. 72, No. 190, October 2, 2007 and IRC's previously filed letters related to the Partner Vetting System.

Sincerely,

George Rupp



International Rescue Committee
122 East 42nd Street
New York, NY 10168-1289
Tel 212.551.3000
Fax 212.551.3179
www.theIRC.org

December 3, 2007

VIA E-MAIL TO: jdendale@usaid.gov

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

RE: **Comments on Federal Register Notice, Vol. 72, No. 190, October 2, 2007**
Agency: U.S. Agency for International Development
Title: Notice of Public Information Collections Being Reviewed by USAID

Dear Mr. Denale:

The International Rescue Committee ("IRC"), a leading humanitarian assistance organization providing relief to refugees and the displaced worldwide, and a long-standing partner of USAID, in response to the Notice of Public Information Collections republished on October 2, 2007, resubmits and incorporates herein for the record all of its previously filed comments on the proposed collection of information by USAID through the Partner Vetting System (PVS) as put forth in its August 24, September 18, and September 21 response letters (attached hereto and incorporated herein for the record).¹ In IRC's view, the October 2 notice does nothing to remedy the serious deficiencies in USAID's proposal to collect information through the PVS, deficiencies IRC has articulated in all of its previously filed submissions.² The October 2 notice appears to have simply published the Partner Information Form that USAID proposes to use to collect information.

The PVS still remains overreaching, unwarranted, and overly burdensome, lacks statutory basis, raises serious privacy concerns, and will certainly result in added insecurity and harm to the NGO community and overseas staff. In addition, the Partner Information Form as proposed is overbroad, vague and full of ambiguities. It fails to adequately identify which individuals are covered by the form. In fact, the definition of "key individual" to include "any other person with significant responsibilities for administration of the USG-financed activities or resources" is so vague and ambiguous that an organization submitting the information would never know if they submitted sufficient information to USAID. In addition, the form confirms that USAID's fifteen (15) minute burden estimate has no factual basis. After reviewing the form, IRC is certain that the burden estimate is closer to one (1) hour to complete the form for each individual vetted and

¹ Letter from George Rupp, IRC President and CEO to Philip M. Heneghan, USAID Chief Privacy Officer, August 24, 2007; Letter from George Rupp, IRC President and CEO to Philip M. Heneghan, USAID Chief Privacy Officer, September 18, 2007; Letter from George Rupp, IRC President and CEO to Mr. Jeffrey Denale, Coordinator For Counterterrorism, September 21, 2007.

² *Ibid.*

Mr. Jeffrey Denale

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perhaps longer, considering that it is unclear who is a "key individual", with the result that any organization submitting the form would have to guess as to on which and how many of its employees it would need to provide information.

Accordingly, IRC strongly urges USAID to withdraw its July 17, July 20, July 23 and October 2 notices and reconsider its proposal for a vetting system in consultation with the NGO community.

Sincerely,



George Rupp
President and Chief Executive Officer

c: Henrietta Fore, Acting Administrator, USAID
Joanne Paskar, Chief, Information and Records Division, Office of Administrative Services, Bureau for Management, USAID
Beverly Johnson, Information and Records Division, Office of Administrative Services, Bureau for Management, USAID
Susan Dudley, Administrator, Office of Information and Regulatory Affairs of the Office of Management and Budget
Dr. Arthur Fraas, Branch Chief, Office of Information and Regulatory Affairs, Office of Management and Budget
David Rostker, Desk Officer, Office of Management and Budget
Philip M. Henegan, Chief Privacy Officer, Chief Privacy Officer, USAID
Sam Worthington, President, InterAction
Nils Daulaire, M.D., President, Global Health Council
The Honorable Patrick J. Leahy
The Honorable Judd Gregg
The Honorable Joseph R. Biden
The Honorable Richard G. Lugar
The Honorable Nita M. Lowey
The Honorable Frank R. Wolf
The Honorable Tom Lantos
The Honorable Ileana Ros-Lehtinen