SYRIA VETTING STANDARD OPERATING PROCEDURES

References:
Foreign Assistance Act of 1961, as Amended, 22 U.S.C. 2151 et seq. 
Executive Order 13224 
Title 18 US Code, 2339A and 2339B

Subject: National Security Screening of Awards

Effective Date: 5/25/2016

I. PURPOSE

The purpose of this document is to describe standard operating vetting procedures for vetting applicable to individuals and organizations seeking USAID funding awards through Bureau for Democracy, Conflict and Humanitarian Assistance (DCHA) and Bureau for the Middle East (ME) programs providing assistance to Syria. These procedures are intended to help mitigate the risk that USAID funds and other resources inadvertently provide support or benefit to individuals or entities that are terrorists, supporters of terrorists, or affiliated with terrorists, while also minimizing the impact of the vetting process on USAID programs and its implementing partners.

II. DEFINITIONS

As used in these Procedures, including the Appendices:

"Award" means any contract, grant, cooperative agreement, or any other instrument that acts as any of the same awarded by USAID. Unless the context otherwise requires, an Award includes Subawards, as defined below.

"Awardee" means any individual or entity that receives an Award. Unless the context otherwise requires, an Awardee includes Subawardees, as defined below.

"CO" or "AO" means, respectively, the Contracting Officer or the Agreement Officer.
“COR” or “AOR” means, respectively, the Contracting Officer’s Representative, or the Agreement Officer’s Representative, who is responsible for day-to-day management of the project or activity in question.

“Key Individuals” means the individuals defined in Section 4 of Appendix A. The definition of Key Individuals is broader than the definition of “key personnel” under a contract, grant, or cooperative agreement.

“Partner Information Form” or “PIF” means the Office of Management and Budget (OMB)/Office of Information and Regulatory Affairs-approved information collection form that requests personal identifying information on Key Individuals from offerors/applicants/Awardees/funds recipients (Appendix B). The form may not be modified or amended without the prior approval of OMB, USAID/SEC, and USAID’s Office of General Counsel.

“Partner Vetting System Application” or “PVS Application” is the password-protected, web-based application that allows USAID Vetting Assistants to confidentially transfer information collected via the PIF or Secure Portal (which is defined below) to USAID/SEC for vetting. It also allows USAID/SEC to request additional information on entities or individuals subject to vetting if the PIF is incomplete.

“Prohibited Party” means an individual or entity that USAID knows or has reasonable grounds to suspect (i) supports or has supported terrorist activities; (ii) is or has been engaged in terrorist activities; (iii) poses a significant risk of committing terrorist activities; or (iv) supports, has supported, is or has been engaged in, or poses a significant risk of committing, other activities that are contrary to the national security interests of the United States.

“Public International Organization” means an international organization included in the List of Public International Organizations referenced in Automated Directives System (ADS) Chapter 308.

“Secure Portal” is the password-protected, web-based application that allows applicants for Awards to enter information requested by the PIF.

“Subaward” means any grant, sub-grant, subcontract, or any other instrument that acts as any of the same awarded by an Awardee pursuant to an Award.

“Subawardee” means any individual or organization that receives a Subaward.

“Vetting Coordinating Official” means the USAID official supervising the coordination of Syria vetting who is jointly designated as such by, and is responsible to, the Assistant Administrators (AAs) for DCHA and ME.
“Vetting Assistant(s)” means the USAID employee or employees jointly designated as such by, and who is or are responsible to, the AAs for DCHA and ME. The Vetting Assistant(s) has/have responsibility for receiving vetting information, responding to questions about information to be included on the Partner Information Form, and coordinating with the USAID Office of Security (SEC) and the Vetting Coordinating Official, and conveying the vetting determination to each applicant, potential subrecipients and contractors subject to vetting, and the contracting/agreement officer.

III. AUTHORITIES AND REFERENCES

Foreign Assistance Act of 1961, as amended (FAA) (22 USC 2151 et seq.)

Executive Order 13224 (eff. 9/24/2001) blocks property and interests in property of individuals and entities that are designated as committing or posing a significant risk of committing terrorist acts. The Executive Order prohibits all transactions and dealings in blocked property or interests in the U.S. or by U.S. persons. It also prohibits transactions with, and provision of support for, individuals or entities designated in or subject to the Executive Order.

18 USC 2339A and 2339B, which prohibit the provision of material support or resources for terrorist acts or to designated foreign terrorist organizations.

IV. PROCEDURES FOR VETTING

Appendix A details the procedures for vetting potential Awardees and other recipients of USAID funds. These procedures are subject to change. Check with the Vetting Coordinating Official for updates prior to implementing.

V. MANDATORY CLAUSES

The clauses set forth in Appendix D should be included in all prime contracts, grants, cooperative agreements, and other instruments that are subject to vetting in accordance with these Procedures.

VI. EFFECTIVE DATE

The effective date of these Procedures for each of the ME and the DCHA Bureaus is the date of signature of each such Bureau as indicated below.
Assistant Administrator, Bureau for the Middle East:

Paige Alexander  
Date 5/25/16

Acting Assistant Administrator, Democracy, Conflict, and Humanitarian Assistance:

Thomas Staal  
Date 5/25/16

VII. APPENDICES

A. Vetting Procedures
B. Partner Information Form
C. Notices of Eligibility/Ineligibility
D. Mandatory Clauses
Appendix A: Syria Vetting Procedures

1. Applicability: Vetting is conducted by USAID in connection with its review and approval of proposed Awards and Subawards to a proposed U.S or non-U.S. recipient in excess of $25,000 and in other situations where USAID retains a right to approve an activity, individual, or entity as a recipient of USAID funding.

a. Contractors and subcontractors: Except as otherwise provided in these Procedures, any proposed Awardee of a contract, subcontract, or any instrument acting as any of the same, and the Awardee’s Key Individuals, will be subject to vetting. This includes USAID-awarded contracts, prime contractor-awarded subcontracts, and contracts awarded by grantees and recipients of cooperative agreements.

b. Recipients of funds under assistance instruments: Except as otherwise provided in these Procedures, any proposed Awardee of a grant, cooperative agreement, sub-grant, or any instrument acting as any of the same, and the Awardee’s Key Individuals, will be subject to vetting. This includes USAID-awarded grants and cooperative agreements, leader with associates awards, prime contractor-awarded grants under contracts (GUCs), and sub-grants under grants or cooperative agreements.

c. Participant Trainees: OUs will vet individuals for whom the OU finances stipends, scholarships, fellowships, or other structured training, but only where the OU specifically approves the individual participants and such stipend, scholarship, fellowship, or other training is for study in the United States or in third countries or in Syria, and individual beneficiaries receive over $500 in stipends, lodging, transportation, or other in-kind assistance (over the life of the Award). The $500 threshold does not preclude the OU from vetting at lower dollar amounts based on its intent to mitigate risk.

d. Other direct recipients of cash or in-kind support: (i) Except as provided in sub-paragraph (ii) hereof, vetting is required when other forms of cash or in-kind assistance are provided directly to one or more persons or entities specifically identified or approved by USAID. For example, vetting would be required for a hospital (and its Key Individuals) that the USAID has identified/approved to receive pharmaceuticals, a USAID-identified/approved company whose manufacturing equipment will be repaired or replaced, or a USAID-identified/approved NGO whose recreational facilities will be renovated. Vetting is not required, however, for persons or entities that benefit from assistance indirectly. In the prior examples, no vetting would be required for patients of the hospital, customers of the manufacturer, or users of the recreational facilities.

(ii) Vetting that would otherwise be required pursuant to sub-paragraph (i) hereof is not required in the following cases:

(A) Individuals who receive jobs under employment-generation activities, including incidental job training.
(B) Ultimate beneficiaries of in-kind assistance, such as food, water, medical care, shelter, etc.

(iii) While vetting need not be conducted in the cases set forth in subparagraph (ii) above, entities providing such assistance are still expected to take appropriate measures to ensure that any cash or in-kind assistance is not provided and does not benefit Prohibited Parties, in accordance with the clause in their agreements prohibiting the provision of support to terrorists.

(iv) Recipients of cash payments or salary stipends that exceed $500 per individual over the life of the Award will be subject to vetting prior to any such payments being made (this will not apply to cash payments or salary stipends paid out by Subawardees, such as sub-contractors, that do not meet the level of vetting threshold described in this subsection).

e. **Global Development Alliances, Public/Private Partnerships, and Development Credit Authority activities:** For Development Credit Authority activities, vetting will be conducted for the individual of the financial institution who will sign the agreement with USAID and the officials of the financial institution who are responsible for deciding whether to enter into the agreement with USAID. Consideration also should be given to vetting key individuals of borrowers when USAID knows who the borrower will be. For alliances and “partnerships” where USAID would not be providing funding to an organization (such as co-financing arrangements), vetting would not generally be required of such an organization.

f. **Other situations:** Even if vetting would not otherwise be required under these Procedures, vetting will be conducted whenever USAID has reason to believe that a potential recipient of USAID funding could be a Prohibited Party.

g. **Educational Institutions:** Vetting applies to colleges, universities, and other educational institutions to the same extent as other types of organizations.

h. **Branches:** If a branch (i.e. a subsidiary organization) is a potential Awardee, the parent organization must be vetted. If an organization and its parent have been previously vetted within the last year, whether subsequent vetting will be required for each of its branches that applies for assistance will be decided by the Deputy Assistant Administrator (DAA) on a case-by-case basis. This decision will depend largely on the extent to which the organization’s headquarters oversees and controls the activities of the branches.

i. **Level of Vetting:** In general, vetting under these Procedures applies only to the first-tier and second-tier organizations. If, for example, a prime contractor (first-tier) awards a grant to a local organization (second-tier), which in turn awards a sub-grant to another local organization (third-tier), the first and second-tier organizations would be vetted, while the third-tier organization would not be. However, if the OU obligating the funds
for a program or activity determines that extenuating circumstances so dictate, vetting may be conducted at the third-tier or even lower tiers.

j. Multi-Donor Funds: With respect to comingled multi-donor funds, these Procedures will apply when, under the applicable multi-donor fund agreements, USG/USAID approval of an activity, individual, or entity to receive funding from the multi-donor fund is required. When vetting applies in such a situation, USAID will not vote to approve a proposed project or entity unless vetting in accordance with these procedures has been completed.

2. Solicitation/Funding Opportunity and New Awards:

Solicitations and Funding Opportunities: For each prime activity or program that will be subject to vetting, the CO/AO will ensure that the solicitation/funding opportunity language for vetting is included and/or adapted for the solicitation/funding opportunity for the particular activity or program.

Prospective Nature of Procedures: In general, the vetting procedures described in these Procedures will only apply to Awards issued after the effective date of these Procedures, and will not apply retroactively, provided, however, that vetting may apply to task order awards to be issued under Indefinite Quantity Contracts (IQC) awarded prior to the effective date of these Procedures; and provided further, that vetting of Awards issued prior to the effective date of these Procedures may be conducted in accordance with Section 1(f).

New Awards: The awarding OU will ensure that new Awards are not issued unless/until all relevant entities and individuals subject to vetting, including the Awardee and any Subawardees named (or expected to be named) in the Award, as well as associated Key Individuals, have been deemed eligible.

Amendments to existing Awards: Vetting under these procedures will be required when contracts or grants are amended to provide additional assistance to Syria. Amendments only extending the time of performance or making minor changes in scopes of work do not require re-vetting unless the OU has reason to believe that changed circumstances justify re-vetting or it has been more than one (1) year since the Awardee and Key Individuals were vetted. The awarding OU will ensure that amendments triggering vetting are not issued unless/until all relevant entities and individuals subject to vetting, including the Awardee and any Subawardees named (or expected to be named) in the Award, as well as associated Key Individuals, have been deemed eligible.

Non-competitive Awards/unsolicited proposals: Proposed Awardees and any Subawardees named (or expected to be named) in a Non-competitive Award or unsolicited proposal will be vetted in accordance with these Procedures as early in the proposal review process as possible and before any approval or required justifications/waivers are submitted for approval.
3. **General Categorical Exemptions**: The following types of Awards or activities are categorically exempted from vetting under these Procedures (subject to section 1.f):

   a. Inter-agency agreements;
   b. Personal services contracts;
   c. Contributions and grants to Public International Organizations (except where such an organization administers a fund described in 2.e above.)
   d. Government-to-government agreements under ADS 220, 305 or 350
   e. General Services Administration Schedule Orders
   f. Urgently needed humanitarian assistance (i.e., natural disasters, large scale accidents, etc.), although vetting may commence once the immediate need has been addressed and may also be conducted post-obligation.
   g. Contracts between Awardees and vendors for the purchase of commercial items (as such term is defined in FAR 2.101) entered into during the ordinary course of business and for the use of such Awardees or Subawardees or for inclusion in-kind grants, provided, however, that vetting will be required prior to the leasing by Awardees of housing and/or office space; and
   h. Donor-to-donor agreements as described in ADS 351

**Vetting of “Key Individuals”**: “Key individuals” means:

   a. Principal officers of the organization’s governing body (including individuals with an ability or potential ability to divert funds or have influence over assistance; e.g., chairman, vice chairman, treasurer, or secretary, of the board of directors or board of trustees);

   b. The principal officer and deputy principal officer of the organization (e.g., executive director, deputy director, president, or vice president)

   c. The program manager or chief of party for the USAID-financed program; and

   d. Any other person with significant responsibilities for administration of USAID-financed activities or resources, such as key personnel as described in either ADS Chapter 302 for contracts or ADS Chapter 303 for assistance awards. Key personnel, whether or not they are employees of the prime awardee, must be vetted.

Note that the definition of “Key Individuals” differs from the definition of “Key Personnel” under a contract, grant or cooperative agreement.
4. Obtaining Data Needed for Review:

   a. If an award is subject to vetting, the CO/AO will inform each offeror or applicant to complete the PIF as a paper document or via the secure portal for all of its Key Individuals and return the PIF to the Vetting Assistant responsible for that award.

   b. Prime will be responsible for collecting, verifying, and submitting the PIF to the Vetting Assistant responsible for each proposed subaward or other action requiring vetting and for themselves as the prime.

5. Vetting Flow:

   **Step 1 – Data Collection:** The CO/AO notifies offerors/applicants when to submit the PIF to the Vetting Assistant. Offerors/Applicants/Awardees or others with duly authorized access to the Secure Portal on their behalf will submit their PIFs electronically via the Secure Portal. If internet access is not available to offerors or applicants then such offerors or applicants will submit hard copies of their PIFs directly to the Vetting Assistant.

   **Step 2 – Data Review:** Upon receipt, the responsible Vetting Assistant will review the data for completeness and accuracy and will seek any additional information necessary from the offeror, applicant, and/or subawardee.

   **Step 3 – Data Submission:**

Before initiating a vetting request, the responsible Vetting Assistant should review the submission to determine if a vetting approval is already in effect for the Key Individual(s) in question. If an individual received an eligible vetting determination within the past year, the Vetting Assistant is not required to submit that individual for vetting during that one-year period, but may elect to do so should conditions so warrant. If USAID has in the past made a determination that the individual was ineligible, that individual must be resubmitted for vetting.

   a. **Secure Portal:** For those offerors, applicants, or proposed subawardees that have the capability, the Syria Vetting Coordinating Official will establish accounts in the Secure Portal for their access. Offerors, applicants, or proposed sub-awardees will enter vetting information electronically through the Secure Portal. The Vetting Assistant will review and approve PIF submissions via the Secure Portal, which will permit the data to be systematically pulled from the Secure Portal into the PVS Application. The Vetting Assistant will then submit the information to USAID/SEC for vetting.

   b. **Non-Secure Portal Submissions:** Prime Awardees will submit the PIFs of proposed subawardees or other entities or individuals required to be vetted under these Procedures to the Vetting Assistant. Upon the Vetting Assistant’s receipt of
the Prime Awardee’s PIF submission, the Vetting Assistant will enter the data into the PVS Application and submit a vetting request.

**Step 4 - Vetting**  
Upon receiving a vetting request, USAID/SEC will search relevant databases, including non-public sources, for derogatory information. If deemed necessary, USAID/SEC will ask the OU to obtain additional information from a Key Individual. Depending on the vetting results, i.e. whether USAID/SEC identifies a Prohibited Party, USAID/SEC will make a recommendation to the Vetting Coordinating Official that the individual or entity proposed for vetting be determined to be either eligible or ineligible. If the recommendation is that the potential awardee is eligible, then USAID/SEC notifies the Vetting Coordinating Official and any designated Vetting Assistant, either of whom may notify the vetted entities following the process described in Step 6, and the CO/AO/COR/AOR, as appropriate, who proceeds with the award. The notification to the entities of the vetting decision must not include any information regarding award decisions (the CO/AO is responsible for notifying offerors/applicants of award decisions).

**Step 5: Final Determination in the Event of Derogatory Information:**  
If USAID/SEC discovers derogatory information and makes a recommendation of ineligibility with respect to one or more potential Prohibited Parties (i.e., applicants that USAID/SEC knows or has reasonable grounds to suspect (i) supports or has supported terrorist activities, (ii) is or has been engaged in terrorist activities, (iii) poses a significant risk of committing terrorist activities, or (iv) supports, has supported, is or has been engaged in or poses a significant risk of committing other activities which are contrary to the national security interests of the United States), the responsible OU Deputy Assistant Administrator (DAA), with the coordination support of the Vetting Coordination Official, will determine whether or not to proceed with the award. USAID/SEC will base any recommendation of ineligibility on the derogatory information used during the analysis. The DAA should consult with appropriately cleared parties in making a final determination. Appropriate parties that the DAA is encouraged to consult with include, without limitation, the relevant technical office(s), GC and/or the RLO, and USAID/SEC. Legal advice on a final determination is important to ensure compliance with applicable law.

**Step 6 - Determination Notification:**  
Once a final determination is made, the Vetting Assistant will notify the relevant offerors or applicants. Notification of the vetting decision must not include any information regarding award decisions. (The CO or AO is responsible for notifying offerors/applicants of the award decisions.) Notices must conform to the language shown in Appendix C, unless prior, written approval is received from USAID/SEC and GC. The OU will retain a copy of the final determination in its files (Note: The Vetting Assistant must coordinate with the CO to determine the necessity and timing of notifications when vetting is done at the prime award competitive range.)
Reconsideration Procedures

Ineligibility Determination: If an entity/individual is found ineligible as a result of vetting, USAID/SEC will provide to the Vetting Coordination Official any information to support the vetting recommendation that USAID/SEC determines to be releasable to the vetted entity/individual. In its determination, SEC will take into consideration the information needed by the decision-maker, the classification or sensitivity of the information, the need to protect sources and methods, the type or source of information, and the status of ongoing law enforcement and intelligence community investigations or operations. Following an ineligibility determination, an entity or individual is not precluded from applying for future awards, as it is USAID policy to re-vet previously ineligible entities/individuals for every proposed award based on information available at the time of the determination.

Reconsideration: (1) Within seven (7) calendar days after the date of the Vetting Assistant’s ineligibility notification to the prime applicant or offeror, such prime applicant or offeror may make a written request to the responsible Vetting Assistant, that the Agency reconsider the ineligibility determination. The request should include any written explanation, legal documentation and other relevant written material for reconsideration. If a prime awardee indicates to USAID that it no longer wishes to propose a prospective Subawardee as a Subawardee under its award, the appeal process will terminate with respect to such Subawardee. The replacement subawardee would then be vetted as well.

(2) Within seven calendar days after the Vetting Assistant receives a written request for reconsideration, the responsible AA will determine if the applicant’s additional information merits a revised decision. If that AA was substantially involved in the ineligibility determination that is proposed for reconsideration, the AA will appoint another senior official (more senior than the one who made the initial decision), as the deciding official. That deciding official’s determination of whether reconsideration is warranted (and decision on eligibility) is final.

6. Step 7 - Duration of Approval:

a. Once an individual/entity has been deemed eligible and received an award, the approval generally will remain in effect for one year. However, new vetting will be required if there is any change in Key Individuals. The Awardee is required to keep USAID apprised of changes in its Key Individuals.

b. The OU may rescind a determination of eligibility if it obtains information indicating that an entity or any of its Key Individuals is a Prohibited Party. In such event, the CO /AO will provide written instructions to the Awardee on termination, in whole or in part, of any Award or Subaward affected. Failure to take immediate action upon receipt of such written instructions may result in disallowance of costs incurred after the date of such written instructions. In
addition, USAID reserves the right to vet or re-vet any Awardee, or other individual or entity subject to vetting at any time regardless of the previous vetting date.

7. **Records**: USAID/SEC will maintain a database of all Key Individuals that have been submitted for vetting and the status of each case. Due to the sensitivity of information in the database, it will be made available only to those with an official need to know. The OU will maintain a database of all final eligibility and ineligibility determinations of awards. The Vetting Assistant and Vetting Coordinating Official will store all paper records containing Sensitive But Unclassified information, such as PII, in a secure container, and will update the PVS application with vetting decisions.
Appendix B: USAID Partner Information Form (PIF)
## PARTNER INFORMATION FORM

(See Burden and Privacy Act Statements on Page 3)

### Part I: Information About Proposed Activities

1. Name of the prime contractor, grantee or recipient proposing the award or other assistance
   
   a. Name of Parent Company (if any)*:
   b. Company website URL*:

2. Type of proposed award or other assistance (check one)*:
   - [ ] Contract or Subcontract
   - [ ] Grant or Subgrant
   - [ ] Training
   - [ ] Equipment
   - [ ] Other

3. US$ amount and estimated start/end date of proposed award or assistance*:
   - Dollar amount: $
   - Start:
   - End:

4. Purpose of proposed award or other assistance*:
   
   a. Location of Proposed Activity – Country*:
   b. State*:
   c. Province/Region*:

5. Organization proposed to receive award or other assistance*:
   
   a. Name*:
   b. Address*:
   c. Telephone Primary Phone*:
   d. 2nd Phone:
   e. 3rd Phone:
   f. Fax*:
   g. 2nd fax:
   h. Email*:
   i. Alternate Email:

6. Information on key individuals associated with the organization named in 5 above, or, if no organization is listed, information on each individual to receive cash or in-kind assistance (including technical assistance). Use continuation sheets as necessary.
   
   i. Name (As in passport or other government-issued photo ID):* 
   ii. Government-issued photo ID number, type of ID and country of issuance:* 
   iii. Place of birth:* 
   iv. Date of birth: (mm/dd/yyyy)* 
   v. Rank or title in organization listed in #5 (if "key individual"):* 
   vi. Other names used (may include nicknames, pseudonyms not listed under "Name"):* 
   vii. Current employer and job title: 
   viii. Occupation: 
   ix. Address of residence: 
   x. Citizenship(s): 
   xi. Province/Region: 
   xii. Tribal Affiliation (if any): 
   xiii. Email: 
   xiv. Is the individual a U.S. citizen or legal permanent resident?* 
   Yes [ ] No [ ] 
   xlv. Alternate Email: 
   xlvii. Professional Licenses – State Issued Certifications:

### Part II: Contractor/Grantee/Recipient Certification:

Contractor/Grantee/Recipient certifies in submitting this form that it has taken reasonable steps (in accordance with sound business practices) to verify the information contained in this form. Contractor/Grantee/Recipient understands that the U.S. Government may rely on the accuracy of such information in processing this vetting request.

Name: 
Title/Organization: 
Signature: 
Date:

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* = mandatory information.
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<th>Part III: Submission details (to be completed by USG vetting official)</th>
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<tbody>
<tr>
<td>Vetting request number</td>
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<tr>
<td>Staff member who initiated request</td>
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<tr>
<td>Project name</td>
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<td>Date submitted for screening</td>
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*A = mandatory information.*
**Partner Information Form Continuation Sheet for Part I, Section 6: List of Individuals**
(Use additional continuation sheets as necessary):

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<thead>
<tr>
<th>ii. Name (As in passport or other government-issued photo ID):*</th>
<th>Government-issued photo ID number, type of ID and country of issuance:*</th>
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<tbody>
<tr>
<td>Place of birth:*</td>
<td>Date of birth:* (mm/dd/yyyy) Rank or title in organization listed in #5 (if &quot;key individual&quot;):*</td>
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<tr>
<td>Other names used (may include nicknames, pseudonyms not listed under &quot;Name&quot;):*</td>
<td>Gender:</td>
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<td>Current employer and job title:</td>
<td>Occupation:</td>
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<td>Address of residence:</td>
<td>Citizenship(s):</td>
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<td>Province/Region:</td>
<td>Tribal Affiliation (if any):</td>
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<td>Email:</td>
<td>Is the individual a U.S. citizen or legal permanent resident?* Yes ☑ No ☐</td>
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<tr>
<td>Alternate Email:</td>
<td>Professional Licenses:</td>
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<th>iii. Name (As in passport or other government-issued photo ID):*</th>
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<td>Gender:</td>
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<td>Current employer and job title:</td>
<td>Occupation:</td>
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<td>Email:</td>
<td>Is the individual a U.S. citizen or legal permanent resident?* Yes ☑ No ☐</td>
</tr>
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<td>Alternate Email:</td>
<td>Professional Licenses:</td>
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<th>iv. Name (As in passport or other government-issued photo ID):*</th>
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<td>Tribal Affiliation (if any):</td>
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<tr>
<td>Alternate Email:</td>
<td>Professional Licenses:</td>
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* = mandatory information.
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<th><strong>V. Name (As in passport or other government-issued photo ID):</strong></th>
<th>Government-issued photo ID number, type of ID and country of issuance:*</th>
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<td>Email:</td>
<td>Is the individual a U.S. citizen or legal permanent resident?* Yes □ No □</td>
</tr>
<tr>
<td>Alternate Email:</td>
<td>Professional Licenses:</td>
</tr>
</tbody>
</table>

* Indicates mandatory information
PARTNER INFORMATION FORM INSTRUCTIONS

Part I

Question 1 - Self-explanatory
Question 2 - Indicate the proposed type of mechanism to be utilized by placing a check mark on the line in front of the appropriate term
Question 3 - Enter the amount of award or assistance in U.S. dollars and indicate the start and end date of the program using a mm/dd/yyyy format
Question 4 - Indicate the purpose of the award or assistance. Use additional sheets and attach to page one of the vetting form if necessary
Question 5 a-e - Self-explanatory
Question 6 - “Key individual” means (i) principal officers of the organization’s governing body (e.g., chairman, vice chairman, treasurer and secretary of the board of directors or board of trustees); (ii) the principal officer and deputy principal officer of the organization (e.g., executive director, deputy director, president, vice president); (iii) the program manager or chief of party for the USG-financed program; and (iv) any other person with significant responsibilities for administration of the USG-financed activities or resources. Note that this definition differs from the definition of “key personnel” under contracts and cooperative agreements. Complete for each of these four categories or indicate “N/A” if a category does not apply.

Part II

Individual filling out form must read the Certification and print their name where indicated, sign where indicated, print their title and the name of their organization where indicated, and print the date where indicated.

Part III

This section is not for individual’s information and will be completed by the USG vetting official.

PUBLIC BURDEN STATEMENT

Public reporting burden for this collection of information is estimated to average 75 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Agency for International Development, Office of Security (SEC), Washington, D.C. 20523-2600.

PRIVACY ACT STATEMENT

Authority: Public Law 109-446 §3(b)(2), 120 Stat. 3318, 3322 (Dec. 21, 2006); 18 U.S.C. 2339A, 2339B, 2339C; Executive Orders 13224 and 12947, applicable Homeland Security Presidential Directives and other legislative or executive branch prohibitions on providing support or resources to, or engaging in transactions with, individuals or entities associated with terrorism constitute the authority for collecting this information; Foreign Assistance Act of 1961 as amended (22 U.S.C. 2151 et seq.).

Purpose: Information in this form is used to conduct screening of individuals and entities as required by applicable U.S. laws and implementing procedures to ensure that USAID funds do not inadvertently provide support to entities or individuals associated with terrorism.

Routine Uses: Disclosure of the information provided on this form will be done in accordance with the Privacy Act, as well as with USAID’s System of Records Notice concerning the Partner Vetting System (USAID-29, 77 FR 72319 (Dec. 5, 2012)), which establishes the routine uses and Privacy Act exceptions that apply to this system of records.

Disclosure: Providing personal information is voluntary, but failure to provide certain information may result in denial of your application for USAID a contract, grant, cooperative agreement, or other funding, or for registration with USAID as a Private and Voluntary Organization (PVO).
Appendix C: Vetting Notices of Eligibility/Ineligibility

Unless otherwise approved in writing by M Bureau, SEC and GC, the following language shall be used to notify of eligibility or ineligibility for an award or sub-award.

NOTICES OF ELIGIBILITY

To Potential Contractor or Recipient Regarding an Organization’s Eligibility

I am writing with regard to [INSERT NAME OF PROPOSED CONTRACTOR/RECIPIENT]’s application for [INSERT NAME OF BUSINESS OPPORTUNITY AND ASSOCIATED SOLICITATION OR NOTICE OF FUNDING OPPORTUNITY REFERENCE NUMBER, IF ANY]. USAID has determined that [INSERT NAME OF CONTRACTOR/RECIPIENT] is eligible at this time to receive a USAID award in connection with the opportunity specified above. Eligibility is not a determination as to whether an award will be made. USAID reserves the right to rescind this eligibility determination in the event that USAID becomes aware of information indicating that the award is contrary to the national security interests of the United States.

This eligibility determination does not relieve your organization of its legal obligation to comply with U.S. Executive Orders and U.S. law prohibiting transactions with, and the provisions of resources and support to individuals and organizations associated with terrorism and to comply with the terms and conditions of its contract/agreement.

Should your organization be selected for this award, the terms and conditions of your contract/agreement with USAID will require prompt notification to the Vetting Official in the event of any change in the identity of any “key individuals.” The Vetting Official must also be notified if there is a material change in the program or operations under this award, or any development that might cause USAID to reconsider [INSERT NAME OF PROPOSED CONTRACTOR/RECIPIENT]’s eligibility for the above business opportunity.

To Potential Contractor or Recipient Concerning Eligibility of Subcontractor or Subrecipient

I am writing with regard to [INSERT NAME OF PROPOSED SUBCONTRACTOR/SUBRECIPIENT], which your organization has proposed to receive a USAID award under [INSERT NAME OF BUSINESS OPPORTUNITY AND ASSOCIATED SOLICITATION OR NOTICE OF FUNDING OPPORTUNITY REFERENCE NUMBER, IF ANY]. USAID has determined that [INSERT NAME OF PROPOSED SUBCONTRACTOR/SUBRECIPIENT] is eligible at this time to receive such award. However, USAID reserves the right to rescind this approval in the event that USAID becomes aware of information indicating that the award is contrary to the national security interests of the United States. Furthermore, a new request for eligibility will be required annually if your organization wishes to make a new award to [INSERT NAME OF PROPOSED SUBCONTRACTOR/SUBRECIPIENT].
This eligibility determination does not relieve your organization of its legal obligation to comply with U.S. Executive Orders and U.S. law prohibiting transactions with, and the provisions of resources and support to individuals and organizations associated with terrorism and to comply with the terms and conditions of its contract/agreement.

Should [INSERT NAME OF PROPOSED SUBCONTRACTOR/SUBRECIPIENT] receive this award, the Vetting Official must be notified in the event of any change in the identity of any "key individuals." The Vetting Official must also be notified if there is a material change in the program or operations under this award, or any development that might cause USAID to reconsider [INSERT NAME OF PROPOSED SUBCONTRACTOR/SUBRECIPIENT]’s eligibility for the above business opportunity.

NOTICES OF INELIGIBILITY

To Potential Contractor or Recipient Regarding an Organization’s Ineligibility

I am writing with regard to [INSERT NAME OF PROPOSED CONTRACTOR/RECIPIENT]'s application for funding. After careful consideration, USAID has determined that [INSERT NAME OF PROPOSED CONTRACTOR/RECIPIENT] is not eligible to receive the award funded by USAID under [INSERT NAME OF BUSINESS OPPORTUNITY AND ASSOCIATED SOLICITATION OR NOTICE OF FUNDING OPPORTUNITY REFERENCE NUMBER, IF ANY].

Within 7 calendar days after receiving this notice, your organization may request in writing that USAID reconsider this determination. Your organization may submit with this request any written explanation, legal documentation, and/or other relevant material for USAID's consideration.

USAID will notify your organization whether reconsideration is warranted within 7 calendar days after USAID receives from your organization the written explanation, legal documentation, and/or other relevant material referred to above.

To Contractor or Recipient Concerning Ineligibility of Proposed Subcontractor or Subrecipient

I am writing with regard to [INSERT NAME OF PROPOSED SUBCONTRACTOR/SUBRECIPIENT], which your organization has proposed to receive a USAID award under [INSERT NAME OF BUSINESS OPPORTUNITY AND ASSOCIATED SOLICITATION OR NOTICE OF FUNDING OPPORTUNITY REFERENCE NUMBER, IF ANY]. After careful consideration, USAID has determined that [INSERT NAME OF PROPOSED SUBCONTRACTOR/SUBRECIPIENT] is not eligible to receive this award funded by USAID.

Within 7 calendar days after receiving this notice, your organization may request in writing that USAID reconsider this determination. Your organization may submit with this request any
written explanation, legal documentation, and/or other relevant material for USAID’s consideration.

USAID will notify your organization whether reconsideration is warranted within 7 calendar days after USAID receives from your organization the written explanation, legal documentation, and/or other relevant material referred to above.

To Contractor or Recipient Regarding an Individual’s Eligibility

I am writing with regard to [INSERT NAME OF INDIVIDUAL], the individual your organization has proposed to receive USAID assistance. USAID has determined that [INSERT NAME OF INDIVIDUAL] is eligible to receive assistance funded by USAID.

To Contractor or Recipient Regarding an Individual’s Ineligibility

I am writing with regard to [INSERT NAME OF INDIVIDUAL], the individual your organization has proposed to receive USAID assistance. After careful consideration, USAID has determined that [INSERT NAME OF INDIVIDUAL] is not eligible to receive assistance funded by USAID. We encourage you to identify another candidate to receive the proposed assistance.
Appendix D: Required Clauses for Vetting

For Acquisition (see Partner Vetting for Acquisition – A Guide for Contracting Officers):

- 48 CFR 752.204-70/71 Partner Vetting Pre-Award Requirements (Feb. 2012)
- 48 CFR 752.204-70/71 Partner Vetting (Feb. 2012) and its alternative I, as applicable.
  The CO must also include the contact information for the vetting official or mailbox for submissions of vetting information in 48 CFR 752.204-70/71

For Assistance: 2 CFR 701