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Partner Vetting

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This is a new chapter.

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ADS 319 – Partner Vetting

319.1 OVERVIEW

Effective Date: 01/15/2021

This chapter contains the policy directives and required procedures for partner vetting (vetting) at the U.S. Agency for International Development (USAID). USAID conducts screening to ensure that American taxpayer funds and the activities we finance do not provide support, purposefully or inadvertently, to entities or individuals that pose a risk to our national security. Partner vetting is an enhanced risk-mitigation measure USAID employs that takes a targeted, risk-based approach and involves the use of public and non-public information to determine a contractor's or recipient's eligibility for an award. The vetting covers the directors, officers, or other employees of non-Federal entities and for-profit entities that apply for contracts, grants, cooperative agreements, or other funding from USAID.

USAID undertakes partner vetting as a part of our strategy to mitigate the risk of the diversion of our funds and resources to terrorists, supporters of terrorists, or affiliates of terrorists, while facilitating our ability to deliver programs in support of U.S. national-security and foreign-policy priorities. The Agency currently 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. USAID reserves the right to expand our partner vetting program, at any time, to other countries and territories in which we deliver or manage assistance.

The [Foreign Assistance Act of 1961 \(FAA\)](#), as amended, permits the Administrator of USAID to consider a range of foreign-policy and national-security interests in determining how to provide foreign assistance. Consistent with this authority, authorizes USAID pursue a range of due-diligence measures to mitigate the risk that our funds and other resources, and the programs we finance, might inadvertently benefit individuals or entities that pose a threat to U.S. national security, which include the following:

- Including clauses in contracts, grants, cooperative agreements, and other agreements that remind USAID's partners of Executive Orders and U.S. law that prohibit transactions with, and the provision of support and resources to, individuals or entities that are terrorists, supporters of terrorists, or affiliated with terrorists;
- Requiring all U.S. and non-U.S. non-governmental organizations (NGOs) that are seeking funding from USAID under grants and cooperative agreements to provide a certification regarding support to terrorists;
- Requiring that, prior to making awards, USAID's Agreement Officers (AOs)/Contracting Officers (COs) confirm that recipients/contractors do not have active exclusions in the System for Award Management (SAM.gov), do not appear on the [Specially Designated Nationals \(SDN\) and Blocked Persons](#)

[List](#) maintained by the Office of Foreign Assets Control in the U.S. Department of the Treasury and the [Consolidated Sanctions List of the United Nations Security Council](#); and

- Requiring USAID's Bureaus/Independent Offices/Missions (B/IO/Ms) that implement programs to conduct Risk-Based Assessments that comply with long-standing Agency guidance to consider risk factors and legal requirements to mitigate the risk that U.S. Government activities could inadvertently benefit terrorists or their supporters.

319.2 PRIMARY RESPONSIBILITIES

Effective Date: 01/15/2021

a. The **Deputy Administrator**, through a delegation from the Administrator, serves as the **Senior Agency Vetting Official (SAVO)**. The SAVO is the primary senior official charged with corporate-level oversight of USAID's partner vetting activities, with the goal of ensuring their efficiency, effectiveness, standardization, and rigor.

b. The **Central Vetting Group (CVG)** in the Bureau for Management, Office of Management Policy, Budget, and Performance (M/MPBP) provides centralized administrative oversight and management support for USAID's partner vetting. This includes the following:

- Formulating and implementing corporate policy and governance processes;
- Designing and implementing training;
- Coordinating with B/IO/Ms on resource requirements;
- Providing staff support;
- Conducting analysis and reporting of data;
- Coordinating with the System Owner and the Office of the Chief Information Officer (CIO) in the M Bureau to identify information technology (IT) requirements;
- Coordinating engagement with the U.S. Government interagency on partner vetting policy;
- Serving as the secretariat for the SAVO, and for the Executive Council on Partner Vetting; and
- Coordinating the Vetting Working Group (see **319.2p**).

c. The **Director of the Bureau for Management, Office of Management Policy, Budget, and Performance (M/MPBP)** oversees and manages the range of centralized vetting-support activities performed by the CVG under the supervision of the cognizant Deputy Assistant Administrator in the M Bureau.

d. The **Chief Information Officer (CIO)** and the **Bureau for Management, Office of the CIO (M/CIO)** provides the Authority to Operate (ATO) for Secure Portal for the Partner Vetting System (PVS), and works with the Office of Security (SEC) and the CVG to identify needed IT enhancements and support the implementation of enhanced vetting functionality.

e. Assistant Administrators and Assistants to the Administrator (AAs), Directors of Independent Office (IODs), and Mission Directors (MDs):

- Oversee and manage Partner Vetting Programs that fall within the administrative scope of their Operating Units (OUs);
- Have primary responsibility, according to their delegated authority, for assessing the risk of diversion of foreign assistance provided by USAID and recommending the initiation of any new Partner Vetting Programs or Heightened-Risk Vetting to mitigate that risk;
- Sign Vetting Orders into operation and manage their implementation efficiently and effectively in support of the Agency's objectives;
- Appoint Vetting Officials (VO) and Vetting Assistants (VA) through Letters of Designation to administer Partner Vetting Programs day-to-day on behalf of B/IO/Ms that conduct Partner Vetting Programs; and
- May decide requests for reconsideration of ineligibility determinations.

f. Cognizant Deputy AAs and Deputy IODs (collectively, DAAs), and **Deputy MDs (DMDs)** have primary responsibility for making final determinations of eligibility or ineligibility for awards, subawards, or other assistance.

g. Vetting Officials (VOs) coordinate the USAID's receipt of Personally Identifiable Information (PII) submitted through the Partner Information Form (PIF) from the Agency's implementing partners and prospective implementing partners; serve as the main B/IO/M point of contact with SEC for the vetting process; and coordinate the decision-making process within B/IO/Ms to reach a final determination of eligibility or ineligibility.

h. Vetting Assistants (VAs) exercise delegated responsibilities for coordinating USAID's receipt of PII submitted through the PIF from the Agency's implementing partners and prospective implementing partners, and for serving as the main point of contact within B/IO/Ms with implementing partners for the vetting process.

i. Vetting Analysts, in SEC, conduct partner vetting and provide a recommendation to USAID's senior policy-makers of eligibility/ineligibility for awards, sub-awards, or other assistance based on an assessment of the organization subject to vetting and its Key Individuals.

j. The Office of Security (SEC):

- Generates semi-annual Counter-Threat Risk-Based Assessments of locations where USAID conducts programs, projects, and activities and categorizes them in risk categories;
- Conducts oversight and management of the partner vetting process to provide eligibility/ineligibility recommendations to policy-makers;
- Supervises Vetting Analysts in the production of recommendations of eligibility/ineligibility;
- Serves as the Agency's liaison with the law-enforcement and intelligence community within the U.S. Government, including in relation to partner vetting; and
- Acts as the System Owner of the Agency's IT system for vetting, namely PVS.

k. The Office of the General Counsel (GC) or the cognizant **Resident Legal Officer (RLO)** provides legal support to the partner vetting team in each participating B/IO/M as they prepare recommendations of ineligibility for review by senior policy-makers, engages in other Agency working-level and leadership fora on partner vetting, and provides guidance in any other situation in which legal issues arise in the partner vetting process.

l. The Agency's Risk-Management Council and Executive Management Council on Risk and Internal Control (EMCRIC) (see [ADS 596mab](#)) reviews recommendations from B/IO/Ms to initiate partner vetting in certain situations and provide input to the SAVO, as appropriate.

m. The Executive Council on Partner Vetting (ECPV) is an AA-level advisory body that serves as the primary deliberative group that assesses Agency-level risks related to partner vetting and provides advice to the SAVO on vetting-related matters that require consideration and decision-making at the senior-management level of USAID. The ECPV coordinates with the EMCRIC.

n. Contracting Officers/Agreement Officers (CO/AOs) determine when in USAID's award cycle it is appropriate to require organizations or individuals that are seeking acquisition or assistance awards, or receiving subawards or subcontracts, to

submit information for vetting, and incorporate applicable provisions for partner vetting in solicitations and awards.

o. Contracting Officer’s Representatives/Agreement Officer’s Representatives (AORs/CORs) and Technical Officers collaborate with Vetting Officials to generate impact assessments that support decision-making around partner vetting.

p. The Vetting Working Group (VWG) conducts the following functions:

- Identifies partner vetting challenges and issues, including for consideration and decision by the ECPV and the SAVO;
- Provides an ongoing, working-level Agency forum to identify risks (threats and opportunities) for consideration by USAID’s Risk-Management Council (RMC), EMCRIC, and the Agency’s senior leadership;
- Develops policies, procedures, or guidance related to partner vetting;
- Shares or develops best practices for conducting partner vetting; and
- Ensures USAID’s practitioners of partner vetting have a common base of information on current events.

319.3 POLICY DIRECTIVES AND REQUIRED PROCEDURES

Effective Date: 01/15/2021

This Chapter constitutes USAID’s internal governance, operational policy, and procedures for conducting vetting. B/IO/Ms may require vetting pursuant to a Partner Vetting Program or Heightened-Risk Vetting (HRV). A Partner Vetting Program is when the Agency has an approved Vetting Order that applies on an ongoing basis to all foreign assistance funded, administered by USAID, or both, delivered in a country program. HRV is the vetting, as specifically approved by the SAVO, of one or more awards, programs, projects, or activities funded, administered by USAID, or both, in any location where the Agency does not maintain a Partner Vetting Program.

When approved as part of a Partner Vetting Program or HRV, USAID conducts vetting of certain individuals and organizations that are receiving or potentially receiving contracts or assistance awards from USAID. The Agency reserves the right to expand partner vetting, at any time, to other countries and territories in which we deliver or manage assistance.

USAID’s vetting regulations prescribe the policies and procedures to apply partner vetting to USAID’s acquisitions and awards of grants and cooperative agreements subject to vetting (see [USAID Acquisition Regulation \(AIDAR\)](#), [48 C.F.R. Subpart 704.70](#); [2 C.F.R. Part 701](#)). This chapter includes exclusively internal policies, does not

apply to USAID's contractors or recipients, and does not establish any rights that might be enforced against USAID.

319.3.1 Initiating a Partner Vetting Program

Effective Date: 01/15/2021

The AA or IOD of a B/IO may initiate a Partner Vetting Program with the approval of the SAVO. A B/IO that initiates a Partner Vetting Program must evaluate risks and other factors, such as the adequacy of available resources to support vetting, and the impact of vetting on the efficient and effective delivery of foreign assistance in support of the U.S. Government's national-security and foreign-policy objectives. B/IOs must use [ADS 319maa, Action Memorandum Template to Initiate a Vetting Program](#), to request the approval of the SAVO. SEC, GC, and the M Bureau must clear the Action Memorandum. The B/IO must include a proposed Vetting Order as an attachment to the Action Memorandum.

The determination to initiate a Partner Vetting Program depends on information that includes SEC's semi-annual Counter-Threat Risk-Based Assessments. As part of this process, SEC provides B/IOs with an assessment that rates countries as high-, medium-, or low-risk. In circumstances in which SEC rates a location as less than high-risk for diversion, the B/IO must submit the Action Memorandum to the RMC and EMCRIC, and request that both bodies consider it as an agenda item at their meetings, prior to submitting it to the SAVO. Any resulting RMC or EMCRIC input must be as an attachment to the Action Memorandum forwarded to the SAVO for final approval.

Any USAID OU that manages or plans a program, project, or activity in a location in which USAID conducts partner vetting must comply with required procedures under the applicable B/IO/M Vetting Order.

319.3.2 Modifying a Vetting Order

Effective Date: 01/15/2021

The AA or IOD of B/IOs that seeks to modify an existing Vetting Order must receive prior, written approval from the SAVO through an Action Memorandum cleared by SEC, GC, and the M Bureau. B/IOs must use [ADS 319mac, Action Memorandum Template to Modify a Vetting Program](#), to request that SAVO's approval. The Action Memorandum must explain the rationale for the modification. The B/IO must include the proposed modification to the Vetting Order as an attachment to the Action Memorandum. Clerical changes, such as updating Points of Contact, are not subject to this requirement. The Central Vetting Group, in consultation with GC, must determine whether a change is clerical in nature.

319.3.3 Initiating Heightened-Risk Vetting (HRV)

Effective Date: 01/15/2021

The AA or IOD of a B/IO may initiate HRV with the approval of the SAVO. An AA or IOD that is seeking to initiate HRV must receive prior written approval from the SAVO

through an Action Memorandum cleared by SEC, GC, and the M Bureau. The B/IO must use [ADS 319mab, Action Memorandum Template for Heightened-Risk Vetting](#), to request approval from the SAVO. The Action Memorandum should assess the overall level of risk to the program, project, or activity, including the operating environment, the nature of the program or activity, the geographic location in which it will take place, and other available risk-mitigation measures. The Action Memorandum should demonstrate there is a heightened risk for the diversion of funds or assistance counter to the national-security interests of the United States; that standard due-diligence measures are not adequate to mitigate the threat; and that partner vetting is an appropriate heightened due-diligence measure that would mitigate this risk. If the SAVO approves HRV, the B/IO must use any directions in the approved Action Memorandum in conjunction with [ADS 319mag, HRV Vetting Order](#), for implementation.

319.3.4 Exception to Policy Effective Date: 01/15/2021

An "Exception to Policy (ETP)" is a variance from Agency-level policy or procedure, or from the policy or procedures set out in a Vetting Order. Any ETP must receive prior, written approval from the SAVO, with mandatory clearance by the AA or IOD who manages the partner vetting activity in question, the M Bureau, SEC, and GC.

319.3.5 Privacy Safeguards and Recordkeeping for Vetting Orders Effective Date: 01/15/2021

Once the SAVO has approved a B/IO's request to initiate a Partner Vetting Program or HRV, the requesting B/IO is responsible for implementing the Vetting Order or HRV and ensuring the CVG has the current version on file from the time of the SAVO's approval.

For those awards subject to partner vetting, the awardee or prospective awardee must submit a completed [AID 500-13 - Partner Information Form](#), including for certain subrecipients or subcontractors, and should only provide the information requested in the PIF.

USAID retains all vetting-related records in accordance with applicable cybersecurity and privacy laws, policies, and standards, including the Privacy Act, the Federal Information Security Modernization Act, the Federal Records Act, [ADS Chapter 508, Privacy Program](#), and [ADS Chapter 545, Information Systems Security](#). Compliance with these requirements facilitates the administrative, technical, and physical safeguards to protect the confidentiality, integrity, and availability of this information. USAID collects, maintains, uses, and discloses the vetting records in accordance with these applicable laws, policies, and the intended purpose, as outlined in [USAID System of Record Notice \(SORN\)-27](#).

319.3.6 Timing of Vetting in Relation to Award by Contracting/ Agreement Officer (CO/AO)

319.3.6.1 Pre-Award Vetting

Effective Date: 01/15/2021

When USAID determines that an award is subject to vetting, the cognizant CO/AO determines the appropriate stage prior to award to initiate vetting. If vetting is required, the Agency must deem the presumptive awardee or contractor eligible prior to award, unless otherwise authorized in accordance with this chapter. Certain subawardees and subcontractors are also subject to vetting as part of this process (see [Subpart 704.70 of the USAID Acquisition Regulation](#) and [Part 701 of Title 2 of the Code of Federal Regulations](#)).

CO/AOs may also identify in the standard vetting provisions any specific classes of services provided under the award for which vetting is required (see [Appendix B, Partner Vetting, Alternate II, of Part 701 of Title 2 of the CFR; Alternate I of Section 752.204-71 of Title 48 of the CFR](#)). Regardless of whether vetting would otherwise be required, the award may require vetting of these subcontractors, or, under an assistance award, contractors, at any tier—for example, Money-Transfer Agents, Internet service-providers, or security firms—that present an elevated risk.

For central and regional awards, vetting is required only for the component(s) of the central or regional award implemented in a country with a Partner Vetting Program or as designated for HRV. Unless the Agency invokes HRV, the solicitation must reflect that vetting is not required for subrecipients or subcontractors that will perform exclusively in countries without a Partner Vetting Program.

319.3.6.2 Post-Award Vetting

Effective Date: 01/15/2021

USAID requires new vetting if there is any change in the Key Individuals or the awardee or contractor or those of a subrecipient or subcontractor for which vetting is required. The awardee or contractor is required to keep USAID apprised of changes in its Key Individuals and all changes in any Key Individuals of the covered subrecipients and subcontractors or both. USAID also may initiate vetting post-award when the cognizant AO/CO modifies an award to incorporate a vetting requirement.

Consistent with USAID's legal authorities, if a B/IO/M that issued the eligibility determination for an organization or individual subsequently obtains information to indicate that the organization, any of its Key Individuals, or an individual, approved to receive funding or other assistance, is no longer eligible, the cognizant CO/AO must promptly consult with GC or the relevant RLO and may determine to terminate the award, in whole or in part, including any subaward, or subcontract the termination affects.

For central and regional awards, post-award vetting is required only for the component(s) of the central or regional activity implemented in a country with a Partner Vetting Program or as designated for HRV. Unless USAID invokes HRV, the award

should reflect that vetting is not required for subrecipients, or subcontractors, or both that will perform exclusively in countries without a Partner Vetting Program.

319.3.6.3 Vetting Urgently Needed Humanitarian Assistance

Effective Date: 01/15/2021

A B/IO/M that is managing urgently needed humanitarian assistance must vet such assistance in any location in which USAID vets development assistance. The B/IO/M must initiate vetting of awards or award modifications for urgently needed humanitarian assistance pre-obligation whenever feasible. As necessary to ensure the delivery of such assistance, the B/IO/M may finalize the obligation prior to the completion of vetting. "Urgently needed humanitarian assistance" includes, but is not limited to, non-food assistance made available in response to a declared disaster or emergency food assistance under Section 491 of the [FAA, as amended](#), or section 202(a) of the [Food for Peace Act](#). Clearance by GC or an RLO is required before a B/IO/M may authorize obligation prior to the completion of vetting for urgently needed humanitarian assistance other than that authorized pursuant to Section 491 of the FAA, as amended, or Section 202(a) of the Food for Peace Act.

319.3.7 Submission and Review of the Partner Information Form

Effective Date: 01/15/2021

If an award is subject to vetting, the CO/AO must inform the offerors or applicants to complete [AID 500-13 – the Partner Information Form](#), either by submitting information through the PVS Secure Portal or as a paper document to the VO/VA/Vetting Support Unit (VSU). If a procurement is subject to vetting, the cognizant CO generally will request the submission of the PIF once they set the competitive range. For assistance awards, the cognizant AO or AOR generally will direct the submission of the PIF once they are ready to make an award selection.

VO/VA/VSUs must review PIFs for accuracy and completeness in accordance with the relevant Vetting Order and the Guidance on the Identification of Key Individuals and Guidance on the Completion of Partner Information Forms (see section **319.4.2**). They must record the results of vetting in the PVS Secure Portal.

Upon receiving a vetting request, SEC must search relevant databases, including non-public sources, for derogatory information. If deemed necessary, SEC must request that the VO/VA/VSU obtain additional information needed to complete the review. Depending on the vetting results, SEC must make a recommendation to the Vetting Official that the vetted entity or entities is/are either eligible or ineligible.

319.3.8 Determination of Eligibility

Effective Date: 01/15/2021

If SEC's recommendation is that a vetted entity is eligible, the VO/VA/VSU must notify the entity and the cognizant CO/AO. The VO/VA/VSU must provide the notice to the entity by using the language provided in [ADS 319mah, Notices of Eligibility and](#)

Ineligibility, unless SEC, GC, and the M Bureau provide prior written approval for the use of different language. Once the VO notifies the cognizant CO/AO, the CO/AO must proceed with the award process. The VO/VA/VSU's notice to the vetted entities of the vetting decision must not include any award-decision information. The cognizant CO or AO must notify offerors/applicants of award decisions separately.

When SEC recommends that an organization subject to vetting, or any of its Key Individuals, is ineligible, a designated USAID management official must make the final determination of eligibility or ineligibility, as follows:

- a. **Mission and Regional Awards.** If SEC makes a recommendation of ineligibility, the designated Mission official must make a final determination of eligibility or ineligibility. The designated determining official must consult with appropriate parties in making a final determination. Appropriate parties for consultation may include, without limitation, the relevant technical office(s), GC, the relevant RLO, or both, SEC, the M Bureau, the Mission Director, and senior officials at the relevant U.S. Embassy.
- b. **Central Awards.** If SEC makes a recommendation of ineligibility, the cognizant Deputy Assistant Administrator (DAA) for the B/IO that is managing the central award must make a final determination of eligibility or ineligibility. The cognizant DAA for the B/IO that is managing the award should consult, without limitation, the relevant technical office(s), the Mission, the relevant Regional Bureau, GC, the M Bureau, and SEC.

A final determination of ineligibility for a given award, subaward, or subcontract will not preclude an entity or individual from seeking future awards, subawards, or subcontracts from USAID. For any award, subaward, or subcontract subject to vetting, USAID must vet organizations and individuals based on information available at the time of the vetting.

319.3.9 Notification of Determination

Effective Date: 01/15/2021

Once USAID has made a final determination of eligibility or ineligibility, the VO/VA/VSU must notify the relevant organizations of the determination. The VO/VA/VSU must not include in the notification any information regarding award decisions, as the cognizant CO/AO will provide such information separately as part of the award process. The VO/VA/VSU must provide the notice by using the language in [ADS 319mah, Notices of Eligibility and Ineligibility](#) unless SEC, GC, and the M Bureau provide prior, written approval for the use of different language.

If USAID finds an offeror or applicant ineligible as a result of partner vetting, SEC must provide the VO with any information to support the vetting recommendation that SEC determines to be releasable to the organization or individual subject to vetting. USAID must provide as much information as possible to the organization regarding the basis for its ineligibility, with the understanding that USAID could be limited in the information

it is authorized to release. The B/IO/M must retain a copy of the final determination in the PVS Secure Portal. The Office of Acquisition and Assistance (OAA) within the M Bureau also must retain a copy of the final determination in the [Agency Secure Image and Storage Tracking System](#) (ASIST).

319.3.10 Reconsideration of Final Determination of Eligibility

Effective Date: 01/15/2021

Within seven calendar days after the date of the VO/VA/VSU's notification, the organization or individual that has not passed vetting may request, in writing, to the VO that the Agency reconsider the vetting determination. The request must include any written explanation, legal documentation, and any other relevant written material for reconsideration. If an awardee or contractor indicates to USAID that it no longer wishes to propose a prospective subrecipient, subcontractor, or both, under its award, USAID must terminate the reconsideration process with respect to such prospective subrecipient or sub-contractor. The awardee or contractor may propose a replacement subrecipient or subcontractor for vetting.

Within seven calendar days after the VO/VA/VSU receives a written request for reconsideration, the appropriate B/IO/M or other official more senior to the official who made the ineligible determination must make the reconsideration determination that the additional information submitted by the applicant/offeror/awardee/contractor merits or does not merit a revised decision. If the official grants reconsideration, that official must also issue a revised decision. The reconsideration official's determination of whether reconsideration is warranted and decision on eligibility is final. The reconsideration official should consult with appropriate parties in making the determination including, without limitation, GC and SEC.

319.3.11 Requirements for Partner Vetting Personnel

Effective Date: 01/15/2021

All incoming vetting personnel, including Vetting Analysts, Vetting Officials, and Vetting Assistants, must complete the following trainings as a prerequisite to initiating the performance of their vetting-related duties: 1) training on this chapter and the Agency's partner vetting policy; 2) counterterrorism-awareness training; and 3) training on the PVS Secure Portal. Incoming vetting personnel or their supervisors must contact the Central Vetting Group at cvg@usaid.gov to schedule the training on vetting policy and counterterrorism-awareness. The CVG must make available training on the PVS Secure Portal through USAID University which new partner vetting personnel must complete.

In addition, the AA/IOD/MD with oversight over the respective Partner Vetting Program must sign a Designation Letter for any incoming Vetting Official or Vetting Assistant (see the [ADS 319map, Letter of Designation for Vetting Official](#) and [ADS 319mal, Letter of Designation for Vetting Assistant](#)). The B/IO/M that is managing a Partner Vetting Program must keep that Designation Letter on file for their records and submit a copy of the signed designation letter to SEC. The B/IO/M must also submit a completed PVS IT System User-Access Request Form (see [ADS 319mai, Partner Vetting System](#)

[Account Access and Deactivation Request](#)) to the PVS IT System Administrator in SEC to request access to the PVS Secure Portal. The Agency will restrict access to the PVS Secure Portal to those with defined user roles and responsibilities related to partner vetting.

319.3.12 Roles and Responsibilities of the Central Vetting Group (CVG)

Effective Date: 01/15/2021

The CVG provides centralized administrative oversight and management support for partner vetting at USAID. The CVG coordinates and supports a wide range of partner vetting activities, including policy and oversight, the centralized identification of resource-management requirements, the analysis of data, training, and the maintenance and development of IT systems that support partner vetting. The CVG also serves as Secretariat for the SAVO and the ECPV. The CVG's functions are as follows:

a. Integration, Coordination, and Oversight of Vetting Policy:

- Serves as central group for the integration and coordination of vetting policy, and ensures USAID's Partner Vetting Programs are consistent with the Agency's approved strategic priorities, implementation guidelines, and centrally budgeted and planned resource-allocation decisions;
- Coordinates the development, evaluation, and continuous improvement of vetting-related policies, procedures, and regulations for the Agency;
- Provides guidance on the management of vetting activities under policies and procedures that are supportive of the Agency's mission, are consistent with sound business principles, and enable the careful stewardship of USAID's funds and resources;
- Drafts partner vetting policies and procedures to support the standardization of policies and procedures to support efficient and effective Agency operations; and
- Provides coordination and review of USAID's vetting policies and procedures, including the response to audits of our partner vetting programs (in collaboration with the Bureau for Policy, Planning, and Learning) to ensure standardization and adherence to the Agency's policies and protocols.

b. Training: Designs, implements, and evaluates standardized training for personnel at USAID and our implementing partners on Agency-level partner vetting policies and procedures, the CVS Secure Portal, and related IT systems.

c. Centralized Resource-Management: Coordinates with B/IOs to formulate budget justifications and support the execution of budgets, including the reporting and

analysis of data, to enable effective management decision-making and performance-measurement.

- d. **Personnel Management:** Coordinates with SEC and assists B/IO/Ms with the identification and mobilization of necessary personnel resources to provide critical skillsets in support of Partner Vetting Programs.
- e. **Core Staff Support:** Provides, as needed, centralized Vetting Official, Vetting Assistant, and Vetting Analyst services as surge support for Partner Vetting Programs, Heightened-Risk Vetting, and the vetting of central and regional awards.
- f. **Management, Verification, Analysis, and Reporting of Data:** Develops analyses and reporting to enable the Agency to use relevant and robust information to make sound decisions on how to improve our Partner Vetting Programs, and inform our stakeholders of progress achieved; conducts and coordinates analyses of data to monitor and assess partner vetting functions and processes, and to provide reporting to internal and external stakeholders.
- g. **Identification of Requirements for the PVS IT System:** Serves as Business Owner for the PVS IT system, including the PVS Secure Portal, and works closely with the M/CIO and SEC to identify needed enhancements and support the implementation of enhanced vetting functionality.
- h. **Secretariat for the SAVO and the ECPV:** Functions as the key coordination and communications mechanism to ensure the SAVO receives information and recommendations needed to make informed and timely decisions on the Agency's governance, policies, procedures, programs, and resources for partner vetting; and is able to advocate effectively in relation to those decisions with internal and external stakeholders, including Congress, other Federal Departments and Agencies, implementing partners, and the public. Provides similar support to the SAVO and members of the ECPV.

319.4 MANDATORY REFERENCES

319.4.1 External Mandatory References

Effective Date: 01/15/2021

- a. [18 U.S.C. Section 2339A](#)
- b. [18 U.S.C. Section 2339B](#)
- c. [18 U.S.C. Section 2339C](#)
- d. [Executive Order \(E.O.\) 12947](#), as amended by [E.O.13099](#), [E.O. 13224](#), and Title VIII of the Patriot Act

- e. [Foreign Assistance Act \(Public Law \[P.L.\] 87-195\)](#)
- f. [Homeland Security Presidential Directive-6](#)
- g. [Homeland Security Presidential Directive-11](#)
- h. [P.L. 115-31, Section 7039](#) (Annual Appropriations Act vetting requirement applicable to assistance in West Bank/Gaza)

319.4.2 Internal Mandatory References

Effective Date: 01/15/2021

- a. [ADS 319maa, Action Memorandum Template to Initiate a Vetting Program](#)
- b. [ADS 319mab, Action Memorandum Template for Heightened-Risk Vetting](#)
- c. [ADS 319mac, Action Memorandum to Modify an Existing Vetting Program](#)
- d. [ADS 319mad, Agreement Officer Disallowance of Costs Letter Following Ineligibility Notice](#)
- e. [ADS 319mae, Executive Council on Partner Vetting Charter](#)
- f. [ADS 319maf, Deviation Language for Post-Award Partner Vetting of Urgently Needed Humanitarian Assistance](#)
- g. [ADS 319mag, Heightened-Risk Vetting Order](#)
- h. [ADS 319mah, Notices of Eligibility and Ineligibility](#)
- i. [ADS 319mai, Partner Vetting System Account Access and Deactivation Request](#)
- j. [ADS 319maj, USAID Guidance on Completion of the Partner Information Form](#)
- k. [ADS 319mak, USAID Guidance on the Identification of Key Individuals](#)
- l. [ADS 319mal, Letter of Designation for Vetting Assistant](#)
- m. [ADS 319mam, Vetting Language for Issues Letters for Assistance](#)
- n. [ADS 319man, Vetting Language for Pre-Award/Pre-Modification Letters](#)
- o. [ADS 319mao, Vetting Language for Technical Approval Communication](#)
- p. [ADS 319map, Letter of Designation for Vetting Official](#)

q. [Partner Vetting in USAID Acquisitions \(48 C.F.R. Subpart 704.7; 48 C.F.R. Subpart 716.5\)](#)

r. [Partner Vetting in USAID Assistance \(2 C.F.R. Part 701\)](#)

319.4.3 **Mandatory Forms**

Effective Date: 01/15/2021

a. [Partner Information Form \(PIF, or USAID Form 500-13\)](#)

319.5 **ADDITIONAL HELP**

Effective Date: 01/15/2021

There are no Additional Help documents for this chapter.

319.6 **DEFINITIONS**

Effective Date: 01/15/2021

See the [ADS Glossary](#) for all ADS terms and definitions.

Agreement Officer (AO) (See also "Contracting Officer")

A person with the authority to enter into, administer, terminate, and close out assistance agreements, and make related determinations and findings on behalf of the U.S. Agency for International Development (USAID). An AO can only act within the scope of a duly authorized warrant or other valid delegation of authority. The term "Agreement Officer" includes persons warranted as "Grant Officers." It also includes certain authorized representatives of the AO who act within the limits of their authority as delegated by the AO. (**Chapters [303](#), [304](#), [319](#)**)

Assistance Award

A legal instrument to transfer funds (or anything of value) from USAID to a recipient to carry out a public purpose. Includes grants and cooperative agreements. (**Chapter [319](#)**)

Award

A form of implementing mechanism through which USAID transfers funds to an implementing partner, generally selected through a competitive process that results in a contract, grant, or cooperative agreement. (**Chapters [201](#), [303](#), [319](#), [573](#)**)

Central Award

An award managed by a USAID Bureau or Independent Office (B/IO) in Washington, DC, with activities carried out in one or more countries. (**Chapter [319](#)**)

Contract

A mutually binding legal relationship that obligates the seller to furnish the supplies or services (including construction) and the buyer to pay for them. It includes all types of commitments that obligate the U.S. Government to an expenditure of appropriated

funds and that, except as otherwise authorized, are in writing. In addition to bilateral instruments, contracts include (but are not limited to) awards and notices of awards; job orders or task letters issued under basic ordering agreements; letter contracts; orders, such as purchase orders, under which the contract becomes effective by written acceptance or performance; and bilateral contract modifications. Contracts do not include grants and cooperative agreements covered by Section 6301 of Title 31 of the United States Code (U.S.C.) *et seq.* This chapter covers contracts for any specific classes of services provided under the award for which vetting is required. For discussion of various types of contracts, see Part 16 of the Federal Acquisition Regulation (FAR). (**Chapter [300](#), [304](#), [319](#), [621](#)**)

Contracting Officer

An individual with delegated authority to award contracts on behalf of the U.S. Government. (**Chapter [319](#)**)

Contracting Officer's Representative (COR)/Agreement Officer's Representative (AOR)

The individual who performs functions that are designated by the Contracting or Agreement Officer, or who is specifically designated by policy or regulation as part of contract or assistance administration (see Activity Manager and [ADS 300](#)). (**Chapter [201](#), [300](#), [306](#), [319](#), [552](#), [567](#), [591](#), [621](#), [635](#)**)

Contractor

An organization or individual from which USAID or one of the Agency's recipients acquires supplies or services. (**Chapter [319](#)**)

Direct Recipient

A natural person or entity that receives cash, goods, or other benefits in furtherance of the objectives of an award, identified in the award or otherwise specifically identified by the Awardee. (**Chapter [319](#)**)

Exception to Policy (ETP)

A variance approved by the Senior Agency Vetting Official from either an Agency-level policy or procedure or from a policy or procedure under a Vetting Order. (**Chapter [319](#)**)

Implementing Partner

Any individual or organization that receives an acquisition or assistance award from USAID (a contract, grant, cooperative agreement, or similar instrument). Unless the context otherwise requires, implementing partners include subrecipients, subcontractors, and contractors under an assistance award. (**Chapter [319](#)**)

Key Individuals

- a. Principal officer of the organization's governing body (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, 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 recipient, must be vetted. The definition of Key Individuals is not the same as "key personnel" under a contract, grant, or cooperative agreement. (**Chapter 319**)

Partner Information Form (PIF)

An information-collection form approved by the Office of Information and Regulatory Affairs (OIRA) in the Office of Management and Budget (OMB) that requests Personal Identifying Information (PII, as defined by [OMB Memorandum M-07-16](#)) on key individuals from offerors/applicants/awardees/contractors/funds recipients. (**Chapter 319**)

Partner Vetting System Application ("PVS Application" or "the PVS Secure Portal")

A password-protected, web-based application that allows B/IOs and Mission to transfer information confidentially on key individuals collected via the PIF to SEC for vetting. It also allows SEC to request additional information on key individuals if the PIF is incomplete. (**Chapter 319**)

Personally Identifiable Information (PII)

Per OMB A-130, personally identifiable information means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. In performing this assessment, it is important for an agency to recognize that non-PII can become PII whenever additional information is made publicly available — in any medium and from any source — that, when combined with other available information, could be used to identify an individual. (**Chapter 319, 508, 545**)

Recipient

An organization that receives direct financial assistance (a grant or cooperative agreement) to carry out an assistance program on behalf of USAID, in accordance with the terms and conditions of the award and all applicable laws and regulations. (**Chapter 303, 319, 591, 636**)

Regional Award

An award managed by one of USAID's Regional Platforms or bilateral Missions that has activities in multiple countries. (**Chapter 319**)

Secure Portal

The password-protected, web-based application that allows applicants for USAID's assistance and acquisition awards to enter information requested by the PIF. (**Chapter 319**)

Subaward

An award provided by a recipient to a subrecipient for the subrecipient to carry out part of an assistance award received by the recipient. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the recipient considers a contract. (**Chapter 319**)

Subcontract

Any contract entered into by a subcontractor to furnish supplies or services for performance of the prime contract or subcontract. This chapter covers contracts and subcontracts for any specific classes of services provided under the award for which vetting is required. (**Chapter 319**)

Subcontractor

Any organization or individual that receives a subcontract under acquisition award made by USAID. (**Chapter 319**)

Subrecipient

A non-Federal entity that receives a subaward from a recipient to carry out part of an assistance program; but does not include an individual that is a beneficiary of such program. (**Chapter 319**)

Vetting Assistant (VA)

Any USAID employee or employees designated as such by, and who is or are responsible to, the MD. The VA(s) has/have responsibility delegated by the Vetting Official, to include receiving vetting information; responding to questions about information for inclusion on the PIF; coordinating with SEC and the VO; and conveying the vetting determination to the cognizant CO/AO and each offeror/applicant, potential subrecipient, contractors, or subcontractor subject to vetting. AORs/CORs must not serve as VAs for prime or sub-awards/sub-contracts for which they serve as AOR/CORs. (**Chapter 319**)

Vetting Official (VO)

The USAID employee who heads the Vetting Support Unit (VSU). The VO coordinates USAID's receipt of PII from the Agency's implementing partners and prospective implementing partners; serves as the main Point of Contact in a B/IO or Mission with SEC for the vetting process; and coordinates the decision-making process in each B/IO Mission that leads to a final determination of eligibility or ineligibility. (**Chapter 319**)

Vetting Support Unit (VSU)

The unit that comprises the VO/VAs. The VSU is responsible for coordinating the Agency's receipt of PII and organizational information for vetting, serving as the point of contact with SEC and implementing partners and prospective implementing partners regarding the vetting process, and coordinating the decision-making process to lead to a final determination of eligibility or ineligibility. The Vetting Official is the head of the VSU. (**Chapter 319**)

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