

Attn: Desk Office for State Department  
U.S. Department of State

February 17, 2012

**Re: 30-Day Notice of Proposed Information Collection: DS-4184, Risk Management and Analysis (RAM), Vol. 77 Fed. Reg. No. 11, page 2601**

To Whom It May Concern:

Please accept these comments opposing Risk Management Analysis/Partner Vetting System RMA/(PVS) pilot program proposed by the Department of State.

I am writing both as an expert in aid delivery program management and a victim of a terrorist attack. My comments are based on this experience. I have been involved in the humanitarian sector since 2009, primarily with the United Nations World Food Programme (WFP) and as a consultant with the International Federation of the Red Cross. Having surviving a suicide-bomber's attack during an assignment in Islamabad, Pakistan, I can attest to the danger aid workers risk when the perceived neutrality of non-governmental organizations (NGOs) is lost. I share the goal of protecting USAID resources from inadvertently being used to support terrorism, but strongly believe that the RMA/PVS is not the right approach to accomplish this goal.

As a Global Information Officer at WFP, I had the privilege of working with field staff in support of several WFP relief campaigns, often in cooperation with United States Agency for International Development (USAID) staff and programs. Positions included post-conflict Kyrgyzstan in 2009, Haiti after the 2010 earthquake and cholera outbreak, the response to the recent civil strife in Yemen and North Africa and the ongoing emergencies in the Democratic Republic of the Congo (DRC), Sudan and South Sudan. I have been deployed to Pakistan twice; once in 2009 to respond to the needs of over three million people displaced as a result of military activity in the North-West Frontier Province (NWFP), and again after the devastating flood in 2010. In 2011, I helped establish the coordination mechanism for the refugee crisis in Liberia after the political impasse in neighboring Côte d'Ivoire.

**Security Threats to Aid Workers and the Suicide Attack on the WFP**

The initial training I received from the UN primarily focused on security in the field. Stressing the fact that aid workers have increasingly become targets of violent attacks in the places where they work, my instructors even warned us to avoid or minimize the number of times travelling in cars with an organizational logo that could be perceived as compromising our independence.

When I arrived in Islamabad in 2009, the city was teeming with checkpoints, barb wiring and blast walls. Our building had been a home converted into an office, and

to enter, one had to pass through a series of checkpoints outside on the street and again after entering the building. It was apparent from my first days there that security was being taken very seriously and few precautions were being overlooked. Earlier in the year, two UN staff had been killed in a hotel in Peshawar<sup>1</sup> and another had been kidnapped in Baluchistan.<sup>2</sup>

Security was one of the top priorities in the humanitarian community working in Islamabad, with local and international NGO staff attending weekly meetings led by the UN. We were also in regular communication with USAID staff in Islamabad about WFP's activities, briefing them on which implementing partners we were working with and where and when we were distributing aid.

Even with all the security procedures in place, the WFP office in Islamabad was not immune from the dangers present in many of the places aid groups operate their humanitarian programs. On Oct 5, 2009<sup>3</sup> our office was trespassed by a suicide bomber who detonated himself in the lobby of our office, killing five of my colleagues and hospitalizing four, including myself, who were medically evacuated to Dubai.

I suffered injuries to my head, leg and stomach and required surgery to remove shrapnel from behind my ear. I was fortunate the neurosurgeon that treated me was able to reconstruct part of my skull and remove fractured bones and shrapnel from my brain without leaving me with permanent disability.

After six months of recovery time I was able to resume working at the WFP. Now working in Rome, there was talk suggesting the Islamabad office had been targeted because of its ties with the Pakistani military establishment: Our officials would fly in their marked helicopters; we had coordinated in the past on distribution locations; and there was also a policy report from early 2009 that highlighted our relationship with the military. Even though the overlap between our organization and the military had been modest, it is not hard to imagine an outside third party mistakenly thinking we were part of the same mission.

### **Why RMA/PVS Would Increase Safety Threat Against Aid Workers**

Based on my experiences, implementing the proposed RMA/PVS plan would exacerbate the safety problem and be a significant burden for USAID-funded

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<sup>1</sup> On June 9, Aleksandar Vorkapic, a UNHCR staff member and Perseveranda So, a UNICEF staff member died in the bombing of the Pearl Continental hotel in Peshawar.

<http://www.un.org/en/events/humanitarianday/2009/risks.shtml>

<sup>2</sup> John Solecki, head of UNCHR sub-office in Baluchistan, was kidnapped on Feb. 2

<http://www.unpo.org/article/9447>

<sup>3</sup> A suicide bomber dressed in the uniform of one of Pakistan's security forces struck the United Nations World Food Program offices in Islamabad, killing five people in what the police said was a serious breach in a building tightly guarded by private security officers.

<http://www.nytimes.com/2009/10/06/world/asia/06pstan.html>

programs trying to meet the needs of vulnerable people around the world. There are already enough obstacles and threats to aid workers in places where armed conflict persists or after a natural disaster strikes without this intrusive and burdensome program adding to it.

Cultivating meaningful relations with local actors and communities remains the best approach to security. That is what PVS fails to get right. Vetting employees of NGOs and local partner organizations against secret government lists undermines the fundamental principles of neutrality and trust upon which NGOs rely to protect the safety of their staff working in dangerous places. If aid groups and their employees are perceived to be part of the wider foreign policy agenda by their beneficiaries and local partners, as well as by militant groups in the area, the risk of violence increases and the assistance programs will not produce their desired results.

The blurring of organizations and missions has led to a major spike in violence toward aid workers in global hot spots. A recent report<sup>4</sup> from the UK-based Overseas Development Institute (ODI) said “attacks against aid workers have increased sharply since 2006” and that “surges in attack rates were seen especially for NGO international (expatriate) staff and UN local contractors.” In a New York Times op-ed piece, one of President Obama’s advisors, Samantha Powers, said aid groups in places like Afghanistan:

“are being lumped with Western governments and military forces” and that they “have never been more at risk... United Nations officials and aid workers who choose to work in conflict zones have always exposed themselves to banditry, crime and violence. But the assaults, kidnappings and killings of humanitarians have more than doubled in the past five years — precisely when independent humanitarian, reconstruction and development assistance has been urgently needed in places like Afghanistan and Iraq.”<sup>5</sup>

This surge in attacks on aid workers has left its mark. Some groups have withdrawn staff or ended its support for programs in places where this kind of politically motivated violence is more commonplace. The groups who remain often require the services of costly private security companies. In other words, the overall availability of resources for aid programs and their beneficiaries is reduced.

### **The Importance of Independence**

With little sign of this trend reversing anytime soon, safety is a very serious problem for all aid workers running assistance programs in politically sensitive or complex areas. That is why most NGOs working in these places are steadfast in their efforts

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<sup>4</sup> Overseas Development Institute, *Providing aid in insecure environments: 2009 Update*, Available online at: <http://www.odi.org.uk/resources/docs/4243.pdf>

<sup>5</sup>[http://www.nytimes.com/2008/08/19/opinion/19power.html?\\_r=1&partner=rssuserland&emc=rss&pagewanted=all%22%3ESamantha](http://www.nytimes.com/2008/08/19/opinion/19power.html?_r=1&partner=rssuserland&emc=rss&pagewanted=all%22%3ESamantha)

to retain their independence. “If the greater portion of international humanitarian aid organizations were able to achieve independence and project an image of neutrality,” ODI says, “this would surely enhance operational security and benefit humanitarian action as a whole.”

And I am not the only one who feels this way. InterAction, the largest coalition of U.S.-based international aid and development NGOs, including groups like Mercy Corps, the Salvation Army and World Vision, shares these concerns. In their comments<sup>6</sup> filed with USAID in January 2012, it said, “Rather than “enhancing” security, requiring NGOs to collect and turn-over personal information to the U.S. government increases the risk of violence against staff.” Adding, PVS is “an unwelcome redefinition of the relationship between our community and the federal government, endangering critical aid and development work and consequently harming U.S. national interests.”

### **A More Effective Approach to Vetting**

I also feel that RMA/PVS will not protect the U.S. taxpayer’s money from being diverted to undesired recipients. **The cost and energy that will be spent implementing this program would be better utilized by funding more staff of NGOs to ensure they have enough resources to monitor their programs and additional USAID staff in the field to monitor their funding and activities of their partners on the ground.**

I know the organizations I have worked with would not want any of the aid they receive from USAID or elsewhere to fall into the wrong hands, especially when their employees are increasingly becoming the victims of retaliation from terrorists groups. They want to ensure that the aid is delivered safely, effectively and that everyone is protected, including the donors.

From this experience and working in other disasters responses I do not believe RMA/PVS will be a beneficial approach in protecting American NGOs or any employees of an NGO receiving USAID funds. It is already an uphill battle maintaining humanitarian principles in many conflict areas and RMA/ PVS will harm any NGO’s ability to protect its employees and maintain its independence. I feel the best measure to protect American NGOs and their funding is by taking the resources it would require to compile, log and analyze the data PVS would require and instead direct it toward providing adequate staffing and training in countries that work with USAID. Groups such the European Interagency Security Forum (EISF) already provide workshops and seminars on aid worker safety, and these types of programs could be established for the benefit of all USAID funded activities.

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<sup>6</sup>[http://www.charityandsecurity.org/system/files/InterAction%20Comment%20Letter%20on%20PVS%201.5.12\\_0.pdf](http://www.charityandsecurity.org/system/files/InterAction%20Comment%20Letter%20on%20PVS%201.5.12_0.pdf)

## **Conclusion**

American NGOs understand that this is a complicated issue and recognize the need for keeping USAID funds away from benefitting terrorist groups. But rather than pursue a program that jeopardizes NGOs and its staff, the State Department and USAID should work with the nonprofit sector to establish a vetting process that is effective and respects the humanitarian principles of NGOs working in dangerous places. Thank you for considering my comments.

Sincerely,

Adam Motiwala