

To Whom It May Concern:

Please accept these comments opposing the proposed Partner Vetting System (PVS). I am a civil society activist in Palestine (and a US citizen). My comments are grounded in my experience in several local and international NGOs trying to promote civil society transparency, accountability, professionalism and effectiveness.

It is my experience, without exception, that complicated and unrealistic procedures like the PVS have NO effect on terrorism or potential terrorism. They do, however, dramatically undermine legitimate and peace-loving civil society in several ways. First, these procedures make it hard for good NGOs to get funds. Second, good groups that do get funds have their credibility undermined by their participation with such USAID requirements, which are widely seen as illegitimate and insulting. Third, they make it very expensive, slow and inefficient to work, thus undermining impact.

As you know, there is a Palestinian civil society boycott against USAID. The boycott is grounded in both political and practical opposition to US anti-terrorism policy in Palestine of which the PVS is a part. Boycotters cite the right of populations under occupation to struggle for their guaranteed right to self-determination, including through the use of violence. Therefore, they oppose inclusion on the list of terrorists of groups and individuals who are or have exercised that right. This doesn't mean that they, or I, condone the use of violence, but rather that we call for respect for international law in the implementation of US anti-terrorism policy. Practical opposition to US anti-terrorism policy is based on the fact that the requirements simply cannot be fulfilled in good faith. People who sign the ATC (or take part in the PVS) may be going through the motions, but it is impossible for NGOs to investigate and enforce US foreign policy--we simply do not have the skills or resources (or desire) to do that. Therefore, the ATC and PVS, among other policies, promote corruption by making it easy and lucrative to lie.

Overall, US anti-terrorism policy in Palestine has been destructive to peace-loving civil society and the PVS is a prime example of misguided policies with impact categorically opposite to the stated objectives. Please reconsider. Let those of us on the ground do our work well, strengthen the good NGOs, enhance the credibility and independence of civil society, and build a state that can stand on its own in a peaceful and just region.

Sincerely,

Nora Lester Murad, PhD  
Jerusalem