

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,

I am writing as an American citizen who has worked in international humanitarian response for over 10 years as an employee and consultant with the International Organization for Migration (IOM), Church World Service (CWS) and the World Food Programme (WFP) sometimes on projects which have been funded by USAID. I wish to contribute comments in response to USAID's kind offer to solicit feedback in order to evaluate possible revisions in the policy for the proposed information collection. I will begin by stating clearly that I share the goal of protecting USAID and any U. S. Government resources from diversion to terrorist groups, but believe that the Partner Vetting System (PVS) needs re- evaluation.

I concur with the sentiments of many NGO's regarding a number of questions that have already been raised by others. These include:

- Compromises to the ability of NGOs to gain the trust of many local partners in other countries, even if such partners could easily pass scrutiny.
- Increased security risks to NGOs due to the same perception that they are arms of US intelligence.
- Questions raised about the accuracy of the lists of terrorists which will be used to assess individuals included in any project proposal or implementation of any project activity.
- Burdens placed on NGOs regarding the collection of required data. It is both a question of time as well as whether it is possible, in some cases, to collect all the information.
- The fact that NGOs will not be notified if a proposal submitted has been denied due to PVS and that there is no recourse, therefore, for a challenge to be made and for the data to be amended or even corrected in light of information coming

from people who many times will know the individuals in question much better than USG personnel or computerized lists.

- Also of concern is the fact that an NGO can be excluded from receiving a USG grant, without ever knowing that the reason is due to inclusion of a suspected terrorist in their project proposal.
- The fact that this data collection process carries the risk of delaying implementation of important programming.

Having worked in sensitive political environments in Sudan, Kenya, Yemen, Kyrgyzstan and Kazakhstan, I can say that adding these information collection requirements could alienate Americans and other aid workers from those that we are trying to assist, while having little or no impact preventing our taxpayer dollars from potential diversion.

Additional information requirements might encourage mistrust among national staff. These dedicated national staff are the key link to those in need in emergency settings. True knowledge of the final destination for program funding comes from a close, trusting relationship with national partners on the ground. It will be much more difficult to achieve this effective working relationship with these additional information collection requirements.

The United States has a long and proud tradition of proving humanitarian need. Let's not compromise this legacy with unnecessary security precautions that are unlikely to have an impact on aid diversion to terrorist elements.

Thank you for requesting and noting comments on this issue.

Best regards,



Mark Slezak
Humanitarian Response Consultant
Global Emergency Group