



# Foreign Assistance Reporting and the Foreign Assistance Data Redaction System

A Mandatory Reference for ADS Chapter 579

Partial Revision Date: 10/21/2020  
Responsible Office: PPL/DC & M/MPBP  
File Name: 579maa\_102120

## Contents

1. Introduction	3
2. Principled Exceptions	3
3. Quarterly Schedule	5
4. General Counsel (GC)/Resident Legal Officer (RLO) Clearance	7
5. Redactions FAQs	7
5.1 What Do I Review?	7
5.2 What is Already Redacted?	7
5.3 What Must I Redact?	8
5.4 What is the Difference Between a Full and Partial Redaction?	8
5.4.1 Partial Field Redactions:	8
5.4.2 Full Field Redactions:	8
5.5 What Can I NOT Redact?	9
5.6 What Are Examples of How to Use Each Principled Exception?	9
5.6.1 When public disclosure threatens national security interests;	9
5.6.2 When public disclosure is likely to jeopardize the personal safety of U.S. personnel or recipients of U.S. resources;	10
5.6.4 When there are legal constraints on the disclosure of business or proprietary information of nongovernmental organizations, contractors, or private sector clients;	11
5.6.6 When data reveal private information about individuals that must be kept confidential consistent with ethical guidelines and federal regulations.	12
5.6.7 Not Qualified for Redaction	13
5.7 What About Post-Publication Redactions?	13

## 1. Introduction

USAID, in partnership with Department of State, Office of Foreign Assistance Resources (State/F), is leading the effort to ensure greater transparency of U.S. Government (USG) foreign assistance funding through robust foreign assistance reporting. The USG is committed to making foreign assistance data more useful for development, increasing its efficiency, and increasing international accountability.

As signed into law, [the Foreign Aid Transparency and Accountability Act \(FATAA\) of 2016](#) mandates that all federal department or agencies administering U.S. foreign development and economic assistance provide quarterly, comprehensive information about such programs. The Act requires that Agencies publish award and country level information, strategies and budget documents, evaluations, descriptive summaries, and all obligations and expenditures, similar to what USAID has published since 2013 under OMB Bulletin 12-01, Guidance on Collection of U.S. Foreign Assistance Data and through other requirements and international commitments. USG agencies have sufficient flexibility to protect sensitive information from disclosure, on a case-by-case basis, in order to protect against potential harm while maintaining a strong presumption in favor of transparency. Such case-by-case protection is defined as a redaction.

Altogether, USAID's foreign assistance data are reported to the multiple Web sites and portals including those listed below. The details on redacting data found in this mandatory reference apply only to:

- The International Aid Transparency Initiative ([IATI](#)): IATI is a voluntary, multi-stakeholder initiative that includes donors, partner countries, and civil society organizations whose aim is to make information about foreign aid spending easier to access, use, and understand. Many organizations report to IATI on a regular basis, and the data published by USAID, the USG and other publishers in the IATI data standard are available for download in the XML format, as well as visualized on multiple platforms.
- [ForeignAssistance.gov \(FA.gov\)](#): Managed by the Department of State, Office of Foreign Assistance (State/F), FA.gov supports all U.S. agencies that manage and/or implement a foreign assistance portfolio to report their contributions to a unified report.
- The [Foreign Aid Explorer Web site](#): Managed by USAID, the Foreign Aid Explorer includes comprehensive, aggregate historical (1946-2000) and disaggregated (2001-present) obligation and disbursement data on the 30 U.S. Government agencies implementing foreign assistance.

This mandatory reference does not cover information reported through acquisition and assistance Web sites and portals, such as FPDS-NG, FSRs.gov, SAM.gov, and USASpending.gov. Procedures for sanitation and redaction of information on those sites can be found in [ADS 302mbj](#) and [ADS 303maz](#).

## 2. Principled Exceptions

USAID is required by law to ensure that its involvement in activities is apparent and/or publicly acknowledged. Additionally, USAID must meet international and Congressional reporting requirements; however, prior to publication, data should be reviewed for potential sensitivities and specific data can be redacted according to stringent criteria and approval requirements, outlined below. [OMB Bulletin 12-01, Guidance on Collection of U.S. Foreign Assistance Data](#), states that, “A core principle of the U.S. assistance transparency policy is a presumption in favor of openness.” However, at times, public disclosure of foreign assistance data may undermine other USG priorities and interests.

FATAA of 2016 includes legal guidance on how USAID can restrict public disclosure of foreign assistance data. Operating Units may only cite one of the below FATAA exemptions when redacting information in the Foreign Assistance Data Redaction System (FADRS):

1. When public disclosure would be detrimental to the national interests of the United States, as determined by the Secretary of State.
2. When public disclosure jeopardizes the health or security of an implementing partner or program beneficiary.

Additionally, USAID does not publish personally identifiable information (PII) and uses the below principled exception to ensure it does not release PII.

3. When data reveal private information about individuals that must be kept confidential consistent with ethical guidelines and federal regulations. USAID does not publish private parties' proprietary information, and uses the below principled exception to ensure it does not release proprietary information.
4. When public disclosure would require the release of proprietary information of an implementing partner or program beneficiary.

For more information and examples of each of these exceptions, please see 5.6.

When examining information that falls within these categories, USG agencies have sufficient flexibility to protect sensitive information from disclosure, on a case-by-case basis, in order to protect against potential harm while maintaining transparency. Even when redacting limited information, USAID must ensure that USG involvement is still apparent or publicly acknowledged. To ensure that these exceptions are rarely applied and are used appropriately and consistently with the presumption of openness, agencies will maintain specific case-by-case justifications for all instances of reliance on the principled exceptions noted above. Agencies will provide these redactions and justifications to the Congress in accordance with the FATAA.

This Mandatory Reference outlines the schedule and requirements of publishing foreign assistance data while protecting information. In July 2016, FADRS, the USAID tool for reviewing the quarterly data and requesting redactions of specific data fields, was created to manage data review. FADRS also manages clearances – allowing users in

Operating Units to propose and clear redactions that are then applied to USAID's foreign assistance data in one streamlined process.

### 3. Quarterly Schedule

Bureaus and Independent Offices need to participate in the foreign assistance data redaction process each quarter. It is important that Bureaus and Independent Offices institutionalize a process for reviewing their data and redactions. While exact dates are not included in the timeline below, the Foreign Assistance Data (FAD) team specifies due dates each quarter. Please use this schedule as a general timeline for planning purposes.

1. **The FAD team processes the quarterly data.**
2. Two weeks later, approximately by the 15th of the following month, the FAD team uploads the data into [FADRS](#), and opens the tool for review. Note: *The FADRS tool is only available to those who have followed step 'a' below and have acquired user access.*
  - a. For FADRS, approved users will be signed in through USAID single sign-on. New users should contact their assigned B/IO redaction Coordinator and/or FADRS user administrators by emailing **FADRS@usaid.gov**, for access to the tool based upon the user's role in the review and redaction process. Users will be assigned a specific role within the FADRS system.
  - b. Roles pertaining to FADRS include:
    - i. **Proposer** – Proposer of redactions in Bureaus or Independent Offices. If a Bureau or Independent Office only has one user, then the Proposer and Coordinator role are combined.
    - ii. **Coordinator** – Bureau or Independent Office coordinator who may request access for more users. The Coordinator may also reject redaction proposals from users in the Bureau or Independent Office (but the system will not allow for formal approval by the Coordinator). The Coordinator is the point of contact for the user administrators and their B/IOs. Coordinators are responsible for ensuring their B/IO completes the review process and help disseminate information.
    - iii. **First Approver** – General Counsel or Regional Legal Officer who approves or rejects the redaction proposals.
    - iv. **Final Approver** – M/MPBP and PPL/DC, who manage the process for USAID, and provide final approval or rejection of the redaction proposals.



clearance is required and the FAD team will not accept redaction proposals without this clearance.

7. Final Approvers approve or reject redaction proposals. The FADRS will then remove the final-approved specific data points and produce a downloadable XML dataset for USAID's FA.gov and IATI reporting.
8. Approximately 45 days after the close of the quarter, the data are published to Foreign Aid Explorer, ForeignAssistance.gov, and the International Aid Transparency Initiative registry.

#### **4. General Counsel (GC)/Resident Legal Officer (RLO) Clearance**

Based on step 6 above, the Bureau or Independent Office GC backstop or RLO clearance is part of FADRS. GC/RLO approval is required for redaction proposals to be reviewed by the FAD team. GC/RLOs are responsible for ensuring compliance with legal requirements that USG involvement is apparent or publicly acknowledged. They must ensure that the data redacted fall under a principled exception and that Bureaus and Independent Offices are applying the correct principled exception. For more information on the first approver role, see the FADRS user manual.

### **5. Redactions FAQs**

#### **5.1 What Do I Review?**

##### New Quarterly Data

USAID is responsible for all of the information found in the FADRS data, so users need to review everything for their Bureau/Operating Unit(s).

##### Previous Redactions

Users review all previously redacted information each quarter. The FADRS user manual contains specific instructions for accessing previous redactions. Data will remain redacted until otherwise specified by the Bureau or Independent Office. Bureaus and Independent Offices should confirm previously redacted information is still sensitive and falls under the corresponding principled exception quarterly in the FADRS system. Past principled exceptions applied to historical redactions will remain valid, unless altered by Proposers and their GC/RLO reviewer. As situations evolve, Bureaus and Independent Offices should update the status of previously redacted information accordingly in FADRS. **Previous redactions will retain the Operating Unit name from when the redaction was created and approved. Legacy Operating Units should be reviewed by the appropriate operational successor Bureau or Operating Unit.**

#### **5.2 What is Already Redacted?**

Each quarter, unless the award is noted in FADRS with an alert symbol, data fields that USAID redacted in previous quarters continue to be redacted by FADRS until Bureaus and Independent Offices specify that USAID can publish the data.

Awards that previously had a redaction that corresponded to that award number and Operating Unit, but have had a field change in a source system are flagged in FADRS by an alert symbol, but are not automatically redacted again due to the fact that the change in field might have rendered the redaction obsolete. Users must confirm the redaction still applies to that award and request the redaction again by submitting a redaction proposal and receiving necessary approvals.

### 5.3 What Must I Redact?

When contemplating whether a redaction is appropriate, Bureaus and Independent Offices should consider if USAID has made data fields for a particular award available previously on public Web sites.

Always review descriptive fields carefully for personally identifiable information (PII) inadvertently entered. USAID should not publish sensitive PII in its foreign assistance data, as it falls under principled exception (f).

[GLAAS Guidance](#) to all GLAAS users and Agency staff specifies the appropriate information to enter into the Award Header and Description fields. In accordance with this guidance, award description fields and award titles should not contain PII or sensitive vendor information.

If a Bureau or Independent Office needs to redact a vendor name because it falls under a principled exception, it should verify that the vendor name does not reappear in other descriptive fields such as Award Description, Activity Narrative, or Activity Name.

### 5.4 What is the Difference Between a Full and Partial Redaction?

#### 5.4.1 Partial Field Redactions:

Users can make partial redaction requests in FADRS. If only part of the Award Description, Activity Name, or Activity Narrative is sensitive, request that the FAD team only remove the sensitive information from the description. Please do not request to remove the entire field unless the entire field is sensitive.

#### **Partial Field Redaction Example (can be used for all fields):**

- Original: Activity Narrative before request:
  - Modification to grant to XYZ Associates for health services.
- Requested: Activity Narrative after request:
  - Modification to grant for health services.

#### 5.4.2 Full Field Redactions:

Users can make full redaction requests and request the removal of an entire field. Full redactions will never result in the removal of the entire transaction – just to the specific field. Full redactions should only be used when the entire field is sensitive, otherwise a partial field redaction should be used. Since only specific information that is subject to a



principled exception should be redacted, removing an entire field should be rare and closely reviewed.

### **Full Field Redaction Example (can be used for all fields):**

- Original: *Activity Narrative before request*:
  - Grant for XYZ Associates to continue working on Undisclosed Activity in Sensitive Area XYZ.
- Requested: *Activity Narrative after request*:
  - Remove entire descriptive field because all individual data elements are sensitive and fall under a principled exception.

When an entire field is removed, the field will be populated prior to publication with standard language noting the field was removed in accordance with OMB Bulletin 12-01.

## **5.5 What Can I NOT Redact?**

FADRS only allows Bureaus and Independent Offices to redact specific fields. Bureaus and Independent Offices may not redact the program area and program element fields, as these are reported in the Congressional Budget Justification and/or the annual submission on U.S. foreign assistance to the Organization for Economic Cooperation and Development, Development Assistance Committee (OECD/DAC). Therefore, they are public information.

Bureaus and Independent Offices may not redact the names of government staff (regardless of hiring mechanism) from the award description unless the information is sensitive or is combined with other information that may be sensitive (i.e., home address). The name of a government employee alone is generally not sensitive personally identifiable information. Only if releasing the name of a government employee falls under another principled exception may a Bureau/Operating Unit redact the name. B/IOs may not redact information for being inaccurate or of low quality. In order to correct or improve data, B/IOs are encouraged to make changes within the source systems that supply FADRS data.

The name of the country in which an activity is operating is one of the primary means for meeting legal requirements that USAID's activities be apparent. Accordingly, Bureaus and Independent Offices may not redact the name of the country in which an activity is operating.

## **5.6 What Are Examples of How to Use Each Principled Exception?**

### **5.6.1 When public disclosure threatens national security interests;**

National security principled exceptions should not occur in USAID's data as the systems USAID pulls from to create this data set is not meant for classified information.

In the event there are data that pose a national security threat if made publicly available, users should ensure this information is clearly justified, as citation for this redaction requires joint approval between USAID and the Department of State leadership to confirm the data are a threat to national security beyond impeding USAID programming.

**Example:** Examples of national security exceptions include classified information, data that when released could risk military attack, economic, energy, environmental, food, or cyber security and U.S. interests.

*Illustrative Examples:*

Principled Exception	Data from Source System	Proposed Redaction	Explanation Justification Box Example Text
National Security	The project aims to support civil society and free association in Country X.	<del>The project aims to support civil society and free association in Country X.</del>	<i>Due to a change in host country conditions, the project conducts sensitive work of which release could harm national security. Citing the redaction as a foreign assistance impediment would only capture concern over the implementation of the project. Since the concern is broadly for national security, we believe this is the only citation appropriate.</i>

**5.6.2 When public disclosure is likely to jeopardize the personal safety of U.S. personnel or recipients of U.S. resources;**

This citation for redaction applies to names of individuals or recipient organizations and other identifiable information when disclosure is likely to jeopardize safety for an individual or recipient’s safety. In many sensitive locations, releasing the names or identifying information about individuals or recipients implementing USAID projects or projects in specific sectors could put individuals or recipients at risk. If there is concern that identifying USAID staff or partners working in country or in offshore programming on specific projects is unsafe, redact this data.

In addition to FADRS redactions, for vendors and assistance recipients’ name and DUNS number fields, [ADS 302mbj](#) and [ADS 303maz](#) procedures should be followed to ensure that this information is not released through other reporting venues, such as USASpending.gov. This requires approval of the AA or MD for the Operating Unit. This approval should be noted in the Justification Box to be approved in FADRS.

*Illustrative Examples:*

Principled Exception	Information from Source System	Proposed Redaction	Explanation Justification Box Example Text
Personal Safety	Change Syria COR to David Smith.	Change Country X COR <del>to David Smith.</del>	<i>Disclosure of information through public release under this particular award or program in this country is likely to expose those associated with the award or program to dangerous situations or bodily harm, including risk of assault, harassment,</i>

			<i>intimidation, jail, detainment, or any other material deprivation of essential human rights or dignity.</i>
Personal Safety	Transfer of first tranche funds to Caring Clinics for HIV/AIDS treatments.	Transfer of first tranche funds <del>to Caring Clinics</del> for HIV/AIDS treatments.	<i>Security risks here could potentially have a chilling effect on potential recipients' willingness to work with at-risk or sensitive populations, beneficiaries, or other stakeholders or where publicly identifying exactly where a program is performed and who the implementer and/or beneficiaries could endanger the organization, its employees or the beneficiaries.</i>
Personal Safety	Renovations for an employee's home at 456 Unsafe St.	Renovations for an employee's home <del>at 456 Unsafe St.</del>	<i>Security risks here could potentially have a chilling effect by publicly identifying exactly where USG employees reside could endanger the organization, its employees or the beneficiaries. A determination pursuant to 2 CFR 25 has been approved by the MD.</i>

**5.6.4 When there are legal constraints on the disclosure of business or proprietary information of nongovernmental organizations, contractors, or private sector clients;**

This citation for redaction should be applied when proprietary information is involved, such as forward looking procurement data or other pieces of information that have legal constraints around public disclosure.

**Example:** Information that contains procurement data such as unit costs, salaries or other information that is proprietary should never be released.

*Illustrative Examples:*

Principled Exception	Information from Source System	Proposed Redaction	Explanation Justification Box Example Text
Proprietary Information	Salaries or hourly rate for Program Assistant (\$25), Program Analyst (\$45), and Senior Program Analyst (\$75) for January - December in Office X.	Salaries or hourly rate for Program Assistant <del>(\$25)</del> , Program Analyst <del>(\$45)</del> , and Senior Program Analyst <del>(\$75)</del> for January - December in Office X.	<i>The salaries or hourly rates for specific positions are business proprietary information.</i>

**5.6.6 When data reveal private information about individuals that must be kept confidential consistent with ethical guidelines and federal regulations.**

This citation ensures that FADRS users remove sensitive PII from foreign assistance data fields. As defined in [ADS 508, The USAID Privacy Policy](#), PII is information which can be used to distinguish or trace an individual's identity, alone, or when combined with other personal or identifying information which 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 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.

Examples of PII include personal addresses and social security number.

The names of government staff (including **PSC, GS, FS, FSL, FSN, TCN, and CCN**) are generally publicly releasable, along with a few other data elements (as set forth in 5 CFR 293.311), such as the POC for the award or the contracting officer for an award.

Otherwise publicly releasable information (*i.e.*, the AOR/COR name) can be considered sensitive in insecure environments, like critical, priority countries, and may be redacted under another principled exception, if sensitive.

Institutional Contractor staff names should be removed from the data prior to publication.

The FADRS team will work with the appropriate M/CIO units to ensure the data comply with privacy mandates.

*Illustrative Examples:*

Principled Exception	Information from Source System	Proposed Redaction	Explanation Justification Box Example Text
Personally Identifiable Information (PII)	Change AOR to FirstName LastName.	(No redaction)	<i>The individual's name on its own is publicly releasable unless it is paired with other non-public identifying information or falls under another principled exception. As an AOR, FirstName LastName is also a U.S. Government employee. As such, his name and association to the U.S. Government is already public information and not redactable.</i>
Personally Identifiable Information (PII)	Contract extension for FirstName LastName for 12 months.	(No redaction)	<i>Because this individual is a PSC, the same disclosure principles apply as to Direct-Hires. See example above.</i>

Personally Identifiable Information (PII)	Renovations for Mission Director FirstName LastName's home at 123 Capitol St.	Renovations for Mission Director FirstName LastName's home <del>123 Capitol St.</del>	<i>The record contains two sets of identifying information: a name and an address. The name of the Mission Director is not redactable - this is generally public information. However, the home address combined with the name is considered sensitive PII and should be redacted accordingly.</i>
---	---	---	--

**5.6.7 Not Qualified for Redaction**

Data that do not meet a principled exception above, but that are not robust or do not properly describe a project, cannot be redacted. In instances where data are of poor quality or incorrect, users should update the data in the source system so that the data will be updated for all future quarters where a transaction occurs.

*Illustrative Examples of No Redactions:*

Principled Exception	Information from Source System	Proposed Redaction	Explanation Justification Box Example Text
Any Principled Exception	Extension of contract 2654-ZXD-8G97F for implementation strategy.	(No redaction)	<i>The description does not properly describe what the project does or mention the great work the team is doing. However, information that is of poor quality cannot be redacted. It is recommended to update more robust information in the source system.</i>

**5.7 What About Post-Publication Redactions?**

The FAD team will not accept post-publication redactions, unless extraordinary circumstances warrant removal. Due to the way FADRS manages the data as well as the way data are ingested across multiple public Web sites and registries, the post-publication redactions are an exceptionally laborious process. If the award appears in subsequent quarters, USAID can accommodate the redaction request assuming it fits a principled exception.

579maa\_102120