



Post-Publication Emergency Redactions

A Mandatory Reference for ADS Chapter 579

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1. Overview

USAID is committed to making information resources accessible, discoverable, and usable by the public, [per transparency mandates](#) such as the [Open Government Data Act](#), [OMB Memorandum M-13-13](#), and the U.S. Government's commitment to the [International Aid Transparency Initiative \(IATI\)](#). However, USAID also recognizes that contexts can change rapidly (e.g. conflict or political upheaval) such that information previously suitable for the public domain can jeopardize the health, safety, or security of our staff, implementing partners, or program participants. Such contexts may alter USAID's balance between its commitment to transparency and its commitment to the health, safety, and security of our staff, partners, and program participants.

This mandatory reference addresses the challenges of implementing aid transparency mandates when conditions change such that the continued publication of certain information could potentially endanger USAID's staff, partners, and program participants. The process by which USAID initiates such emergency redactions is the Post Publication Emergency Redaction (PPER) process. The PPER process is initiated when USAID has already publicly disseminated information, but extraordinary circumstances require USAID to conduct a post-publication emergency redaction of that information.

Agency leadership may initiate the PPER process when it determines that leaving certain data or information on USAID or United States Government (USG) websites as publicly available could put USAID's staff, implementing partners, or program participants at risk. The Agency has a low risk tolerance in these circumstances, as indicated in the [Agency's Risk Appetite Statement](#). The Agency must also document these circumstances in a PPER Memo, as outlined in the "Business Process" section below.

For this mandatory reference, "redact" is defined as obscuring, or removing data or information with the aim of safeguarding USAID staff, USAID beneficiary, or USAID implementing partner information across public reporting websites and other public information dissemination channels. While USAID has the ability to redact information from its own websites and the ability to influence such redactions on other USG sites, its ability to influence such redactions among non-USG entities is limited.

Moreover, information that the Agency has previously made available publicly via the internet on any website may have already been copied, archived, or stored for future use by one or more of the following:

- Websites, web crawling, advertising, or internet archive services;
- Search engines, which may reveal the previous existence of data or a digital artifact, even after it was removed from public view; and

- Adversarial state or non-state actors.

However, USAID has determined as a matter of policy that redacting information from USAID and USG websites is nonetheless within the Agency's interest and an appropriate use of Agency resources under emergent circumstances.

It is important to note that USAID operates in numerous fragile environments that carry inherent risk for its staff and partners. Operating in such an environment does not itself necessarily warrant the initiation of the PPER. It is the responsibility of Operating Units (OUs) to redact sensitive information not appropriate for public release prior to publication consistent with law and agency policy (see [ADS 579maa](#)). Proper redactions applied prior to publication will reduce the information impacted in the event the PPER process is initiated.

Redaction of sensitive information in the event of exigent circumstances should occur with deliberate speed. However, USAID leadership and staff must approach any PPER decision with great care since the process is laborious in terms of technical workload and coordination with interagency partners and third parties. As conditions change, USAID must, as practicable, restore redacted data as long as the restoration does not jeopardize the health, safety, or security of individuals.

In all cases, the Agency must meet the legal obligations concerning publication and redaction requirements for data.

2. Authorities to Redact

USAID's authorities to redact information under specific circumstances stem from the following:

- [Foundations for Evidence-Based Policymaking Act of 2018](#) (Evidence Act)
- [The Foreign Aid Transparency and Accountability Act of 2016](#) (FATAA)
- [OMB Memorandum M-13-13](#) (2013)
- [OMB Memorandum 12-01](#) (2012)
- [Federal Funding Accountability and Transparency Act of 2006](#) (FFATA)
- [Privacy Act of 1974](#)
- [2 CFR § 25.110](#)
- [FAR 4.605](#)

3. Scope and Criteria

The PPER process begins when a [USAID geographic or functional bureau](#) initiates a [PPER Memo](#) to USAID’s Deputy Administrator for Policy and Programming (DA/PP) who then approves or disapproves the memo. This is fully outlined in the Business Process Steps (see section **4 below**). Once the PPER memo is approved, USAID teams identified in the table below will begin implementing redactions. Unless otherwise specified in the PPER memo, USAID’s default approach is as follows:

Criteria: For awards or activities implemented within the past six years¹ that have generated public-facing information that creates a risk to the health, safety, or security of USAID staff, partners, or program participants **AND**:

- Place of performance = **[location(s) provided by PPER initiator]**
- Place of performance = Worldwide, Regional, or multi-country but the following are present:
 - **[location(s) at the country / county / district / city level]**
 - **[project / activity name]**
 - **[partner name]**

USAID will take the following actions:

Website	Action	Responsible Party
USAID website	Redact: <ul style="list-style-type: none"> ● Implementing Partner Name (Except Public International Organizations (PIOs)) ● Implementation Location ● Award Title ● Award Description ● Contracting/Agreement Officer’s Representative (COR/AOR) 	Bureau for Legislative and Public Affairs (LPA)
Development Experience Clearinghouse	Restrict access to USAID email accounts only.	USAID Data Services (M/CIO)
Development Data Library	Restrict access to USAID email accounts only.	USAID Data Services (M/CIO)

¹ The six years is intended to cover the standard five-year period of performance for most awards and a buffer year.

Website	Action	Responsible Party
Dollars to Results	Redact: <ul style="list-style-type: none"> ● Implementing Partner Name (Except PIOs) ● Subnational Location Information ● Award Title ● Award Description 	Bureau for Management, Office of Management Policy, Budget, and Performance (M/MPBP)
Environmental Compliance Database	Restrict access to USAID email accounts only.	Bureau for Development, Democracy, and Innovation (DDI)
ForeignAssistance.gov and the International Aid Transparency Initiative	Per ADS 579maa and FA.gov Standard Operating Procedures (SOPs). This means redacting: <ul style="list-style-type: none"> ● Implementing Partner Name (except PIOs) ● Award Title ● Sub-national location information ● Sensitive information from the Activity Description as allowable under FATAA OUs can remove less information as needed or based on other business rules - such as narrowing by sensitive sectors or other information.	Bureau for Policy, Planning and Learning, (PPL) and M/CIO

For items meeting the **Criteria** above, USAID advocates for the following actions regarding USAID data on websites that USAID does not directly manage by contacting the website owners listed below and providing a formal written request to redact.

Website	Action	Responsible Party
<p align="center"><u>Federal Procurement Data System</u></p>	<ul style="list-style-type: none"> ● Redact vendor information by adding the generic Unique Entity Identifier (UEI) numbers to applicable awards. ● Replace any sensitive information in the award with alternative language as available. Update 'Description of Requirement' to "Overseas Contract." ● If the award is a delivery or task order, change the place of performance. 	<p align="center">Bureau for Management, Office of Acquisition and Assistance (M/OAA)</p>
<p align="center"><u>USA Spending</u></p>	<ul style="list-style-type: none"> ● Redact recipient information by adding the generic UEI to applicable awards (except PIOs). ● Replace any sensitive information in the award with alternative language, as available. Remove applicable acquisition and assistance subawards. 	<p align="center">M/OAA</p>
<p align="center">USAID Inspector General Websites</p>	<ul style="list-style-type: none"> ● Subject to Office of the Inspector General (OIG) discretion. M/CIO notifies OIG of the Agency leadership decision regarding initiation of PPER. 	<p align="center">M/CIO - OIG</p>
<p align="center"><u>Organization for Economic Co-operation and Development (OECD) Creditor Reporting System (CRS)</u></p>	<ul style="list-style-type: none"> ● Request an update to the US submission to the Creditor Reporting System with redactions applied as necessary: <ul style="list-style-type: none"> ○ Implementing Partner Name (except PIOs) 	<p align="center">Bureau for Policy, Planning, and Learning, Office of Development Cooperation (PPL/DC)</p>

4. Business Process

- a. Both of the following methods are acceptable to initiate the PPER:

- i. **Option A: Initiated by USAID/Washington:** The Assistant Administrator of a [USAID geographic or functional bureau](#) initiates the PPER by sending the [PPER Memo](#) to USAID's Deputy Administrator for Policy and Programming (DA/PP) who then approves or disapproves the memo. A copy of the draft memo must be shared with USAID's Chief Data Officer (CDO) during this step to help expedite any potential actions.
 - ii. **Option B: Initiated by a Mission:** A USAID Mission Director initiates the PPER by sending the [PPER Memo](#) to USAID's Deputy Administrator for Policy and Programming (DA/PP) who then approves or disapproves the memo. Under this option, it is mandatory that the Assistant Administrator of the Mission's respective geographic bureau be listed as a clearing official on the memo. A copy of the draft memo must also be shared with USAID's CDO during this step to help expedite any potential actions.**NOTE:** The CDO may contact the Responsible Parties identified in the table above at this point, recommending that they *prepare* to redact on short notice. However, redactions cannot commence until the PPER Memo is approved.
- b. If approved, the memo is sent to:
- i. USAID's Deputy Administrator for Management and Resources (DA/MR)
 - ii. Assistant Administrator for Management (AA/M)
 - iii. USAID Chief Information Officer (CIO)
 - iv. USAID Chief Data Officer (CDO)
- c. The USAID CDO initiates the PPER process by contacting the Responsible Parties outlined in the tables above and notifying them that redactions may begin.
- d. Responsible Parties listed in the tables above provide real-time updates on redactions via the [PPER Tracking Template](#). The CDO coordinates this process to ensure actions are taken in a timely manner.
- e. The CDO provides regular updates to the Redaction POC identified in the PPER memo.
- f. No later than 60 calendar days after the DA/PP approves the PPER memo, the Redaction POC must seek a decision from their leadership on whether to 1) extend the 90-day redaction period for another 90 days; or 2) initiate the process of restoring information to public view.

NOTE: There is no limit on the number of 90-day extensions the Redaction POC can request. However, if 365 days have elapsed since the DA/PP approved the initial PPER memo, the Redaction POC may

update the PPER memo to request an extension for another 365 (rather than 90) days, with annual reviews thereafter **or** to make the redactions permanent. Requests to make redactions permanent will require a strong legal justification in coordination with the Office of General Counsel.

i. To extend the redaction period for another 90 days:

1. The Redaction POC provides the CDO with an updated, fully cleared copy of the [PPER Memo](#).

ii. To begin the process of restoring information to public view:

1. The Redaction POC obtains approval from their Bureau or Mission leadership to restore certain items to public view and communicates this decision to the CDO;
2. The CDO provides the Redaction POC with the most updated copy of the [PPER Tracking Template](#);
3. The Redaction POC coordinates with relevant teams to identify items that may be restored to public view. The Redaction POC ensures that the items ready for restoration to public view are clearly marked in the PPER Tracking Template;
4. The Redaction POC notifies the CDO that items ready for restoration to public view have been marked in the PPER Tracking Template;
5. The CDO coordinates with the Responsible Parties to restore the identified items to public view; and
6. Once the restoration process is nearing completion, the Redaction POC coordinates with the CDO to craft an [After-Action PPER Memo](#). The purpose of this memo is to document the steps taken to restore information to public view that had previously been redacted. This helps ensure an audit trail demonstrating USAID's concrete steps and rationale in balancing transparency mandates with staff and partner security.