



FOR OFFICIAL USE ONLY

ACTION MEMO FOR THE DEPUTY ADMINISTRATOR FOR POLICY AND PROGRAMMING

Date:

From: Assistant Administrator for the Bureau for [XXXX]

Subject: Request for Emergency Redaction of Information

Recommendation: That you approve the Post-Publication Emergency Redaction (PPER) of information as noted in the Redaction Parameters section of this memo for a period of 90 calendar days.

Approve _____ **Disapprove** _____

BACKGROUND

Recent events in [XXXX] have increased the sensitivity of information that USAID has previously made available publicly via various USAID and United States Government (USG) websites. Bureau and Mission leadership believe that this information could be used in a way that jeopardizes the health, safety, or security of USAID staff, implementing partners, and program participants. The Agency has a low-risk tolerance in such circumstances, as indicated in the [Agency’s Risk Appetite Statement](#).

[ADS 579](#) allows for emergency redactions under “extraordinary circumstances” while cautioning that 1) the information may have already been harvested by other websites, search engines, or malicious actors; 2) such redactions are exceptionally laborious; and 3) time and effort will likely be needed to conduct a rigorous review and restore as much data as practicable to the public view at an appropriate time.

However, Bureau leadership maintains that emergency redactions are still warranted based on the following verified events:

- [Illustrative example only]: Implementing partner’s country leadership in [XXXX] stated that their staff in cities falling under [XXXX] control report searches of homes and cell phones for linkages to USG or other government affiliation.
 - Source:

- [Illustrative example only]: Media outlets controlled by [XXXX] have launched false media campaigns, using information from USAID.gov websites to allege that USAID partners are “foreign agents” with malicious political intent and thus subject to increased scrutiny and site visits per local law.
 - Source:

- [Illustrative example only]: Members of [XXXX] sent a warning letter to a USAID partner, threatening violence in light of the organization’s known affiliation with the [XXXX] project. Detailed information on this project can be found across multiple websites that may facilitate further identification of contract staff by hostile parties.
 - Source:

REDACTION PARAMETERS:

[Delete all text between these brackets prior to finalizing the memo. On previous occasions during crises of an exceptional nature, USAID has implemented the default approach found below. Operating Units may choose to adopt this approach by default when urgent action is required or to customize if needed.]

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

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

Website	Action	Responsible Party
USAID website	<ul style="list-style-type: none"> ● 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)

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
Development Data Library	Restrict access to USAID email accounts only.	USAID Data Services (M/CIO)
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 generally means redacting: <ul style="list-style-type: none"> ● Implementing Partner Name (except PIOs) ● Award Title ● Subnational Location Information ● Activity Description and replacing any sensitive information in the award description with alternative language, as available. 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 will advocate 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
Federal Procurement Data System	<ul style="list-style-type: none"> ● Redact vendor information by adding the generic Unique Entity Identifier (UEI) numbers to 	Bureau for Management

Website	Action	Responsible Party
	applicable awards. <ul style="list-style-type: none"> ● 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. 	Office of Acquisition and Assistance (M/OAA)
USA Spending	<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. 	M/OAA
USAID Inspector General Websites	<ul style="list-style-type: none"> ● Subject to Office of the Inspector General (OIG) discretion. M/CIO notifies OIG of Agency leadership decision regarding initiation of PPER. 	M/CIO - OIG
Organisation for Economic Co-operation and Development (OECD) Creditor Reporting System (CRS)	<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) 	PPL/DC

REDACTION POINT OF CONTACT (POC)

The Bureau has designated the following individual to serve as the POC for this effort. This individual will work with USAID’s Chief Data Officer in M/CIO to manage the redaction process and the process of restoring redacted information to public view upon expiry of this memo:

Name	Position / Title	Email Address

AUTHORITIES:

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](#)

RESOURCE IMPLICATIONS:

Time and effort required to implement these actions are generally covered under existing USAID support contracts or by Direct-Hire resourcing. Upon expiration of the 90-day period, USAID will need to 1) extend the 90-day period; or 2) expend additional resources to begin restoring affected items to public view.

Attachments:

Tab 1: [PPER Tracking Sheet](#)

Document:

Drafter:

Approved:

Bureau-Level Clearances

Clearance Status

Date