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Action Memorandum Template to Initiate a Vetting Program

A Mandatory Reference for ADS Chapter 319

New Edition Date: 01/15/2021

Responsible Office: M/MPBP

File Name: 319maa\_011521

**Date:**

**To: Deputy Administrator**

**From: AA/[Bureau Acronym]**

**Subject: Initiating a Vetting Program for [INSERT NAME OF COUNTRY]**

**Recommendation:** That you, in your capacity as the Senior Agency Vetting Official (SAVO), approve the initiation of a vetting program and [INSERT BUREAU/INDEPENDENT OFFICE OR MISSION] vetting order for [INSERT COUNTRY], to include the vetting of U.S. persons; with the start of vetting to take place after the completion of consultation with Congress and the entry on duty of vetting personnel support.

**Approve\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Disapprove\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**BACKGROUND**

This memo seeks your approval pursuant to Administrative Directives System (ADS) 319, [Section X] to initiate a partner vetting program, and the vetting order at Tab 1, for [INSERT COUNTRY]. The assessed threat and risk supports the initiation of partner vetting as an enhanced due diligence measure to prevent the diversion of funds to terrorist groups and their supporters. [INSERT B/IO/M] plans to begin vetting in [INSERT QUARTER AND FISCAL YEAR].

Existing Threat and Risk Information

[Discuss threat and risk information, in classified form, as appropriate, that supports the initiation of vetting. Address why other risk mitigation is not sufficient.

Attach the current Counter-Threat Risk Based Assessment as determined by the Office of Security. If rated “medium” or “low,” discuss consultation with the Risk-Management Council (RMC) and Executive Management Council on Risk and Internal Control (EMCRIC) in accordance with ADS 319 and attach a summary of RMC and/or EMCRIC input, if any. If available, include information from (a) the Departments of State, Treasury, or Defense; (b) the relevant Country Team; (c) the National Security Council; and (d) an Inspector General.]

Department of State (State)

[Discuss “State’s vetting policy for the location in question, if any, and report on consultation with State about the matter]

Impact on Implementation of USAID Programs

[Discuss the extent to which vetting is anticipated to have an impact, if any, on USAID’s ability to implement programming.]

Tailored Vetting Order Provisions [IF ANY]

[Discuss any policy or process in the vetting order at Tab 1 that is tailored to the location in question. If you have a question about whether a tailored provision is a departure from common USAID vetting policy or procedure, please consult the Central Vetting Group at [cvg@usaid.gov](mailto:cvg@usaid.gov) and the Office of General Counsel].

Congress and Implementing Partners

[Discuss any statutory requirement to consult with Congress, the plan to brief Congress that USAID will begin vetting in [INSERT COUNTRY], the plan to brief and train Implementing Partners, and other relevant congressional and partner considerations, if any.]

Memorandum of Understanding (MOU) with the Office of Security (SEC)

[Discuss the status of the required MOU with SEC on the management of Vetting Analysts].

Legal Risks

[As applicable, address any litigation risks associated with implementation of the vetting program].

**AUTHORITIES**

ADS 319 establishes the authority of the Deputy Administrator as the Senior Agency Vetting Official to approve the recommended actions.

**RESOURCE IMPLICATIONS**

[Discuss estimated vetting caseload in the current fiscal year and fiscal year following, corresponding vetting personnel requirements, how personnel requirements will be filled, by hiring mechanism, and funded, and, as appropriate, the timetable for on-boarding new personnel.]

**ATTACHMENT**

Attachment:

Tab 1—Vetting Bureau/Mission Order

**Drafter**: [B/IO/Title]:[Name]:[Phone extension];[After Hours Phone No.]

**Approved**: [B/IO/Title]:[JDoe]

**Bureau Level Clearances Clearance Status Date**

GC:

SEC:

M: