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Action Memorandum Template for Heightened-Risk Vetting

A Mandatory Reference for ADS Chapter 319

New Edition Date: 01/15/2021

Responsible Office: M/MPBP

File Name: 319mab\_011521

**Date:**

**To: Deputy Administrator**

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

**Subject: Initiating Heightened-Risk Vetting of [INSERT PROPOSED SUBJECT OF VETTING]**

**Recommendation:** That you, in your capacity as the Senior Agency Vetting Official (SAVO), approve the initiation of Heightened-Risk Vetting (HRV) for [INSERT PROPOSED SUBJECT OF VETTING], to include the vetting of any U.S. persons.

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

**BACKGROUND**

This memo seeks your approval pursuant to Administrative Directives System (ADS) 319, [Section X] to initiate HRV in accordance with the vetting order at Tab 1 [M Bureau HRV Order]. The assessed threat and risk for diversion of funds counter to the national security interests of the United States supports HRV as an enhanced due diligence measure. [INSERT B/IO/M] plans to begin vetting in or about [INSERT QUARTER AND FISCAL YEAR].

Subject of Vetting

[Provide a detailed description of the proposed subject of vetting, including any relevant definitions, and whether the subject of vetting would be, or include, a U.S. citizen or organization. By definition, HRV cannot be a country program. The subject could be an activity or activities in a particular subnational geographic location or jurisdiction, a competitive solicitation or set of solicitations, a non-competitive proposal or set of proposals, an award, subaward, modification, a set of awards, subawards, or modifications, or other form of development or humanitarian assistance.]

Existing Threat and Risk Information

[Discuss threat and risk information, in classified form, as appropriate, indicating a heightened risk to U.S. national security. Address why other risk mitigation is not sufficient.

Attach the current Counter-Threat Risk Based Assessment as determined by the Office of Security, relevant interagency vetting policy or a report on consultation with the interagency about the matter. If available, include information from (a) the Departments of State, Treasury, or Defense; (b) the Country Team at the relevant U.S. Embassy, Embassies, or Consulate(s); (c) the National Security Council; or (d) the USAID Office of Inspector General.

If post-award vetting is proposed, specifically address why the threat outweighs potential legal and other risks associated with vetting after award.]

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].

Legal Risks

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

Personnel Support

[Discuss arrangements for vetting personnel support covering the vetting official, vetting assistant, and vetting analyst functions. Available options are: (a) staff already functioning in these roles in connection with a vetting program within the B/IO, or one of its Missions, (b) staff already functioning in these roles from another B/IO, or one of its Missions; (c) the Central Vetting Group.]

B/IO Decision-Making Authority

[Provide the title and name of the senior USAID policy-making official at the Deputy Assistant Administrator level who will adjudicate eligibility or ineligibility].

**AUTHORITIES**

ADS 319 establishes the authority of the Deputy Administrator as the SAVO to approve the recommended actions.

**RESOURCE IMPLICATIONS**

[Indicate either that there are no resource implications because HRV will be an additional duty within existing resources or alternatively the estimated cost beyond existing resources.]

**ATTACHMENT**

Attachment:

Tab 1—HRV 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: