

JUSTIFICATION FOR EMERGENCY REVIEW

Iran Democracy Program Grants Vetting

A critical component of the Administration's Iran policy is the support for indigenous Iranian voices calling for freedom. President Bush himself has pledged this support and the State Department has made the awarding of grants for this purpose a key component of its Iran policy.

As a condition of licensing these activities, the Office of Foreign Assets Control (OFAC) has requested the Department of State to follow certain procedures to effectuate the goals of Sections 481(b), 531(a), 571, 582, and 635(b) of the Foreign Assistance Act of 1961 (as amended); 18 U.S.C. §§ 2339A and 2339B; Executive Order 13224; and Homeland Security Presidential Directive 6. These licensing conditions mandate that the Department conduct a vetting of potential Iran democracy grantees and sub-grantees for counter-terrorism purposes. To conduct this vetting the Department envisions collecting information from grantees and sub-grantees regarding the identity and background of their key employees and Boards of Directors.

The Department has therefore determined that:

1. This collection is needed prior to the expiration of time periods normally associated with a routine submission for review under the provisions of the Paperwork Reduction Act;
2. This collection is essential to the mission of the Department of State, in particular promoting our vital national interests in Iran, ensuring that grant recipients are appropriately vetted, and avoiding inadvertently benefiting terrorists or terrorist activities;
3. The use of normal clearance procedures will prevent the Department from obtaining the information needed to release funding for vital and urgent democracy promotion grants regarding Iran on a timely basis. Public harm is likely to result if normal clearance procedures are followed because failure to finalize the Iran democracy promotion grants within this month will adversely impact the Administration's overall Iran

policy. Iran continues to pursue a radical course through its pursuit of a nuclear weapons capability, its notoriety as the world's leading supporter of terrorist groups, and its deplorable treatment of its own people. These grant programs are a critical component of the Administration's attempts to support the Iranian people and a more open and free political process in order shift Iran's radical course.

The political scene in Iran, which is holding several sets of elections on December 15, is changing fast. The awarding of these grants is part of ongoing efforts by the United States and international community to press Iran to end its pursuit of nuclear weapons capability, and stop its support of terrorists in the region. A delay in providing approval for sub-grants and for new grants will cause the United States to lose time to affect Iranian policy.

Therefore, the Department of State requests OMB approval for this collection as soon as possible, but no later than by December 8, 2006.

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