



June 6, 2019

Accountability Counsel – USA
Other Interested Civil Society Organizations and Practitioners

Re: Comments on DFC's Impact Assessment Questionnaire (DFC-007)

Dear Interested Civil Society Organizations and Practitioners:

This letter presents the Overseas Private Investment Corporation's (OPIC) response, on behalf of the US International Development Finance Corporation (DFC), to comments of the Interested Civil Society Organizations and Practitioners (see Attachment A) pertaining to the OPIC Federal Register notice, titled "Submission for OMB Review; Comments Request" related to DFC's Impact Assessment Questionnaire (DFC-007), published on March 22, 2019.

Since DFC-007 will be the longest and most complex form completed by our clients, OPIC is in the process of retaining independent experts to advise OPIC/DFC on renovating the entire form in order to collect this important developmental and compliance information most effectively. Due to the short timeframe of the transition from OPIC to DFC, it was not possible to complete the renovation process. So, the current DFC-007, which as you noted includes some of your recommendations, is only the first iteration. OPIC/DFC plans to complete a more thorough revision in 2020 and will keep your further recommendations under consideration as part of that process.

One item we would like to address, however, is with regard to your recommendations on adding questions about key project parties' possible inclusion on debarment lists published by various International Financial Institutions (IFIs), or their involvement in complaints lodged with Independent Accountability Mechanisms (IAMs), National Contact Points (NCPs) or other venues for community-related grievances. OPIC has evaluated the efficacy of asking such questions in our forms vs. determining the answers via our extensive character risk due diligence utilizing independent information sources, which include IFI debarment lists. We have found that the independent due diligence process is more effective in uncovering information on these important topics than attempting to collect such information through our forms. Therefore, adding these types of questions is unnecessary.

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OPIC appreciates your comments to the DFC-007 and your engagement on these important issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Genevieve Stubbs', with a stylized, overlapping flourish.

Genevieve Stubbs
Senior Administrative Counsel
Overseas Private Investment Corporation

Attachment A -- Interested Civil Society Organizations and Practitioners

Abibiman Foundation – Ghana
Accountability Counsel – United States
Actions Paysages contre la Faim – Democratic Republic of Congo
African Coalition for Corporate Accountability (ACCA) – South Africa
Buliisa Initiative for Rural Development Organisation (BIRUDO) – Uganda
Center for Biological Diversity – United States
Center for International Environmental Law (CIEL) – United States
Centre for Human Rights and Development – Mongolia
COMPPART – Nigeria
Conseil Régional des Organisations Non Gouvernementales de Développement – Democratic Republic of Congo
Friends of the Earth U.S. – United States
Fundación Ambiente y Recursos Naturales – Argentina
Gender Action – United States
Greenpeace U.S. – United States
International Accountability Project (IAP) – United States
Lumière Synergie pour le Développement – Senegal
Nash Vek Public Foundation – Kyrgyzstan
Observatoire d'Etudes et d'Appui à la Responsabilité Sociale et Environnementale (OEARSE) – Democratic Republic of Congo
Oyu Tolgoi Watch -- Mongolia
Rivers without Boundaries Coalition – Mongolia
Youth For Environmental Education and Development Foundation (YFEED Foundation) – Nepal
Youth Group on Protection of Environment -- Tajikistan