



USAID
FROM THE AMERICAN PEOPLE

May 3, 2019

ACTION MEMO FOR ADMINISTRATOR, MARK GREEN

FROM: AA/M—Fred Nutt *FN*

SUBJECT: Effective Partnering and Procurement Reform (EPPR) – Advance Equality between Men and Women by Updating the Contractor Employee Biographical Data Sheet (AID Form 1420-17)

Recommendation

That you approve revising the Agency's standard form on biographical data to eliminate salary history and replace it with market value and supporting rationale for positions under cost-reimbursement contracts to remove the potential for gender disparity in hiring and compensation based on salary history.

MAY 03 2019

Approve

MTB

Disapprove

Background

The Agency's Contractor Employee Biographical Data Sheet (commonly referred to as the "Biodata Form") currently captures information on the education, employment, language capability, and salary history of employees, contractors, and consultants. The Agency recently shared the form with the public to obtain input on its use. Some of the respondents commented that the use of the form inhibits individuals from being paid the market value for a position because Contracting Officers (COs) over-rely on salary history rather than the market rate and the individual's qualifications and experience for the position. Some of the respondents also stated that the form perpetuates the salary disparity between men and women.

The Bureau for Management's Office of Acquisition and Assistance (M/OAA) undertook further research, including by reaching out to our colleagues in Acquisition and Assistance (A&A) to determine a more-effective approach to review the reasonableness of salary costs. Opinions varied, given the importance of eliminating the potential for gender disparity while also maintaining a structured framework to promote consistency in cost reviews. To address these two-fold purposes, I recommend the revision of the bio-data form to eliminate salary history and replace it with the market value of the proposed position. In addition,

contractors would document the basis for the position's market value, and their rationale for the proposed salary.

The Bureau for Management, in conjunction with the Office of General Counsel, would pursue rule-making to revise the bio-data form, and work through any additional public comments during that process.

Resource Implications

There are no envisioned resource implications for the Agency at this time, other than staff time to undertake the associated rule-making processes.

Attachment:

a/s

Effective Partnering and Procurement Reform (EPPR)

Recommendation 10 - Advance equality between men and women by updating requirements related to the usage of the biodata form and releasing guidance to Contracting Officers (and potentially partners) on providing salary approvals.

Milestone Plan

10.1	How we Partner	Advance equality between men and women by updating requirements related to the usage of the biodata form and releasing guidance to Contracting Officers (and potentially partners) on providing salary approvals.	Completion Date
	<i>Sub task</i>	Distribute a survey to Contracting Officers	March 26, 2019
	<i>Sub task</i>	Review Results of the survey	April 15, 2019
	<i>Sub task</i>	Draft an Action Memo to approve revisions of the biodata form	April 30, 2019
	<i>Sub task</i>	Action Memo approved	May 4, 2019
	<i>Sub task</i>	Issue Proposed Rule and/or <i>Federal Register</i> Notice to revise the form	TBD
	<i>Sub task</i>	Issue AIDAR Final Rule and/or <i>Federal Register</i> Notice	TBD

CLEARANCE PAGE FOR ACTION MEMO FOR Effective Partnering and Procurement Reform (EPPR) – Advance Gender Equality by updating the AID Form 1420-17 - Contractor Employee Biographical Data Sheet

Drafter: SDAA/M:ACrumbly:X21200

Approved: AA/M:FNutt

Bureau Level Clearances

GC/A&A DPerone

Clearance Status

Cleared

Date

5/1/19