



**USAID**  
FROM THE AMERICAN PEOPLE

November 23, 2021

**MEMORANDUM**

**TO:** Michael McManus, USAID Desk Officer Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**FROM:** Heather Bomans  
Senior Operations Management Coordinator, Bureau for Management, Critical Coordination Structure (M/CCS) at the U.S. Agency for International Development (USAID)

**SUBJECT:** Justification for Emergency Processing

To protect the health and safety of the Federal workforce, Executive Order 14042 (Ensuring Adequate COVID Safety Protocols for Federal Contractors) requires all USAID Personal Services Contractors (PSCs) to be fully vaccinated against COVID-19 by January 18, 2022, other than in limited circumstances where the law requires an accommodation. USAID is implementing this vaccination requirement for its workforce and requesting PSC staff provide documentation to establish compliance with the requirement. Exceptions may be granted for religious or medical reasons, or due to delays related to a temporary condition or medical circumstance. The collection instruments for religious and medical exceptions have already been approved by OIRA for emergency processing.

USAID must evaluate PSC vaccination documentation to ensure that the information provided complies with Executive Order 14042. USAID proposes to utilize a Report Vaccination Form to collect medical information that will help determine whether PSCs are in compliance with the federal COVID-19 vaccination mandate. The template form is the same as the form used by U.S. Direct Hire (USDH) staff and ensures USAID has the most accurate and current information on contractors' vaccination status. The form requires PSC staff to submit medical information indicating the number of vaccination doses, date(s), and type(s) of vaccination received. All USAID PSCs, unless they have submitted an exception request, are required to complete a Report Vaccination Form.

USAID requests OMB approval to conduct this information collection with USAID PSCs. The information obtained in this form would inform our verification process to ensure all staff adhere to the federal vaccine mandate.

The Paperwork Reduction Act (PRA) of 1995 requires that agencies obtain OMB approval before requesting most types of information from the public ("information collections" include forms, interviews, and record keeping). USAID seeks emergency approval of information collection associated with administering this form and requests OIRA approval to not publish a Federal Register notice in relation to this form. USAID cannot reasonably comply with the normal clearance procedures under the PRA because doing so would delay the Agency's efforts to adhere to the guidance issued by the Safer Federal Workforce Task Force and the deviation contract clauses issued to implement that guidance (FAR 52.223-99, DFARS 252.223-7999, etc.) by the January 18, 2022 deadline. Our request meets the standard for emergency processing as the Agency needs adequate medical information to ensure compliance with the federal vaccine requirement, and PSCs must receive their last dose of their vaccine no later than January 4, 2022, to meet the January 18, 2022 deadline to be fully vaccinated. Additionally, the COVID-19 pandemic is an unanticipated event with immediate risks to workforce lives, warranting emergency processing. This form is critical to USAID's compliance with the federal vaccination mandate and COVID-19 response efforts. As such, we request expedited approval of this information collection. Further, USAID respectfully requests that OIRA waive the requirement for publication of a federal register notice for the proposed collection prescribed by 5 CFR § 1320.5(a)(1)(iv), in accordance with the procedures for emergency processing set forth at 5 CFR § 1320.13(d).

**Signed by:**

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