



## DISCLOSURE OF REAL OR POTENTIAL CONFLICT OF INTEREST FOR EXTERNAL EVALUATIONS

This document includes a template for disclosure of real or potential conflict of interest for USAID external evaluations and instructions.

### Instructions

*Evaluations of USAID activities will be undertaken so that they are not subject to the perception or reality of biased measurement or reporting due to conflict of interest.<sup>1</sup> For external evaluations, all external evaluation team leaders and team members will provide a signed statement attesting to a lack of conflict of interest or describing an existing conflict of interest relative to the activity being evaluated.<sup>2</sup> USAID employees who participate as a team member on an external evaluation should not complete this form.*

Evaluators of USAID activities have a responsibility to maintain independence so that opinions, conclusions, judgments, and recommendations will be impartial and will be viewed as impartial by third parties. External evaluators and evaluation team members are to disclose all relevant facts regarding real or potential conflicts of interest that could lead reasonable third parties with knowledge of the relevant facts and circumstances to conclude that the evaluator or evaluation team member is not able to maintain independence and, thus, is not capable of exercising objective and impartial judgment on all issues associated with conducting and reporting the work. Operating Unit leadership, in close consultation with the Contracting Officer, will determine whether the real or potential conflict of interest is one that should disqualify an individual from the evaluation team or require recusal by that individual from evaluating certain aspects of the activity(s).

In addition, if evaluation team members gain access to proprietary information of other companies in the process of conducting the evaluation, then they must agree with the other companies to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.<sup>3</sup>

### REAL OR POTENTIAL CONFLICTS OF INTEREST MAY INCLUDE, BUT ARE NOT LIMITED TO:

- I. Immediate family or close family member who is an employee of the USAID operating unit managing the activity(s) being evaluated or the implementing organization(s) whose activity(s) are being evaluated.

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<sup>1</sup> USAID Evaluation Policy; USAID Contract Information Bulletin 99-17; and Federal Acquisition Regulations (FAR) Part 9.5, Organizational Conflicts of Interest, and Subpart 3.10, Contractor Code of Business Ethics and Conduct.

<sup>2</sup> USAID Evaluation Policy

<sup>3</sup> FAR 9.505-4(b)

## DISCLOSURE OF REAL OR POTENTIAL CONFLICT OF INTEREST

2. Financial interest that is direct, or is significant/material though indirect, in the implementing organization(s) whose activities are being evaluated or in the outcome of the evaluation.
3. Current or previous direct or significant/material though indirect experience with the activities being evaluated, including involvement in the activity design or previous iterations of the activity.
4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose activity(s) are being evaluated.
5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose activity(s) are being evaluated.
6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular activities and organizations being evaluated that could bias the evaluation.

## PRIVACY ACT STATEMENT

**AUTHORITY:** The Foreign Assistance Transparency and Accountability Act (2016) and The Foundations for Evidence Based Policy-Making Act (2019) enhance the transparency, accuracy, and reliability of USAID program and activity evaluations. USAID ADS 201mah, USAID Evaluation Report Requirements, states that an evaluation must include as an annex signed disclosures of conflicts of interest from evaluation team members.

**PURPOSE:** The form USAID Disclosure of Real or Potential Conflict of Interest for External Evaluation Team Members collects information in order identify any conflicts of interest that could create bias or influence data analysis, findings, and or recommendations presented in the evaluation report. The purpose of the form is to support transparency of USAID's data collection and reporting. The form is in a table format and requests the following information: name, title, organization, evaluation position, evaluation award number, USAID activities evaluated, and real or potential conflicts of interest to disclose (yes/no). USAID will use this information to determine the validity, accuracy, and reliability of the evaluation findings.

**ROUTINE USES:** Because the disclosure of conflicts of interest is included as an annex in the evaluation report, the information will be disclosed to any reader of the report in or outside of the Agency. This will allow the reader to determine the validity, accuracy, and reliability of the evaluation findings. For other uses, see USAID-27: Partner Vetting System, published 77 FR 2319, (December 05, 2012); modification published 87 FR 3109 (January 14, 2021)

**DISCLOSURE:** This PII collection is voluntary. If the individual does not provide all or any part of the requested information, then the transparency of the evaluation methodology is reduced and bias may contribute to erroneous analysis, findings, and recommendations. Biased evaluation reports may negatively impact USAID's program cycle including decision-making, program planning, budget allocation, and processes of collaboration, learning, and adapting.

DISCLOSURE OF REAL OR POTENTIAL CONFLICT OF INTEREST

**TEMPLATE: USAID Disclosure of Real or Potential Conflict of Interest for External Evaluation Team Members**

<b>Name</b>	
<b>Title</b>	
<b>Organization</b>	
<b>Evaluation Position</b>	<input type="checkbox"/> Team Leader <input type="checkbox"/> Team member
<b>Evaluation Award Number</b> <i>(contract or other instrument)</i>	
<b>USAID Activity(s) Evaluated</b> <i>(Include activity name(s), implementer name(s) and award number(s), if applicable)</i>	
<b>I have real or potential conflicts of interest to disclose.</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>If yes answered above, I disclose the following facts:</b>  <i>Real or potential conflicts of interest may include, but are not limited to:</i> <ol style="list-style-type: none"> <li>1. Close family member who is an employee of the USAID operating unit managing the activity(s) being evaluated or the implementing organization(s) whose activity(s) are being evaluated.</li> <li>2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose activities are being evaluated or in the outcome of the evaluation.</li> <li>3. Current or previous direct or significant though indirect experience with the activity(s) being evaluated, including involvement in the activity design or previous iterations of the activity.</li> </ol>	

DISCLOSURE OF REAL OR POTENTIAL CONFLICT OF INTEREST

<p><b>CONTINUED</b></p> <p><b>If yes answered above, I disclose the following facts:</b></p> <p><i>Real or potential conflicts of interest may include, but are not limited to:</i></p> <ol style="list-style-type: none"> <li>4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose activity(s) are being evaluated.</li> <li>5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose activity(s) are being evaluated.</li> <li>6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular activities and organizations being evaluated that could bias the evaluation.</li> </ol>	
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I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.

Date	
Signature	