



February 14, 2024

MEMORANDUM

TO: Tyler Glotfelty, USAID Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget

FROM: Isobel Coleman, Deputy Administrator for Policy and Programming
U.S. Agency for International Development

SUBJECT: Justification for Emergency Processing

Request

The U.S. Agency for International Development (USAID), in support of the U.S. government's Operation Enduring Welcome and to assist the Department of State (State) in processing Afghan Special Immigrant Visas (ASIVs), respectfully requests expedited emergency approval to conduct an information collection of our implementing partner (IP) holders of USAID government contracts in Afghanistan for the employment records of all Afghan national employees who worked on USAID contracts since 2001. We request OMB approval within two days of submitting this letter.

Background

USAID established the Afghan Partner Relocation Task Force (APRTF) to improve our effectiveness in expediting our Afghan partners through Operation Enduring Welcome, the U.S. government's effort to resettle our Afghan allies. Supporting our Afghan allies is a key Administration goal, particularly as Afghan allies continue to face imminent harm under the Taliban regime.

In 2023, State directed APRTF to assist with the employment verification required for the Chief of Mission (COM) approval step of the ASIV process. Among other considerations, COM approval requires confirmation at least one year of qualifying employment by or on behalf of the U.S. government (for example, as an employee of an organization awarded a U.S. government contract) and demonstration of faithful and valuable service in Afghanistan. In Fiscal Year 2023, State was unable to grant COM approval in more than 50 percent of cases due to lack of sufficient employment documentation. APRTF is requesting emergency approval to reach out to IPs who held USAID government contracts in Afghanistan since 2001, which is estimated to be at least 300 contractors. This data collection will be voluntary and will only request data that IPs likely already have as part of their human resources data collection processes. USAID will issue a Federal Register Notice notifying the public of this request.

Justification

USAID is requesting emergency OMB approval of this information collection in accordance with 5 C.F.R. § 1320.13. OMB may authorize emergency processing of submissions of collections of information when an agency provides a written determination that the collection of information is urgently needed and essential to the agency's mission. 5 C.F.R. § 1320.13(a)(1). The agency's determination must also justify why it cannot reasonably comply with the normal clearance procedures; for example, because "public harm is reasonably likely to result if normal clearance procedures are followed." 5 C.F.R. § 1320.13(a)(2)(i).

USAID needs to conduct this information collection to expedite the COM approval process for ASIV applications. State currently faces a backlog of around 130,500 applications in the pre-COM approval stage of the ASIV process, significantly delaying the time to resettle eligible Afghan allies. The safe and expeditious resettlement of Afghan allies is both an Administration priority and essential to USAID's commitment to support our Afghan allies. *See* 5 C.F.R. § 1320.13(a)(1).

Given the dire circumstances many U.S.-associated Afghan nationals face in Afghanistan under the current Taliban regime, USAID cannot reasonably comply with normal clearance procedures because it is reasonably likely to result in harm or death to our Afghan allies. *See* 5 C.F.R. § 1320.13(a)(2)(i). Collecting employment data from former USAID contractors will allow USAID to assist the State Department in processing the thousands of ASIV applications in its backlog and facilitate a process that could save the lives of those former employees and their families.

Based on the above justification, USAID respectfully requests expedited emergency processing to begin outreach to our IPs immediately. USAID appreciates your assistance in this endeavor.

Sincerely,



Isobel Coleman
Deputy Administrator for Policy and Programming
U.S. Agency for International Development