

INVEST Data Protection Policy for the USAID Finance and Investment Network
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Background

INVEST is a mechanism collaboratively designed by USAID and a set of implementing partners to meet the growing demand within USAID for mobilizing investment to impact the critical challenges of international development. It serves to advance the implementation of the USAID Private Sector Engagement Policy and was co-created through a BAA process, culminating in a contract issued to DAI as the organizing partner in September 2017 with option years extending the work to September 2022. USAID worked closely with INVEST to develop a finance network of traditional and new and underutilized entities to overcome the technical challenges to USAID's utilization of blended finance approaches in its development activities. This network has evolved to become the USAID Finance and Investment Network – a continuously growing network of firms specializing in transaction advisory, investment facilitation, fund management, public-private partnerships, gender lens investing, and more that is an asset to USAID extending well beyond INVEST. The USAID Finance and Investment Network began as a list of 26 firms in September 2017, and as of October 2020 comprised 324 firms, most of which are new and underutilized partners for USAID. Any firm that is interested in joining the Partner Network is invited to since the intention is to expand USAID access to a breadth of technical expertise in the face of a continually expanding demand within the Agency. The network functions on a principle of inclusivity which means that interested organizations that want to join can do so. Moreover, no firm has to join the network to bid on any of INVEST's RFPs. The full list of partner network members is posted on the USAID INVEST [website](#) and is updated monthly. The USAID INVEST website list includes firm names only.

In December 2019, USAID directed INVEST to expand the partner network to include the CATALYZE mechanism as well as any other mechanisms managed by the USAID Private Sector Engagement (PSE) Team so that these mechanisms could have access to partners where specific approval has been provided to share a partner's information. Since January 2020, INVEST has generated a partner network report on a monthly basis to share with CATALYZE and expects to begin sharing the partner network information with other mechanisms under the USAID PSE Team in the months to come. INVEST collects consent from individual partners to share this partner network data with CATALYZE and other mechanisms as described in the "Sharing of Finance and Investment Network Partner Data" section below.

Collection and Storage of Finance and Investment Network Partner Data

INVEST collects data on partners primarily through a survey that each organization completes to join the network. The survey requests information on the organization including:

- Name of firm
- Country(ies) of registration
- Small business status (if a U.S. firm)
- Geographic experience
- Technical expertise
- Point of contact information

The survey also collects data to support USAID in its understanding of our engagement with New and Underutilized Partners (NUPs), which feeds into USAID's New Partnerships Initiative and includes information about each organization's previous experience working with USAID, total value of its contracts/agreements with USAID, and its status as a "local organization" per USAID's definition.

It should be noted that the survey was rolled out in December 2018. Prior to the survey, firms were added to the partner network through participation in the original co-creation workshop that led to INVEST, online research conducted by the INVEST team, identification of firms that were included as partners on proposals from partner network members that would be suitable members of the partner network themselves, and firms contacting INVEST directly requesting to join the partner network. INVEST personnel also conduct desk research on firms in the network to supplement information provided in the survey, to add points of contact to organization profiles, or to add information to firms' profiles that joined before the survey was developed.

All information collected on partner network firms is stored in the project's Zoho CRM system, which requires a license to access and is password protected per user. Each member of the partner network has a profile in the Zoho CRM system that includes information on the firm as described above. In addition to the organization information described above, the CRM also includes records of all procurement activity in which the organization engaged. The CRM "Procurements" module includes an entry for each procurement released by INVEST, lists each firm that submitted a proposal, each firm that was short-listed, and each firm that was awarded a subcontract under that procurement. The modules inter-link, so each partner's CRM profile includes a record of all procurements on which they submitted a proposal and all procurements from which they were awarded a subcontract. The CRM does not include any sensitive information around performance or reputation of the firms.

Only select members of the INVEST team have access to the CRM, including the Director of Operations, Procurement and Partnerships Team, MEL Manager, and technical personnel that support buy-ins using Zoho. DAI personnel outside of the INVEST project do not have access to the Zoho CRM, and the INVEST CRM information is not included in the corporate DAI CRM. USAID does not have access to the Zoho CRM given the license-based access requirement.

Use of Partner Network Data

The primary use of partner network data is to support the implementation of buy-ins by matching USAID demand with the best technical expertise and to validate the breadth of PSE expertise in the network for USAID given its importance as an Agency goal of the PSE policy. INVEST continually analyzes the technical and geographic expertise of the partner network and identifies gaps where INVEST needs to identify additional firms to support USAID requirements. These gaps are typically filled through market research, including requesting recommendations from USAID, DAI home office technical sectors or projects in the region, and online searches using relevant search terms.

INVEST also collects data described above on NUPs to support data requests related to USAID's New Partnerships Initiative that aims to simplify access to USAID resources and make it easier for new partners to bring forward their ideas and innovation. As USAID tracks and reports on its engagement with NUPs, INVEST is required to report on how INVEST engages NUPs through participation in the partner network and especially through the award of subcontracts under INVEST that lead to NUPs implementing technical work. INVEST also meets the mandatory USAID reporting on the level of

engagement of U.S. small businesses within the partner network and the number and value of subcontracts for implementation of technical work under INVEST. All of this data for reporting is stored in the organization profiles in the CRM and the reports for USAID are generated from the Zoho CRM.

Sharing of Partner Network Data

Whenever USAID asks for the partner list to be shared with other mechanisms INVEST puts out a specific request to partners to secure their agreement before anything beyond the public partner list is shared. INVEST has been collecting partner consent to share select information – limited to firm name, small business status, technical and geographic expertise, and point of contact information – with CATALYZE and the other PSE Hub mechanisms since January 6, 2020. As of September 24, 2020, no firms have responded declining to share their information. INVEST follows up with firms that have not yet responded on a monthly basis to request consent to share their information.

USAID's goal for INVEST is that by the end of the project the members of the partner network will be more knowledgeable about working with USAID and better prepared to win work with USAID beyond INVEST. In support of this goal, INVEST is committed to supporting partner network members to identify and pursue partnering opportunities beyond the procurement released under INVEST and CATALYZE. This may include partnerships with the larger DAI and Palladium companies, or with other members of the Partner Network, or with other firms not affiliated with the PSE Hub.

At the end of the INVEST project, as part of the Partner Network transition and project closedown, INVEST will request consent from member firms to be included in DAI's corporate CRM system so that DAI can continue to work with Partner Network members after the project ends. As each firm provides consent, its organization information will be added to the corporate DAI CRM system.

Safeguarding of Technical Contributions from Partners

By design, DAI leads and manages the INVEST project but pushes as much technical work as possible to the partner network. DAI is prohibited from bidding on any INVEST RFP. The majority of INVEST's technical implementation is conducted through subcontracts awarded to partners through competitive procurement processes. This approach requires the receipt and protection of proprietary technical and cost information received from partners as part of each procurement process, as well as the review and retention of technical deliverables produced by partners during subcontract implementation.

Procurement Process

During each procurement, offerors submit a technical and cost proposal in response to a Request for Proposals released by INVEST. INVEST protects the technical and cost information from offerors as follows:

- Technical and cost proposals are saved in a dedicated file storage system with restricted access, only accessible by the INVEST operations team
- The technical proposals only – no cost proposals – are saved in a Google Drive managed by the procurement team for the purpose of coordinating proposal evaluations. Each procurement is saved in its own folder on the Google Drive so permissions can be managed on a procurement-by-procurement basis.
- Access to each procurement is restricted to those who have signed a Non-Disclosure Agreement (NDA). These individuals typically include INVEST personnel and USAID personnel, and

sometimes also include outside technical consultants or stakeholders from host country institutions who serve on the Technical Evaluation Committee. Google Drive access is only granted to an individual after signing and returning an NDA and written confirmation that the individual does not have a conflict of interest with any of the offerors for a particular procurement. The INVEST procurement team signs a new NDA for each procurement.

- The price analysis conducted on the winning proposal is conducted by the INVEST procurement team directly with the successful offeror, on an email chain separate from any INVEST technical staff and from USAID.

At the conclusion of a procurement, INVEST notifies the unsuccessful offerors and offers the option to request a post-award written evaluation summary from INVEST that outlines the strengths and weaknesses of the proposal. This post-award written evaluation summary also includes the name of the successful offeror(s) that were awarded under the procurement. INVEST has also updated its Procurement Forecast [website](#) to include a list of all RFPs released to the partner network, along with the winning offeror and its partners.

Project Implementation

INVEST Quarterly and Annual Reports are required to be uploaded to the USAID Development Experience Clearinghouse (DEC) per the INVEST contract. These contract deliverables at times have spotlights on partner work or quotes from partners, and in all cases that work is fully attributed to the partner that implemented the work. INVEST also develops communications pieces and blog posts that feature partner experiences and achievements under INVEST. INVEST's Communications team works directly with partners to gather information, highlight their experiences, and develop the communications pieces. INVEST clears all partner quotes through partners before publishing.

During subcontract implementation, any technical deliverables produced by partners that are fully funded by USAID through the subcontract are the property of USAID per DAI Subcontract Clause 7.3, Intellectual Property Rights. Technical deliverables produced under a subcontract are not required to be uploaded to DEC. The INVEST team reviews all deliverables and provides input and edits before submitting the final versions to USAID per the terms of the buy-in. INVEST also saves the deliverables produced under each subcontract in its dedicated file storage system. INVEST does not share those deliverables to a wider audience or post them online. INVEST also does not claim those deliverables as the work of DAI but attributes them to the partner that produced the deliverable.

Project Closedown

DAI is required to maintain INVEST project files for audit purposes for 10 years after the project period of performance expires. All proprietary information shared by partners through procurement processes and subcontract implementation will continue to be stored in the project's dedicated file storage system with access restrictions continuing after project closedown.