

## **BURMA DUE DILIGENCE ASSESSMENT**

U.S. foreign assistance for Burma or Burmese beneficiaries is subject to restrictions. This includes restrictions, pursuant to section 7043(a)(3) of the Department of State, Foreign Operations, and Related Programs Appropriations Act, 2020 (Div. G, P.L. 116-94) (SFOAA), on funds appropriated under title III of the act for assistance for Burma. Section 704(a)(3) provides that such funds “may not be made available to any organization or entity controlled by the armed forces of Burma, or to any individual or organization that advocates violence against ethnic or religious groups or individuals in Burma.”

Applicant organizations should be cognizant of these restrictions when developing project proposals as these restrictions will require appropriate due diligence vetting of program beneficiaries and collaboration with DRL to ensure compliance with these restrictions. Due diligence vetting in this context can be understood as any practice or process undertaken by a DRL grantee to collect and examine information on an individual or organization prior to the provision of funding or support in order to ascertain whether such assistance can be provided in light of the restrictions outlined in the first paragraph. Examples of due diligences practices can include conducting background checks on individuals and organizations against relevant sources in the public domain, consulting with local staff and other experts in the field, and other steps and processes by which a grantee investigates, monitors, and safeguards against the provision of assistance to prohibited individuals and/or organizations.

To gain a better understanding of an organization’s existing vetting practices and capabilities, applicant organizations are required to submit a one-page Burma Due Diligence Assessment outlining existing organizational vetting practices and experience conducting due diligence vetting in Burma or other country contexts. The assessment should discuss current practices, capacity and/or experience conducting and documenting open source vetting of program beneficiaries, existing organizational safeguards preventing the provision of funding or other forms of assistance to entities or individuals involved in human rights abuses, and experience working with donors on grant compliance.