

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

| | | |
|--------------------------|---|------------------------------|
| _____ |) | |
| AMERICAN FOREIGN SERVICE |) | |
| ASSOCIATION, et al., |) | |
| |) | |
| <i>Plaintiffs,</i> |) | Civil Action No. 1:25-CV-352 |
| |) | |
| v. |) | |
| |) | |
| DONALD TRUMP, et al., |) | |
| |) | |
| <i>Defendants.</i> |) | |
| _____ |) | |

DECLARATION OF YOLANDA DOE

I, Yolanda Doe, declare the following under penalties of perjury:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.
2. I am a member of the American Foreign Service Association.
3. I have been a Program Officer FSO at USAID for about 16 years, and Program Officers (and Program Offices) are responsible for ensuring development strategies, programs, funding, etc. for their operating unit are all planned and reported on in accordance with law and USAID policies and procedures.
4. I write in response to the assertions that “it is currently impossible to access sufficient information in one place to determine whether the foreign assistance policies and interests supported by appropriations are not duplicated, are effective, and are consistent with President Trump’s foreign policy” and “it was impossible to review existing programs without shutting everything down.” The assertion that the

Government is making that it is impossible to review all USAID programs without shutting them down is false. Every other new Presidential administration reviewed plans and programs and worked with USAID staff to align programs to the new priorities. For this current Administration, as with all new administrations, USAID staff were standing by to participate in the review, but for this transition, we never received any guidance on how to provide information to support a review.

5. Every year, budget plans (“Operational Plans”) are developed for all foreign assistance funds. For USAID, these plans are very detailed; they identify each project/activity/award (including the start and end dates and the implementing partner) and describe what that project/activity/award does (or will do if it is still in design or procurement), how much of that fiscal year's funds it will receive, what it will use those funds to do, and how it aligns with the current Administration's objectives. This is done for all foreign assistance funds, including USAID operating units (overseas Missions and Bureaus in Washington). These plans are organized by strategic objective (which are directly linked to the current Administration's priorities and strategies) and cleared by the head of the USAID Operating Unit (Mission Director or Senior Deputy Assistant Administrator) as well as representatives in USAID's BRM (Budget, Resource and Management), and then reviewed and approved by the Foreign Assistance Office ("F") at State Department. For Missions overseas, the Ambassador also reviews and certifies the plan. During the first Trump Administration someone in the Secretary of State's office reviewed and questioned all Operational Plans to ensure alignment with the Administration's

priorities before the plans were approved and funds were allowed to be obligated. These plans are input into the FACTSInfo database, so that all internal State Department and USAID staff have access to them. It is required to update the Operational Plans and project/activity/award information at least annually (generally just before the next Operational Plan will be developed). Much of this information is also pushed to a public website (foreignassistance.gov). The FACTSInfo database has the capacity to produce a variety of reports, including reports for all projects/activities/awards for specific Operational Plan years and/or for particular operating units, etc. It is able to filter out reports for just USAID if the Administration does not want to review foreign assistance programs for other Agencies working in the same overseas Mission (the Operational Plan is for all foreign assistance programming in that operating unit, so that can include State Department and other agencies). The Administration could have asked for specific reports from the system to support their review, even without the need to even involve USAID staff in the process (if that is what they preferred). Certainly, a review could easily happen without shutting down programs as information is readily available to support the review and USAID staff have been standing by to support the review and any questions.

6. In addition, FACTSInfo also houses Performance Plans and Reports (PPRs), which are reports on results and progress for all foreign assistance programs, including USAID operating units. Reports from this module in FACTSInfo could also provide additional information on the progress of particular programs, if the

Administration would find that useful. At the same time that we do the PPR, USAID also updates its evaluation registry, which is housed in FACTInfo. This shows all the external evaluations of projects and activities, including their key findings and how those findings will be used. Further, USAID has numerous processes outlined in the ADS (particularly ADS 201) and displayed in the Program Cycle to help ensure that programs are effective and that we as an Agency learn and adapt to improve our programs for maximum results achievement.

7. It is important to note that Operational Plans and PPRs are aligned with a cascading set of strategies that directly tie to the Administration's priorities. A new Presidential Administration first develops a new National Security Strategy (NSS). That strategy is used to develop a State USAID Joint Strategic Plan (JSP), which is in turn used to develop for overseas posts an Integrated Country Strategy (ICS), which is coordinated by the Department of State and aligns all USG efforts directly to the NSS and JSP. USAID also develops for Missions overseas Country Development Cooperation Strategies (CDCSs), which link directly to the ISC. The ICSs and CDCSs basically provide more details on the priorities of posts and how they directly link with the JSP and NSS. This Administration could have followed the process of all other new Administrations by first articulating their priorities through this strategy cascade and reviewing all Operational Plans (prior and going forward) for alignment with their new priorities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 11, 2025.

/s/ Yolanda Doe
Yolanda Doe