## Congress of the United States

H.S. House of Representatives Committee on Small Business 2361 Rayburn House Office Building Washington, DC 20515-6515

June 13, 2024

The Honorable Anthony Blinken Secretary U.S. Department of State 2201 C Street NW Washington, D.C. 20520

Mr. James P. Rubin Special Envoy and Coordinator Global Engagement Center U.S. Department of State 2201 C Street NW Washington, D.C. 20520

Dear Secretary Blinken and Mr. Rubin:

The House Committee on Small Business is investigating the U.S. government's censorship-by-proxy and revenue interference of American small businesses because of their lawful speech, including by the U.S. Department of State's Global Engagement Center (GEC). The purpose of this investigation is to evaluate legislative solutions to federal funds being used to demonetize, tarnish, or censor domestic small businesses on the basis of their lawful speech. Rather than comply with the Committee's investigation into and oversight of the GEC's funding of third parties who engage in these activities, the State Department has, stunningly, provided only two documents totaling 12 pages, with heavy redactions, in the span of one year.

The Committee launched its investigation into the extent of the Biden Administration's involvement and collaboration with the private sector to interfere with the ability of small businesses to compete online on June 7, 2023. This included measures such as: (1) facilitating removal of business social media posts and accounts, impacting the ability to monetize those platforms; (2) pressuring online marketplaces to remove businesses' products, resulting in reduction of sales; and (3) funding non-governmental entities that interfere with businesses' advertising and other revenue streams based on partisan determinations of mis-, dis-, or malinformation. Over the course of the Committee's 12-month investigation, the Department has consistently missed the Committee's requested production deadlines, slow-rolled document productions by taking months to produce one document at a time, and consistently ignored legitimate oversight document requests, all while the Committee has repeatedly offered accommodations to the Department without prompting, including providing extra time and narrowing its requests. The Department's continual obstruction, in the form of delays, non-

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substantive responses, and excessive redactions, has hindered the Committee's ability to consider legislative reforms regarding issues directly related to the investigation.

The Committee initially made just two requests on June 7, 2023 (Letter 1), with a June 21, 2023 deadline: (1) an unredacted list of all GEC grant recipients and associated award numbers from FY 2019 to present; and (2) unredacted copies of all GEC Award Purpose and Objective Alignment documents from FY 2019 to present. State acknowledged receipt of Letter 1 that same day, followed by a phone call with Kem Anderson, the Director of Capitol Hill Liaison Offices for the Department's Bureau of Legislative Affairs. On June 22, 2023, the day after the deadline, the Committee followed up by email seeking an update on the status of the Department's response. The Committee received no response to that email, nor to the follow-up email Committee staff sent on July 5, 2023.

Due to State's lack of response, on July 24, 2023, the Committee sent a follow-up letter (Letter 2) with document requests identical to those in Letter 1, emphasizing its need for the documents, particularly in light of recent litigation updates, including the apparent involvement of GEC employees in what one federal judge called "the most massive attack against free speech in United States history." State acknowledged receipt but did not produce any documents. Accordingly, on August 22, 2023, the Committee sent a follow-up email, which State ignored. The Committee then contacted State staff by telephone on August 29, 2023, and was told that State had decided to change the internal point of contact for the Committee's requests. That same day, in hopes of getting the new point of contact quickly up to speed, the Committee retransmitted copies of Letter 1, Letter 2, and all communications up to that point. State responded by email the same day that both letters were "flagg[ed]" for the Bureau of Legislative Affairs and its Legal Affairs colleagues but provided no response to the substance of the Letters.

Yet again, State failed to produce the GEC records or to respond further. On October 2, 2023, the Committee requested an update on its document requests. State responded the next day only to copy two State employees to "further assist" the Committee. By that point, it had been over three months since the Committee's initial requests, and State had not produced a single document to the Committee. On October 25, 2023, the Committee requested another update, and in response, State acknowledged "it's been a while since this request, but rest assured GEC is working on it" and that a response is "on its way and will be coming to you soon." However, by November 28, 2023, when the Committee had still received no response more than one month after the October conversation, it sent another follow-up email. Later that day, State responded that the Committee could expect the production later that week or early next.

On December 3, 2023, nearly six months after Letter 1, State provided a heavily redacted document production to the Committee (Production 1) consisting of only one document: a five-page spreadsheet of cooperative agreements, rather than all grant types. Notably, this production

<sup>&</sup>lt;sup>1</sup> Letter from Roger Williams, Chairman, H. Comm. on Small Bus., to James P. Rubin, Special Envoy and Coordinator, Global Engagement Center (June 7, 2023).

<sup>&</sup>lt;sup>2</sup> Letter from Roger Williams, Chairman, H. Comm. on Small Bus., to James P. Rubin, Special Envoy and Coordinator, Global Engagement Center (July 24, 2023).

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was transmitted during FY 2024; the Committee's request included a record of all awards from FY 2019 to present, yet the spreadsheet only included awards through FY 2023. Further, there were multiple gaps in Federal Award Identification Numbers (FAIN) sequences attached to each award. The Committee reached out to State, requesting a phone call to discuss Production 1 and an *in camera* review of the redacted portions of Production 1. The *in camera* review took place on December 19, 2023. Information the Committee learned during the *in camera* review prompted questions about the FAIN gaps in Production 1 and whether the gaps indicated omissions of existing awards. Indeed, multiple awards (cooperative agreements and project grants) adhering to the same FAIN structure for the applicable fiscal years were publicly available on USAspending.gov but were not included in Production 1.

On January 2, 2024, the Committee followed up by email with additional requests for information based in part on the *in camera* review, including: (1) the identity of project grants since FY 2019; (2) the identity of the cooperative agreements missing from State's initial production (ex. FY 2020 SGECPD20CA0001 to SGECPD20CA0006); (3) a briefing on the process for reviewing and approving subawardees/subgrantees; (4) the identity of all subawardees/subgrantees since FY 2019; and (5) the contact information for State's Office of the Inspector General.<sup>3</sup> An attorney for the State Department responded the same day to say that she had passed on those questions to the GEC.

Next, having received no further information from State, the Committee sent a follow-up letter on January 8, 2024 (Letter 3) to reiterate its need for the information requested on January 2 and to expand upon and reiterate its requests from Letter 1, as State had failed to adequately respond. The Committee also extended the scope of the requests to FY 2018 in order to provide documents to capture subawards that were given out in FY 2021 but stemmed from a direct award from FY 2018. The requests in Letter 3 included: (1) an unredacted list of all GEC grant recipients and associated award numbers from FY 2019 to present, in addition to any other awards, project grants, or cooperative agreements that were omitted from the December 3 partial production; (2) unredacted copies of all contracts and related documentation (including communications describing scope of work) for every GEC award, project grant, and cooperative agreement from FY 2018 to present; (3) a list of all subawardees/subgrantees and any pertinent contracts for FY 2018 to present; (4) a description of the GEC's process for screening, approving, and overseeing subawardees/subgrantees; (5) a list of all GEC contractors for FY 2018 to present and unredacted copies of all associated contracts; (6) a list of all GEC subcontractors for FY 2018 to present; and (7) a copy of GEC's internal file named "2023.02.14" GEC-GDI-BLACKLIST.docx."5

On January 29, 2024, a week after the deadline in Letter 3 had lapsed, the Committee emailed State requesting a status update and to discuss a production schedule to accommodate

<sup>5</sup> *Id.* at 4.

<sup>&</sup>lt;sup>3</sup> Email from Stephanie Chambless, Counsel, H. Comm. on Small Bus., to Molly Claflin, Special Counsel, U.S. Dep't of State (Jan. 2, 2024).

<sup>&</sup>lt;sup>4</sup> Letter from Roger Williams, Chairman, H. Comm. on Small Bus., to James P. Rubin, Special Envoy and Coordinator, Global Engagement Center (Jan. 28, 2024).

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the GEC, given State's assertions about its workload. When the Department did not respond to this email, the Committee followed up on February 5, 2024, again to discuss production and to schedule a briefing with a GEC grant officer and grant officer representative on the GEC's award process. On February 9, 2024, State said it was working on its response to Letter 3 and expressed concerns with the Committee's handling of Production 1, due to public reporting on the documents.

On February 14, 2024, the Committee received a letter from State that threatened to only allow the Committee to view further information *in camera*. The Committee responded to the GEC by letter on February 16, 2024 (Letter 4) to clarify that it is entitled to share information about investigations with its members, that none of the information in Production 1 was classified, and that the Committee had taken additional precautions to protect certain information. The Committee notified State that it would not be deterred by State's hedging and threats. Letter 4 repeated the requests from Letter 3, with the additional request for a briefing with a grant officer and grant officer representative responsible for GEC awards. By this point, approximately three weeks after the deadline from Letter 3 had passed, the Committee demanded a response as soon as possible.

State continued its refusal to produce the requested information. The Committee had not received any substantive response to Letter 4 by March 7, 2024, leading it to check again with State on its progress and to offer a phone call to discuss the accommodation of a rolling production. The Committee never received a response to this email.

Next, the Committee received another partial production from State on March 28, 2024 (Production 2), this time consisting of only one document of seven pages, which was heavily redacted and contained essentially the same information as Production 1 and again omitted awards from FY 2024. No further documentation was produced, including responses to the vast majority of the requests in Letter 3 and Letter 4. No explanation was provided for the similar FAIN gaps, nor for the GEC awards available on USAspending.gov that were not reflected in either production.

The Committee raised its concerns about potential omissions in State's document productions with State on April 2, 2024, and also requested an *in camera* review of the heavy redactions in Production 2. The Committee subsequently attended a briefing with State and an *in camera* review of Production 2. During the *in camera* review, State made available to the Committee an unredacted copy of Production 2 and the internal document titled "2023.02.14 GEC-GDI-BLACKLIST.docx." State reiterated its claims that it had provided all existing awards

<sup>&</sup>lt;sup>6</sup> Letter from Naz Durakoğlu, Ass't. Sec., Bureau of Leg. Affairs, U.S. Dep't of State, to Roger Williams, Chairman, H. Comm. on Small Bus. (Feb. 14, 2024).

<sup>&</sup>lt;sup>7</sup> Letter from Roger Williams, Chairman, H. Comm. on Small Bus., to James P. Rubin, Special Envoy and Coordinator, Global Engagement Center (Feb. 16, 2024).

<sup>&</sup>lt;sup>8</sup> *Id*.

<sup>&</sup>lt;sup>9</sup> *Id.* at 2-3.

<sup>&</sup>lt;sup>10</sup> On file with the Committee.

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for the applicable fiscal years and that neither production contained omissions, but it had no explanation for why the awards available on USAspending.gov that followed the FAIN structure of the produced awards were not included in Production 1 or Production 2.

The Committee sent one more letter on May 16, 2024 (Letter 5), which memorialized the questions that arose during the second *in camera* review and, in an accommodation to State, narrowed its prior document requests. <sup>11</sup> The Committee warned that if State failed to provide complete responses by May 30, 2024, the Committee would evaluate the use of compulsory process to obtain them. <sup>12</sup> The requests in Letter 5 reiterated previous requests while naming specific document types for certain awardees and subawardees, such as funding applications and risk assessments, and asked for specific documentation about the GEC's Disinfo Cloud program. <sup>13</sup> The Committee did not receive an acknowledgement of receipt of Letter 5.

On May 20, 2024, the Committee received information through Representative Beth Van Duyne, Chairman of the Committee's Subcommittee on Oversight, Investigations, and Regulations, who had submitted requests to GEC asking it to account for the suspected omissions in Production 1 and Production 2 as part of her participation in a hearing before the House Foreign Affairs Committee's Subcommittee on Oversight and Accountability. <sup>14</sup> In response to Rep. Van Duyne's questions, State had indicated that the FAIN gaps did not suggest that any awards had been omitted from the productions to this Committee. However, State did not explain the awards available on USAspending.gov that have FAIN matching the gaps in Production 1 and Production 2. The Committee then requested further information from State on May 21, 2024. <sup>15</sup> Again, State chose not to respond to the Committee's attempts to understand the omissions or the awards on USAspending.gov with matching FAIN. On May 29, 2024, the Committee inquired whether State had obtained answers to the follow-up questions sent on May 21, 2024, and asked for an update on the expected production schedule, given the May 30, 2024 deadline. Later that day, State responded that it hoped to deliver a letter response "very soon" but that the productions would "take a little longer."

This investigation has now been open for one year, with miniscule progress made by State, despite numerous accommodations by the Committee in both allotted time and narrowed scope.

The Committee has broad authority to investigate "problems of all types of small business" under House Rule X. The Committee continues to have serious concerns about the Department's efforts to comply with legitimate oversight requests and will not tolerate any further delay. Accordingly, attached to this letter is a subpoena, issued pursuant to Rule

<sup>&</sup>lt;sup>11</sup> Letter from Roger Williams, Chairman, H. Comm. on Small Bus., to James P. Rubin, Special Envoy and Coordinator, Global Engagement Center (May 16, 2024).

<sup>12</sup> Id. at 2.

<sup>&</sup>lt;sup>13</sup> *Id*.

<sup>&</sup>lt;sup>14</sup> Notably, the purpose of this hearing was for the House Foreign Affairs Committee to address the GEC's insufficient cooperation with their own investigations.

<sup>&</sup>lt;sup>15</sup> On file with the Committee.

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XI.2(m)(1)(B) of the Rules of the House of Representatives and Rule 9(A) of the Committee's rules, with a response date of June 27, 2024.

Sincerely,

Roger Williams Chairman

House Committee on Small Business

cc: The Honorable Nydia M. Velázquez, Ranking Member

### **SUBPOENA**

# BY AUTHORITY OF THE HOUSE OF REPRESENTATIVES OF THE CONGRESS OF THE UNITED STATES OF AMERICA

The Honorable Anthony Blinken, Secretary, U.S. Department of State

Clerk

You are hereby commanded to be and appear	before the
House Committee on Small Business	
of the House of Representatives of the United States at the place, date, and time specified below.  to produce the things identified on the attached schedule touching matters of inquiry committed to scommittee or subcommittee; and you are not to depart without leave of said committee or subcommittee.	
Place of production: 2361 Rayburn House Offi	ice Building, Washington, D.C. 20515
Date: June 27, 2024	Time: 12:00p.m.
to testify at a deposition touching matters of i and you are not to depart without leave of said	nquiry committed to said committee or subcommittee committee or subcommittee.
Place of testimony:	
Date:	Time:
	quiry committed to said committee or subcommittee;
Place of testimony:	
Date:	Time:
ny authorized staff member or the U.S. Marshals	Service
	to serve and make re
Witness my hand and the s	eal of the House of Representatives of the United Stat
the city of Washington,	D.C. this 13 day of June , 20
"Kern F. McCulre	Today     Contint

#### Schedule to Subpoena

In accordance with the attached Schedule instructions, you, the Honorable Anthony Blinken, Secretary of the U.S. Department of State (State), are required to produce the following documents and communications that are in your possession, custody, or control in unredacted form:

- 1. Documents sufficient to show all Global Engagement Center (GEC) grant recipients and associated award numbers from FY 2019 to present.
- 2. All documents and communications related to every GEC award, subaward, project grant, subgrant, or cooperative agreement from FY 2018 to present. This includes, but is not limited, to:
  - a. All contracts, awards, subawards, grants, subgrants between State and/or GEC and the following entities:
    - i. NewsGuard;
    - ii. Global Disinformation Index;
    - iii. Code for Africa and its subsidiaries;
    - iv. Atlantic Council and its Digital Forensic Research Lab;
    - v. Albany Associates;
    - vi. Center for European Policy Analysis;
    - vii. Center for Strategic and International Studies;
    - viii. The Democracy Council of California;
    - ix. DT Institute;
    - x. East-West Center;
    - xi. GLOBSEC;
    - xii. Institute for Strategic Dialogue;
    - xiii. Institute for War and Peace Reporting:
    - xiv. Internews;
    - xv. King's College London;
    - xvi. Moonshot:
    - xvii. National Democratic Institute;
    - xviii. Park Capital Investment Group LLC;
    - xix. Poynter Institute and its subsidiaries;
    - xx. Thomson Reuters Foundation; and
    - xxi. Zinc Network.
  - b. Any risk assessment on the "impacts on local jobs and the community," referenced in in 2 C.F.R. § 200.206(b).
- 3. All funding applications, documents concerning risk assessments (including GEC-produced documents, the documents reviewed on Office of Management and Budget-designated databases, and the documents from the non-public segment of SAM.gov),

decisional documents, and contracts for awards and subawards with any of the entities listed in Paragraph 2(a) above.

- 4. The GEC's file named, "2023.02.14 GEC-GDI-BLACKLIST.docx."
- 5. Documents sufficient to identify each of the 366 programs featured on GEC's Disinfo Cloud platform, mentioned in the document named "2023.02.14 GEC-GDI-BLACKLIST.docx," as well as the application and approval process of each program.
- 6. All documents and communications relating to the planning for any successors to the Disinfo Cloud platform, including, but not limited to, the launch of the Defeat Disinfo website, <a href="https://www.state.gov/defeat-disinfo/">https://www.state.gov/defeat-disinfo/</a>.
- 7. All documents and communications relating to each of the programs featured on any successors to Disinfo Cloud.

#### RESPONDING TO COMMITTEE SUBPOENAS

In responding to the subpoena, please apply the instructions and definitions set forth below:

#### **INSTRUCTIONS**

- 1. In complying with this subpoena, you must produce all responsive documents in unredacted form that are in your possession, custody, or control or otherwise available to you, regardless of whether the documents are possessed directly by you. You must also produce documents that you have a legal right to obtain, that you have a right to copy or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. You must also produce any responsive documents or communications from any Slack or Teams channel that (1) you own, (2) is in your primary control, or (3) you have access to. Subpoenaed records, documents, data, or information should not be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.
- 2. If any entity, organization, or individual named in the request has been, or is currently, known by any other name, the subpoena should be read also to include such other names under that alternative identification.
- 3. You should send documents in electronic form rather than in paper productions.
- 4. Documents produced in electronic format should also be organized, identified, and indexed electronically.
- 5. Documents produced to the Committee should include an index describing the contents of the production. To the extent that more than one CD, hard drive, memory stick, thumb drive, box, or folder is produced, each CD, hard drive, memory stick, thumb drive, box, or folder should contain an index describing its contents.
- 6. When you produce documents, you should identify the paragraph(s) and/or clause(s) in the Committee's schedule to which the documents respond.
- 7. All documents should be Bates-stamped sequentially and produced sequentially. Documents produced pursuant to this request should be produced in the order in which they appear in your files and should not be rearranged. Any documents that are stapled, clipped, or otherwise fastened together should not be separated.
- 8. Documents produced in response to this subpoena should be produced together with copies of file labels, dividers, or identifying markers with which they were associated when this request was issued. Indicate the office or division and person from whose files each document was produced.
- 9. You shall not refuse to produce documents on the basis that any other person or entity also possesses non-identical or identical copies of the same documents.

- 10. If any of the subpoenaed information is only reasonably available in machine-readable form (such as on a computer server, hard drive, or computer backup tape), you should consult with Committee staff to determine the appropriate format in which to produce the information.
- 11. Full compliance with the subpoena shall be made by June 27, 2024, at 12:00pm Eastern. If not possible by that time, an explanation of why full compliance is not possible shall be provided no later than June 20, 2024, at 12:00pm Eastern.
- 12. If a document is withheld on any basis, provide a log containing the following information: (a) the basis for withholding the document; (b) the type of document; (c) the general subject matter; (d) the date, author, and addressee; and (e) the relationship of the author and addressee to each other.
- 13. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, or has been placed into the possession, custody, or control of any third party and cannot be provided in response to this subpoena, you should identify the document (stating its date, author, subject, and recipients) and explain the circumstances under which the document ceased to be in your possession, custody, or control, or was placed in the possession, custody, or control of a third party.
- 14. If any document responsive to this subpoena cannot be located, describe with particularity the efforts made to locate the document and the specific reason for its disappearance, destruction, or unavailability.
- 15. In complying with the subpoena, be apprised that the U.S. House of Representatives and the Committee do not recognize any purported non-disclosure privileges associated with the common law, including, but not limited to, the deliberative process privilege; the attorney-client privilege; the attorney work product protections; any purported privileges or protection from disclosure under the Freedom of Information Act; or any purported contractual privileges, such as non-disclosures agreements.
- 16. If a date or other descriptive detail set forth in this subpoena referring to a document, communication, meeting, or other event is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the subpoena, you should produce all documents that would be responsive as if the date or other descriptive detail were correct.
- 17. The subpoena is continuing in nature and applies to any newly discovered document, regardless of the date of its creation. Any document not produced because it has not been located or discovered by the return date should be produced immediately upon location or discovery subsequent thereto.
- 18. Two sets of the documents should be delivered to the Committee, one set to the Majority staff in Room 2361 of the Rayburn House Office Building and one set to the Minority

- staff in Room 2069 of the Rayburn House Office Building. You should consult with Committee staff regarding the method of delivery prior to sending any materials.
- 19. Upon completion of the document production, you must submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been conducted of all documents in your possession, custody, or control that reasonably could contain responsive documents; and (2) all responsive documents located during the search have been produced to the Committee.

#### **DEFINITIONS**

- 1. The term "document" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including but not limited to, the following: memoranda, reports, expense reports, applications, proposals, solicitations, contracts, agreements, riders, certifications, orders, assessments, scopes of work, work plans, progress reports, project reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intra-office communications, electronic mail, instant messages, direct messages, calendars, cables, notations of any type of conversation, including, but not limited to, telephone calls, meetings, or other communication, bulletins, printed matter, computer printouts, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies, investigations, questionnaires, surveys, presentations, spreadsheets, work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments to any of the foregoing, as well as any attachments thereto), and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape, or otherwise. A document bearing any notation not part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
- 2. The term "communication" means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document, or otherwise and whether in a meeting, by telephone, facsimile, email (desktop or mobile device), text message, instant message, direct message, MMS or SMS message, regular mail, telexes, releases, or otherwise.
- 3. The phrase "documents in your possession, custody or control" means: (a) documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, or representatives acting on your behalf; (b) documents that you have a legal right to obtain, that you have a right to copy, or to which you have access; and (c) documents that have been placed in the possession, custody, or control of any third party.
- 4. The terms "and" and "or" should be construed broadly and either conjunctively or disjunctively as necessary to bring within the scope of this request any information which might otherwise be construed to be outside its scope. The singular includes the plural number, and vice versa. The masculine includes the feminine and neutral genders.
- 5. The terms "person" or "persons" mean natural persons, firms, partnerships, associations, limited liability corporations and companies, limited liability partnerships, corporations, subsidiaries, divisions, departments, joint ventures, nonprofits, proprietorships, syndicates, other legal, business, educational, nonprofit, or government entities, or any other organization or group of persons, and all subsidiaries, affiliates, divisions, departments, branches, and other units thereof.

- 6. The terms "referring" or "relating," with respect to any given subject, mean anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is in any manner whatsoever pertinent to that subject.
- 7. The term "employee" means agent, borrowed employee, casual employee, consultant, de facto employee, joint adventurer, loaned employee, part-time employee, permanent employee, provisional employee, contract employee, contractor, or any other type of service provider.
- 8. The term "award" means any type of federal award, including, but not limited to, any grant, direct payment, loan, indefinite delivery contract, or contract.
- 9. The term "subaward" includes any award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity.
- 10. The term "grant" includes, but is not limited to, any cooperative agreement, project grant, formula grant, or block grant.
- 11. The term "subgrant" includes but is not limited to any grant provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a grant received by the pass-through entity.
- 12. The term "U.S. Department of State" or "State" refers to the United States Department of State and its component entities, including the Global Engagement Center.
- 13. The term "FY 2018" means the period from October 1, 2017 to September 30, 2018.
- 14. The term "FY 2019" means the period from October 1, 2018 to September 30, 2019.
- 15. The term "Disinfo Cloud" is an unclassified platform used by the U.S. government, foreign partners, and technology providers to identify and learn about technologies to counter adversarial propaganda and disinformation.