SESSION 5.

BECOMING AN IEE AUTHOR

Dakar, Senegal • June 2018
TOPICS

• Discuss the trend toward using PAD/DO IEE
• Challenges and tradeoffs between Activity-level and PAD/DO IEEs
• Triggering of downstream compliance requirements
• Review of the BEO harmonized template
• Preparation for IEE development
• Development of an IEE

GOALS:  
Become comfortable with using your IEE
Take part in IEE development!!!
“Types” of IEEs……same but different

- Activity-level or partner IEE
- Programmatic IEE (P-IEE) and Supplemental IEE (S-IEE)
- Project Appraisal Document (PAD)/Development Objective (DO) IEE
- Office or Sector-level IEEs (e.g., WASH or GCC)

Different approach based on the programming, timing, and oversight needs for different bureaus

<table>
<thead>
<tr>
<th>Bureau</th>
<th>Most Common Type of IEE</th>
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<tbody>
<tr>
<td>DCHA</td>
<td>Activity or partner IEE w PIEE from Wash DC</td>
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<tr>
<td>Africa</td>
<td>PAD or DO IEE (sometimes Office IEE) from Mission</td>
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<tr>
<td>Global Health and E3</td>
<td>P-IEE from Wash DC and S-IEE from Mission</td>
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<tr>
<td>Global Development Lab</td>
<td>Depends on activity</td>
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<tr>
<td>Type of IEE</td>
<td>Pros</td>
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<td>----------------------------------------------------------------------</td>
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<tr>
<td>PAD/DO IEE</td>
<td>• Easier to ensure pre-implementation requirement is met&lt;br&gt;• Easier for contracting office to use in solicitations&lt;br&gt;• Reduced amount of time required for specific offices to draft multiple IEEs&lt;br&gt;• Clearance burden reduced</td>
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<table>
<thead>
<tr>
<th>Activity/Partner IEE</th>
<th>Pros</th>
<th>Cons</th>
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<td>• More specific to partner needs&lt;br&gt;• Increased partner ownership&lt;br&gt;• Provides more details and transparency on expectations</td>
<td>• Requires budget and capacity at the partner or A/COR level to draft&lt;br&gt;• Many IEEs may be required&lt;br&gt;• Difficult to interpret if there are cross-overs with other activities&lt;br&gt;• May require frequent revision if the activity has minor changes</td>
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<thead>
<tr>
<th>P-IEE and S-IEE</th>
<th>Pros</th>
<th>Cons</th>
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<tr>
<td></td>
<td>• Easier to ensure pre-implementation requirement is met, especially for central programs operating in multiple countries&lt;br&gt;• Allows for making awards while further project details evolve</td>
<td>• Requirement for the follow-up S-IEE which provides more details and specificity is often overlooked&lt;br&gt;• Duplicative or additional effort due to S-IEE requirement&lt;br&gt;• Confusion on oversight, monitoring, and reporting – who is responsible</td>
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IEE APPROACHES:
EVOLUTION IN AFRICA BUREAU

Starting in late 2012-2013:

Africa Bureau moved from Activity or Sector/Office IEEs toward more frequent PAD/DO IEEs.

Reasons:
• ADS 201 revision (~2012)
• # of projects and overlap and coordination between projects
• Frequent need for revisions and tracking of multiple IEEs
• Length of the clearance process
CHALLENGES WITH PAD/DO IEEs

• Difficult to understand and detail activities at the time the PAD is being developed

• A/COR may not yet be assigned to activities

• Uncertain where the activities will be implemented (important for the environmental baseline section)

• Significant upfront effort that needs multiple authors

• “Translation” necessary (taking conditions and applying them to specific actions or activities)

• Expiration date and funding amounts do not necessarily align with each individual activity
Even with PAD/DO IEEs and P-IEEs, there are still requirements for more documentation.

**Specific Mitigation and Monitoring Plans:**
- Environmental Mitigation and Monitoring Plans (EMMPs)
- Water Quality Assurance Plans
- Pesticide Evaluation Report Safer Use Action Plan (PERSUAP)

**Annual Reporting:**
- Environmental Mitigation and Monitoring Reports (EMMRs)
- Environmental Status Reports (ESRs)
- Other annual reporting – work plans, performance monitoring plans, portfolio reviews

**Sub-project Reporting:**
- Environmental Review Form (ERF)
BEO HARMONIZED TEMPLATES

• BEOs recognized the differences between the approaches and confusion over which documents to use

• Began a working group in 2017 to draft a harmonized template

• Driven by potential IT systems for submission

• Templates are largely being implemented but feedback is being encouraged

• Used with Activity, Programmatic, or PAD IEEs

Templates available at: http://www.usaidgems.org/compliance.htm
REQUEST FOR CATEGORICAL EXCLUSION (RCE) vs INITIAL ENVIRONMENTAL EVALUATION (IEE)

• Templates are similar but different

• Request for Categorical Exclusion has:
  – a shorter explanation of project details
  – still includes CRM analysis
  – justification of categorical exclusion
  – limitations (need for development of an IEE if activities are determined in the future to have environmental impact)

Only use the RCE when you have ALL categorically excluded actions.
IEE DEVELOPMENT PROCESS

When to develop an IEE:

• Must be in place prior to irrecoverable disbursement of funds
• There is enough information available to make a meaningful review of the impacts of the actions

Who develops:

• A/COR
• Sector team
• Team Lead

Give yourself enough time:

• Activity IEE – typically 2-4 months
• PAD/DO IEE – typically 4-12 months
PREPARING FOR AN IEE

• Team meetings to plan the process and assign roles
• Invite the MEO and CIL to work planning sessions
• Review procurement plan
• Collect documents or identify information needs
• Plan for CRM needs
• Review environmental analysis in the CDCS or PAD
• Interview stakeholders – own team, partners, government counterparts
DEVELOPING AN ACTION LIST

After reviewing and gathering information, first document to develop is an “Action List”

Purpose:

– Organize your actions
– Ensure full coverage
– Confirm approach - intervention categories or analysis by activity
– Identify whether an Environmental Assessment (EA) is needed
A. Direct and Capacity-building support for health service delivery & access to health services, excluding commodity procurement/supply chain strengthening

1. Strengthening capacity of implementing partners,
2. Direct support for on-the-ground service delivery and care,
3. Strengthen referral network to health facilities for continuum of care;
4. Strengthen bi-directional referral linkages between community and health facilities:
5. Strengthen access to HIV services

B. Social Marketing, Education, and Behavior Change Communication (BCC)

Social marketing, education and behavior change communication activities entail the following:

1. Address adherence to ART medication and retention
2. Mitigation of TB and TB/HIV infection in high risk populations,
3. Education and programs
4. Reduce the stigma associated with HIV/AIDS
5. Promotion of HIV prevention and healthy lifestyles
6. Education on Gender Based Violence (GBV)


This intervention category consists of the following activities:

1. Procurement of pharmaceuticals and supplies including:
   A. Procurement of pharmaceuticals to manage STIs, drugs for opportunistic infections, TB, and HIV (e.g., ARVs, prophylaxis);
   B. Appropriate management of stocks of nutritional supplements and therapeutic foods;
   C. Purchase and promotion of condoms to high-risk groups, through social marketing and through free distribution;
   D. Procurement of rapid test kits for HIV/AIDS;
   E. Procurement of ARV prophylaxis for HIV-infected pregnant women and their newborns and referral to ARV treatment;
   F. Family planning products, including contraceptives to those that seek them.
## Intervention Categories

<table>
<thead>
<tr>
<th>Projects/Activities</th>
<th>Categorical Exclusion</th>
<th>Negative Determination</th>
<th>Positive Determination</th>
<th>Deferral</th>
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<tbody>
<tr>
<td>Capacity Building for Improved Health Services</td>
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<td>Health Communications and Community Mobilization</td>
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<tr>
<td>Procurement of Pharmaceuticals and Medical Supplies</td>
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<td>Malaria Control and Prevention</td>
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<td>Small-Scale Health Facility Refurbishment Activities</td>
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<td>Program Monitoring, Learning, Assessment, and Evaluation Activities</td>
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<tr>
<td>Improved Provision of Sustainable Safe Water, Sanitation And Hygiene</td>
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<td>Technical for Health Systems Strengthening</td>
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<td>Animal and Disease Surveillance</td>
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FACESHEET

- Different Facesheets for RCE and IEE
- Include links from the environmental compliance database (ECD) for:
  - associated IEEs
  - PERSUAPs
  - amendments
- Expiration date
  - date of drafting
  - expiration of PAD
- Funding amount
- Clearance page
SECTION 1. PROJECT/ACTIVITY OVERVIEW

• Outline of your Project or Activity
• Largely drawn from the PAD or workplans
• Use text you have already developed
SECTION 2. BASELINE ENVIRONMENT

Requirements:

• Locations Affected and Environmental Context
  – Environment
  – Physical
  – Climate
  – Social

• Applicable and Appropriate Partner and Country Standards, laws, policies, and regulations

• Country/Municipality Environmental Capacity Assessment (G2G)

Where to Find:

• Old IEEs
• Biodiversity and Tropical Forests Analysis
• NGO Documents and Reports
• GIS Office and SERVIR
• National Adaptation Plans
• Climatelinks.org
SECTION 3. ANALYSIS OF POTENTIAL ENVIRONMENTAL RISK

Requirements:
Document the impacts of your actions, including:
- No impact
- Indirect impact
- Cumulative
- Social impact
- Greenhouse gas emissions

Where to Find:
• Old IEEs
• Sectoral Environmental Guidelines
• Site Visit
• Stakeholder consultations
• Work plans for similar projects
• Common sense

Important to note those of potential significant impact that cannot be mitigated – Discuss with your MEO
SECTION 4. ENVIRONMENTAL DETERMINATIONS

Recommended Environmental Threshold Determination (ETD) for each action or sub-intervention

<table>
<thead>
<tr>
<th>Projects/Activities</th>
<th>Categorical Exclusion Citation (if applicable)</th>
<th>Negative Determination</th>
<th>Positive Determination</th>
<th>Deferral</th>
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</thead>
<tbody>
<tr>
<td>Category A.</td>
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<tr>
<td>Sub-activity</td>
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<tr>
<td>Category B.</td>
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<tr>
<td>Sub-activity</td>
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<td>[Add rows as needed]</td>
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# SECTION 4. ENVIRONMENTAL DETERMINATIONS

## CRM Narrative and Table

<table>
<thead>
<tr>
<th>Defined or Anticipated Project Elements (Purpose/Sub-purpose, Area of Focus, or Activity/ Mechanism, etc.)</th>
<th>Climate Risks</th>
<th>Risk Rating</th>
<th>How Risks are Addressed at Project Level</th>
<th>Further Analysis and Actions for Activity Design/ Implementation</th>
<th>Opportunities to Strengthen Climate Resilience</th>
</tr>
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<tbody>
<tr>
<td>List key risks related to the project elements identified through either the strategy- or project-level climate risk assessment.</td>
<td>Low/Moderate/ High</td>
<td>Describe how risks have been addressed at the project level. If a decision has been made to accept the risk, briefly explain why.</td>
<td>Describe CRM measures to be integrated into activity design or implementation, including additional analysis, if applicable.</td>
<td>Describe opportunities to achieve development objectives by integrating climate resilience or mitigation measures.</td>
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SECTION 5. CONDITIONS AND MITIGATION MEASURES

Most important section for directing the partners.

- Degree of specificity may vary
- Use downstream compliance documentation to fill gaps such as Sector Environmental Guidelines, WQAPs, operation and maintenance manuals, etc.
- Standard language exists for common activities (e.g., irrigation, construction, boreholes, etc.)
- Resources:
  - Old IEEs
  - Recommended Acceptable Use Language Format (RALF)
  - Experience with similar projects
### SECTION 5. CONDITIONS AND MITIGATION MEASURES

<table>
<thead>
<tr>
<th>Action</th>
<th>Conditions</th>
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| Capacity building for agricultural extension services | Negative Determination subject to the following conditions: While USAID does not have direct control of implementation on the ground resulting from support to extensions, USAID should promote:  
1. Integration and promotion of general awareness of the environmental, health and safety risks presented by agriculture, or livestock activities, and appropriate choices and measures to manage these risks.  
2. Climate-smart practices will promote crop, groundcover and agroforestry species endorsed for use by the relevant governmental authority.  
3. Soil fertility management will avoid spreading animal waste near surface waters and the burning vegetation on fields.  
4. Any pesticide use, procurement, or promotion in any activities (including support to extension activities) must fully conform to the provisions of the 2013 SEG PERSUAP or subsequent PERSUAPs which fully amend or replace the 2013 SEG PERSUAP and conform with the GOM rules and regulations for pesticide procurement and use. |
| Eco-Charcoal/ Green Charcoal activities | Deferral. |
| Eco-tourism support | Negative Determination subject to the following conditions: Eco-tourism operations are not yet well-defined. The actions will be revised through sub-project process before implementation as soon as enough information becomes available to assess environmental impact and appropriate mitigation measures. The subproject review process can be found in Annex C. For activities not covered elsewhere in this IEE, and amendment to the IEE will be necessary. |
SECTION 6. LIMITATIONS AND SECTION 7. REVISIONS

Section 6.
• Details follow-on reporting requirements
• May need some adaptation to your specific projects but largely utilize provided text
• Important for instruction of next steps, reporting, and requirements of the IPs!

Section 7.
• Identifies when revisions are necessary and the process for revisions
• Specifies deferrals