Best Practice Review

Survey Questions for practitioners



Roles and Responsibilities of Positions in the environmental Compliance process

General Mission Processes – All Staff

1. Is there a Mission Order in place on environmental compliance? Yes  No
2. Does Mission have electronic files of IEEs and other environmental compliance documents including those for centrally-funded projects (EMMPs, EAs, PERSUAPS, etc.) available to all staff in a centralized location? Yes  No
3. Does staff keep soft or hardcopies of current IEEs and other environmental compliance documents (EMMPs, EAs, PERSUAPS, etc.)? Yes  No
4. Has staff and IPs completed environmental compliance training (e.g., ESDM/ Reg. 216)? Yes  No
5. Are there IEEs and S-IEEs approved (SO and/or DO) fully covering all activities? Yes  No
6. Are there DO level IEEs with the PAD? How well are DO IEEs working? Yes  No  Are they challenging to understand how they apply to programs? Yes  No  What are the positives and negatives of DO IEEs compared to SO or activity level IEEs?
7. Are there any tools (field level or tracking) the MEO or A/CORs use? For example, is there a standard Mission form for field visits or reporting and is there a section for environmental compliance? Yes  No
8. Are there near term and long term opportunities to reinforce sound environmental management at the Mission and in projects? For example, linking to upcoming host government initiatives? Yes  No
9. Is the Mission undertaking G2G agreements? Yes  No  How are requirements for Reg. 216 being met?

Mission Environmental Officer

1. Involved in IEE, PERSUAP, EA preparation? Yes  No
2. Participates at RFA/P stage so that environmental compliance (cross-cutting) is incorporated? Yes  No
3. Reviews IP quarterly/semi-annual reports for activities that have conditions attached to their IEEs? Yes  No
4. Attends portfolio reviews for teams (all or only some teams)? Yes  No
5. Attends monthly team meetings? Yes  No
6. Participates in partners Annual Work Plan meetings, particularly when the partner has activities with environmental concerns/conditions? Yes  No
7. Clears on contracting instruments (e.g., AAD, COAg, DOAg RFP/RFA, G2G)? Yes  No
8. Participates in post-award meetings with new partners to overview requirements? Yes  No
9. Incorporates language (special provisions) from the IEE into a contracting agreement or other contracting instruments before clearing contracting instruments (e.g., AAD, COAg, DOAg, RFA/P, contract, cooperative agreement)? Yes  No
10. Reviews project budgets to check if funds are adequate to cover mitigation and monitoring? Yes  No
11. Ensures all projects with conditions in the IEEs have EMMP/EMMRs? Yes  No
12. Conducts site visits to verify implementation of mitigation measures/the EMMP/EMMR? Yes  No

Additional Questions

1. What percentage of time does the MEO designate/spend on environmental compliance? Does the MEO have other roles? Yes  No
2. Where does the MEO reside (Program Office, Technical Officer, or other) and how is the position funded?
3. If there is a Deputy MEO (dMEO), what is the division of labor or sharing agreement with the MEO?
4. a) Who typically prepares an IEE/PERSUAP (MEO, A/COR, project staff, contractor)?.

b) Has the staff that prepares IEEs taken environmental compliance training (for example, ESDM/Reg. 216)? Yes  No

1. How important has on the job training been to fulfilling your role?
2. What does MEO feel are the gaps in his/her environmental compliance expertise, and how can these be filled?
3. Does MEO feel there are gaps in coordination among Teams, REA, BEO and other USAID staff? Gaps in coordination between MEO and partner staff? Yes  No
4. How are host country requirements harmonized with Reg. 216?
5. For centrally-funded programs from Functional Bureaus, is the MEO consulted on program design, IEE preparation, and other monitoring/performance reports? Has MEO ever assisted IPs with Environmental Status Report/annual environmental report preparation? Yes  No
6. Is the MEO asked to review and/or clear IEEs for centrally-funded programs that will operate in their country? Yes  No

Program Officers:

1. Reviews environmental compliance status before clearing contracting/financial/implementation instruments? Yes  No
2. Reviews project budgets to check if funds are adequate to cover mitigation and monitoring? Yes  No
3. Includes the MEO when designing new projects? Yes  No
4. Includes environmental compliance reviews in the PPR, OP, and PMP? Yes  No
5. Includes environmental compliance an agenda item in portfolio reviews? Yes  No
6. Is there budget for MEO travel to the field? Is field review supported? Yes  No

Contracting Officer:

1. Coordinate with MEO on RFPs, RFAs, and contract agreements to ensure environmental compliance is addressed? Yes  No
2. Coordinate with MEO to review environmental compliance status when amending contracts/cooperative agreements? Yes  No
3. Reviews project budgets to check if funds to cover mitigation and monitoring are included? Yes  No
4. Shares the procurement plan with the MEO? Yes  No

Agreement/Contracting Officer’s Representative (AOR/COR), ACTIVITY MANAGERS, Team Leaders

1. Coordinates with the MEO when designing activities. Consults with the MEO when new activities are proposed or when they are unsure if the new activity is covered by the IEE? Have revisions resulted? Yes  No
2. Includes the MEO on proposal review panel when RFP/RFA requests environmental compliance information and/or when there may be particular environmental issues once the activity begins? Yes  No

1. Keeps environmental compliance documentation (IEEs, EA, EMMPs, etc.) in project files? Yes  No
2. Shares and discusses relevant IEEs and implications for the program with project staff? Yes  No
3. Includes an environmental compliance discussion in post-award briefings? Yes  No
4. Ensures regular reporting (e.g., quarterly, annual reports) includes a section on environmental compliance? Yes  No
5. Coordinates with MEO on the review of quarterly or semi-annual reports for those activities with conditions (for those activities with EMMPs/EMPs). Ensures appropriate approvals of EMMPs/EMPs and files approvals. Includes the MEO during mid-term and final evaluations/reviews? Yes  No
6. Ensures a PERSUAP is prepared and implemented for their program? Adapts SUAPs for the specific project? Yes  No
7. Requests the MEOs involvement in Annual Work Plan meetings for activities with environmental concerns/IEE conditions? Yes  No
8. Includes MEO in SO Team meetings to ensure environmental compliance is being addressed? Yes  No
9. Activity Managers coordinate with AOR/CORs in Washington DC? Roles and responsibilities for environmental compliance are clear and appropriate?
10. Request MEO site visit to verify mitigation measure implementation, assess environmental impacts during activity implementation, or to otherwise document environmental compliance status? Are there major logistical challenges to field monitoring? How are these challenges being met? Yes  No
11. Follows environmental compliance down to the subcontractor/sub-awardees for their programs. Is the Mission using ERF process? Is its use confusing? How are small grants activities monitored? Yes  No

Additional Questions:

1. a) Who prepares the Team’s IEEs?
2. Have SO-level or activity-level IEEs been prepared for your project? Yes  No
3. Are deferrals present in your program and how are they followed up on? Yes  No
4. Are EMMP/EMMRs being implemented? Yes  No
5. a) If any evaluations were done, have they considered environmental compliance? Yes  No
6. Did the evaluation SOW include environmental compliance/ESDM issues? Yes  No
7. Are there gaps in environmental compliance expertise and/or coordination on environmental compliance in the Mission; how can these be filled? Yes  No
8. For centrally-funded programs from Functional Bureaus, A/CORs coordinate with the AMs and the MEO on program design, IEE preparation, and other monitoring/performance reports? A/CORs share EMMPs, monitoring reports, performance reports with the AM and discusses issues of non-compliance? Yes  No  Engages the MEO in remedies for non-compliance? Describe process for monitoring and report on environmental compliance between the AM and A/COR.
9. The AM and A/COR request review of programs with the MEO? Yes  No

Activity Managers or Mission Representatives for Centrally-funded/managed Programs or Central Funding with Local Implementation (e.g., Functional Bureaus, IQCs, LWAs, Global Development Lab, Power Africa):

1. Keeps soft or hard copies of IEE and S-IEEs? Yes  No
2. Retains copies of EMMP/EMMRs and reviews before site visits. Consults with the MEO before site visits? Yes  No
3. Communicates/reports to AOR/COR on issues of non-compliance? Yes  No
4. Seeks input/advice from the MEO? Yes  No
5. Monitors environmental compliance of partners and sub-awardees/sub-contractors? Yes  No

Additional Questions:

1. Is AM aware of roles and responsibilities of environmental compliance? Yes  No
2. The centrally-funded program AORs/CORs support field monitoring by the AM and communicates responsibilities? Yes  No
3. Are EMMP/EMMRs required for your programs? Are they being implemented? Yes  No
4. Are there major logistical challenges to field monitoring? How are these challenges being met? Yes  No
5. When was the last field visit by the A/COR? Did you discuss environmental compliance? Yes  No
6. What are the needs for ensuring environmental compliance requirements are met?

Regional Legal Advisor:

1. Coordinates with MEO on environmental compliance prior to clearing contracting instruments? Yes  No
2. Reviews or clears on IEEs? Yes  No
3. Includes IEEs in the PAD and pre-obligation checklists? Yes  No

Controller:

1. Did the most recent Federal Management Financial Information Act (FMFIA) review include any issues on environmental compliance?   
    Yes  No

Reporting:

1. Are IPs reporting on conditions in their semi-annual or quarterly reports? Are they using an EMMP/EMMR format? Yes  No
2. a) Do the EMPs/MMPs include indicators? Yes  No
3. If yes, do these indicators correspond to indicators in the Mission’s PMP? Yes  No
4. a) Who is responsible for collecting environmental compliance data for the Mission’s Annual Report?

b) Who is responsible for collecting environmental compliance data for project semi-annual/quarterly reports?

Additional Documentation:

1. Have all centrally-funded activities submitted their most recent ESR/annual compliance report? Yes  No
2. Are there any compliance issues with ESRs/annual compliance report? Yes  No
3. Do all project closure reports include status of environmental compliance and mitigation and monitoring information? Yes  No

Beyond compliance:

1. Does Mission have a Green Procurement Policy in place? Yes  No
2. Has the Mission supported development of environmental regulations, guidelines, or other environmental legislation in the host country?   
    Yes  No
3. Has the Mission supported strengthening the role of courts, journalists, advocacy groups, environmental lawyers, or other actors in the EIA process? Yes  No
4. Are local EIA professionals used to support Mission and Partner EIA trainings? Yes  No

Partner Programs

1. Does your RFA/RFP and project agreement contain environmental compliance requirements? Sub-contracts/agreements? Yes  No
2. Did you consider environmental impact in the project design? Is support to environmental compliance in your project budget?   
    Yes  No
3. Has staff been trained in environment or in USAID Regulation 216 specifically? Yes  No
4. Is there a specific team member responsible for environmental compliance? Do they have other roles? What are their duties?   
    Yes  No
5. Did the AOR/COR provide you with an IEE at the start of the award? Did you receive an environmental in-brief at the start of the award?   
    Yes  No
6. Is there an EMMR/EMP? Who is responsible for reporting? Yes  No
7. Do you have activities that are ND w/C and what does that mean for the program activities? Are there changes? Yes  No
8. How do you implement the EMMP/EMP?
9. Do you have any internal indicators (annual or mid-term) that would reflect performance in environmental compliance? Yes  No
10. Do you report on the environment in regular reporting cycles (quarterly and annual reports) to USAID? Yes  No

staff associated with Centrally-managed/funded projects with no or Limited Mission Representation:

1. Do you have centrally-managed/funded projects where there is no direct manager staffed at the Mission (e.g., American Schools and Hospitals Abroad, Global Development Lab, etc). Yes  No  What are the projects?
2. Is there a POC within the Mission for each of these projects? Yes  No
3. Has the A/COR established a process with the Mission POC on monitoring and oversight of potential environmental compliance issues if they arise? Yes  No
4. Has the A/COR visited the projects to review environmental compliance? Yes  No  Did a Mission representative participate? Yes  No
5. Specifically, has the A/COR discussed with a Mission representative the process and expectations for assistance with monitoring and oversight of the EMP/EMMP? Yes  No
6. Does the Mission tracking system, maintained by the MEO, include Regulation 216 documents for these projects? Yes  No
7. Is a Mission representative, such as the MEO, Program Officer, or M&E officer, copied on Regulation 216 documentation (e.g., IEEs, EAs, PERSUAPs)? Yes  No  Does the POC retain copies of the IEEs and host country environmental documentation on file? Yes  No
8. Is there resource sharing or available financial resources to support the Mission POC’s participation in environmental compliance oversight of these programs (e.g., site visits with the A/COR)? Yes  No
9. Is the MEO is notified in advance when new awards, agreements, and contracts in their country are being issued or when ceilings are raised? Is the MEO solicited for comments? Yes  No

Acronyms

AAD Activity Approval Documents

A/COR Agreement/Contracting Officer’s Representative

AM Activity Manager

BEO Bureau Environment Officer

BPR Best Practice Review

COAg Cooperative Agreement

dMEO Deputy Mission Environmental Officer

DO Development Objective

DOAg Development Objective Agreement

EA Environmental Assessment

EIA Environmental Impact Assessment

EMMP Environmental Mitigation and Management Plan

EMMR Environmental Mitigation and Monitoring Report

EMP Environmental Management Plan

ESDM environmentally sound design and management

ESR Environmental Status Report

FMFIA Federal Management Financial Information Act

G2G government to government

IEE Initial Environmental Examination

IP implementing partner

IQC Indefinite Quantity Contract

LWA Leader with Associates

MEO Mission Environmental Officer

OP Operational Plan

PAD Project Appraisal Document

PERSUAP Pesticide Evaluation Report Safer Use Action Plan

PMP Performance and Monitoring Plan

PPR Performance Progress Report

RCE Request for Categorical Exclusion

REA Regional Environment Advisor

RFA/P Request for Application/Proposal

S-IEE Supplemental Initial Environmental Examination

SO Strategic Objective

SOW Scope of Work

USAID United States Agency for International Development