ANNEX 1- RISK ASSESSMENT AND MANAGEMENT PLAN FOR HIGH RISK ENVIRONMENTS

BHA provides significant funding to humanitarian organizations operating in high-risk environments, which refers to environments with a presence of groups or individuals who are subject to sanctions.[1] BHA and its partners must take appropriate and necessary steps to ensure the provision of U.S. foreign assistance does not result in a violation of applicable sanctions.

The following is a non-exclusive list of geographic areas that BHA has identified as "high-risk" based on an analysis of the complex and high-threat operating environment, presence of sanctioned groups/individuals, and other key factors. BHA will update this list on a periodic basis. Additionally, BHA may notify you during the application review process that heightened risks exist in other areas. Your organization should also determine if the areas in which you propose to operate should be considered "high-risk" even if these areas have not been identified as such by USAID. You should discuss with BHA field or regional staff whether these conditions may apply to your application.

- Afghanistan
- Burkina Faso
- Cameroon
- Chad
- Colombia
- Iraq
- Lebanon
- Libya
- Mali
- Mozambique
- Niger
- Nigeria
- Somalia
- Syria

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[1] This would include all types of sanctions including groups, individuals, countries, and goods from certain countries.

- Ukraine: Non-Government Controlled Areas
- Venezuela
- Yemen

If your application involves implementation of activities in areas where United States Government sanctioned groups are operating, or if your own assessment raises concerns regarding sanctions, you must include the following information.

While the questions center on sanctioned groups and individuals, BHA encourages you to also respond to the questions by addressing other risks to programming, including the presence of other armed groups.

1. Analysis of the operating environment, including identification of the specific sanctions concerns. This should, where applicable, include a discussion of groups/individuals that have a presence in or de facto or de jure control over territory.[2] In such circumstances the analysis must discuss how these groups/individuals operate vis-à-vis humanitarian partners and programming generally and, more specifically, with respect to the types of activities being proposed in the application. Also, include relevant information even if it does not directly impact your activities, such as the risk of extortion or taxation of local vendors. Specific sanctions concerns that should also be addressed include risks of transactions in violation of country sanctions (e.g., procurement of Iranian-manufactured goods).

2. An explanation of the specific safeguards and measures you intend to utilize to decrease the likelihood that BHA-provided resources will result in violations of sanctions. Include information on how you will prevent sanctioned groups or individuals from interfering with or influencing the way you carry out program activities. You should clearly articulate triggers for action (e.g., reliable information provided by other humanitarian actors) and specify organizational processes for decision-making, including roles within your organization's headquarters and field offices. You should also describe efforts you will undertake in collaboration with other organizations, such as the development of joint operating principles or information exchanges on risks in the operating environment. Describe enhanced due diligence efforts you will undertake, such as remote or third-party monitoring.

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[2] *De jure control* means that the sanctioned group legally controls and governs the area in question, whereas de facto control exists where the sanctioned group does not have legal control, but retains physical control of an area, or is able to exert authority indicative of control, such as requiring humanitarian actors to register or pay fees, tolls, and other taxes.

3. A description of how you will mitigate the risk that beneficiaries targeted by the activity are or were affiliated with a sanctioned group or individual. For example, if a risk mitigation measure is to publicize information on how beneficiaries will be selected through an impartial needs assessment in order to prevent interference by groups or individuals subject to sanctions, include the information here.

4. A description of the measures you are taking to mitigate the risk that the formal procurement of goods and/or services or hiring staff and/or consultants may benefit armed or sanctioned groups and/or sanctioned individuals. Do you have existing policies that verify the background of employees, vendors, or suppliers to decrease the likelihood that hiring or procurement will violate sanctions? For cash and voucher programming, describe steps that decrease the likelihood that assistance will violate sanctions, including through the purchase by beneficiaries of goods in violation of sanctions.

5. Efforts that you will take to prevent direct or indirect benefits from other commercial activities (not previously discussed under number 4) going to sanctioned groups or individuals that result in the payment of "taxes", fees, tolls, or other transactions. Additionally, include a description of your organization's risk mitigation plans for moving equipment and supplies into proposed geographic areas, including whether a sanctioned group could potentially benefit from fees or "taxes" paid during any stage of implementation or could seek to divert equipment or supplies.

6. Measures to mitigate the risks that sanctioned groups or individuals could receive reputational benefit from the proposed activities, such as a sanctioned group or individual claiming credit for assistance or services provided.

7. Information regarding other internal controls and oversight mechanisms that you will implement to comply with sanctions requirements.

RESOURCES

- The OFAC Specially Designated Nationals And Blocked Persons List is available at https://www.treasury.gov/resource-center/sanctions/sdn-list/pages/default.aspx.

- The U.S. Government System for Award Management database is available: https://sam.gov/SAM/pages/public/searchRecords/search.jsf.

- U.S. Department of State list of Foreign Terrorist Organizations is available at https://www.state.gov/j/ct/rls/other/des/123085.htm

- U.S. Department of State, Bureau of Consular Affairs, Travel Advisories, available at https://travel.state.gov/

- U.S. Agency for International Development Office of Inspector General and U.S. Department of State Office of Inspector General, *Compliance and Fraud Prevention: A pocket guide for the Middle East Crisis Humanitarian Response*, available at https://www.oig.usaid.gov/

- United Nations Security Council (UNSC) consolidated sanctions list available at https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list

- USAID Preventing Sexual Exploitation and Abuse (PSEA) Policy available at https://www.usaid.gov/PreventingSexualMisconduct/psea-policy

- Third-party assessments of the applicant's risk mitigation policies and procedures and/or implementation thereof if available.