



Non-U.S. Organization Pre-Award Survey (NUPAS) Guidelines

An Additional Help for ADS Chapter 303

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I. Background

In accordance with [ADS 303.3.9](#), the Agreement Officer (AO) must evaluate the risks posed by a selected applicant organization (hereinafter referred to as the “organization”) following the principles established by USAID and the Office of Management and Budget (OMB) before making an award. The overall pre-award risk assessment, including any pre-award survey, is not intended to be used as a deciding factor in selecting the appropriate acquisition or assistance (A&A) instrument or determining the type of assistance instrument, as the appropriate instrument is determined as part of the award design process (see [ADS 304](#)).

If the AO determines a pre-award survey is necessary for a non-U.S. non-governmental organization (NGO) then a survey must be conducted using either the Non-U.S. Pre-Award Survey (NUPAS) or a similar detailed analysis in accordance with locally established or award-specific criteria that achieves the same objectives as the NUPAS (see **section II**), at the AO’s discretion. The survey conclusions may highlight areas of the organization’s ability to comply with agency and federal requirements that may need to be strengthened or may pose a risk to issuance of an award. In conducting the survey, the Survey Team should consider the effort made by the organization in developing an application, preparing for the survey and site visit, and committing to risk mitigation measures.

II. Objective

The NUPAS is first and foremost a tool to assist AOs in assessing the risk of issuing an award to a non-U.S. NGO.

The primary objectives of the NUPAS are:

1. To determine whether the organization has sufficient financial capacity and managerial capability to manage USAID funds, in accordance with U.S. Government (USG) and USAID requirements, to achieve the intended objectives of the activity;
2. To assess the organization’s internal control systems and identify areas that may require strengthening and improvement to effectively implement activities; and
3. To determine the degree of support and oversight necessary to ensure proper accountability of funds provided to the organization.

The NUPAS results will help the AO determine whether the organization’s financial management and internal control systems are adequate to manage, control, account for, and report on the uses of potential USAID funds, thus protecting the USG’s interests. Additionally, the survey results will inform the AO on the appropriate method of financing to use under the potential assistance award.

The Survey Team conducting the NUPAS will identify areas of risk and can recommend risk mitigation measures for consideration by the AO. For organizations that have previously received a USAID award, AOs can refer to a previously completed NUPAS or Agency-facilitated pre-award survey results when awarding another new award to the same organization. However, the AO should consider the date at which previous surveys were conducted, what areas or elements were reviewed, and if these factors influence the relevancy of relying on the survey results.

The NUPAS is not meant to result in a “pass/fail” conclusion, but rather should be used as a tool to inform the AO and other staff responsible for award oversight of areas of risk to the Agency and corresponding mitigation measures. However, there are certain mandatory requirements that may prevent or delay the issuance of an award. For example, if the organization is not legally registered in the country of operation, the AO may determine either that an award cannot be made, or that the award cannot be made until and unless the organization obtains valid legal registration.

The NUPAS can also serve as a means to build a partnership with the organization, although this is not the primary objective. The Survey Team works closely with the organization to identify areas of its systems, operations, and other capacities that may need to be strengthened to ensure successful implementation of activities.

III. Applicability

The NUPAS is an optional tool for conducting a pre-award survey of non-U.S. NGOs receiving an assistance award from USAID. The AO must determine if NUPAS will be used in conducting the survey or if a similar detailed analysis in accordance with locally established or award-specific criteria that achieves the same objectives as the NUPAS (see **section II**) will be used.

The NUPAS must not be used in assessing risk of U.S. NGOs (see [ADS 303.3.9.1](#)), Public International Organizations (PIOs) (see [ADS 308](#)), or partner governments (see [ADS 220](#)).

AOs must not use the NUPAS for assessing recipients of fixed amount awards. Per [ADS 303.3.25](#), the [Fixed Amount Award Entity Eligibility Checklist](#) is the mandatory pre-award tool that AOs must use when a fixed amount award is contemplated. If an organization previously received only a fixed amount award(s), the AO may determine that a pre-award survey is necessary to issue a cost reimbursement type assistance agreement to the organization.

As an optional pre-award survey tool, NUPAS should not be conflated with USAID’s capacity assessment resources that serve other purposes and cannot replace pre-award surveys. This includes, for example:

- [USAID’s Organizational Capacity Assessment \(OCA\)](#)¹. The OCA is a non-mandatory, self-assessment tool for an organization to reflect on and rate itself in several common areas of internal function. As a self-assessment tool, the OCA can be used by any interested organization at any time, however it is not mandatory to complete as part of the pre-award risk assessment. The OCA is not a pre-award survey tool.
- USAID’s Pre-Engagement Assessment. This self-assessment tool (found online at [WorkWithUSAID](#)) can be used by organizations interested in working with USAID to review basic areas of operational readiness to receive USAID funding. The Pre-Engagement Assessment is not a pre-award survey tool.

IV. Structure

The NUPAS process has the following components, which are compliant with [2 CFR 200.206](#) requirements for conducting a pre-award risk evaluation. When the AO elects to use the NUPAS to conduct a pre-award risk assessment, all of these components should be addressed:

1. [Organization Questionnaire](#). An initial questionnaire completed by the organization, containing basic information about the organization, its legal status, and submission copies of organizational documentation (such as policies and procedures) in the original language, to the maximum extent practicable, to support the start of the survey. As part of its documentation, the organization should submit copies of recently completed risk assessments or pre-award surveys conducted by its other donors. USAID cannot rely solely on other donors’ surveys to assess risk associated with the USAID award, however the AO may find it useful to review the results of those surveys to inform and tailor the NUPAS. For example, the AO may use relevant and recent donor survey results to determine if the NUPAS should include a more detailed analysis of a particular functional area, or if a less extensive review would sufficiently inform the entity’s ability to comply with award requirements.
2. [Desk Review](#). The Survey Team reviews the Organization Questionnaire and the documents provided by the organization and begins to fill out the survey.
3. [Survey Tool](#). The written portion of the NUPAS (found in Appendix A) which documents the status of the organization’s operational capacities, identifies risks or potential risks, and establishes risk mitigation recommendations and suggests specific conditions (see [ADS 303](#)). The Survey Team documents its review of policies, procedures, and interviews with organization staff in the survey tool.
4. [Site Visit or Virtual Meeting](#). The Survey Team meets with key staff at the organization to verify findings from the desk review, assess staff knowledge and

¹ For information on USAID’s Local Capacity Strengthening Policy, please visit <https://www.usaid.gov/policy/local-capacity-strengthening>

understanding of organization policies and procedures, and confirm program capability as outlined in the organization's application.

5. Final Report. The Survey Team documents its final recommendations and suggests specific conditions, if any, for the award.

V. Procedures

Prior to conducting the NUPAS, the AO and the Survey Team are encouraged to review USAID's [Risk Appetite Statement \(RAS\)](#) and the Agency's 7 Step Risk Management Process, outlined in [ADS 596](#). The RAS provides broad-based guidance on the level and type of risk the Agency is willing to accept—based on an evaluation of opportunities and threats—to achieve the Agency's mission and objectives. Currently, USAID has a high appetite for programmatic risk when it comes to working with local partners and an overall low appetite for fiduciary risk. Within the category of fiduciary risk, USAID has a medium appetite for risk with regard to implementing funding through local partners, recognizing that programmatic opportunities must be balanced, while ensuring corruption, fraud, waste, abuse, or diversion of funds are mitigated. Reviewing the RAS may help the AO in determining if and how to tailor the NUPAS and guide the Survey Team on prioritizing survey functional areas.

In preparing for and conducting the NUPAS, the AO and Survey Team should consider the following critical steps:

1. Establishing the Survey Team, Roles and Responsibilities. The AO is responsible for and maintains discretion as to the composition of the Survey Team. While the composition of each Survey Team will be different depending on the staffing resources of each Mission and the partner under review, it is important to consider the following roles:
 - a. *Agreement Officer*. The AO may serve as a member of the Survey Team, assigned to review a particular subject matter, or may support the Survey Team in other ways. The AO may participate in meetings with the Survey Team before, during, or after the survey is completed. Once completed, the Survey Team submits the final report to the AO, who has ultimate discretion in determining whether to make an award and what, if any, specific conditions will be incorporated into the award.
 - b. *Survey Team Leader*. The Survey Team Leader is responsible for coordinating all meetings, tracking documents, establishing deadlines, and other tasks to keep the survey moving forward to completion in a timely and thorough manner. Any member of the Survey Team can serve as the Team Leader. The Team Leader is typically an individual with experience conducting pre-award surveys and the capacity to guide the Survey Team through the process.

- c. *Subject Matter Experts (SMEs)*. The composition of the Survey Team should include Mission staff who are experts in a relevant functional area of the survey. Ideally, the majority of team members will consist of local staff who may be more familiar with the local context and language. Team members can include, for example:
- i. Office of Financial Management (OFM) - the Mission staff from OFM can lead the NUPAS sections pertaining to financial management. For example, OFM staff may review financial systems, policies and procedures, interview the organization's financial staff, and assess the organization's financial sustainability.
 - ii. Office of Acquisition and Assistance (OAA) - A&A staff can review the organization's procurement policies and procedures, as well as subaward management procedures, and interview relevant organization staff on these topics.
 - iii. Executive Office (EXO) - EXO staff can lead the NUPAS sections pertaining to human resources, information technology systems, cybersecurity and data safeguarding, records management, or other areas. If OAA staff will not be reviewing procurement policies and procedures, EXO staff can also provide this review and feedback.
 - iv. Technical Office - The Activity Planner, Agreement Officer's Representative (AOR), or other technical staff are best placed to review the programmatic components of the NUPAS, including verifying the organization's capability to achieve the program objectives as detailed in the application.
 - v. Resident Legal Office (RLO) - the Mission legal officers can support the NUPAS by reviewing the organization's legal structure, registration documents, and governance framework.

The AO may determine additional SMEs are needed, beyond those described above, and may add those to the Survey Team as necessary. Technical officers may be included to advise on risk mitigation factors. The AO should also consider the local language context and the benefit of ensuring local staff who are familiar with the subject matter, language, and culture are included in the Survey Team. Ultimately, coordination and collaboration within the Survey Team and with the AO is critical to a successful survey. Survey Team members should not work in silos. Regular team meetings, calls, and emails are suggested to ensure effective communication.

2. Orienting the Survey Team. As a best practice, the Survey Team should meet prior to beginning the survey to ensure all team members understand the process. The AO can provide guidance on the risk appetite for the anticipated award and designate the survey functional areas and sub-areas to be reviewed. This is also

an opportunity to discuss the objectives and framework for completing the NUPAS. When using the NUPAS, each Survey Team member must understand the components of completing the survey tool in Appendix A, which include:

- a. *Functional Areas and Sub-Areas*: The AO should determine if each functional area and sub-area is required or not required, (see **Section V.3.b, Flexibility to Tailor the Survey**, for more information). After receiving instruction from the AO, the team member responsible for the functional area or sub-area can mark the appropriate option (required or not required). Note that valid, unexpired legal registration will always be a required sub-area.
 - b. *Documents Reviewed & Person(s) Interviewed*: Survey Team members should describe the type of documentation reviewed and the person(s) at the organization who was interviewed as part of the review of a functional sub-area.
 - c. *Observations*: Survey Team members describe observations after reviewing the area, including issues and potential risk areas, as well as positive feedback.
 - d. *Recommendations*: When appropriate, the Survey Team can document recommendations for the organization to make adjustments in order to improve and strengthen functional areas and/or sub-areas. Recommendations may include suggestions for improving or strengthening systems or procedures, including those that are not considered critical to receiving the award. Recommendations are not necessarily suggested specific conditions (see **Section V.6, Survey Conclusion**, for more information).
 - e. *Potential Risks to Award*: If the Survey Team has identified potential areas of risk to the award, these should be identified and described in the survey tool. A potential risk would impact the organization's ability to meet the specific requirements of the award. For example, if the organization does not have financial policies or procedures and does not have any staff with financial oversight, this could be identified as a potential risk impacting the organization's ability to understand and comply with award requirements pertaining to financial management. Note: There is no need to identify a "level" of risk (e.g. low, medium, high); rather, if there is a potential risk to the award, it should be identified and mitigation measures should be discussed with the AO.
 - f. *Suggested Specific Conditions*: If the Survey Team has identified risks to the award, they should suggest specific conditions for the AO to incorporate into the award terms (see **Section V.6, Survey Conclusion**, for more information).
3. Preparing the Survey Scope and Contents.
- a. *Layout and Composition of the [Survey Tool](#)*. The survey tool includes the following functional areas:

- A) Legal structure,
- B) Financial management and internal controls,
- C) Human resources,
- D) Program management,
- E) Records management,
- F) Cybersecurity,
- G) Procurement and asset management, and
- H) Subaward management.

Each functional area contains several sub-areas to analyze the organization's capacity in more detail. For example, under the functional area "legal structure" the survey includes the existence of legal registration, good governance, and responsibilities of the board of directors.

- b. *Flexibility to Tailor the Survey.* The survey should reflect the complexity of the anticipated award, taking into consideration the award amount, program objectives and activities, period of performance, budget, and other aspects. At the AO's discretion, the NUPAS may be tailored to focus only on the functional areas and sub-areas relevant to the award. Simplified grants, for example, are an award type in which the AO should limit areas of review to the most essential elements to determine whether the applicant can adhere to the requirements contained in the [Simplified Grant Format](#). Likewise, the AO may add functional areas or sub-areas to address other categories of review critical to the award. The AO may solicit feedback from the Survey Team in determining if and how to tailor the survey. Some functional areas or sub-areas will always be mandatory (e.g., valid legal registration, existence of a bank account registered in the legal name of the organization, etc.). Other functional areas or sub-areas may only need to be included in the survey if the USAID-funded activities will include those elements (for example, subaward management). Tailoring the NUPAS will provide for a more focused, expeditious survey process. While NUPAS is not meant to result in a "pass/fail" conclusion, an entity which cannot meet basic mandatory criteria, such as valid legal registration, is not eligible for award.
4. Orient the Organization. Prior to starting the survey, the Survey Team should orient key staff of the organization to the survey process. Consider the following best practices for this orientation:

- a. Assign a member of the Survey Team to be the point of contact with the organization; this can be the same person as the Team Leader. This person should be responsible for sending coordinated communications to the organization and facilitating questions and answers with the organization.
 - b. Send an introductory email to the head of the organization explaining the NUPAS process and including a copy of this Additional Help Document (ADS 303sam) and the [survey tool \(Appendix A\)](#). The email may also include an acknowledgement of the status of the pending award and the role the NUPAS plays in the pre-award process. Request the organization to complete the “Organization Questionnaire” tab and provide a reasonable deadline for the organization to prepare the requested documentation. The organization should submit the completed questionnaire, along with required documents listed in the questionnaire, before any site visit or virtual meeting is scheduled. Remind the organization that it only needs to submit the documentation that it has; if the organization does not have a certain document, policy or procedure, it does not need to create one for the purposes of the survey. Existing documentation that is submitted should be copies (originals are not required) and can be in the originating language (e.g. the documents do not need to be translated).
 - c. Schedule an orientation call with the head of the organization to address any initial questions or concerns regarding the NUPAS process.
 - d. Establish a schedule for site visits or virtual meetings with relevant staff at the organization, to be conducted following the Survey Team’s completion of the desk review.
5. Conduct Survey. Throughout the survey process, the Survey Team should meet and correspond regularly to ensure coordination, present a united approach, and support a thorough and expeditious completion of the survey.
- a. *Desk Review*. The Survey Team reviews the Organization Questionnaire and documents submitted by the organization. During this review, the Survey Team can begin filling out the survey tool with the information and observations obtained while reviewing the Questionnaire and the documents submitted by the organization. This is a critical step to ensure the survey tool is populated with as much information available, as it will allow the Survey Team to focus on validating the information while interviewing key staff at the organization during the site visit (or virtual meeting). The Team Leader should establish a deadline for the completion of the Desk Review with all members of the Survey Team.
 - b. *Site Visit or Virtual Meetings*. The site visit or virtual meetings are the Survey Team’s opportunity to confirm information received in the Questionnaire, reviewed and observed from the documents submitted, and even the application itself. The Survey Team should consider the effort required by the organization to host the Survey Team, understanding that the organization’s

staff supporting the survey are also responsible for their other daily work during this period. In this regard, site visits or virtual meetings should be scheduled in advance and limited to a duration that is appropriate to obtain the necessary information.

- i. *Interviewing Key Staff.* The Survey Team Leader should coordinate closely with the Survey Team and the point of contact at the organization to identify key staff of the organization with whom the Survey Team can meet and when. For example, for questions pertaining to financial systems, the Survey Team may meet with the organization's finance manager or other finance staff. The interviews with organization staff should be used to verify if staff understand and articulate organizational policies, procedures, or practices. In this way, the Survey Team can validate that policies or procedures are being followed.
 - ii. *Verifying Documentation.* The Survey Team can use the site visit as an opportunity to verify the documentation submitted. For example, if the organization policies or procedures state that personnel files are locked away, the Survey Team can verify this is the case and identify who has access. Another example are financial systems, if the organization has written financial policies, the Survey Team can review the financial systems in place to verify if it aligns with the policy.
 - iii. *Technical Capability.* The Survey Team can also use site visits to validate the information from the application. If the organization has identified certain protocols or technical capacities in the application, the Survey Team can verify this through discussion with key staff, reviewing documentation, and even visiting specific program sites.
6. Survey Conclusion. Completion of the survey is meaningful both to the organization and to USAID staff. It represents a mutual effort to ultimately reach issuance of an award. The process is substantial - concluding the survey and receiving the award can be a sense of pride to the organization and to USAID staff who have supported the process.
- a. *Final Report and Recommendations.* The Survey Team must document survey results and recommendations in a final report and should use the final report template in [Appendix B](#). In the event the Survey Team has identified areas that need to be strengthened, these should be described in the survey tool and recommendations to address those areas should be included in the final report. Recommendations do not necessarily lead to specific conditions. For example, recommendations may include suggestions for the organization to improve its systems or procedures, which do not necessarily present a risk to the organization's ability to implement the award in accordance with the award requirements. However, where areas of risk to the award have been identified, the Survey Team should further describe these with suggested specific

conditions (see next section). The AO may determine if other mitigation measures are appropriate, in accordance with [ADS 303](#). The Survey Team submits the final report to the AO for review and consideration of award terms and conditions.

- b. *Suggested Specific Conditions*. During the survey process, the Survey Team may have identified potential areas of risk to the issuance of an award and, in these cases, the Survey Team may suggest to the AO specific conditions to be incorporated into the award to mitigate the identified risk. The AO retains authority to review the potential risk areas and will make the final determination on what specific conditions, if any, will be included in the award. The AO must document the rationale for including or not including the specific conditions suggested by the Survey Team as part of the Negotiation Memorandum (see [ADS 303](#) for more information on specific conditions).
 - c. *Debrief and discussion with the organization*. At the AO's discretion, the AO or the Survey Team may hold a discussion with the organization to debrief the survey results. Additionally, the AO should send the final report or a summarized version of the report, or provide an oral report to the organization. This will allow the organization to understand general areas of its operations that need strengthening, and to understand the award terms and conditions, including specific conditions. It can also be an opportunity to highlight the organization's strengths. To the extent practicable, the debrief with the organization can be conducted in the language of the organization to facilitate broad accessibility and application within the organization. At the AO's discretion, the final report or summary of the report may be translated into the language of the organization.
7. Timeline. The AO and Survey Team should carefully monitor and manage the timeline, to the extent possible, as an extended NUPAS process can negatively impact the lead time to award. AOs should consider the Procurement Action Lead Time (PALT) as established in [ADS 300](#). The timeline depends largely on the availability and coordination of the Survey Team, as well as the organization.

Outsourcing the survey. Outsourcing the NUPAS, may be a necessary option for situations where there are insufficient resources at the Mission or when the organization is located in areas inaccessible to Agency staff (for example, due to security concerns). AOs will need to assess the benefits and needs for outsourcing the survey. It is preferable that Agency staff conduct the NUPAS because it ensures that institutional knowledge of the NUPAS is retained in-house which benefits the team responsible for oversight and supervision of the award, including monitoring the recipient's compliance with specific conditions, if any. As noted earlier in this document, the NUPAS can serve as the foundation for building a positive and trusting relationship between the organization and the Agency.

VI. Appendices

- A. [Non-US Pre-Award Survey Tool](#)
- B. [Final Report Template](#)

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