



Date: December 14, 2023

Subject: Bureau for Humanitarian Assistance's (BHA) responses to questions received on the BHA Multi Year Annual Program Statement (MYAPS) base released on June 22, 2023 - Funding Opportunity Number: 720BHA23APS00002

Summary

U.S. Agency for International Development Assistance's (USAID) Bureau for Humanitarian Assistance (BHA) has summarized below the questions that BHA received on the Multi Year Annual Program Statement (MYAPS) base.

BHA has made changes to the MY APS in the following sections:.

- The addition of Sustained Response Program (Introduction Letter and Section A - Program Description - Section A 1.2 and Section A 2)
- Section A.3 Programming Principles
 - Clarifications within
 - People Centered Approaches
 - Localization and Climate Adaptation and Disaster Risk Reduction
 - Use of Evidence and Learning for High Quality and Adaptive Management
- Section B. 5 Authorized Geographic Code
- Section C. 1 Eligibility Information
- Section D. 5 Technical Application Format
- Section D. 5.c Construction, Alteration, or Repair of Structures/Infrastructure
- Section D. 7 Changed Business (Cost) Application to Cost Application.
- Other- Changed 'beneficiary' to 'participant' throughout.

BHA has revised the base APS where appropriate and reissued it as Modification #1. BHA did not reply to all questions and comments received during the Questions and Answers (Q&A) period individually. BHA has however tried to provide responses to as many individual questions received as possible which are found below. BHA has grouped questions and responses according to thematic relevance. Due to procurement sensitivity and the nature of this framework APS, which leaves open the possibility for rounds that have not yet been drafted, BHA cannot state definitively what interventions may appear in future rounds. BHA is not accepting additional questions on the base.

Questions on APS and BHA Responses

1. Questions related to Shock Response and Early Action

- On page 10 can BHA clarify whether it will consider anticipatory, early, or forecast-based actions to mitigate the impact of foreseeable shocks (Cyclones, droughts) and support vulnerable communities to prepare and absorb the shocks, through, for example, transfer of assets or cash?
- Within the RFSAs, will BHA consider flexible funding to be able to respond to shocks without impeding the investments made toward building resilience?
- Is there any opportunity to provide emergency relief support during disasters?
- Section 1.2 describes two major conceptual areas, Declaration of Humanitarian Need (DHN) and Early Response, Recovery and Resilience (ER4). How will anticipatory action be included in the MY APS? If anticipatory action is included, which conceptual area does this fall under?

BHA Response: While BHA cannot provide specifics on future funding rounds, the [USAID Climate Strategy](#) and BHA's [ER4 Framework](#) both state the importance of Early and Anticipatory Action. In addition, some recent RFSAs incorporated response funding into planned activities separate from the crisis modifier flexibility to shift funding to response. Funding to establish systems and/or pre-planned financing for Anticipatory Action (AA) would conceptually need to occur prior to a Declaration of Humanitarian Need (DHN) since those AA activities would occur before a specific shock and specific needs had been identified.

Stand-alone response to rapid onset disaster is outside the scope of this APS. Yet, rapid response mechanisms or anticipatory action mechanisms could be included in multi-year activities. See future funding rounds for specifics on the types of activities BHA seeks to fund.

2. Questions related to Climate, Environmentally Protected Areas, and Environmental Safeguards and Requirements

- How do environmental requirements coordinate with climate risk reduction?
- If BHA identifies a geographic area that includes protected areas, will it be acceptable for applicants to state that they will not program in those areas despite unmet needs? What if there are high levels of malnutrition, food insecurity, poverty, displaced people or refugees in those areas?
- Please state when and if an IEE and other environmental documents need to be submitted or if each round will indicate which environmental documents are required. The IEE and other environmental documents (PERSUAP, etc) should be listed and indicated for submission in the table on pages 20-21. Partner would also suggest that consideration be given to whether these documents must be submitted with the application, or later in the process by apparently successful applicants.

BHA Response: USAID requirements exist to address environmental and climate challenges that are inextricably linked. Environmental sustainability can help build resilience to climate shocks,

while climate change's impacts can negatively impact the environment. The humanitarian community has demonstrated commitment to the greening of assistance through USAID's signing of the Climate and Environment Charter for Humanitarian Organizations. Using international safeguarding standards, the USAID Initial Environmental Examination (IEE) is codified by US regulation (22 CFR 216) to assess environmental/social impacts and document climate risk management practices in order to promote the greening of humanitarian assistance awards. Achievement of integration of climate and environmental risks into design and implementation are monitored by USAID performance indicators for Climate Adaptation, the Climate and Environment checklist in the BHA RFSA Annual Reporting Guidance, and via a Climate Keyword for awards via the Emergency Application Guidelines (EAG).

In the MY APS, BHA requires a strong justification to program in environmentally protected areas. That justification requires compelling precautions to mitigate impacts of aid intervention on the local ecosystem. In addition, an Environmental Assessment (EA) is required per 22 CFR 216 for Development Assistance (DA) and Title II Development funded activities implemented in environmentally protected areas.

IEE and other environmental and climate requirements (PERSUAP, etc) will be detailed in funding rounds.

3. Questions related to HDP Approaches

- Will the MY APS support appropriate interventions in line with HDP coherence and humanitarian principles in order to manage and mitigate conflict, integrate a conflict-sensitivity and conflict-prevention lens, and/or strengthen social cohesion?
- Partner would like to encourage BHA to ensure that their funding facilitates integrated HDP nexus programming under the new MYAPS. For example, this may include:
 - a. extending grant periods for humanitarian funding, allowing reallocation between development and humanitarian funding, and providing flexible funding for nexus programming.
 - b. Strengthening coordination between development, humanitarian and peace donors to define collective priorities
 - c. Recognizing and covering the true costs of working in fragile contexts. This is particularly important when operating in contexts of constant insecurity which includes specific risks for implementing partner staff, partners, and project participants. We urge BHA to recognize and allow for the full operational costs for partners.
 - d. Supporting and covering the costs of decentralizing support services in program implementation.
 - e. Providing seed funding to allow implementing partners to develop and test new models within their programming, which would allow successful models to be taken to scale and have transformational impact.
 - f. Prioritizing engagement in the safe participation and engagement of women who represent affected communities.

- g. Support implementing partner regional and country offices to raise humanitarian concerns at the global level through pragmatic advocacy approaches and avenues.
- Does BHA intend to fund, or will it be amenable to funding, any activities under the MY APS in the areas of social cohesion strengthening and conflict management/integration?

BHA Response: BHA is unable to provide specifics on future rounds of funding. Nothing in the base APS precludes identifying elements of social cohesion as a goal, purpose, or otherwise within a Theory of Change if this was determined to be necessary to achieve prioritized humanitarian outcomes.

BHA supports HDP approaches. BHA is able to allow flexibility for reallocation in funding with Title II and CDF between development and humanitarian assistance specifically with RFSAs. BHA does not build in flexibility from emergency programming to development. BHA will take under advisement partner needs in contexts of conflict-sensitive programming, the potential for seed funding, and support for engagement in global coordination fora.

4. Questions related to Technical Areas and Sectors

Learning and Capacity Strengthening

- Learning and capacity strengthening is a round although, monitoring and evaluation is a sector and yet monitoring and evaluation is part of every round. Could you clarify what will distinguish it as [a] sector?
- Will research and learning be considered part of one or more of the sectors listed that BHA will fund? If not, how will BHA anticipate integrating research and learning to ensure that BHA-funded programs contribute to the wider humanitarian-nexus learning base?

Sector Guidance

- Why are technological risks paired with natural hazards and not listed separately? Definitions of each would be helpful to understand why they are related as they seem very different.
- Can BHA clarify what is meant by “significant” in this statement: "...bounce back from crises without significant losses." Alternatively, partner suggests revising to "...bounce back from crises without devastating / catastrophic losses." The term "significant" is relative, depending on a variety of factors. Devastating or Catastrophic loss is what we really try to minimize; significant loss results from virtually any emergency situation.
- Can BHA please confirm each of the sectors listed on pages 6 and 7 will correspond to the sector specific guidance BHA currently has in place? Will the sector guidance be applicable for RFSAs rounds of applications?
- In the programme area “Early Recovery, Risk Reduction and Resilience (ER4)”, does it include small scale infrastructural resilience activities?
- If there are any climate related risks in the targeted location, can we apply DRR

interventions to mitigate those risks?

- Would BHA consider not requiring the use of sector and subsector for MY APS proposals in such a rigid manner?

Transfers and Modalities

- "Purposes may be multi-sector (e.g., food security) or single sector." This is unclear. Food security is a single sector. Could BHA consider deleting "(e.g., food security)" or providing a better example of multi-sector?
- What if applicants will not provide transfers? Do they need to justify this based on a market analysis and the modality decision tool? Should justification be provided based on the appropriateness of a modality to accomplish outcomes in the Theory of Change? For instance, applicants may determine based on the TOC that transfers will be appropriate to use at certain times during the project life, but not at others, and that the nature of the transfers may change in order to bring about certain outcomes. Should an applicant state this as part of the justification of the modality to be used?
- The APS states that BHA prioritizes response analysis and that applicants should utilize a context-driven approach to modality selection, specifically the Modality Decision Tool (MDT) for Humanitarian Assistance. Does this mean that all modalities will be available to applicants for resource transfers? If not, how can applicants use the MDT to "guide their decision-making and the content of the narrative" if certain modalities are mandated (e.g. with mandated levels of USG GIK food commodities for RFSAs)?

Agriculture, Markets, Nutrition and Health

- While market appropriateness is one criterion in the MDT, there do not seem to be any specific requirements in this section (or elsewhere in the MY APS) regarding market assessment and market monitoring. It would be good to include an initial market assessment and annual market monitoring reports among APS requirements (or at least for certain program types, e.g., RFSAs). Including these as required activities will ensure these activities are appropriately planned and budgeted at the proposal stage.
- Is training of community health workers/health workers something BHA would consider in terms of resilience and early recovery?
- Partner staff have been invited by USAID/Advancing Nutrition to participate in a virtual consultation that includes solicitation of feedback on the draft USAID SBC Handbook for RFSAs in the Refinement Phase. It would be useful to see this document referenced in MY APS given the specific information in the handbook on TOC content.
- Is there any opportunity to include climate smart agriculture practices in the project interventions?
- Could BHA please provide information that would give background to this position, as in, why are keyhole or tower gardens unlikely to yield a sustainable impact, and how is "a sustainable impact" being defined here?

BHA Response:

The list of sectors in the MY APS coincides with the current list of sectors in the EAGs. The EAGs apply where stated in the base MY APS and as explicitly specified in future funding rounds.

Learning and Capacity Strengthening

- The [EAG Sector Requirements](#) contain additional details on the Monitoring and Evaluation sector requirements on pages 136-142. "It is intended to complement BHA-funded investments with targeted and enhanced M&E support beyond the M&E requirements for an individual BHA activity." Natural hazards and technological risks are described in more detail on pages 149-153 of the [Sector Requirements](#) in the EAGs.
- Learning and Capacity Strengthening is stated as one of the Programming Areas under Section A.2. In ER4 and RFSA awards, these activities could fall under the Humanitarian Policy, Studies, Analysis, or Applications Sector or in any of a number of other sectors if the research and/or learning contributes to those sectoral outcomes.

Sector Guidance

- BHA has updated phrasing in the MY APS on page 10 to read, "DRR lays the foundation for resilience and adaptation by reducing the impact of recurrent disasters, which enables communities and countries to invest resources for development and bounce back from crises without consequential losses."
- At this time, BHA is not able to share details of future rounds of funding.
- At this time, BHA is not removing requirements for sectors and sub-sectors for ER4 and Learning and Capacity Strengthening programs in the interests of aligning to existing systems and processes. Those may be updated in the future, but overhauling broader BHA systems was outside of the scope of this solicitation.

Transfers and Modalities

- Applications with no resource transfers do not need to complete the section entitled "*Market Analysis and Modality Selection (for activities with resource transfers only)*." If a funding round requires distribution of resource transfers, this will be stated in the funding round.
- Any restrictions on modality will be articulated in individual funding rounds. The preponderance of BHA's funding is IDA, which has no modality restrictions. When soliciting activities with Title II funding, BHA will comply with the requirements of the Food for Peace Act including any and all applicable statutory language on availability and use of 202(e) funding.

Agriculture, Markets, Nutrition and Health

- BHA understands food security to be multi-sectoral, as illustrated in our Resilience Food Security Activities, which may include food assistance, agriculture, economic recovery and market systems, nutrition, WASH, disaster risk reduction policy and practice, and/or other sectoral activities in an integrated fashion to achieve a food security purpose. Since RFSA's are such a prominent example of multi-sector programming in BHA and represent one of the programming areas in this APS, BHA prefers to continue to use this as an example.
- The APS does not set a formal minimum requirement on market assessment and monitoring for all types of programming. More specific requirements may be included in

funding rounds based on type of funding and context. For example, Title II funding has mandatory requirements to comply with the Bellmon Amendment.

- BHA will not require applicants to use the SBC handbook at this time for Theory of Change guidance.
- Climate smart agriculture could factor in ER4 or RFSAs activities. ER4 could include small-scale infrastructural resilience activities. Risk Reduction is also part of the ER4 Framework and may feature in ER4 or RFSAs programs. See future funding rounds for any specifics on the types of activities BHA seeks to fund.
- BHA developed the list of activities that require robust justification through a review of past BHA programmatic experience and available literature on evidence. BHA's conclusion was that the available evidence was weak on the sustainable impact of keyhole and tower gardens on food security and nutrition outcomes.

5. **Questions related to RFSAs**

- Does USAID anticipate that the forecasted FY24 RFSAs (Madagascar and Somalia) will be released under the new Multi-Year APS?
- Does USAID anticipate that RFSAs solicitations will be released as country-specific RFAs or all within a single round under the new Multi-Year APS? For example, would the FY24 RFSAs (Madagascar and Somalia) be released as individual RFAs or would all RFSAs in a fiscal year be released under a single round?
- Would USAID please consider sharing an anticipated schedule of future RFSAs that will be awarded under MYAPS or a list of current RFSAs, their periods of performance, and implementing partner(s)?
- If RFSAs will be released under the MY APS, does USAID anticipate a multi-phase application for the RFSAs?
- Would USAID/BHA please clarify whether the new MY APS mechanism will be used for all RFSAs procurements going forward including those that were in the USAID business forecast before the MY APS release?
- Will the MY APS round replace standalone NOFOs for RFSAs solicitations?
- If MY APS will be used for some or all RFSAs procurements, could the Business Forecast be updated to reflect which RFSAs are intended to be released as a round under MY APS?
- Would USAID/BHA please clarify whether a concept note stage will be included in RFSAs procurements under this MY APS?
- Under the MY APS mechanism, would USAID/BHA please clarify whether the practice of releasing draft RFAs for RFSAs will continue?
- If continuation of the practice of releasing draft RFAs for RFSAs is planned, will they be issued as a round under the MY APS?
- Will BHA issue draft amendments for rounds of applications for RFSAs for comment? If yes, when will they be expected to be released?
- The definitions of ER4s and RFSAs overlap to some extent. What are the major differences between the contexts in which each of these types of programs would be used?

- Will RFSAs require breaking out sectors using keywords? Why or why not?
- BHA states “rounds for RFSAs will provide specific guidance on applicable technical areas.” Will this also be the case for ER4s and Learning and Capacity Strengthening rounds? How much leeway is there for RFSAs applicants to include sectors not included in the RFSAs rounds, or to not include technical areas included in guidance for RFSAs rounds if evidence shows that different approaches are needed and/or the budget provided will not allow for adequate achievement in sector guidance? This would especially be the case for awards with large, required food aid components.
- Would USAID/BHA please publish a list of all current RFSAs award numbers and urge all RFSAs implementers to ensure all reports are uploaded to the DEC per their agreements?

BHA Response: Questions related to specific solicitations already on the USAID Business Forecast will not be addressed here. Applicants should continue to monitor www.grants.gov for more information. The APS provides a framework for soliciting RFSAs under funding rounds. Future RFSAs rounds (as stated in the APS) may be issued as a round under the APS or they may be issued as stand alone solicitations. In general, BHA may choose to issue future rounds under the APS as single country awards, multiple awards per country/region etc. As stated in the APS, USAID reserves the right to issue stand alone solicitations separate from this APS.

If a phased approach to applications is required, the phases will be determined by funding round. All opportunities to partner with BHA will be listed on the business forecast. At this time, we are not able to release details on activities that have not been announced yet. BHA may consider if it is possible to share a list of current RFSAs, their period of performance and implementing partner in the future. However, BHA is unlikely to provide a list of future RFSAs that will be issued under the MY APS. BHA plans to publish rounds with a question period in line with the requirements that the funding type requires.

ER4 is a strategic framework which applies to RFSAs. RFSAs are one type of ER4 activity that fall under distinct Title II and/or CDF funding authorities. Applicants may find the ER4 Framework on page 4 of the MY APS. RFSAs Budgets will be categorized by Sector according to entry into BHA's financial systems. However, RFSAs technical narratives will continue to use technical areas. Any of the funding rounds may include specific guidance on applicable technical areas. Merit review criteria will be stated in each funding round that will dictate how approaches must be evaluated. BHA cannot share details of future opportunities at this time. Partners are required to follow the conditions in their award terms for submitting documents to the DEC. At this time, BHA does not plan to publish a comprehensive list of active RFSAs award numbers.

6. Questions related to Future Rounds

- Will this APS include programs under BHA's Climate Smart Disaster Ready APS? Is there a plan to align these APS more intentionally for future rounds?
- In general, does BHA plan to share a draft round before publishing the final version?
- Can USAID confirm that funding opportunities released under this APS will be added to the Business Forecast so applicants can have sufficient time to prepare and analyze the opportunity?

- When a new amendment announcing a funding round under the APS is posted, is it possible to ensure that this is visible as a change to the APS on grants.gov? Our past experience with other Annual Program Statements is that the amendment does not result in an updated Posted Date?
- Can BHA share how many anticipated rounds there will be to the MY APS, and when they might be released?
- For the purposes of rounds under this APS, would BHA please consider allowing a minimum of five to six months from final “round” issuance to submission? Alternatively, Partner would suggest a robust concept, followed by a structured refinement phase that allows for that deeper stakeholder engagement upon approval of the initial concept design
- Does BHA anticipate that all future multi-year awards will fall under this APS, or will there also be opportunities for organizations to submit unsolicited or standalone proposals for multi-year projects?
- Will BHA continue to accept stand-alone concept papers for Learning and Capacity Building, or must all proposed projects fall under a future APS round?
- Does USAID/BHA still intend to accept unsolicited concept notes for ER4 programming, or will all ER4 opportunities be released through this MY APS?
- Is an applicant able to submit multiple applications to a particular round (in the case of a regional call for proposals)?
- Is there a possibility that rounds focusing on different programming areas will be released at the same time/within the same period? If yes, can an eligible applicant respond to more than one round/call at any one given?
- Will rounds overlap with sectors over-lapping and would an entity be allowed to apply for more than one sector/round if they are overlapping?
- Can BHA provide parameters for when they anticipate releasing broad calls for proposal versus specific Scopes of Work? Meaning, will the APS mean that applicants will be provided wider scope to design programs, or will BHA release requests for applications that respond to specific programmatic needs identified by BHA?
- Are the currently forecasted BHA opportunities (USAID Business Forecast) for Ethiopia and Sudan (BHA Ethiopia Rapid Response Mechanism and Sudan ER4, respectively) expected to be issued as amendment rounds of applications to the MYAPS?
- Can BHA clarify if the forecasted Optimizing Food Assistance Program, Processes and Products for Nutrition (O3P) opportunity might be released as a round under the MYAPS NOFO as part of the Learning and Capacity Programming?
- In DRC, Ituri, North Kivu, South Kivu, and Tanganyika are humanitarian crisis zones due to armed conflict. Considering that all these zones present significant gaps in terms of humanitarian response, will these areas be eligible under this APS? What weight does USAID give to each region when allocating resources?
- Will USAID/BHA investments in the Latin American & Caribbean region (including Haiti) support targeting/building upon local capacity strengthening efforts (LCS4R) and support initiatives targeting a broader segment of local organizations across Haiti? Or will BHA investments lean more heavily towards research and thought leadership initiatives?
- How will BHA release rounds under this MY APS? Will each round be posted as a new

- entry on grants.gov, or posted as an addendum under the “Related Documents” tab?
- Does BHA intend to continue its use of the Food Aid Consultative Group mechanism for the release of draft program descriptions for review and comment? Further, does BHA anticipate any changes to the current 45-day review and comment period?
 - Does BHA anticipate that future rounds for ER4 programming will target specific geographic priorities? If so, can BHA elaborate?
 - Does BHA anticipate evaluations (baseline, midterm, endline) in the pipeline for RFSA countries that will be publicly shared on the DEC or through other channels, and which countries / regions would be covered?
 - Will BHA consider applications that seek to transition current humanitarian-based awards to MYAPS ER4 awards (e.g., those successful programs nearing self-reliance)?
 - Will BHA, through the MY APS, consider applications that integrate ER4 components into an ongoing humanitarian response? In such cases, the technical approach would address acute humanitarian needs in Year 1 following EAG response guidance, while allowing the applicant partner to transition to longer-term ER4 approaches to address root causes and promote strong secondary adoption of community approaches for communities living in less vulnerable, but still at risk conditions?
 - Can BHA provide further guidance on WHEN multi-phased proposal processes that include oral presentations and co-creation workshops will be required and/or utilized? Given the humanitarian nature of BHA-funded programs, how does BHA anticipate moving through concept note oral presentation full application co-creation workshop stages in an efficient, time bound way that will enable critical funding to reach those in need as quickly as possible?
 - Does BHA anticipate engaging in any pre-award co-creation processes as part of any rounds? If so, can this be clarified?

BHA Response: All opportunities to partner with BHA will be listed on the business forecast. BHA cannot provide specifics on future funding rounds. BHA plans to publish rounds with a question period in line with the requirements that the funding type requires and BHA will continue to comply with Food for Peace Act requirements pertaining to the FACG. If a funding type does not require a draft-for-comment period, BHA may choose to issue a future round without a comment period. If and when BHA seeks to convey geographic priorities under this APS for a particular region, they will be designated under the details of the relevant funding round. Each round will be posted as an addendum under the existing Base APS that was posted June 22 on www.grants.gov.

If BHA requests applications to transition existing humanitarian relief portfolios into multi-year ER4 awards, that would be stated in the funding round. However, each funding round under this APS is subject to competition. Nothing in the base MY APS precludes issuing a funding round that would integrate ER4 components into an ongoing humanitarian response; however, BHA cannot provide specifics on future funding rounds. The MY APS is structured to be open-ended. New funding rounds will be determined on a rolling basis until the APS is closed. At this time, there is no predetermined number of anticipated rounds of funding. Additionally, when new APS rounds are added, they will appear as Amendments on www.grants.gov with

the updated release date visible on the Synopsis and Version History tabs. BHA will modify the current APS on www.grants.gov to add rounds once they are posted so it is visible as a change to the APS. Any additional limitations not identified in the base MY APS will be stated in the funding round.

This APS does not preclude other multi-year awards. BHA may issue additional annual program statements or requests for applications. Page 16 of the EAGs still currently states, "BHA requires you to consult with BHA staff before submitting a concept paper or application under these Guidelines for an activity of 18 months or more." That will continue to apply until and unless amended.

Applicants may be provided wider scope to design programs, or to respond to specific programmatic needs identified by BHA. The APS is structured so that both are possible. Unless otherwise specified, applicants may apply to any open round of funding.

The different types of rounds of funding offer the potential for a variety of possible configurations. A round of funding may solicit applications for a multi-sectoral, integrated activity or for a focused sectoral activity. Unless the round of funding explicitly states that it in some way precludes applying for other rounds of funding, applicants are free to apply to any and all open rounds of funding. Future rounds for ER4 programming may target specific geographic priorities. However, specifics of future rounds cannot be shared at this time. BHA does not rule out the possibility of other standalone procurements such as the recently released Climate Smart Disaster Ready APS.

BHA will determine necessary application phases on a case by case basis for each funding round. The Multi-Year APS will issue funding rounds for multi-year ER4, RFSAs, and Learning and Capacity Strengthening activities. The phases required for each funding round will be determined based on context and the nature of the activity. Concurrently, the EAGs will still be available to respond to urgent needs.

Page 19 of the base MY APS references co-creation workshops as a possibility. Any other co-creation processes will be articulated in the funding round if required.

7. Questions related to Supporting Documents

- Under 6. Other Supporting Documents, (a) Host Country Agreement, it states that BHA requires an HCA for all food security agreements. Does this include ER4 programs funded exclusively with IDA, RFSAs funded exclusively with CDF and/or Learning and Capacity Development awards?
- Could BHA describe the contents of and/or requirements for the Host Country Agreement (HCA)? Will BHA provide a template or other guidance to facilitate the development of the HCA? If so, will HCAs be expected at the concept note, proposal, or agreement phase?
- Can BHA confirm [the Supply Chain Management] section is inclusive of in-kind Title II food aid?

- History of Performance: Can an applicant cite recent experience of LRIP and commodity management from recently implemented USDA McGovern-Dole Food for Education and Child Nutrition programs if this experience is relevant to what is being done within the activity?
- The procurement plan requirement for applicants planning to use more than \$50,000 of BHA funds for procurement seems overly burdensome at the proposal stage and duplicative with information that is provided in the budget. We request that USAID apply this requirement to apparently successful applicants.
- Would USAID/BHA please clarify if this supply chain procurement process (see pgs. 30-31, Section c) Supply Chain Management provides guidance about procurement) applies to all three types of programs to be covered under the MY APS? Or there will be more specific separate requirements for each program when they are solicited out, specifically for RFSAs, for example? Would USAID/BHA please clarify whether these procurement requirements also apply to procurement done for general program operation (i.e., staff computers, office furniture, vehicles, etc.)? Specifically, would USAID/BHA clarify whether a procurement plan is required to include procurement for both commodity distribution and general program operations? Would USAID/BHA please clarify whether a transport plan is needed if the commodities to be purchased are for project operations and distribution to beneficiaries?
- Partner recommends that BHA revise a requirement to read "Applicants must confirm the existence of relevant policies and procedures (e.g., procurement, supply chain management), and attach a full list of the relevant policies and procedures to the application. If requested during BHA's review process, recipients agree de facto to make the requested documents available to BHA."
- "Applicants planning to use more than \$50,000 of BHA funds for procurement, combined, must provide:" This section is confusing, very limiting, and potentially burdensome and inconsistent vis a vis award values (big awards will logistically result in higher levels and costs of procurement). Partner suggests this be a percentage of overall award value. In many cases, a large portion of the costs will be borne by ITSH.
- Partner notes the following sections reading "...risk mitigation statement that describes how they will mitigate risks such as accidents, damage, diversion, and theft of commodities" be revised. For clarity, partner suggests a revision to "...risk mitigation statement that describes how they will mitigate risks such as road crashes and security threats, damage, loss and misappropriation (e.g., theft, abuse, misuse) of the goods being transported."
- "The organization's current fleet management policy...." Would BHA consider allowing recipients to confirm the existence of fleet management policies and procedures at the Agency and Country Program level, and provide a list of relevant policy and procedures. This would reduce the burden of having to provide the full policy, which can be very large, at the time of proposal submission, and also removes the 5-year eligibility requirement as organizations will determine on their own the eligibility time frame of their policies and procedures.
- Can BHA clarify what information is expected to be included in the Host Country Agreements for food security activities?

- Can you elaborate on the Accountability to Affected Populations (AAP) plan and its significance in the application procedure? What specific aspects should the AAP plan address?

BHA Response: The Host Country Agreement is required under 22 CFR 211, which pertains specifically to the Title II account. HCAs will be required at application submission and prior to signing the agreement (see Base APS pg. 20).

Yes, the Supply Chain Management section applies to all activities that include procurement, transport, and warehousing commodities.

Applicants may provide details of any recent past performance that is relevant to the specific activity proposed.

The \$50,000 requirement refers to procurement of commodities, services, and equipment to be used in BHA-funded activities.

The Supply Chain Management section applies to all types of programs that procure, transport, and warehouse commodities as part of implementation. However, a budget may be prepared with the subawardee listed as to be named. Any unique requirements will be articulated during the funding round, such as if use of Title II commodities is required. These requirements do not apply to office supplies or equipment line items in the budget for use by staff. These Supply Chain Management requirements apply to commodity distribution and use of restricted commodities like pesticides, fertilizers, and veterinary pharmaceuticals. A transport plan is not required for routine office supplies and equipment.

BHA does not plan to make changes to the requirement for submission of organization policies at this time.

BHA has stated the language on risk mitigation broadly and does not plan to revise the language at this time.

BHA does not plan to make changes to the fleet management policy requirement at this time.

The organizational policies in question have to be regularly revised by the partner and shared with BHA to stay relevant. The request provides BHA with a minimal level of assurance that the partner organization has reviewed their policies, which in turn leads to reduced levels of fraud and waste of BHA provided resources. BHA believes a five year period is reasonable.

BHA Functional Policy 20-03: Award Requirements for Source and Origin of Local, Regional, and International Procurement (LRIP) of Food Commodities states an explicit preference for local procurement over regional and regional over international where feasible. Although not stated on page 33 of this APS, this does reflect current BHA policy.

The requirements for a Host Country Agreement are described in 22 CFR 211.3(b). Pages 33-34 indicate that, "The AAP plan should describe the following: How the affected population, including marginalized or vulnerable groups, will actively participate in decisions about the activity design and implementation; What mechanisms are in place to provide timely and accessible information, and to receive and respond to participant beneficiary feedback throughout the activity; How the organization will ensure feedback and information mechanisms are safe, accessible, and preferred by participants/beneficiaries, especially marginalized or vulnerable populations; and How the organization will ensure confidentiality and respond to any critical or sensitive program irregularity or protection issues." BHA does not have further details to share at this time. Future funding rounds may include additional details on requirements for that funding round.

8. Questions related to Localization and Local Systems

- Does BHA expect any rounds to be restricted to local entities?
- Localization: This section focuses on encouraging applicants to incorporate local capacity building. However, does BHA have specific commitments with respect to funding local institutions directly?
- Can BHA clarify in the APS whether strengthening or engagement or both is required and will be funded? What distinction is BHA drawing?
- As consortiums are built and local organizations join as subs, from which Sector could the Prime specifically fund capacity strengthening of local partners? Particularly which of the Sectors listed on pg 6/7?
- Given USAID's new localisation strategy (25% by 2025 and 30% by 2030), but also the limitations it faces, what is the expected percentage of funds transferred to local partners for BHA humanitarian aid and for the activities that might be covered under the APS (RFSAs, ER4, and Learning and Capacity Strengthening)?
- Could USAID please clarify the meaning of "local systems" to strengthen human and institutional actors? Does this refer to the enabling environment?
- Can BHA elaborate on how or to what extent applicants' proposals adhere to USAID's Localization agenda?

BHA Response: At this time, BHA is not able to share details of future rounds. If an opportunity is restricted to local organizations, the details will appear in the relevant round of funding.

BHA's approach to enhancing locally-led humanitarian assistance will align with USAID's publicly available Localization Vision - [USAID Localization](#). BHA will contribute to meeting the Agency's goals of channeling a greater percentage of funding directly to local organizations and adapting our programming to create space for local partners and the local communities to lead in priority setting, design, partnership formation, implementation, and defining and measuring results. USAID has released its Performance Indicator for measuring locally-led activities, which identified 14 good practices to enable greater local leadership in USAID activities: [Measuring Progress on Localization](#). Additionally, BHA is committed to serving as a global advocate and

thought leader, using our convening power, partnerships, voice, and other tools of diplomacy to catalyze a broader shift toward locally led humanitarian assistance..

BHA has clarified local capacity strengthening and local engagement in section 3.2 of the APS.

There is no single sector for funding capacity strengthening of sub-recipients. However, there are a number of possibilities where it could qualify depending on the nature of the capacity strengthening activity. For example, the Humanitarian Policy, Studies, Analysis, or Applications Sector has a sub-sector entitled, "Capacity Building, Training, and Technical Assistance."

At this time, BHA does not have a specific numeric target for funds to be directed to local partners. Future funding rounds may include specific requirements related to BHA's localization efforts.

Per the USAID Local Systems: A Framework for Supporting Sustained Development, "Local system refers to those interconnected sets of actors—governments, civil society, the private sector, universities, individual citizens and others—that jointly produce a particular development outcome. The "local" in a local system refers to actors in a partner country. As these actors jointly produce an outcome, they are "local" to it. And as development outcomes may occur at many levels, local systems can be national, provincial or community-wide in scope." BHA has updated the APS (see page 5) to include this Framework.

The USAID Local Capacity Strengthening Policy is an agency-wide policy. Section 3.2 of the base MY APS provides an overarching discussion of Localization as a programming principle for all awards under this APS. Future funding rounds may include additional requirements and/or evaluation criteria.

9. Questions related to Gender, Youth and Social Protection

- Can BHA please define "social-identity-related factors"?
- It is important to include protection in the area that describes what applicants are expected to do to ensure the success of equitably including marginalized groups.
- Can you elaborate on the Code of Conduct and Protection from Sexual Exploitation and Abuse (PSEA) requirements? Do any specific resources or guidelines exist to assist applicants in creating their Codes of Conduct?
- How can there be economic recovery (or any other kind) when people feel depressed, hopeless, and weak due to their traumatic experiences of the past? If hatreds persist in a conflict-affected society, how can there be a sustainable recovery without peacebuilding and social cohesion that builds on people's willingness (and mental strength) to move forward with their lives without feeling stuck in their past?
- Partner would like to see BHA distinguish adolescents from "youth," and be more specific and less perfunctory when using the term vulnerability to consider generational mobility and vulnerability and intra-household vulnerability.

BHA Response: Thank you. BHA has clarified social-identity-related factors on page 7.

BHA agrees to include ‘protection’ and has revised accordingly on pages 7 and 8 of the Base APS.

Multiple resources exist for Codes of Conduct. While BHA does not officially endorse a specific resource in favor of any other, one such can be found at the Core Humanitarian Standard (CHS) Alliance site: [CHS Alliance Code of Conduct Toolkit](#).

BHA acknowledges the importance of mental health and psycho-social support to ER4 approaches. In the interests of managing page length and complexity, BHA made a conscious effort to minimize technical details here. While the description of ER4 in the base MY APS is only seven sentences, more details can be found in our 48-page ER4 Framework at [BHA Strategic Framework for Early Recovery, Risk Reduction and Resilience](#). Funding rounds may also provide specific details on the desired approach in a given context.

USAID's Youth-in-Development policy encompasses four age bands (including adolescence) which can be found on page 5 of the APS (See Annex 4, page 59 of the Youth-in-Development Policy). BHA does not take the stance of narrowly defining youth to the adolescent stage. Partners are free to define and target according to life stage and these age bands as it is relevant to proposed programming activities and context.

10. Questions related to Eligibility Information

- How is a PVO the same or different from an NGO? How does this affect their eligibility?
- It is noted that sub-awardees may be non-exclusive and reference is made to local organizations. What about international NGO sub-awardees? Can they also be non-exclusive? On page 16 the APS states that it is indeed possible for international organizations to be non-exclusive. However, this is not consistent with what is stated on page 15.
- Will cost share be required or encouraged for any rounds? Please clarify.
- What if an entity was previously part of an organization that received USG funding, but split off and became an independent locally registered organization? Is it considered that they have in the past received USAID grants or cooperative agreements or not?
- Is an applicant that currently has an ongoing USAID funded activity eligible for this BHA MY APS?
- Could you explain the procedure and requirements for partner screening? What should be included on the USAID Partner Information Form, and when should it be submitted?
- As Reg. 11 is only applicable to USAID programs funded with Title II funding, requesting applicants to have a host country agreement for all food security activities is confusing as it can imply that 22 CFR 211 will be a regulation that will be applicable to an award. “BHA requires an HCA for all food security activities.” The use of “food security activities” is not clear as many different activities contribute to food security. If the intent is to ensure that the applicant is legal[ly] permitted to operate in the country (ies)

of implementation then recommend that BHA delete “BHA requires an HCA for all food security activities” and replace with “BHA requires applicants to provide evidence that they are registered with the host country government and can operate in the implementing countries.”

BHA Response: There is no difference between a PVO or NGO when it relates to eligibility requirements under this APS. Both entities are eligible to receive USAID funding through an assistance mechanism. Where an NGO differs from a PVO is that, NGOs are U.S. or non-U.S. based non-government organizations or entities that are non-profit or profit making eligible to receive funding through assistance AND contract mechanisms. PVOs on the other hand are non-profit, non-governmental organizations based in the U.S. Entities operating as PVOs are exempt from Federal Income Taxes Under Section 501 (c) (3) of Title 26, receives funds from private sources; voluntary contributions of money, staff time, or in-kind support from the public, and that is engaged in or planning to engage in voluntary, charitable, or development assistance activities. For more information on PVOs, please visit [USAID's Private Voluntary Organization \(PVO\) Registration Page](#).

With respect to exclusivity, the BHA has revised to read "Applicants may sign and submit with their application, non-exclusive letters of commitment with the sub-awardees they propose to work with if they decide to. However, BHA neither expects, nor desires exclusivity for sub-awardees." Each application must describe what role a prospective sub-awardee would perform in the activity proposed in that application but are not required to discuss other applicants' activities. International NGO sub-awardees may also be non-exclusive. BHA has revised the APS to clarify.

Cost sharing may be required in future funding rounds if explicitly stated (thus amending the APS for that round of funding). If not stated, the base MY APS does not require cost sharing.

When a new organization splits from a different organization that previously received USAID funding, the organization that received funding prior to becoming a new entity did the work as a USAID recipient. As a new, locally registered entity, it is unlikely that this prior work would 'count' for this new organization as a result of new/separate registration, articles of incorporation etc. It will depend, though. If a USAID award were officially 'novated' or transferred from the prior organization to the new organization while the project was still active, then it would 'count' as having been implemented by the new organization.

Yes, an applicant that currently has an ongoing USAID funded activity is eligible for this BHA MY APS.

Section F.6.d) provides details on the process to complete the USAID Partner Information Form. The AID 500-13 form includes instructions on the second page. The form is estimated to require approximately 90 minutes to complete.

HCAAs are required for Title II funded activities prior to the finalization of the award. At this time, BHA does not have any information to share on updating 22 CFR 211.

11. Questions related to Federal Award Information

- Would BHA kindly consider changing the geographic code from 937 to 935?
- Page 13: BHA states that they will immediately halt activities if they do not meet “detailed performance specifications.” a. Will there be a set timeframe within which the specifications are to be met? b. Will this accommodate external factors outside an organization’s control? c. Can grace periods be built into a given program to recoup any lost time from a halted activity?
- Code of Conduct, PSEA, Implementation Details, Safety and Security Plan, RAMP: in this section USAID refers to “applicants” required to submit a Code of Conduct and PSEA, Implementation Details, Safety and Security Plan, RAMP; however, its placement in the APS suggests this material is required of apparently successful applicants. Can USAID clarify if the Code of Conduct and PSEA requirement are applicable in the application package, or in the award phase?
- "Applicants must also submit implementation details for the Code of Conduct specific..." Please include this "standard" requirement in the table on pages 20-21.
- What are the safety and security plan's expectations? Are there specific vulnerabilities or threats that applicants should address in their plans?
- In the Safety and Security Plan, can training activities listed for staff working on a project in areas deemed by the implementing organization to be insecure, be charged to the project?

BHA Response: BHA will revise the geographic code to reflect 935. Substantial involvement clauses will be detailed, as needed, in each future funding round. Details of how and when SI actions will be adhered to will be finalized in the cooperative agreement award.

Code of Conduct Implementation Details have been added to the table. At this time, the Code of Conduct/PSEA Policy, the Code of Conduct Implementation Details, and the Safety and Security Plan must be submitted at time of full application.

Page 56 states, "Safety and Security Plans must include and clearly address the following for each location where activities are proposed: Contextual analysis; Threat analysis; Vulnerability analysis (relating to personnel and operations); Contingency planning for relevant emergency situations such as: Abductions or illegal detention; Evacuation; Emergency medical care; Psycho-social support for staff impacted by serious crimes or personal violence; Sexual assault; Armed attack; Reporting and prosecution options; and Risk mitigation measures to reduce identified vulnerabilities, which must address the threats in the analysis of proposed activity areas. Check the BHA EAG Page routinely for new or updated supplementary materials and requirements, including any requirements about pandemics or other global emergencies. The BHA EAG Page is the Bureau’s repository for supplementary safety and security information materials and requirements and is routinely updated."

BHA is generally open to staff security training in insecure environments.

12. Questions related to Primes and/or Sub-Awardees

- If sub-awardees apply as partners to more than one consortium per round, do they need to demonstrate the capacity to play the required roles outlined in each application should more than one award be given to prime applicants they are partnered with?
- Subawards: can BHA clarify if detailed sub-recipient budgets will be required at the proposal stage?
- Under the Management Structure and Institutional Capacity section on pg. 27, the instructions note that “the applicant must explain [...] communication between organizations and staff.” Can BHA clarify this request?
- Can BHA confirm that the Organizational Chart requested on page 34, refers to the current structure of the applicants or sub-awardees and not to the proposed staffing structure for the project to be implemented under a given round?
- Can one organization apply in multiple consortia?
- Does the 'MY APS' offer opportunities for international non-governmental organizations to facilitate the transition of qualified national organizations to become prime recipients within the 2-5 year award period?
- Page 27, Section d) Management Structure and Institutional Capacity states “Non-exclusive letters of commitment from consortium members must be submitted with the application.” Would USAID/BHA please confirm that exclusive letters of commitment may be used for RFSA procurements if the partnering organization is not a local entity?
- Page 42, Section f. “Approval of Subawards” includes the UEI as a requirement. Given that it can take some time to obtain a UEI, to facilitate the involvement of local partners in USAID programming, we would suggest that proposed sub-awardees be required to have a UEI in place before the execution of sub-awards, but not at the application stage.
- Can BHA confirm whether they would prefer applicants to apply as consortia for follow on rounds of MY APS, or whether there will be opportunities for organizations to apply for smaller amounts and more niche programming as primes?

BHA Response:

Yes, BHA will require detailed sub-recipient budgets during the proposal stage. BHA typically will not require these for Concept Notes, yet reserves the right to if deemed appropriate. Applicants should ensure they read each round fully for Cost Application requirements. Applicants should refer to section D. 7. d of the APS for reference.

The Management Structure and Institutional Capacity section should provide clarity on which organizations will be performing which roles in an application that includes multiple sub-recipients or consortium partners. Where roles and responsibilities may appear to overlap, this section should clarify how coordination and communication channels will operate. For example, the application might state whether the leads on two separate workstreams are

responsible for coordinating their work with each other or if both report independently to the chief of party who is responsible for ensuring the workstreams are coordinated.

The organizational chart should reflect proposed staffing for the activity to be implemented, as articulated in each round, and as it includes consortium arrangements and sub-recipients. Exact names do not need to be designated if the position has not yet been filled, but the chart should reflect the planned management structure to be used to implement any resulting award.

Yes. BHA specifically states that letters of intent for local organizations must be non-exclusive. International organizations may either sign exclusive or non-exclusive letters of intent.

Nothing in the base MY APS precludes issuing a funding round that includes facilitating a transition to local organizations to be able to manage funding directly. Some recent RFSA RFAs have included language of this nature.

Final revised language now reads "Applicants may sign and submit with their application, non-exclusive letters of commitment with the sub-awardees they propose to work with if they decide to. However, BHA neither expects, nor desires exclusivity for sub-awardees."

Organizations may not be added as a named subawardee in approved budgets until they have a UEI established. The budget may be prepared as a TBD partner in a separate tab but may not be named until their UEI is established.

The MY APS does not establish preference for or against consortia. Future funding rounds may, however, state the number of awards and/or maximum number of anticipated awards for a particular country or region.

13. Questions related to Submission Procedures

- Could BHA please provide an outline of how to provide instructions via email to ensure that multiple attachments, annexes, PDF documents, etc. do not go missing? What is the maximum size of email that BHA's system can accept?
- What are the required administration files for applying? Do we have to attach any legal documents from the applying agency to the proposal?
- Can BHA please confirm if applicants are required to include their organization's PSEA and code of conduct policy during any submissions, including concept notes, or only as specified within specific rounds for full proposals? Can BHA also please clarify at what point Safety and Security Plans are required?
- Given the time that is required for stakeholder engagement and developing partnerships to inform program design, how much time does BHA anticipate will be provided between the time that a round of funding is announced and the submission deadline?
- Does USAID/BHA have plans for providing training/overview or orientation material for new and existing partners covering all of the many policies, strategies and other required reading? Is there a plan for some sort of overall summary? If such material exists, it

would also be useful to provide links in this umbrella MY APS.

- A checklist such as BHA provided for the Emergency Application Guidelines would be extremely helpful.
- If this is a tool that would come out under the specific solicitation each time, could there still be an “umbrella” checklist to make sure that potential applicants do not miss some requirement from the APS?
- Applicant recommends that the ESR and AER be listed and indicated for submission on the table on pages 20-21. These are required for RFSAs or other Title II supported activities.

BHA Response: General file submission and naming conventions are found on APS page number 19 under Section IV Application Submission Procedures. The file type and size will be provided in each round under that solicitation's Section IV "Application and Submission Information."

See the table on pages 20-21 for a summary of requirements. Additional details can be found in Section D.6. "Other Supporting Documents" and Section F.6. "Other Requirements." At this time, the Code of Conduct/PSEA Policy, the Code of Conduct Implementation Details, and the Safety and Security Plan must be submitted at time of full application.

Length of time for submission will be determined by funding round and the phases selected for the application process.

BHA is considering the most appropriate way to provide further guidance to our partner community. A series of presentations, trainings, and/or summary guidance are all considerations however no final decision has been made. BHA will inform partners accordingly in the future.

Applicants should refer to pages 20-21 of section 5- Technical Application Format in the base APS which outlines required documents for each round.

Table updated to indicate ESR and AER are required for RFSAs. ER4 will depend on the funding round and whether Title II is included.

14. Questions related to Staffing, Key Personnel Identification, and Letters of Commitment

- Can BHA provide rationale for including Key Personnel for ER4 as a requirement in applications moving forward?
- Does BHA expect applicants to initiate recruitment for ER4 projects moving forward?
- Will key personnel named be considered during the merit review of applications for ER4 projects moving forward?
- Will BHA utilize substantial involvement in key personnel who are named in ER4 proposals? (Same questions apply for Letters of Commitment)
- Under (h) letters of commitment, it states that “BHA encourages letters of commitment from partners and staff, if applicable.” Aren’t Letters of Commitment required if

applicable? If BHA “encourages” these LOCs, this would imply that they are nice but not required. Is this the case?

- Can BHA please confirm what level of detail and format is expected for the staffing plan? I.e. should it include every position listed in the budget, along with a description of roles and responsibilities and Level of Effort?
- Partner suggests that BHA replace commodity management with supply chain management.
- If BHA may award either a grant or cooperative agreement, can BHA revise page 29 to read “Specific key personnel positions as may be designated in rounds to the MY APS”?
- The table states that Key Personnel CVs are required for the Technical Application, while page 34 states “The application must include curriculum vitae of key personnel as detailed in the round.” Can USAID please confirm that Key Personnel CV requirements will be determined by each round?
- Under ‘Activity Specific Staffing Plan’, the first bullet refers to staff with substantive experience in the area being proposed. Does this refer to Key Personnel recruited pre-award and included with the application, or staff recruited post-award?

BHA Response: Key personnel requirements will be stated in the funding round. At this time, BHA cannot provide specific details on future funding rounds. Merit review criteria may include key personnel if the positions are determined to be critical to the success of the activity. Elements of substantial involvement will be enumerated in funding rounds, which could include key personnel. BHA encourages letters of commitment from partners and staff, if applicable.

Applicants should refer to rounds for specific guidance on substantial involvement related to key personnel.

Applicants may sign non-exclusive letters of commitment. If required by a particular funding round, this will be specified in the funding round.

The staffing plan must adequately demonstrate the applicant's capacity to fulfill the requirements of the funding round, which will vary in size and complexity. The staffing plan is not intended to duplicate the budget and budget narrative but should clearly articulate how the applicant will meet operational needs whether through existing institutional capacities, recruitment, consultancies, or otherwise.

Key personnel requirements will be stated in each funding round. If a round is solicited as a cooperative agreement this indicates that substantial involvement is anticipated during the period of performance, in which case initial submission of key personnel at time of application would be required.

The Activity Specific Staffing Plan must discuss planned staffing during the life of the activity, which could include existing staff and/or additional positions that have not yet been recruited.

15. Questions related to Technical Application Format

- Can BHA please confirm that text within text boxes may be 10 pt font?
- Do RFSA's need to list the applicable sectors and sub-sectors? Is this also the case for Learning and Capacity Strengthening applications?
- Can BHA please confirm if there are page requirements for the specific technical sections, if they will be specified during specific rounds, or if applicants should follow page limits as provided in the EAG?
- If there is specific guidance within the EAG, the MY APS, or within the follow on rounds that is contradictory, which guidance should applicants follow? For example on page limits, formatting or required annexes?
- The cover page requires [a] mailing address and telephone number. With business correspondence for proposals being conducted primarily through email, and proposal submission required through email, and hard copy proposals not accepted, and many employees in many organizations working remotely and so not having a business telephone, a mailing address and telephone number do not make sense in 2023. Can BHA remove these irrelevant requirements?
- Supply Chain Management: Does this replace the current Logistics Plan? Will it include the AER, IEE, Pipeline, LOA Calls Forward Schedule, etc.?
- This statement is unclear, "The below requirements apply to all applications that include procuring, warehousing, or transporting commodities or procuring services." The next sentence is about USAID restricted goods. Please explain how these ADS and regulations apply to the application or clarify that when an award is issued, the successful applicant will have terms and conditions on source and nationality, restricted and ineligible goods and suppliers. This paragraph states that the applicant must follow the applicable USAID regulations, including ADS Chapter 310, 312, and 313. USAID's ADS is the Agency's internal guidance, policy directives, procedures for USAID staff. The respective ADS chapters do provide applicants with additional information on how to ensure that the correct approvals required when procuring goods and services can be approved expeditiously. It is unclear why there is reference to these ADS in the MY APS. Partner recommends that a revision be made as in the paragraph before section "c" where applicants are referred to an ADS for more information. Please revise the reference in the supply chain section to the ADS to read for more information on Source and Nationality, Restricted and Ineligible goods, Ineligible Suppliers see ADS 310, 312, 313, 22 CFR 228 and 22 CFR 211.
- In the table on pages 20-21 USAID indicates that an M&E Plan, CLA Plan and Interventions Table are required for RFSA and ER4. On pages 34-37 USAID indicates that they "may" be required. Please clarify if these requirements apply to all RFSA and ER4 rounds, or depend on the solicitation for each round.

BHA Response: Future funding rounds may provide specific page limits for specific sections. In general, BHA will provide page limits where doing so helps to clarify the level of depth expected.

Yes, text within text boxes may be 10 pt font. This change has been made.

Learning and Capacity Strengthening awards must break out sectors and sub-sectors. RFSA funding rounds will state requirements for technical areas in each funding round.

BHA is not changing the requirement for a mailing address and telephone number at this time.

BHA will take the suggestion for issuing templates along with the rounds under advisement. For applications to the MY APS, funding round information amends the base APS and should be interpreted as the most current information available. If the MY APS or subsequent funding rounds cite sections of the EAGs but provide instructions that explicitly override those stated in the EAGs, comply with the language in the APS or funding round that is stated to replace those requirements. If a requirement is still not clear, notify BHA at bhaglobalmyaps@usaid.gov.

The Supply Chain Management section does address commodity management but does not replace any other explicitly required documents. Additional requirements may be included in future funding rounds depending on the type of funding.

The ADS represents agency level policies and procedures that BHA is required to comply with. The information is continuously updated to align USAID's policies with the latest Federal regulations, Administrator policy statements, and other overarching guidance. The policy is not strictly internal. The mandatory standard provisions for U.S. and non-U.S. NGOs are articulated in the ADS, for example, as well as other relevant information that pertains to BHA award terms and conditions.

The CLA Plan section clarifies that it is required for RFSA and ER4 funding rounds as described further under sub-section (j)(l) on page 36.

16. Questions related to Targeting, Needs Assessment, and Context Analysis

- Regarding the needs assessment, should applicants only provide information regarding problems they plan to address as part of the program or can other related evidence-based issues also be included that the program will not address, but other activities in the target areas will address through a layering and sequencing approach?
- Page 9: BHA says, "Applicants are encouraged to utilize sequencing, layering and integration in their activity designs, both across BHA programs and other USAID activities as well as programs funded by government and donors across the Humanitarian Development Peace (HDP) nexus, to maximize the impact and sustainability of interventions and create potential for longer-term success." a. As part of this coordination, is it possible to have two BHA projects in the same zone with two different partners having different areas of intervention? Or will BHA encourage a gathering of partners who wish to apply for the same proposal? Is it possible to set up a consortium in which partners can apply for two or three regions, with each partner working in a different region?
- In what cases would global or regional rounds be used?

- Are there any specific geographic priorities for this year’s programme statement?
- Is supportive capacity among local civil society in Ukraine something that is being considered by BHA?
- Could BHA describe how it foresees programming transitioning from BHA to BRFS?
- Page 24: Clarify learning and capacity strengthening beneficiaries “within the context of specific studies, tools, or research...” It would be very helpful if BHA could be more specific here and add more detail.
- Can BHA clarify on page 24, sections 2 and 3, concerning the importance placed on social cohesion strengthening?

BHA Response: The MY APS requires that applicants "provide brief contextual information for the proposed activity, not a comprehensive history of the country, region, or problems not related to the proposed activity." Applicants may exercise discretion to determine which contextual details are most relevant to explain what needs the activity seeks to address.

The base APS does not establish preference for or against consortia or limit the number of partners that may implement in the same zone. Future funding rounds may, however, state the number of planned awards in total for the round or per geographic location.

If a specific organizational approach is preferred, it will be stated in the relevant funding round.

Section 3.5 of the base MY APS discusses Sequencing, Layering, and Integrating (SLI). Opportunities for SLI must be assessed by the country context. Resilience Focus Countries and the Global Food Security Strategy are taken into consideration during the RFSA country selection process.

BHA agrees and has revised page 24 concerning learning and capacity strengthening of beneficiaries.

More details may be available in future funding rounds related to social cohesion strengthening.

17. Questions related to Monitoring and Evaluation (M&E) Plan, Theory of Change (TOC), and Indicators

- Performance Indicators, Targets, Baseline Data, and Data Collection: can BHA provide more specific guidance on the kinds of indicators and data collection methods expected under the new APS? Will it differ from the current BHA MEL guidelines? In particular, if BHA plans to award more multi-year programs, will there be an expectation to measure impact/report on impact indicators?
- Can BHA confirm if applicants may propose a Theory of Change in both a narrative format within the technical and as a graphic as an attachment to stay within page limits?
- If the activity is complex (e.g. a RFSA) should a separate annex be provided with a comprehensive diagram of the TOC be included. Or is a summary diagram and narrative section in the technical proposal sufficient?

- Can BHA provide examples of what type of evidence would be sufficient to support the hypothesized change for the Theory of Change?
- Itemized budget for M&E as a table in the M&E plan. The costs of M&E are already generally covered in the cost application, including staffing, and are / will be supported in the Budget Narrative. Partner requests this be removed. Adding this as a possible requirement per round creates an additional burden.
- Page 35: Partner suggests including “market information” in the last bullet point, along with other external conditions that may affect implementation.

BHA Response: BHA is not able to provide more specific guidance on the types of indicators and data collection methods under the new APS as the indicators will be specific to the amendment. BHA required and required if applicable (RiA) indicators for MY programming will be specified in the amendment but will be derived from the BHA EAGs Indicator Handbook or RFSAs Indicator Handbooks I and II. BHA will also recommend custom indicators if appropriate.

Each funding round will specify if there are format and page number requirements for the theory of change.

Please see the [BHA RFSAs TOC Guidance](#) for examples of types of evidence. This applies to RFSAs and while other requirements may be provided in subsequent rounds this example may be used.

M&E requirements are not broken down by line item in the overall budget. Partners would only have to copy and paste the line items for M&E if it's clearly stated in their overall budget which is not seen as a major burden to partners. BHA will not make changes to budgeting requirements.

BHA made the change on page 35 to include market information.

18. Questions related to Cost Applications, Budgets

- Which term does BHA prefer applicants use for the business (cost) application: “Business (cost) application,” “cost application,” or “business application”?
- On page 43, Section h) History of Performance, USAID states that apparently successful applicants “must provide information regarding its recent history of performance... not to exceed three (3) years or five (5) awards.” Can USAID please confirm that applicants should include the lesser of the two?
- In developing their budgets, should applicants adhere to the EAG Common Requirements (i.e., per sector/purpose) or to those in the MY APS (i.e., per year and major budget category [p. 38])?
- On page 38: “(3) Certificate of Compliance: Please submit a copy of your Certificate of Compliance if your organization’s systems have been certified by USAID/Washington’s Office of Acquisition and Assistance (M/OAA). On the template provided for the Certificate of Compliance under Supplementary Reference to the Mandatory Reference

for ADS 303, 30359s1, partner has noted the following issues: 1. All references are made to the regulations that are no longer in existence: OMB Circular A-133, USAID Regulation 8. 2. The reference to OMB Circulars made on the first paragraph is vague, and not applicable. 3. The scope of the certification is general and does not clarify the applicability to USG funding. Does BHA have an updated template to provide reasonable assurance and make the necessary disclosures for this requirement? If not, is there a suggested way forward beyond using the provided template?

- lii is about requesting exemption. Please add language that these are presumptive exceptions and that for safety and security reasons a waiver to the marking requirements can be requested.

BHA Response: BHA refers to Cost Application for the sake of consistency and has revised the APS accordingly. However, applicants are free to use Business or Cost Application depending on their own requirement.

BHA has clarified not to exceed 3 years and not to exceed 5 awards.

Applicants will use the budget guidance in the MY APS. Budgets are broken out by major budget category and year. However, we also do require categorization by sector within each year of implementation.

BHA agrees with this recommendation and has removed: "(3) Certificate of Compliance: Please submit a copy of your Certificate of Compliance if your organization's systems have been certified by USAID/Washington's Office of Acquisition and Assistance (M/OAA)." on page 38 of the APS.

The presumptive exemption language comes from the USAID standard provisions in ADS 303mab. Safety and security is certainly considered in waiver requests, but we will be using the standard provision language in this APS.

19. Questions related to Sustainability

- It would be helpful to have BHA include a definition of/examples of sustainability, along with the links to the evidence supporting the sustainability factors of motivation, capacity, resources and linkages. The paragraph doesn't specify sustainability types (environmental, economic, social etc.) and it seems to focus more on local ownership.

BHA Response: Sustainability is achieved when outcomes and impacts (and sometimes interventions) are maintained or expanded after an activity withdraws its resources through the exit process. BHA does not plan to provide additional definitions of sustainability at this time. BHA may specify additional sustainability requirements in future funding rounds.

20. Questions related to BHA Policies, Frameworks, Strategies, and Programming Principles

- Climate adaptation and disaster risk reduction is stated as a programming principle of the MY APS (section 3.6). How will BHA consider climate impacts when determining the types of resources (e.g., commodities, cash) that will be made available for the program types under each round of funding?
- Disaster Risk Reduction (DRR) is included both as a sector for funding (page 6) and then under programming principles (page 10). Is DRR to be considered both as a sector and a design principle or will it be based on the specific opportunity [of] how DRR is included in the design?
- GESI was included as under the design for people centered approaches (page 7). What other cross-cutting themes need to be considered under the APS?
- Does BHA anticipate the revised Resilience Policy being finalized by the time that rounds are published under this MY APS? If the revised Resilience Policy is finalized by the time that this MY APS is finalized, will Implementing Partners be required to follow the revised policy or the USAID Resilience Strategy that is cited in Section 1.3.2?
- In the past, BHA has included an overall strategic framework for its programs. Does BHA plan to provide such a framework?
- Will BHA continue to favor approaches that rely heavily on market-based systems (e.g., Food-for-Assets, vouchers, and cash-based approaches) or does BHA envision a shift in strategy? If so, is BHA able to elaborate?

BHA Response: Not all funding rounds will designate a preference between types of resource transfers. When a specific preference or requirement is stated, that determination may be a result of a range of factors related to context--potentially including environmental impacts--as well as legislative requirements.

"Climate Adaptation and Disaster Risk Reduction" is a programming principle that underpins all activities solicited under this APS. "Disaster Risk Reduction Policy and Practice" (DRRPP) is a sector eligible for funding for dedicated DRR interventions, which may or may not be explicitly included in any given funding round.

Section 3. "Programming Principles" lists seven principles: Design for People-Centered Approaches; Localization; Prioritization and Focus; Strive for Sustainability; Sequencing, Layering, and Integrating; Climate Adaptation and Disaster Risk Reduction; and Use Evidence and Learning for High Quality and Adaptive Management.

The MY APS is structured to be open-ended. New funding rounds will be determined on a rolling basis until the APS is closed. If new agency level policies are announced, those policies may apply to subsequent rounds of funding.

BHA does not plan to provide an overall strategic framework at this time. This APS does not set forth any changes to BHA's strategic approach to market-based systems.

21. Questions related to Construction

- Please better define this entire section, delimit the funding levels allowable for different types of construction, and please provide some flexibility for small-scale construction activities. Almost always, especially when providing goods and services at the community level, small-scale construction activities are required to protect goods stored at the location (e.g., food commodity storage). These activities often fall under ITSH, but not always, and USAID limitations and unclear language can be a barrier.
- This paragraph describes what USAID policy considers construction, for which the source appears to be ADS 303 mandatory reference, 303maw, that provides a definition for what is NOT included as an improvement, renovation, alteration, and refurbishment. For transparency additional language should be included so applicants can appropriately classify and budget for construction appropriately.
- ADS 303 mandatory reference, 303maw states “waivers are currently granted for the offices and activities listed below. (1) Construction activities carried out under Food for Peace for disaster relief (including that using program income and monetized proceeds); (2) Construction activities carried out by CPS/OTI through Grants Under Contracts (e.g., Support Which Implements Fast Transition contract or SWIFT) to the extent current practice is maintained; 3) Construction activities conducted by BHA; (4) Construction activities carried out by the West Bank/Gaza Mission; and (5) Construction activities conducted by DCHA/ASHA.” For bullets (1) and (2) it would be helpful for applicants if you provided details on what the waivers are so applicants can request them.
- At the top of page 26: “Applicants proposing construction activities do not need to provide explicit implementation plans at the initial application stage. The recipient will be required to submit explicit, site-specific implementation plans post-award before construction will be authorized. Implementation plans will include: (then there is a list of 12 bullets on what to include in the plan)...” In the paragraph at the bottom of page 26, after the bullet list there is this statement. “. . . applicants must provide full documentation of the above construction documentation to BHA and receive concurrence at application submission.” These two statements appear to contradict each other, which will cause confusion. Partner suggests that BHA retain submission of detailed implementation plan for after issuance of award. Revise the paragraph after the bullet list to read that to expedite construction approval include an implementation plan at application submission. Clarify that submission of the detailed plan is not required at submission, and the submission or non-submission will not be used to determine eligibility for award. At the bottom of page 26: “. . . do not need to provide explicit implementation plans at the initial application stage.” Align language so this is clear.

BHA Responses: The APS has been updated to reflect recent revisions to ADS 303maw, the Agency policy governing construction policy. Please note that certain revisions to 303maw provide greater flexibility for BHA programming, however, all activities which meet the Agency definition for construction must be included in the required construction budget.

USAID does not have separate, more detailed guidance on the activities covered by these specific waivers approved in the ADS. Please refer to recent revisions to ADS303maw clarifying

definitions of what qualifies as construction in USAID programming and BHA flexibilities for construction activities. The waivers mentioned are internal USAID waivers for award making and are not waivers to be requested by partners.

Thank you for this comment. The APS has been revised to clarify submission requirements and timeline.

22. Questions related to Emergency Application Guidelines (EAGs)

- Page 4 states that the MY APS is meant to complement—but not replace or change—the EAGs. If there is guidance that is not mentioned in the MY APS, but is listed on the EAG Common Requirements, should we adhere to the EAG Common Requirements?
- Can USAID confirm that the EAGs are still applicable for multi-year programs requiring a 1-2 year timeframe that have similar objectives or purposes to ER4 programs? Does USAID/BHA still intend to update the EAG in FY2024, and is there a timeline for this?

BHA Response: Language in the EAG Common Requirements applies to the MY APS specifically where stated. Sections of the EAGs that are not stated to apply to this APS should not be assumed to apply. If there are questions about which requirements apply, please contact bhaglobalmyaps@usaid.gov.

At this time, BHA is not able to confirm the timeline for a holistic revision to the EAGs, although efforts are underway to review our program cycle processes. The language on page 18 of the Common Requirements in the EAGs still permits submissions for longer programs outside of the MY APS contingent upon discussions with BHA staff:

"While activities will generally be for 12 months or less, BHA may support longer-term activities if they fall within the priorities in Section 3.1, BHA Funding Priorities Under These Guidelines.

BHA supports competition wherever possible and must be able to justify multi-year emergency activities as described under the ADS 303 emergency and disaster programmatic exceptions. Therefore, BHA requires you to consult with BHA staff before submitting a concept paper or application under these Guidelines for an activity of 18 months or more. Acceptable justification will be context specific and dependent on the needs assessment and proposed interventions."

23. Questions related to Selection and Review Criteria

- The MY APS notes the importance of layering, sequencing, integration. To this point, how will current BHA funding impact an organization's likelihood of selection? How will the BHA selection process consider current partners seeking to leverage impact of existing programming?
- When issuing rounds, can USAID please outline Merit Review criteria for each anticipated phase of the application process? For example, if the round will include a Concept Paper, Oral Presentation, and Full Application, can USAID please provide criteria for the Concept Paper, criteria for the Oral Presentation, and criteria for the Full

Application? This will help applicants ensure we provide USAID with responsive application materials.

BHA Response: Funding rounds will be evaluated based on the factors set forth in Merit Review Criteria. Unless otherwise stated, all forms of SLI stated in section 3.5 including "BHA programs and other USAID activities as well as programs funded by government and donors across the Humanitarian Development Peace (HDP) nexus" may be considered.

The merit review criteria for the funding round will be articulated when it is issued. All phases may not be scored independently.

Adjustments to Base Formatting, Language, and References

- On page 21 there is an outline of the Technical Application Format. Then, starting on page 22, there appears to be more detailed outline of this format. However, there is not title given for the section starting on page 22, so it is unclear whether this relates to what is on page 21, or if it is something different. Can BHA please clarify the relationship between what is on page 21 and page 22 (if any)?
- Can BHA please release the APS notification in a format that may be edited for copy/paste purposes in templates?
- Footnote 2 [on page 29] directs the reader to see "Administrator's Action Alliance for Prevention of Sexual Misconduct (AAPSM). Can a link be provided to this?
- The MY APS states under 2. Administrative and National Policy Requirements: "The resulting award from this NOFO..." Can BHA please clarify this reference to NOFO vs APS.
- Reference is made to the ARR (Annual Results Report). However, currently reports of this type are referred to as Annual Reports or AR. Please clarify this reference.
- General: A word search revealed that the word "participant" has been used four times, and the word "beneficiary" or "beneficiaries" has been used 19 times. In the past, BHA has referred to those reached through RFSA activities as participants. Will those reached by MY APS awards be known as participants or beneficiaries, or some combination of both?
- General: The MY APS does not include a list of acronyms or definitions as previously provided in BHA RFSA RFAs and NOFOs. Does BHA plan to include a list of acronyms and definitions for the MY APS? These have been very helpful in the past.
- [page 16] This is the first time UEI and SAM are used. Please define or add a glossary/acronym list at start of document.
- This [page 16] repeats verbatim most of what was stated on page 15, Section 1, paragraphs 5-6. Suggest deleting from one section or the other.
- "Commodities" implies "food commodities" when related to USAID funding, which is often not the intent. The term should be revised throughout the document. Please consider revising all references to commodities to include the type(s) of "commodities" (e.g., food commodities, health commodities, agricultural commodities) and when used generically please use the term "goods and services, products, etc."

- Partner recommends to replace “Period of the program” and “entire implementation period of the project” with “period of performance” in B1, B3 and page 37 section 7.
- Partner recommends replacing “. . . commodity management” with “. . . supply chain management.”
- Page 60 [Standard Provisions]: Please move this entire section to the front of the document.

BHA Response: Page 21 provides a brief summary of requirements, such as the Cover Page, Executive Summary, Activity Design, and Management Structure and Institutional Capacity. The following section starting on page 22 provides additional details on what to include in each of those sections.

Applicants may copy/paste the template and edit their own copy in the version titled "Base MY APS Final Draft (printable version)" uploaded on June 28 to grants.gov.

The link to the AAPSM has been added.

References on page 51 have been revised to “APS.”

BHA will use participants in all cases except where cited in official resources or where it is quoted from other sources.

Acronyms are identified on first use. First references to UEI and SAM are revised to define on first use.

Section 1, paragraphs 5-6. has been revised to reduce duplication on pg. 16.

To the extent possible, BHA has tried to be purposeful in specifying food commodities where the requirements only pertain to food. Where BHA refers to commodities in this APS, this generally signals that ADS 312 "Eligibility of Commodities", 22 CFR 228 "Rules for Procurement of Commodities and Services Financed by USAID", or other similar policies and regulations may apply.

BHA has revised contradictory language in Section B.1, B.3 and section 7 on to now read ‘period of performance’.

Commodity management has been changed to supply chain management.

BHA will not be making a change to page 60 [Standard Provisions] at this time.