

Global Health eLearning Center

Bureau for Global Health Environmental Management Process Training

Session 1: Global Health Environmental Management Process Training



Global Health Environmental Management Process Introduction

Introduction from Jennifer Adams, Former Senior Deputy Assistant Administrator for United States Agency for International Development (USAID) Bureau for Global Health (GH).

Jennifer Adams Introduces the Global Health Initial Environment...



Course Learning Objectives

Upon completion of this course, participants will be able to do the following:

- Identify applicable legal and policy guidelines governing the GH environmental compliance program
- Explain the importance of following the Initial Environmental Examination (IEE) process
- Describe the GH IEE process
- Understand the roles and responsibilities involved in the IEE process
- Explain the relationship between environmental screening and Threshold Decisions
- Describe how environmental monitoring and oversight should be performed
- Identify where IEE documentation should be stored

Glossary Term:

Threshold Decision

Initial Environmental Examination (IEE) Process


Overview of Legal and Policy Requirements

GH Program Managers, Agreement Officer's Representatives/Contracting Officer's Representatives (AORs/CORs), Activity Managers (AMs), and other stakeholders are committed to improving global health through the quality, availability, and implementation of health services around the world. However, our programs cannot reach their potential if we do not consider the impacts (intended or unintended) of our activities on the environment.

Per the Agency's policy directives and environmental procedures:

“Environmental sustainability is integral to USAID's overall goal, and therefore must be mainstreamed into all activities to achieve optimal results, to avoid inadvertent harm to the people we are trying to help, and to prevent wasting taxpayer dollars.” (Automated Directives System (ADS) Chapter 204.1).

USAID ADS

The ADS consists of over 200 chapters and contains the organization and functions of USAID, along with the policies and procedures that guide the Agency's programs and operations. The information is continuously updated to align USAID's policies with the latest Federal regulations, Administrator policy statements, and other overarching guidance. Recent updates to ADS chapters are indicated with yellow highlights on the respective documents. [More information on the ADS is available here](#) .

Overview of Legal and Policy Requirements (Cont'd)

There are three main resources that establish the legal and policy requirements for the GH IEE process. Each document should be considered before beginning project planning and referred to for guidance throughout the IEE process.

In the event of a conflict between these documents, follow the order of precedence below:

1. Code of Federal Regulations Title 22 Part 216 (22 CFR 216)
2. ADS 204
3. GH Bureau Operating Procedure (BOP) for the IEE process

Document	Description
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22 CFR 216 ↗	<p>This U.S. federal regulation defines USAID’s environmental compliance procedures, which are used to ensure that environmental factors and values are integrated into the USAID decision-making process. 22 CFR 216 describes the process and assigns responsibility for assessing the environmental effects of USAID’s actions and is intended to implement the requirements of the National Environmental Policy Act (NEPA) as it affects the USAID program.</p>
ADS 204 ↗	<p>This chapter establishes USAID's mandatory operational policies and core environmental compliance requirements. It defines what USAID and its operating units must do to integrate environmental issues into its programs, both to meet U.S. Government (USG) legal environmental obligations and to optimize economic and social development results.</p>
GH BOP for the IEE Process	<p>The BOP provides GH staff and other GH project stakeholders with the Bureau's process for planning and implementing health programs consistent with the Agency's environmental legal requirements. The BOP describes roles, responsibilities, and procedures for coordination among GH staff and others throughout the IEE process.</p>

Session 2: Roles and Responsibilities



Roles and Responsibilities Overview

By the end of this session, you will understand the key roles and responsibilities in the Bureau for Global Health (GH) Initial Environmental Examination (IEE) process. We will discuss the following:

- Agreement Officer's Representatives/Contracting Officer's Representatives (AORs/CORs)
- Activity Managers (AMs)
- GH Bureau Environmental Officer (BEO)
- Implementing Partners (IPs)
- Mission Environmental Officers (MEOs)
- GH Office Directors
- Project Design Teams

Glossary Term:

Agreement Officer's Representatives/Contracting Officer's Representatives

AORs/CORs are the linchpin of the environmental compliance process. They are responsible for ensuring that environmental safeguards are identified and implemented for their mechanisms. AORs/CORs regularly interface with the GH BEO, AMs, and IPs regarding environmental requirements.

AORs/CORs:

- Ensure that environmental compliance documentation is current and covers all activities
- Maintain required documentation on file
- Review IEE documents and recommend for approval
- Review and approve Environmental Mitigation and Monitoring Plans (EMMPs) and ensure that they are reflected in workplans
- Monitor IP performance to ensure partner/contractor compliance with IEE conditions and other environmental requirements
- Ensure annual environmental screenings are conducted

For a more detailed description of AOR/COR responsibilities, review the information at [Automated Directives System \(ADS\) Chapter 204.3.4](#) [↗](#).

Glossary Term:

Mechanism

Environmental Mitigation and Monitoring Plan (EMMP)

Initial Environment Examination (IEE) Document

Activity Managers

AORs/CORs delegate many day-to-day responsibilities for program activities to Activity Managers (AMs). AMs are typically more closely connected with activities in the field. It is important that AMs keep their AORs/CORs informed about environmental issues and the actions they take.

AMs, in consultation with the AOR/COR:

- Help design, monitor and implement programs, projects and activities
- Perform day-to-day management of specific, program activities
- Ensure that environmental impacts are considered and requirements are implemented for their projects

Global Health Bureau Environmental Officer

The Global Health Bureau Environmental Officer (GH BEO) is the senior environmental officer for GH.

The GH BEO:

- Oversees and monitors Code of Federal Regulations Title 22 Part 216 (22 CFR 216) compliance across all Bureau-managed Acquisition & Assistance mechanisms
- Approves and/or concurs on 22 CFR 216 documents
- Ensures that GH staff are aware of and trained in environmental procedures and standards
- Provides technical guidance and support to GH program office representatives and AORs/CORs

Regional Bureaus

Regional BEOs have lead responsibility for review and approval of Mission-generated IEE documents. GH assists Missions with required environmental compliance documents when accessing GH contract mechanisms.

Implementing Partners

Implementing Partners (IPs) are the executing agencies or the implementing entities that carry out programs with U.S. Government (USG) funding through a legally-binding award or agreement.

According to [ADS 200.6](#), IPs may include the following:

- [Host country](#) governments
- Private Voluntary Organizations
- Indigenous and international nongovernmental organizations (NGOs), universities, other USG agencies, the United Nations (UN), and other multilateral organizations
- Professional and business associations
- Private businesses and individuals

IPs are responsible for the environmental monitoring of their activities and reporting the results to AORs/CORs, as specified in contract or grant provisions. This includes preparing and submitting EMMPs and [Environmental Mitigation and Monitoring Reports \(EMMRs\)](#) to AORs/CORs.

Glossary Term:

[Host Country](#)

[Environmental Mitigation and Monitoring Report \(EMMR\)](#)

Private Voluntary Organizations

Private Voluntary Organizations are tax-exempt nonprofits that leverage their expertise and private funding to address development challenges abroad. They are a subset of the wider NGO community and must register with United States Agency for International Development (USAID) to compete for grants and other types of funding.

Mission Environmental Officers

Mission Environmental Officers (MEOs) assist and advise AMs and AORs/CORs in preparing 22 CFR 216 documents on new activities and monitoring environmental compliance for ongoing activities.

More specifically, MEOs:

- Advise the Mission Management Unit in reviewing and approving Mission-level EMMPs that are submitted to the GH AOR/COR for projects conducted under Mission 'buy-in' to GH mechanisms
- Contribute to the development and/or review of EMMPs, IEEs, and site visits
- Assist the Mission Management Unit in reviewing the EMMP and monitoring project activities for compliance with environmental requirements

Mission Buy-Ins

More details on 'Mission buy-in' available in Session 3.

Global Health Office Directors

GH Office Directors are the senior office-level officials responsible for clearing IEE documents. They also manage budgeting and strategic planning for their technical offices to ensure compliance and effectiveness of projects and activities.

GH Office Directors:

- Oversee their offices and manage budget and strategic planning
- Oversee quality control on project design and implementation
- Monitor project effectiveness
- Ensure that their Management Units follow USAID policies and procedures

Project Design Teams

Project Design Teams, including program technical leads, perform planning and project design activities within their programs. During the IEE process, their responsibilities are to:

- Propose projects/activities
- Screen activities for environmental impacts
- Propose Threshold Decisions
- Ensure that environmental requirements are identified and documented before funds are obligated
- Develop, obtain approval for, and distribute IEE documentation

Glossary Term:

Threshold Decision

Environmental Impact

Special Considerations: Host Country Coordination



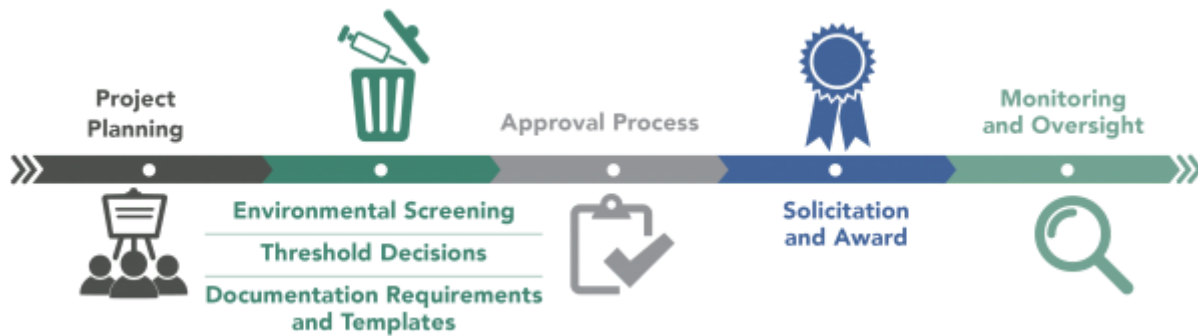
Once the location(s) of project activities is/are established, the AOR/COR, or designee, may be required to consult with relevant host country agencies when project activities have environmental discharges to air, water, and/or soil. Host country agencies may recommend additional IEE conditions, permit requirements, or instructions related to the project.

The AOR/COR consults with the GH BEO regarding the IEE requirements to fulfill host country consultation requirements. The AOR/COR documents host country consultation(s) and any host country agency instructions in the IEE appendices.

Session 3: Global Health Initial Environmental Examination Process



Overview of the Global Health Initial Environmental Examination Process



Now that we know who is involved, let's look at the process for conducting an Initial Environmental Examination (IEE). The following sessions focus on the steps involved during the Bureau for Global Health (GH) IEE process. The image above depicts each step of this process, from project planning to monitoring and oversight.

By the end of the following sessions, you will be able to:

- Describe the basic approach for environmental impact screening
- Recognize the Threshold Decisions resulting from the GH IEE process
- Describe the contents of the documents that result from the GH IEE process
- Explain how to obtain the necessary approvals for those documents
- Identify the documents involved in the solicitation and award process
- Explain how to conduct effective monitoring and oversight of program activities to ensure environmental compliance

Glossary Term:

Threshold Decision

Initial Environmental Examination (IEE) Process

Environmental Impact

Project Planning



Project Planning Overview



Goal: To help the Project Design Team define the project activities, goals, and objectives as part of the design process.

Description: Detailed project planning is critical to the successful design of a project. During planning, Project Design Teams are formed and propose projects and activities to support program objectives. The proposed activities at this stage of the design process are used as the basis for environmental screening (next step of the process). If the Project Design Team is unable to define project activities at this early stage of the planning process, they should identify categories of project activities with illustrative examples to support the environmental screening and Threshold Decision. The Project Appraisal Document (PAD) contains a summary of the project, description of project activities, project goals and objectives. The completed and approved IEE document, which describes the results of the environmental screening and Threshold Decision, will be included with the PAD.

GH Guidance for the PAD is located [here](#).

Roles Typically Involved: Project Design Team

Documentation Typically Involved: PAD

Glossary Term:

Project Appraisal Document (PAD)

Is the Agreement Officer's Representative/Contracting Officer's Representative (AOR/COR) identified yet?

At this step in the process, the AOR/COR may not be identified. Often the AOR/COR is on the Project Design Team but has not been appointed yet.

Special Considerations: Project Planning

In certain situations where GH participates in partnerships with other organizations, GH's role, level of participation, and the nature of the agreement determine how the requirements of 22 CFR 216 and ADS 204 are implemented. These considerations impact multiple parts of the process. Two examples are provided below: Public International Organizations (PIOs) and Mission buy-ins to GH mechanisms.

PUBLIC INTERNATIONAL ORGANIZATIONS (PIOS)

ADS 308 outlines United States Agency for International Development (USAID) policy regarding the award of cost-type grants to PIOs with their own environmental policies. For activities that are not exempt or categorically excluded from environmental analysis under 22 CFR 216, USAID strives to rely upon the PIO's application of its own environmental policies to the activity proposed and include appropriate language in the PIO agreement (ADS 308.3.11(c)). A list of PIOs designated by USAID can be found [here](#) [↗](#).

GH AORs, in consultation with the GH Bureau Environmental Officer (BEO), may defer to the PIO's environmental policies if the PIO's environmental procedures and processes are reasonable to result in adequate environmental safeguards. However, PIO environmental processes are often high-level and sometimes lack project-level environmental procedures and reporting requirements needed to ensure that environmental impacts are adequately identified and mitigated.

GH AORs and the GH BEO may choose to strengthen PIO environmental processes or use the USAID environmental compliance process and reporting documents, if the PIO's environmental procedures and processes will not reasonably result in adequate environmental safeguards.

MISSION BUY-INS

Missions may acquire services from GH mechanisms. When a Mission “buys in to” a GH mechanism, the Mission typically prepares the IEE document, which is then cleared through the Regional BEO. GH may provide a courtesy review and clearance, if requested. Regional Bureaus may have additional procedures in place related to the process.

Mission requirements should provide for the preparation of an Environmental Mitigation and Monitoring Plan (EMMP). The Mission reviews and clears the EMMP prior to submitting it to the GH AOR/COR, if the AOR/COR resides in GH. The GH AOR/COR approves the EMMP and obtains concurrence from the GH BEO.

Glossary Term:

Initial Environment Examination (IEE) Document

Public International Organization (PIO)

Mechanism

Environmental Mitigation and Monitoring Plan (EMMP)

Tip: Use the Program-Level IEE

Mission Project Design Teams should obtain a copy of the GH program-level IEE from the GH AOR/COR or the USAID Environmental Compliance Database [↗](#) (ECD) to ensure that they review and consider the results of program-level environmental reviews, requirements, and standard conditions when evaluating project activities and preparing IEE documentation.

CASE STUDY - Introduction

Throughout the remainder of this course, we will use a case study to guide you through the Initial Environmental Examination (IEE) process. At the end of each step, you will review a section of the case study that corresponds to that lesson. Several of the case study pages contain a question that asks you to apply the knowledge that you have gained for that step of the process.

The next page contains a general description with background and the scope of the case study project.



Glossary Term:

Initial Environmental Examination (IEE) Process

CASE STUDY - Project Description

Disease X is believed to be one of the most communicable diseases known, with an infection rate of more than 25% of those exposed. It causes at least one million deaths yearly, the majority of which occur in sub-Saharan Africa. More than half of the world's population is at risk of contracting Disease X, but young children, pregnant women, and the elderly have the highest risk of infection and mortality.

Risk factors contributing to the spread of Disease X include: poverty, climate, poor-quality health facilities, improper diagnosis, and drug resistance. As a member of the Bureau for Global Health (GH) Project Design Team, you have been working diligently to define and plan for the new Disease X Initiative (DXI). The purpose of DXI is to provide training, health promotion, and community mobilization related to Disease X and other infectious diseases in the affected countries. The partnership will promote early diagnosis of Disease X, proper quarantine procedures, and effective treatment and prevention strategies. In particular, the partnership will do the following:



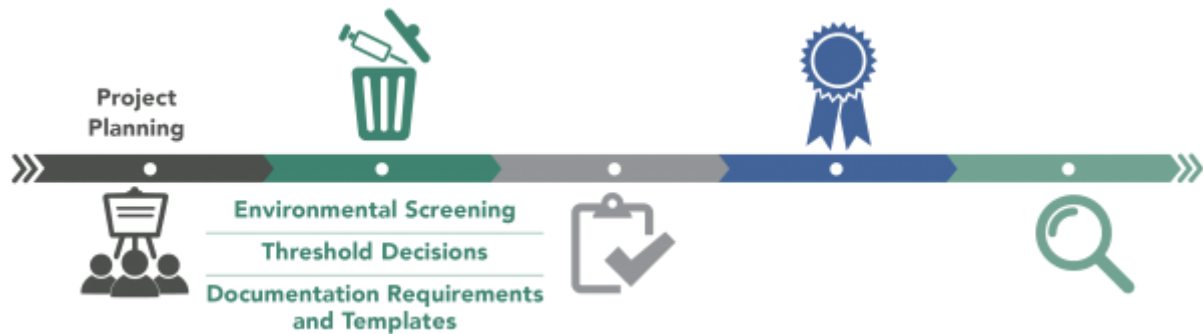
- Create and distribute training and informational materials
- Conduct trainings and community outreach on best practices related to prevention, early screening, proper diagnosis
- Demonstrate the proper administration of treatment and vaccination options

DXI activities will focus on countries with the highest Disease X mortality: Ghana, Liberia, Madagascar, and Tanzania.

Session 4: Environmental Screening



Environmental Screening, Threshold Decisions, and Documentation Overview



The next stage of the Initial Environmental Examination (IEE) process consists of three steps:

1. **Environmental Screening:** Identifying and evaluating the environmental impacts of proposed project activities
2. **Threshold Decisions:** The outcome of environmental screening, used to recommend an environmental determination for the project
3. **Documentation:** Ensuring that process documentation is complete and accurate is vital to gaining the necessary approvals for a program, project, or activity

Glossary Term:

Threshold Decision

Initial Environmental Examination (IEE) Process

Initial Environment Examination (IEE) Document

Environmental Impact

Negative Determination

Initial Environmental Examination (IEE)

The term **IEE** is used in two ways:

IEE process: The entire process that a project goes through to ensure project activities are evaluated for environmental impacts, applicable environmental requirements, and compliance with 22 CFR 216.

IEE document: This is the document that must be completed if the result of a Threshold Decision is a Negative Determination (further defined in the next session).

Environmental Screening Overview



Goal: To identify and evaluate the potential environmental impacts of project activities.

Description: Project Design Teams screen project activities (or categories of activities) to identify potential environmental impacts and evaluate whether those impacts have a significant effect on the environment. Project Design Teams document the activities identified in the planning phase using the Environmental Screening Form (ESF).

Once project activities are identified, Project Design Teams use the Global Health (GH) Environmental Screening Tool to assist with evaluating the environmental impacts of those activities. The tool describes the environmental impacts associated with GH activities and provides examples of mitigation measures and monitoring indicators that can be used to minimize or eliminate environmental impacts. The evaluation is a key component of the IEE development process and assists Project Design Teams in recommending a Threshold Decision for each of their project activities. Threshold Decisions are described further in the next session of the training.

Roles Typically Involved: Project Design Team

Documentation Typically Involved:

- [IEE](#)
- [ESF](#)
- [Environmental Mitigation and Monitoring Plan \(EMMP\)](#)
- [Environmental Mitigation and Monitoring Report \(EMMR\)](#)

Glossary Term:

Significant Effect

Environmental Impact

Environmental Screening Form (ESF)

Environmental Mitigation and Monitoring Plan (EMMP)

Environmental Mitigation and Monitoring Report (EMMR)

GH Environmental Screening Tool Access for Implementing Partners

Implementing Partners (IPs) may access the [GH Environmental Screening Tool](#) but must first request access. Please email ghcompliancesupport@usaid.gov to request access.

USAID Sector Environmental Guidelines (SEGs)

The SEGs are another resource available to Project Design Teams. They provide information essential to assessing the potential impacts of activities and to the identification and detailed design of appropriate mitigation and monitoring measures. The SEGs are available [here](#) .

Examples of Global Health Activities with Environmental Impacts



GH projects include diverse activities with the potential to impact the environment. The following table describes typical GH activities and examples of potential environmental impacts. This is not a comprehensive list and is provided for illustrative purposes.

Activity	Examples of Potential Environmental Impacts
Education, Technical Assistance, and Training	Impacts to air, land, surface water, or ground water from disposal of solid waste generated during training sessions or technical assistance
Research and Development	Impacts to air, land, surface water, or ground water from disposal of hazardous laboratory wastes generated during research activities
Public Health Commodities Transportation, Storage, and Distribution	Impacts to air, land, surface water, or ground water from disposal of expired or damaged healthcare commodities
Small Scale Construction or Rehabilitation	Impacts to soil, surface water, and ecosystems resulting from project siting, runoff and erosion; landfill impacts related to disposal of construction debris waste
Small Scale Water and Sanitation	Water quality impacts related to project siting and maintenance of water systems
Nutrition Services	Impacts to air, land, surface water, or ground water from disposal of damaged or expired fortified food commodities
Vector Control (includes distribution of insecticide-treated nets (ITNs), use of larvicides, and fumigation)	Impacts to land, surface water, and ecosystems from pesticide exposure resulting from potential misuse or inappropriate repurposing of ITNs (e.g., fishing)

Emergency Response	Impacts to air, land, surface water, ground water, and ecosystems resulting from siting of emergency medical clinics during disaster response or large-scale disposal of expired or damaged healthcare commodities
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Session 5: Threshold Decisions



Threshold Decisions Overview



Goal: To determine the recommended environmental Threshold Decision for the entire project.

Description: The Project Design Team recommends a Threshold Decision based on the evaluation of environmental impacts identified during environmental screening, as described in the previous step. Anticipated environmental impacts can range from no foreseen impact to significant effect on the environment. While a project may have various activities with different Threshold Decision results, there will ultimately be one overall Threshold Decision for the entire project. The Bureau for Global Health (GH) Bureau Environmental Officer (BEO) is available to provide support to the Project Design Team when deciding on a recommendation for the overall Threshold Decision.

Roles Typically Involved:

- Project Design Team
- BEO

Glossary Term:

Threshold Decision Categories Overview

A Threshold Decision should be recommended for each activity planned for a project. The overall Threshold Decision for the project is based on the project activity that has **the most severe environmental impact**.

The Threshold Decision recommended by the Project Design Team during this step influences the remaining steps in the Initial Environmental Examination (IEE) process and determines which environmental compliance documents are required.

Glossary Term:

Initial Environmental Examination (IEE) Process

Negative Determination

Did you Know?

The most common Threshold Decision in GH is a Negative Determination.

Threshold Decision Categories

The following table describes each possible Threshold Decision and provides illustrative examples of GH activities that would typically result in each Threshold Decision.

Threshold Decisions and Sample GH Activities

Threshold Decision	Description	Illustrative Activities
<u>Categorical Exclusion (CE)</u>	Project activities have no or negligible effects on the environment, or USAID has no knowledge or control over the activities, or for carefully controlled research activities with limited scope.	<ul style="list-style-type: none">• Workshops (that do not generate healthcare or other potentially hazardous waste)• Staff support• Classroom training (no travel)
<u>Negative Determination</u>	Project activities do not have significant effect on the environment. However, activities require the development and implementation of mitigation measures to reduce or eliminate environmental impacts.	<ul style="list-style-type: none">• Public health commodities procurement, transportation, storage, and/or distribution• Healthcare waste management• Disposal of insecticide-treated nets (ITNs)• Small-scale construction or rehabilitation• Small-scale water system management
<u>Positive Determination</u>	Project activities have a significant effect on the environment. For projects with a Positive Determination, a more detailed environmental evaluation is required to address environmental and social impacts.	<ul style="list-style-type: none">• Large-scale incineration• Spray application of pesticides• Large-scale construction or rehabilitation

Glossary Term:

Significant Effect

Categorical Exclusion (CE)

Negative Determination

Positive Determination

Special Considerations: Threshold Decisions



Pesticides

Projects involving pesticide products procurement, application, or waste management are generally considered to have a potential significant effect on the environment, which results in a Positive Determination Threshold Decision. Positive Determinations require more substantial analyses, studies, and reporting requirements.

However, certain pesticide-related activities may qualify for a Negative Determination Threshold Decision if they involve the procurement or distribution of insecticide-treated nets (ITNs) or larvicidal agents. In these cases, an [IEE document](#) may be used for projects involving ITNs and larvicidal agents with specific conditions that are described in the

[GH Environmental Screening Tool section for Vector Control](#) [↗](#) (link available to United States Agency for International Development (USAID) staff or registered users only).

Remember: No Categorical Exclusions are possible when activities involve pesticides, according to [Code of Federal Regulations Title 22 Part 216 \(22 CFR 216.2\(e\)\)](#) [↗](#). Refer to the Pesticide Procedures in [22 CFR 216.3\(b\)](#) [↗](#) for additional information and contact the GH BEO for further assistance.



Exemptions

Project activities involving disaster assistance, sensitive foreign policy issues, or addressing emergencies may be considered for an Exemption from additional environmental screening. A “formal written determination, including a statement of the justification” is required for each project, program, or activity for which an exemption is made (22 CFR 216.2(b)(2)).

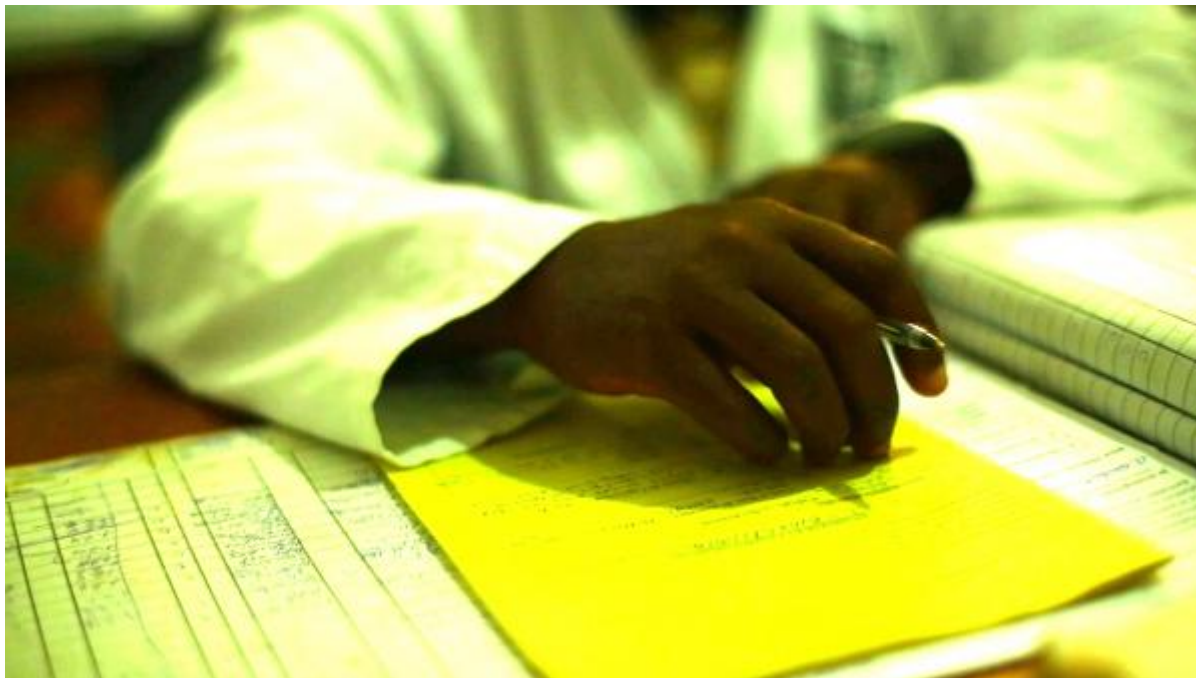
To qualify for an environmental exemption, the proposed activity must meet the conditions outlined in [Automated Directives System Chapter 204 \(ADS 204.3.10\(c\)\)](#) [↗](#). Exemptions are very rare, so they should be discussed with the GH BEO and require senior GH leadership

involvement, including support of the GH Assistant Administrator.

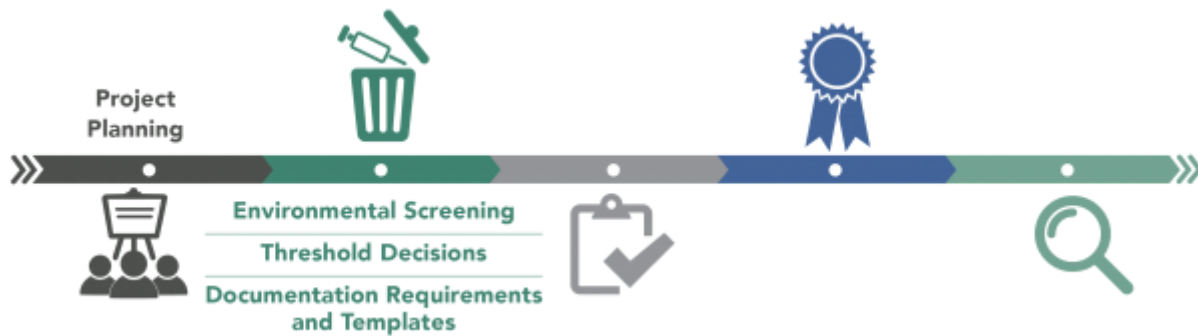
Glossary Term:

[Initial Environment Examination \(IEE\) Document](#)

Session 6: Documentation Requirements



Documentation Requirements Overview



Goal: Complete the appropriate documentation based on the results of the environmental screening and Threshold Decision.

Description: Once a Threshold Decision for the project has been made, the appropriate documentation must be completed and approved in order to proceed with the project. The next page describes the documentation requirements for each Threshold Decision.

Roles Typically Involved:

- Project Design Team
- Agreement Officer's Representative/Contracting Officer's Representative (AOR/COR)
- Activity Manager (AM)

Documentation Typically Involved:

- Request for [Categorical Exclusion \(RCE\)](#) [↗](#)
- Initial Environmental Examination (IEE) [↗](#)
- Environmental Assessment (EA) [↗](#)
- Environmental Screening Form (ESF)
- Environmental Mitigaion and Monitoring Plan (EMMP) [↗](#)
- Environmental Mitigation and Monitoring Report (EMMR) [↗](#)

Glossary Term:

Initial Environment Examination (IEE) Document

Environmental Screening Form (ESF)

Environmental Mitigation and Monitoring Plan (EMMP)

Environmental Mitigation and Monitoring Report (EMMR)

Threshold Decision

Required Initial Environmental Examination Process Documentation



The image above shows the required documents for each possible Threshold Decision in the IEE process. You can see descriptions of each type of document below:

- **RCE Template:** Categorical Exclusion (CE) from additional environmental review may be approved when project activities have negligible or no impacts on the environment. The RCE template for documenting a CE justification is available here [↗](#). RCE documents are typically 4-7 pages long.

- **IEE Template:** Negative Determinations are the most common Threshold Decisions in the Bureau for Global Health (GH). The IEE document template is available here [↗](#). IEE documents are typically 15-45 pages long.
- **EA:** Positive Determinations result from the IEE process when project activities may have a significant effect on the environment. An IEE document is not sufficient to fully describe the environmental analysis for this Threshold Decision. A scoping study is sometimes prepared to determine the need for an EA document. The Scoping Statement and EA templates are available here [↗](#). For additional assistance regarding Positive Determinations and their documentation requirements, contact the GH BEO.

The following pages further describe the RCE and IEE documents.

Glossary Term:

Initial Environmental Examination (IEE) Process

Positive Determination

Categorical Exclusion (CE)

Negative Determination

Initial Environment Examination (IEE) Document

Significant Effect

Mixed Determinations

When the recommended Threshold Decision for a project is a Negative Determination, there may be activities that can be categorically excluded. In that case, an IEE document is prepared that discusses activities with a Negative Determination and lists activities that are categorically excluded with a corresponding citation and justification from Code of Federal Regulations Title 22 Part 216 (22 CFR 216).

Positive Determinations

When a Threshold Decision results in a Positive Determination, an EA may be required. Positive Determinations are not common in GH, so this course will not cover the requirements for EAs. Examples of GH activities that could result in Positive Determination include:

- Large-scale incineration projects
- Pesticide application
- Large-scale construction activities

Refer to 22 CFR 216 [↗](#) for more information and contact the GH BEO for additional assistance.

Categorical Exclusions

Remember, a CE can be issued for a project activity that has negligible or no effect on the environment. According to 22 CFR 216, activities fitting in a set of 15 specific categories generally qualify as CEs, including the following:

- Education, technical assistance, or training programs
- Document or information transfers
- Analyses, studies, and academic or research workshops and meetings
- Nutrition, health, and family planning activities

See the full list of activities that generally qualify for a CE in 22 CFR 216.2(c)(2) [↗](#).

What documentation is required for project activities that qualify for a CE?

Document your request for a CE using the RCE Template. The RCE template can be found here [↗](#).

You will also use the ESF to document annual screenings and demonstrate that project activities remain within the project scope covered by the CE. [The ESF template can be found here.](#)

Did You Know?

A CE is not possible when an activity involves pesticides.

Initial Environmental Examination Document Format

Knowing Negative Determinations are a common outcome of environmental screening in GH, we are going to focus on the documentation, approvals, and monitoring requirement for that Threshold Decision. The document required for a Negative Determination is the IEE document.

Project Design Teams develop the IEE document to describe their activities, document the results of the environmental examination and Threshold Decision, and discuss environmental mitigations that should be implemented to control [environmental impacts](#). The IEE document must be detailed enough so that the Implementing Partner (IP) can create the [Environmental Mitigation and Monitoring Plan \(EMMP\)](#).

The IEE template can be found [here](#) .

Glossary Term:

[Environmental Impact](#)

[Environmental Mitigation and Monitoring Plan \(EMMP\)](#)

IEE sections include the following:

- 1.0 Project/Activity Description
- 2.0 Baseline Environmental Information
- 3.0 Analysis of Potential Environmental Risk
- 4.0 Environmental Determinations
- 5.0 Conditions and Mitigation Measures
- 6.0 Limitations of this Initial Environmental Examination
- 7.0 Revisions

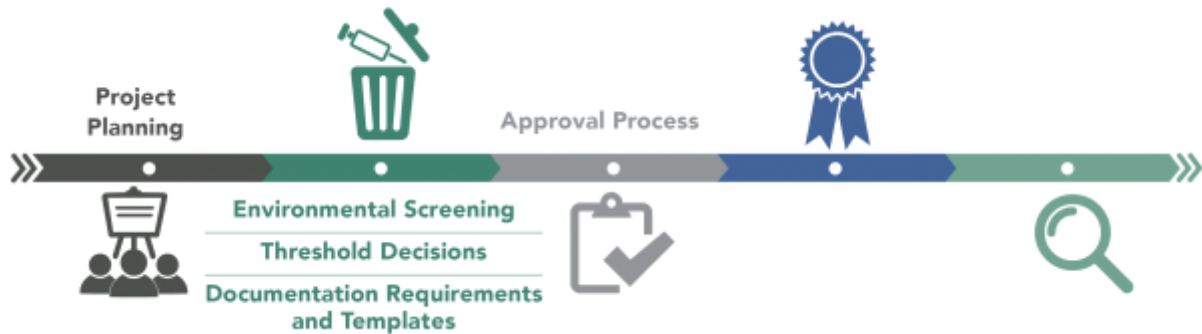
Tip: Reference Frequently Asked Questions (FAQs) for GH Environmental Documentation

The Project Design Team should review the [FAQs for GH Environmental Documentation](#) for further resources on starting the environmental documentation process. This document is a great reference for additional tips, tools, and explanations of environmental documentation.

Session 7: Approval Process



Approval Process Overview



Goal: To obtain clearance and approval for the required Initial Environmental Examination (IEE) process documentation.

Description: The Bureau for Global Health (GH) Project Design Team preparing the IEE initiates the process for document clearance. The Project Design Team lead, or designee, is responsible for obtaining clearances from relevant stakeholders. The following page further describes the approval process.

Roles Typically Involved:

- Project Design Team lead
- Agreement Officer's Representative/Contracting Officer's Representative (AOR/COR) (if designated)
- GH Bureau Environmental Officer (BEO)

Documentation Typically Involved:

- Request for Categorical Exclusion (RCE) [↗](#)
- IEE [↗](#)
- Environmental Assessment (EA) [↗](#)
- Environmental Mitigation and Monitoring Plan (EMMP) [↗](#)

Glossary Term:

Initial Environment Examination (IEE) Document

Initial Environmental Examination Document Approval



The approval process is the same for both IEE and RCE documents. The graphic above depicts the high-level approval process, which is further described below.

Step 1: GH Project Design Team initiates the process for document clearance

Step 2: AOR/COR and GH Office Director recommend the IEE document for approval

Step 3: GH BEO concurs on the IEE document

Step 4: AOR/COR, or designee:

- Scans and distributes a copy of cleared IEE document to GH BEO and others on the distribution list
- Uploads IEE to the United States Agency for International Development (USAID) Environmental Compliance Database (ECD) by emailing the documents to:
environmentalcompliancesupport@USAID.gov
- Sends approved IEE to GH Office of Policy, Programs, and Planning (P3) Project Appraisal Document (PAD) Coordinator to complete the PAD process

Step 5: GH Project Design Team distributes the approved IEE document to the Implementing Partner (IP)

Step 6: AOR/COR ensures environmental compliance requirements are discussed during project kick-off and may invite BEO to attend

Glossary Term:

Project Appraisal Document (PAD)

Initial Environment Examination (IEE) Document

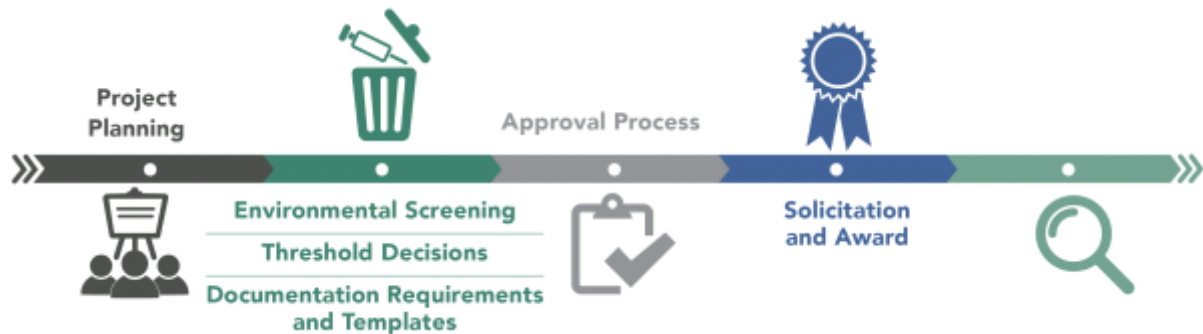
Additional Considerations

The Program Office Director or AOR/COR may consider specialized issues that require additional review and clearance of the IEE document, including the Office of the General Counsel and Regional BEOs. The GH BEO may also recommend additional clearances, prior to concurring.

Session 8: Solicitation and Award



Solicitation and Award Overview



Goal: To ensure that environmental compliance requirements are communicated to offerors during solicitations and included in contracts and agreements upon award to Implementing Partners (IPs).

Description: Initial Environmental Examination (IEE) document requirements are converted into official contractual language used for solicitations and when awarding the project to an IP. The Agreement Officer's Representative/Contracting Officer's Representative (AOR/COR) or designee works with the Agreement Officer/Contracting Officer (AO/CO) to ensure that appropriate requirements are included. In addition, the AOR/COR ensures that an overview of the environmental requirements for the project is provided to the IP during the project kickoff activities. The Bureau for Global Health (GH) Bureau Environmental Officer (BEO) is available to brief the IP, if requested.

Roles Typically Involved:

- Office of Acquisition and Assistance (OAA)
- AO/CO
- AOR/COR
- GH BEO

Documentation Typically Involved:

- [Request for Categorical Exclusion \(RCE\)](#) [↗](#)
- [IEE](#) [↗](#)

- [Environmental Assessment \(EA\)](#) ↗
- Solicitation and award documents (see next page)

Glossary Term:

[Initial Environment Examination \(IEE\) Document](#)

Solicitation and Award: Additional Resources

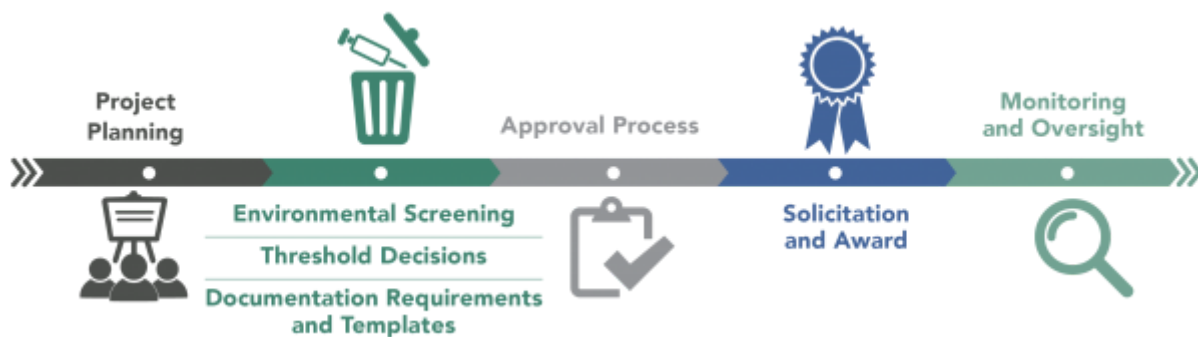
The following documents outline the solicitation and award process:

- [Automated Directives System \(ADS\) 300](#) ↗: This document contains the procedures and requirements for Acquisitions and Assistance planning.
- [Environmental Compliance: Language for Use in Solicitations and Award, An Additional Help for ADS 204](#) ↗: The ADS 204 supplement provides recommended environmental compliance language when preparing solicitations and awards.

Session 9: Monitoring and Oversight



Monitoring and Oversight Overview





Goal: To effectively monitor implementation of environmental requirements and mitigation measures, based on the results of the [Initial Environmental Examination \(IEE\) process](#).

Description: Implementing Partners (IPs) are responsible for monitoring the implementation and effectiveness of environmental mitigation measures applicable to their activities. IPs develop an [Environmental Mitigation and Monitoring Plan \(EMMP\)](#) and report on the effectiveness of implementation using the [Environmental Mitigation and Monitoring Report \(EMMR\)](#).

Roles Typically Involved:

- Agreement Officer's Representatives/Contracting Officer's Representatives (AORs/CORs)
- IPs
- Bureau for Global Health (GH) Bureau Environmental Officer (BEO)
- Activity Managers (AMs), Mission Environmental Officers (MEOs), and Other Mission Support Staff

Documentation Typically Involved:

- [EMMP](#) 
- [EMMR](#) 

Glossary Term:

[Environmental Mitigation and Monitoring Plan \(EMMP\)](#)

[Environmental Mitigation and Monitoring Report \(EMMR\)](#)

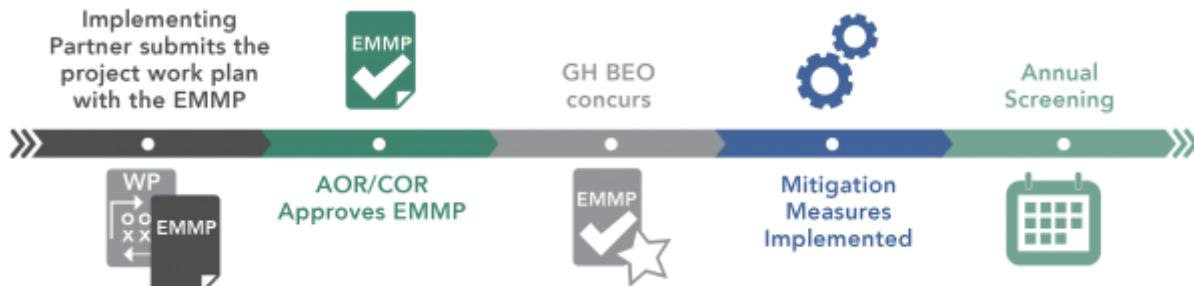
[Initial Environmental Examination \(IEE\) Process](#)

[Public International Organization \(PIO\)](#)

Remember

If your project involves a [Public International Organization \(PIO\)](#), you should strive to rely upon the PIO's environmental policies, if the PIO's environmental procedures and processes are reasonable to result in adequate environmental safeguards. GH AORs and the GH BEO may choose to strengthen PIO environmental processes or use the United States Agency for International Development (USAID) environmental compliance process and reporting documents, if the PIO's environmental procedures and processes will not reasonably result in adequate environmental safeguards.

Monitoring and Oversight Timeline



The Monitoring and Oversight of program activities involves the following important steps:

1. IPs prepare EMMPs that translate environmental requirements from the IEE process into environmental mitigation measures and monitoring requirements
2. AORs/CORs review and approve, and the GH BEO concurs on EMMPs
3. IPs implement the mitigation measures described in the EMMP and prepare an annual EMMR that evaluates the effectiveness of the monitoring program and documents the actions taken to achieve environmental compliance
4. AORs/CORs review EMMPs and evaluate IP effectiveness at meeting environmental requirements
5. AORs/CORs, or their designees, annually review/screen activities of IP to ensure there has been no changes in the scope of activities that could result in new [environmental impacts](#)

Glossary Term:

[Environmental Impact](#)

Monitoring and Oversight: Key Responsibilities

AORs/CORs

- Ensuring environmental compliance throughout project implementation
- Reviewing and approving EMMPs

- Submitting EMMPs to the GH BEO for concurrence
- Ensuring that EMMPs are implemented and effective
- Ensuring Annual Screening of the IP's scope of work
- Reviewing EMMRs

IPs

- Preparing the EMMP
- Implementing the environmental mitigation measures described in the EMMP
- Maintaining records of environmental mitigation and monitoring and supporting documentation for submission to the AOR/COR
- Preparing and submitting an annual EMMR to the AOR/COR to document the implementation and effectiveness of the mitigation measures in the EMMP

GH BEO

- Maintaining the EMMP and EMMR templates
- Reviewing and concurring on the EMMPs
- Providing technical assistance regarding environmental compliance issues, as needed

AMs, MEOs, and Other Mission Support Staff

- Providing monitoring support for country-level activities to ensure environmental requirements are implemented

Environmental Mitigation and Monitoring Plan

The EMMP describes the anticipated environmental impacts identified in the IEE process and explains the mitigation measures planned to minimize or eliminate those impacts on the environment. The IP develops and submits the EMMP to the AOR/COR for approval. The BEO reviews and concurs on the EMMP.

Each EMMP includes the following:

- Brief overview of project activities
- Impacts anticipated for each project activity
- Mitigation measures to address impacts
- Position titles responsible for monitoring the implementation of mitigation measures
- Monitoring indicators used to determine if mitigation measures are adequately and effectively implemented
- Methods for monitoring the implementation of mitigation measures
- Frequency of monitoring

Glossary Term:

Categorical Exclusion (CE).

Did You Know?

Project activities under a Categorical Exclusion (CE) do not require an EMMP. However, projects with categorically excluded activities do require annual screening to identify changes in scope that could require additional environmental review.

Remember

When reviewing an EMMP, refer back to the IEE document to ensure that the EMMP sufficiently addresses the environmental impacts, mitigations, and other environmental requirements identified for the project.

Environmental Mitigation and Monitoring Report

The EMMR is a tool that provides the AOR/COR with sufficient information to confirm that environmental mitigation measures in the EMMP are implemented and effective in addressing environmental impacts. AORs/CORs monitor environmental compliance for their projects using field verification techniques such as site visits, photographs, interviews with on-site personnel, or other appropriate means to substantiate compliance observations, which should be documented in the EMMR. AORs/CORs consult with AMs, MEOs, and others who have field-level knowledge or project activities to determine if EMMRs are accurate.

The IP develops and submits the EMMR to the AOR/COR annually, according to the schedule identified in the IEE. The EMMR is typically due within 45 days after the end of the fiscal year.

AORs/CORs work with the IP to correct mitigation measures that are not effective.

The EMMR template is available [here](#) .

AOR/COR Approval?

While EMMRs do not require approval by the AOR/COR, it is important that the AOR/COR reviews the EMMR. As AORs/CORs are responsible for the successful implementation of environmental mitigation measures, they need to ensure that the monitoring program is successfully implemented.

Annual Screening and Amendments

Annually, AORs/CORs are responsible for ensuring that screenings of their projects are conducted to determine whether project activities and annual workplans remain within the scope of the activities reviewed during the IEE process. Annual screenings may be conducted in conjunction with other work planning activities to integrate environmental management with other routine AOR/COR functions and are typically documented in the [Environmental Screening Form \(ESF\)](#).

Changes to project scope may require additional environmental review and, if required, amendments to the IEE document and EMMP. Scope changes may also require project extensions, which could result in extensions of the IEE or Request for Categorical Exclusion (RCE) documents.



IEE AMENDMENTS

Sometimes a project receives a no-cost extension. This means it is not necessary to amend the IEE document if the extension meets the following conditions:

- Current activity/project is in compliance
- Extension is 12 months or less
- No new activities are planned
- Scope of the project is unchanged

If the IEE document extension does not meet the conditions outlined above, the AOR/COR consults with the GH BEO to determine if an IEE amendment is required.

Session 10: Document and Record Control



Document and Record Control Overview

After completion of this session, you will be able to do the following:

- Identify management practices for environmental compliance documents
- Recognize the documents that need to be uploaded to the United States Agency for International Development (USAID) Environmental Compliance Database (ECD)
- Upload a document to the USAID ECD

Reasons for Document and Record Control

Have you ever had this happen?

- You have problems keeping up with who has the latest version of project documents.
- You search for archived documents in the ECD but can't find them.
- You want to see the project files that another employee has developed but don't have access to their files.
- The Agreement Officer's Representative/Contracting Officer's Representative (AOR/COR) asks you to send a document related to a project, and you can't find it in the file.

These are just some of the reasons why document and record control is so vital to our work at the Bureau for Global Health (GH). The good news is that these issues are all preventable by storing documents in the appropriate locations (electronic or hard copy files and systems).

Document and Record Management

We must have ways to store project documents and records so that stakeholders can find them when they are needed. Sometimes that means adding documents to project files, uploading approved documents to approved USAID databases, or storing the files in public locations (e.g., websites).

Documents should be managed by each Project Design Team in a way that is accessible to other GH staff who may need to access the project information. The image below shows examples of the documents that should be maintained in project files:

- Approved PADs

- Environmental Screening Forms
- 22 CFR 216 documents
- Project Statement(s) of Work
- Request for Proposals and other solicitation documents
- Documentation of project scope changes

The Project Design Team must ensure that approved Initial Environmental Examination (IEE) documentation is uploaded to the USAID ECD [↗](#).

Documents that should be stored in the ECD include the following:

- Approved IEE documentation (IEE, Request for Categorical Exclusion (RCE), and Environmental Assessment (EA) documents)
- Environmental Mitigation and Monitoring Plans (EMMPs)
- Environmental Mitigation and Monitoring Reports (EMMRs)

Note: Approved IEE, CE, and EA documents are typically considered public documents.

To upload documents to the ECD, email them to environmentalcompliancesupport@usaid.gov. Make sure to include any special instructions. If there is procurement-sensitive information in the IEE document, instruct the database manager to keep the IEE outside of the public domain until completion of the award.

Glossary Term:

Initial Environment Examination (IEE) Document

Environmental Mitigation and Monitoring Plan (EMMP)

Environmental Mitigation and Monitoring Report (EMMR)

Categorical Exclusion (CE)

Initial Environmental Examination (IEE) Process

EA Documents

Recall that Positive Determinations, and therefore EAs, are not common in GH and are not covered in this course. The EA template is available here [↗](#). Consult with the GH BEO if you have further questions about EA documents.

Final Assessment

