

(One likely) Corrective Action Plan for USAID/XXX

The Mission is required to prepare an environmental compliance action plan within one month to come into full compliance with USAID environmental procedures, and submit quarterly progress reports to the AA/*Regional Bureau* and *Regional Bureau* BEO until the plan is achieved.

A rough draft of such an action plan might look like this:

Road Project

The mission shall immediately halt implementation of the 98km new road project pending completion and approval of an EA.

Mission Director All-staff Memo

Within 1 week, the Mission Director will issue a memo to all staff explaining the findings of the OIG audit, confirming mission commitment to full environmental compliance, emphasizing that AORs/CORs and their Team Leaders have primary operational responsibility for compliance, and summarizing key elements of the corrective action plan

Portfolio Review

The Mission shall complete, within three months, an external Mission portfolio environmental compliance review or audit of all projects/activities to examine them for environmental compliance.

This audit will determine whether: 1) every USAID-funded activity under the Mission's control is covered by BEO-approved 22 CFR 216 documentation; and 2) every environmental decision in the BEO-approved IEE is being implemented, including all conditions established in IEEs (“Negative Determinations with Conditions”), EAs and Pesticide Evaluation Reports and Safe Use Action Plans (PERSUAPs),

Portfolio Review Follow-Up

Based on the portfolio review, the Mission, in collaboration with the BEO and Regional Environmental Advisor (REA), will define actions and set a time table to bring all out-of-compliance activities into compliance, including:

- developing or amending Reg. 216 documentation as needed .This includes *including scheduling and funding Environmental Assessments as needed.*
- developing a compliance plan with each IP. This will likely require changes to approved workplans and budgets.
- re-do/rehabilitation of activities if required: for example if schools were built with asbestos, buildings painted with lead-based paint, wastewater systems installed too close to drinking water wells or groundwater supplies or surface water, drinking water supplies were untested for their suitability, etc.

A master list of all corrective measures will be developed, timetables and budgets developed, and a mission tracking system established to see that each action is completed in a timely way.

Mission Order

The Mission shall prepare/ revise and issue an appropriate environmental compliance Mission Order, with clearance from the BEO. The Mission Order should include specific responsibilities for the Mission Environmental Officer (MEO), Deputy MEO, Office Directors (OD), deputy ODs, CORs and AORS with respect to Reg. 216 compliance.

MEO Appointment Letters

The Mission Director will confirm the appointments of an appropriate MEO and a minimum of one deputy MEO and issue appointment letters which spell out MEO and deputy MEO responsibilities and authorities they need to do their jobs, with consultation with the BEO.

Staff Annual Evaluation Forms (AEFs)

The compliance action plan will require Reg. 216 compliance be incorporated into an appropriate element in the AEFs of the MEO, deputy MEO, and ODs, dODs, CORs and AORs.

Environmental Compliance Training Requirements

All Mission staff will receive a short-format (nominally half-day) environmental compliance training within one month.

Within six months, the Mission shall arrange, in consultation with the BEO, a longer-format (nominally 3-5 day) environmental compliance training for mission staff AND IPs. All CORs/AORs managing activities deemed by the REA to be environmentally complex or which are identified by the environmental compliance audit as requiring extensive corrective action shall attend. IP counterparts for these AORs/CORs shall also attend.

Such longer format trainings shall be offered at minimum every four years. All staff shall be required to attend a short-format refresher training at least every 2 years.

Environmental Compliance Language in Solicitations and Awards

Going forward, all solicitations and awards issued by the mission will include environmental compliance language per the ADS 204 help document: Environmental Compliance: Language for Solicitations and Awards.

External Environmental Compliance Technical & Capacity Building Support

The Mission will design and fund or buy-in to an environmental compliance support project, either in-house, in-Agency, or in-conjunction with approved contractors or consultants to assist the Mission in designing, preparing, implementing, monitoring, and evaluating environmental compliance documents and decisions, including, Initial Environmental Examinations (IEE), Amended IEEs, Environmental Assessment Screenings, Environmental Documentation Forms (EDF), Environmental Mitigation and Monitoring Plans, Environmental Assessment Screenings, Pesticide Evaluation Reports and Safe Use Action Plans (PERSUAP), scoping sessions, Scoping Statements (SS) for Environmental Assessments (EA), and EAs.