

What Would You Do If...

You have recently reported to the Mission in XXXX. The Mission is very short staffed. Someone heard that you took a 1.5-day Environmental Compliance training, so in addition to your normal portfolio, you have also been handed the job of serving as the **Mission Environmental Officer (MEO)**.

As you settle into your cubicle, you are handed a recently issued audit report. The **Office of the Inspector General (OIG)** recently completed an audit of one of the largest of the Mission's programs and concluded that the Mission was not in compliance with environmental procedures, not just for this large program but for all of its programs. Examples of specific problems identified in the report include:

- ✓ In FY 2008, only one out of 22 of the required Reg.216 documents was approved by the Bureau Environmental Officer (BEO) prior to the "Funding Begin" date.
- ✓ Contracting is complete & groundbreaking is imminent on a new, mission-funded 98km road, presumably on the authority of a "negative determination with conditions" assigned to rural roads activities. However, this determination was made for small-scale road *rehabilitation* only.

Reg. 216 lists several classes of actions normally having a significant effect on the environment (22 CFR 216.2 (d)) for which an Environmental Assessment will be required. These include "penetration road building or road improvement projects." No EA has been conducted.
- ✓ IPs were not aware of IEE conditions that applied to their activities, and their contracts and agreements contained no provisions requiring compliance.
- ✓ AORs/CORs were not in receipt of information from IPs that would allow them to verify/oversee environmental compliance for their projects, and none reported assessing environmental compliance during site visits.

The **OIG Report** identifies the following factors as significant causes of these compliance gaps.

- The mission had no process in place to apply conditions established in sector portfolio-level Reg 216 documentation down to the level of individual projects.
- The CORs & AORs lacked awareness of their responsibilities for overseeing compliance with environmental procedures;
- The mission had inconsistencies between the Automated Directives System and a Mission Order regarding the roles and responsibilities of AORs/CORs;
- The mission lacked a dedicated MEO;
- The Mission had compressed project time frames that did not accommodate appropriate pre-implementation environmental review.

The Mission Director is looking to you for a **Corrective Action Plan**. She has to respond to the OIG Report with a detailed plan including actions and timelines for bringing the Mission into full compliance with Reg 216. She's asked you to develop that plan

Your task:

In your groups, you will develop a Corrective Action Plan; given limited time, please use a bullet-point format rather than try to develop polished prose. Include the elements of the plan, what problems would be corrected, and how you propose it would be implemented.

To get started., ask yourselves:

- What problems need to be addressed?
- What are the elements of the corrective action plan? (You can use the *Environmental Compliance Best Practice Standard* to help guide your thinking)
- Where could you turn for help with developing your plan? With implementing your plan?
- What would help avoid these kinds of problems in the future?
- What might be the consequences of failing to comply with USAID's environmental procedures?