

## MEMORANDUM

**TO:** USAID Transformation Task Team and Gender Development Team

**FROM:** Oxfam, Save the Children, and Plan International USA, on behalf of The Big Ideas for Women and Girls Coalition

**DATE:** March 6, 2019

**RE:** Feedback on USAID's Draft Effective Partnering and Procurement Reform Recommendations

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Thank you for sharing the Effective Partnering and Procurement Reform Recommendations draft and for inviting us to contribute to its development. We look forward to continuing to work together to ensure that the needs of the most vulnerable are met, particularly those of women and girls, and that USAID's business processes work in harmony with its programmatic approaches to promote gender equality. We strongly believe that gender equality and the empowerment of women and girls is at the very heart of development, is an absolute prerequisite to the self-reliance of communities and countries.

We believe the procurement reform recommendations have great potential to benefit women and girls and contribute to sustainable development. The recommendations provide strong steps forward in lowering barriers of entry for partners, which would benefit local women's rights organizations and organizations focusing on gender equality more broadly if implemented well. However, doing so will require a number of changes in order to ensure that gender equality plays a strong role in the document. At the moment, gender equality is only mentioned one time in the document.

**Gender Pay Parity:** We applaud USAID for the quality of that one mention- advancing gender equality by ensuring that USAID awards can increase gender pay parity is a critical area to help lessen inequalities for women who are on the front lines of implementation of USAID-funded projects. The guidance on not using salary history to determine pay rate is particularly useful and will help ensure that gender inequalities are not exacerbated by the provision of USAID awards, but in fact improve the situation of women earners associated with aid projects in the long run.

Yet pay parity for implementers is just one small piece of development landscape facing women in partner countries and that participate in USAID's procurement system. There is much more that could be strengthened to ensure that gender equality is advanced through procurement. Many of these changes will need to be implemented by USAID staff who are not always trained in gender equality programming approaches, and therefore the USAID workforce recommendations also need strengthening to ensure this document meets its potential.

### **Proposed amendments:**

We have proposed a number of topline changes to the recommendations that if taken up, will represent a big step forward for women and girls who together represent a majority of the recipients of US assistance provided by USAID.

We offer these for your consideration:

**1) Prioritize local women's rights organizations within procurement:** There is not sufficient attention paid to gender equality generally in the document, and specifically on prioritizing local

women's rights organizations. Local women's rights organizations must be included and emphasized as important new and underutilized partners for sustained engagement, and partners deserving of capacity building efforts, as a means to achieving gender equality and sustainable development. Women's rights organizations are among the most marginalized and discriminated against in some countries and must be intentionally brought into the mainstream of USAID partners. USAID has a powerful role to play in ensuring that women's rights organizations and organizations promoting gender equality are part of the "Journey to Self-Reliance", and that the concerns and solutions raised by these organizations are recognized and acknowledged as a critical contribution to co-creation of programs.

**2) Ensure that capacity building data clearly disaggregates based on gender and type of actor:**

As USAID works to develop its capacity building plan, it should ensure that gender data is disaggregated in each of the indicators that are developed. The type of actor must also be disaggregated to ensure that there is no confusion between local actors and locally established actors, which is a distinction that can muddy the important line between an organization that is indigenous to the partner country, versus one that has strong US ties and therefore US support and often governance. This data is essential to evaluate and ensure the effectiveness of capacity building efforts for partners; expand the pool of new and underutilized partners; and, to make visible the inequalities that could be promoted via USAID procurement processes in order to ensure that USAID's business practices do not deepen existing inequalities.

**3) Ensure that implementation of innovative procurement approaches opens up space for organizations promoting gender equality:**

New approaches such as Broad Agency Announcements (BAA) open up USAID processes to a problem-oriented approach and encourage co-creation of solutions by multiple stakeholders. These approaches should be leveraged to ensure that women's rights organizations and organizations promoting gender equality are appropriately advertised to ensure that they are valued participants in these processes. Consortia that are developed as a result of these approaches should encourage the inclusion of organizations promoting gender equality, given the important role that gender mainstreaming plays in all of USAID's programs.

**4) Require additional training on gender equality for key mission-level decision makers:**

Additional training is also essential to ensure that key USAID personnel, including Mission leadership positions, contracting and agreement officers (including CORs/AORs), understand the importance of gender equality. These trainings should be tailored to address the needs of specific positions, and should include dedicated training of Mission Directors. A 2016 evaluation of the implementation of USAID's gender equality policy<sup>1</sup> cited the lack of understanding on gender of key officers in the procurement process as a barrier to the implementation of the policy. If these officers do not understand why gender equality or gender integration are important within a solicitation, they may cut the language entirely. USAID should build in more dedicated time for staff training at the mission level on gender equality and amongst key

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<sup>1</sup> The USAID Gender Equality and Female Empowerment Policy: A Report on Implementation, June 2016, available at: <https://encompassworld.com/resources/usaaid-gender-equality-and-female-empowerment-policy-report-implementation>

decision-makers. USAID should ensure that its workforce matches demand and need through hiring additional gender advisors mandated to ensure that procurement processes are inclusive of gender and take a gender-equality centered approach to fostering partnerships and building capacity.

**5) Ensure gender equality and women's and girls' empowerment policies are exempted from efforts to eliminate policies or evaluation criteria.** While we applaud the efforts to lower barriers of entry and to streamline requirements to ensure partners can more easily access USAID funding, gender equality policies are those that should be implemented fully. These policies are critical for strengthening USAID's gender analysis, gender mainstreaming and gender infrastructure. Additionally, partners, including those that are Washington, DC-based, also benefit from USAID's policies, such as ADS 205, and can use them to make changes within their own organizations.

**6) Monitor compliance with ADS Chapter 205.** To include an important accountability function to the procurement recommendations, we recommend that USAID explore ways to monitor compliance with ADS Chapter 205 via procurement implementation, including section 205.3.6. on gender integration within solicitations and other sections relevant to procurement and partnership.

We hope these comments are helpful as you strengthen your recommendations on how to implement these important reforms for USAID's procurement and partnership. We look forward to discussing these with you and with the Gender and Development team further and continued conversations on how to ensure gender equality and the empowerment of women and girls remain central in our efforts toward a more prosperous and peaceful world.