

NGO Community Response to USAID Transformation: Strengthening Core Capabilities through USAID Structural Changes September 2018

In April 2018, as a part of the broader USAID Transformation effort, USAID unveiled a proposed, new structure for its bureaus and offices. Designed by a team of predominantly career staff, the proposed structural changes incorporated feedback from an agency-wide listening tour, internal working groups, and leadership reviews, as well as dozens of internal and external consultations in DC and in USAID Missions. These proposals were consolidated into nine Congressional Notifications that have been sent to Congress for further review and approval in September 2018.

These shifts were designed to strengthen existing areas of USAID's work, streamline reporting to the USAID Administrator, and prepare USAID for the development and humanitarian demands of the future. The proposals included:

- Five new consolidated bureaus:
 - The Bureau for Policy, Resources and Performance (PRP)
 - The Bureau for Development, Democracy and Innovation (DDI)
 - The Bureau for Resilience and Food Security (RFS)
 - The Bureau for Humanitarian Assistance (HA)
 - The Bureau for Conflict Prevention and Stabilization (CPS)
- Relocation of the Afghanistan and Pakistan Bureau to within the Asia Bureau
- A refocused Management Bureau
- Streamlined coordinator positions throughout the agency
- A restructuring of front office positions and reporting lines to the Administrator

Most of the Regional Bureaus and the Bureau for Global Health remain relatively the same. The shifts to the front office would create two new Associate Administrators who would report directly to the Administrator and oversee several of the new bureaus. The Associate Administrator for Relief, Resilience and Response (R3) would oversee the RFS, HA and CPS Bureaus and the Associate Administrator for Strategy and Operations would oversee the PRP, Legislative and Public Affairs, and Management Bureaus. Other Bureaus, including DDI, will continue to report to the Administrator.

Impact of Structural Changes to USAID and Programmatic Challenges:

The proposed structural shifts have the potential to change how USAID engages with Congress, the NGO sector, and others. InterAction is supportive of many of these changes and sees how these structural shifts will help to modernize USAID to better address humanitarian and development challenges. That said, there are a few aspects of the proposals that merit further questions. Although USAID Transformation is intended to increase efficiency while achieving better results, implementing transformation as part of a broader drive to cut foreign assistance budgets would be detrimental to USAID and its core mission.

Key highlights or questions for further consultation:

- The new PRP Bureau structurally reinforces strategy-budget alignment. As designed, the PRP Bureau is a major step in the right direction. By bringing the responsibilities for strategy and budgeting closer together, the PRP Bureau could help to better align country strategies and budget allocations so that the former shapes the latter rather than the other way around.
- Can the DDI Bureau work to make development programming more effective and efficient? This
 reform will result in the consolidation within one bureau of many different sectoral areas and crosscutting priorities. That alone will prove a daunting management challenge, but notably, other very
 significant sectors and priorities will continue to exist apart from DDI, raising challenges for the model.
 There is also a risk that running many more decisions through a centralized DDI Bureau could have an
 unintended effect bottlenecks in the process of program planning.
- More clarification is needed on the management, function and engagement of cross-cutting
 organizational structures, like those held in RFS and DDI. Little is known about the leadership and
 governance of the Centers, Hubs and Leadership Councils, how they will engage with related efforts in
 other bureaus, and how they will effectively deliver support for missions and direct, implement, monitor,
 and evaluate the results of the sectors they oversee.
- Creation of the HA Bureau elevates USAID's humanitarian functions and leadership and works to streamline all forms of assistance. This shift also allows the agency to speak in greater unity on humanitarian issues and ensure higher-level international representation for the USG.
- The CPS Bureau prioritizes, elevates and better coordinates conflict prevention within USAID and the inter-agency, however work is still needed to ensure non-elite, in country civil society organizations have a key role in procuring, designing, implementing, and evaluating conflict prevention and stabilization work.

*** Continue to the Bureau one-page briefs for further details on the sector and bureau-specific impacts of USAID Transformation.

Consultations with the NGO Community:

In order to better understand the impact of and provide context to the proposed changes, InterAction and its members engaged in a series of briefings with USAID officials across all levels on the five new bureaus, specifically the Bureaus for PRP, DDI, RFS, HA, and CPS. In these sessions, the community gave direct feedback on the proposed changes and shared our expertise on the impact of such changes. Many of our initial critiques and suggestions were accepted or resolved. We hope to continue the consultations throughout the implementation process and as final questions are answered.

InterAction's Coordinating Role:

InterAction's robust membership includes the nation's largest alliance of humanitarian and development nonprofits, making it well-positioned to coordinate consultations with USAID and our members. Our broad community draws insights and suggestions based on decades of on-the-ground operational experience observing U.S. government efforts and partnering with it on programs and policies. InterAction hopes to continue to be a resource to USAID and to help identify potential areas of concern, answer key questions, and continue giving feedback as the long process of structural reforms proceeds.



Proposed USAID Bureau for Policy, Resources and Performance (PRP)

Through InterAction's annual *Choose to Invest* publication and subsequent education on authorizing efforts and appropriations, **InterAction continuously engages on how the United States funds foreign assistance**. As the agency worked to establish a new structure to effectively manage its budget and policy agenda, USAID consulted the NGO community at InterAction for support, advice, and critiques in its transformation process. As partners, implementers, and advocates for humanitarian and development assistance, **InterAction and our members understand that strategic planning, development policy and management of budget are intrinsically linked.** To continually enhance policy and improve planning, it is vital to understand the capacity of program budgets, and strategy should shape budgets. The proposed Bureau for Policy, Resources, and Performance (PRP) has the potential to institutionalize this desired integration of policy and budget planning at USAID.

Proposed Bureau Overview:

The proposed Bureau for Policy, Resources, and Performance (PRP) would integrate the duties of the current Bureau for Policy, Planning, and Learning; Office of Budget and Resource Management; and other related offices including parts of the Global Development Lab and the responsibility for the Operating Expense budget, which currently sits in the Management Bureau. Lead by an Assistant to the Administrator (AtA), the proposed bureau will house the budget, program, and learning agenda for missions, other bureaus, and the agency. The Bureau will work to create coherence between policy, resources, and strategies from the missions to the administrator. The PRP Bureau will operationalize the Journey to Self-Reliance approach through an integrative, learning agenda and house the metrics associated with this initiative. **The Bureau places policy, budget, learning, and Agency-wide program planning support into a single bureau.** The Bureau will consist of six offices: Bilateral and Multilateral Engagement; Development Policy; Budget; Learning, Evaluation, and Performance; Program Cycle, Policy, and Support; and Program and Management Operations. The employees of USAID working at State/ F will also report to the assistant administrator of the PRP Bureau.

Areas of Increased Effectiveness and Coordination:

- **Strategy-budget alignment.** As designed, the PRP Bureau is a major step in the right direction toward resolving mismatches that have existed between budget allocation decisions and field-based assessments and strategic planning. USAID's major initiatives have, in the past, driven the agency's operations and strategic planning, given their size and visibility. But they have also existed apart from the corporate strategic planning process designed to support principles of country ownership, impact and sustainability. By bringing the responsibilities for strategy and budgeting closer together, the PRP Bureau could help to better align country strategies and budget allocations so that the former shapes the latter rather than the other way around.
- **Speaking in unison.** The PRP Bureau will help orient missions, bureaus, and leadership in the same direction as well as set and manage certain metrics for the Agency. By fusing the power of senior

leadership and budgets with the insights of policy and learning, PRP can become USAID's powerhouse for policy leadership and program effectiveness. This also establishes a key budget and policy liaison with OMB and State Department.

- Clear connections with other key donors. As partners in the field, InterAction members view cooperation between donors as essential for effective and efficient programming. The Office of Bilateral and Multilateral Engagement will continue as a key office for planning and strategic coordination with other key donors that support humanitarian and development work.
- Promoting effective and dynamic programs. We are pleased to see USAID institutionalizing
 effective and efficient development strategies. In addition, we are excited to see the next stages of the
 Agency's maturing approach to learning through a greater focus on an agency-wide learning agenda
 with aggregated insights alongside continued efforts to improve the quantity and quality of evaluations
 at the field level.
- Alignment of legislative and public messaging with policy and strategy. The proposed coupling of the Bureau for Legislative and Public Affairs and the PRP Bureau under a new Associate Administrator will better allow the agency to consistently convey important information about how and why it does what it does.
- Mission access to information. As partners on the ground, we look forward to missions gaining more holistic, realistic knowledge of their programs in relation to USAID goals and strategies. Integrating the Office of Budget with the responsibilities that have been managed by PPL will better allow NGOs to understand, and augment, mission capacities.

- Build coherence and stitch together complementary areas of policy analysis. The Office of Development Policy should continue serving as a central node to connect dots and build greater coherence across USAID policies. The Agency should also formalize communication channels between the PRP Bureau and offices in other bureaus that are engaged in specific areas of policy research.
- Build pathways for engagement and reporting to Congress. To ensure agency programs are
 effective and sufficient, USAID must consistently share lessons learned, successes, and failures with
 political leaders. This will require coordination with the Bureau for Legislative and Public Affairs (LPA).
- Create more consistent channels for formal consultation with NGOs. As NGOs often innovate to deliver assistance, we are eager to develop formal consultation channels for USAID's policies and learning agendas, rather than the semi-regular, ad-hoc basis approach currently utilized. We have appreciated the work done in this transformation process and know we can assist USAID as it carries out its development strategies and goals.
- Bolster education and connections in missions. Appreciating the impact that the new offices could have for crafting better programs, missions should apply all available, relevant PRP tools and work to better integrate perspectives across field-level offices as Country Development Cooperation Strategies (CDCS) are developed. These strategies should reflect evaluations and best practices in adaptive management learned through PRP training and consultation.



Proposed USAID Bureau for Development, Democracy, and Innovation (DDI)

By hosting the Democracy, Rights and Governance Initiative, a coalition involved in building democratic institutions abroad, InterAction has seen how USAID centers or hubs can work to consult with members of Congress, USAID, and other U.S. agencies to build good programs and policies which put American values into practice abroad. As partners, implementers, and advocates for humanitarian and development assistance, InterAction members have seen first-hand the increasing demand from the field for improved coordination and integration of technical support and assistance on programs. Since NGOs serve as key partners who evolve and continuously learn to do better work, USAID consulted the NGO community at InterAction for support, advice, and critiques in its transformation process. USAID's intentional merging of numerous assistance sectors and cross-cutting lenses into a single bureau could help modernize its programming and lead to more consistent coordination with field missions but could also lead to thorny management challenges and unintended delays in programming.

Proposed Bureau Overview:

The proposed Bureau for Development, Democracy, and Innovation (DDI) is to be led by a Senate confirmed Assistant Administrator with a heavy emphasis on cross-sectoral programming to better align linked development efforts and improve technical support to the field. The new proposed bureau will incorporate existing offices or centers under one structure in an effort to improve accountability and create more informed and holistic programming. DDI will merge and restructure the Bureau for Economic Growth, Education and Environment (E3); the U.S. Global Development Lab (the Lab); the Center for Democracy, Human Rights, and Governance (DRG); the Center for Faith and Opportunity Initiatives (CFOI); the Office of American Schools and Hospitals Abroad (ASHA); and some technical expertise from the Regional Bureaus.

In DDI, USAID proposes to create four Centers, to be the lead provider of technical support to the field, five Hubs, to provide agency wide support and services on cross-cutting priorities, and three support and administrative offices. The four centers are Economics and Market-Development; Democracy, Human Rights, and Governance; Environment, Energy, and Infrastructure; and Education. The five hubs are Innovation, Technology, and Research; Gender Equality and Women's Empowerment; Youth and Inclusive Development; Private-Sector Engagement; and Local, Faith-based and Synergistic Partnerships. USAID's regional and topical bureaus and country missions will work with the Centers and Hubs to create more effective program design and to programmatically integrate learning, adaptive management, co-design with partners and beneficiaries, and innovative approaches to addressing development challenges.

Areas of Increased Effectiveness and Coordination:

• **Capitalizing on the experience of existing centers and offices.** USAID should incorporate best practices and replicate successful models of existing centers, like the Democracy, Rights, and Governance (DRG) Center and Gender Equality and Women's Empowerment Office, and their frameworks as it develops new centers and hubs, especially in sectors addressing vulnerable populations such as gender, youth, LGBTQ populations, indigenous populations, or people with disabilities.

- Can the DDI Bureau work to make development programming more effective and efficient? The structural changes wrapped up in the DDI Bureau and the intended process changes they represent are part of a complex realignment of USAID's sectoral expertise to improve the design and execution of development programming. This reform will result in the consolidation within one bureau of many different sectoral areas and cross-cutting priorities. That alone will prove a daunting management challenge, but notably, other very significant sectors and priorities (eg. health, food security, resilience and conflict prevention) will continue to exist apart from DDI, raising challenges for the model. The aim is to look at programs more holistically but how all the resulting intersectional issues are managed and adjudicated will matter tremendously. Another stated aim has been to remove some burdens from the field, but there is a risk that running many more decisions through a centralized DDI Bureau could have a less-desired effect costly bottlenecks in the process of program planning.
- Ensuring access and consistency. USAID's use of its current Centers varies between Bureaus and Missions as Centers act at the request of a mission. USAID should provide guidelines that ensure that the benefits offered by the new centers are fully utilized across missions and other bureaus.
- Expand partnerships. USAID should continue to practice and expand consultative processes with
 implementing partners and stakeholders throughout program cycles at both the Mission and Bureau
 levels. In addition to program development, NGOs with in-country presence can be useful partners in
 interpreting the self-reliance metrics and offering perspectives on what kinds of interventions are bestplaced to help a country advance along the self-reliance pathway.
- Intentionally integrate centers and sectors and establish clear intra-agency pathways. USAID
 programming is often cross sectoral, and Centers help link activities. USAID should take steps to
 ensure that when such integration occurs that the proper centers are utilized, especially in scenarios
 where more than one center provides pivotal support to a single program. The formal linkages between
 Bureaus are unclear. To maximize collective efforts between offices and missions, USAID should
 formalize the connections between the policy and planning components of the of the various new
 bureaus, including DDI and its Centers, with the Bureau of Policy, Resources, and Performance.
- Provision of education: Decisions regarding the optimal modality for provision of education should be locally contextualized at the Mission level and aligned with national education sector plans, CDCS guidance, and the U.S. Government Strategy on International Basic Education. USAID should not establish a broad policy that would prioritize strengthening non-state educational networks and institutions at the expense of supporting and strengthening public provision of education.
- Maintain USAID's gender equality framework. Preserving the term "gender equality" in titles and mandates for all positions and policies in the Gender Equality and Women's Empowerment Hub ensures that gender- focused programming will continue to address broader power dynamics and differences in the rights, roles, resources and responsibilities of women and men, girls and boys. Any narrowing of the language would create policy incoherence, jeopardize aid effectiveness, conflict with existing legislation, and signal a retreat from international norms.



Proposed USAID Bureau for Resilience and Food Security (RFS)

InterAction and our members know the challenges associated with food security and helping people feed themselves and build more resilient communities. The NGO partners at InterAction work to educate Congress and the public on USG global food security policy and programs, from the Farm Bill to USAID's Feed the Future Initiative. To build on this expertise and experience, USAID consulted the NGO community at InterAction throughout the Transformation process. As partners, implementers, and educators of humanitarian and development assistance, InterAction and our members understand the critical role agriculture, nutrition, water, and health play in fighting poverty worldwide. Through USAID Transformation, a more holistic approach to emergency and critical food security programs has the potential to increase program sustainability and expand effectiveness.

Proposed Bureau Overview:

The proposed Bureau for Resilience and Food Security (RFS) is designed to address the cycle of chronic vulnerability, extreme poverty, and hunger driven by recurrent shocks and stresses. Lead by an Assistant to the Administrator (AtA), the new Bureau will combine resources and expertise from the current Bureau for Food Security with the water and sanitation as well as climate adaptation functions from the existing Bureau for Economic Growth, Education, and Environment. **RFS will also be the focal point for agency-wide leadership councils on nutrition, resilience, and water and sanitation.** It will house four sector centers, the Centers for Water Security, Sanitation, and Hygiene; Nutrition; Agricultural-led Growth; and Resilience to serve as strategic technical resources for USAID Missions and the Agency. The RFS Bureau, along with the new Bureau for Humanitarian Assistance and Conflict Prevention and Stabilization Bureau, will report to the new Associate Administrator for Relief, Response, and Resilience (R3). This structure aims to better connect and integrate programs across the humanitarian and development spectrum and develop strategic approaches that accelerate country progress on the journey to self-reliance.

Identified Areas of Increased Effectiveness and Coordination:

- Bridging humanitarian and development food security efforts. The growing pressure of addressing
 or resolving issues such as refugees and internally displaced people, extreme weather, and prolonged
 conflict need thoughtful programs which develop sustainable agriculture and access to food sources
 during crises and improve the pathways that lift people out of poverty.
- Centers provide multi-sector knowledge and advice. More and more evidence confirms building long-term food security requires a multi-year, multi-sectoral approach. The inclusion of the Centers for Water Security, Sanitation, and Hygiene and Nutrition is designed to promote this cross-sector engagement. Connecting water, sanitation and hygiene (WASH) and nutrition through the lens of resilience can also provide new opportunities to leverage and further efforts to better health systems, alleviate poverty, strengthen market supply systems, and promote good governance and environmental resilience.

• Implementing more holistic food security programs. As food security is both a short- and long-term issue, connecting sectors, such as WASH and humanitarian efforts, prioritizes the need to craft sustainable approaches.

- Clarification on the management of cross-cutting organizational structures and sectors. Little is
 known about the leadership and governance of the Centers and Leadership Councils and how they will
 effectively deliver support for missions and direct, implement, monitor, and evaluate the results of the
 sectors they oversee. USAID should formalize the policy, planning, and decision-making components of
 the centers, and leadership councils.
- **Related sectors need critical cross-bureau links.** Recognizing the key role that hygiene and nutrition play in development and health programs, the Center on Nutrition and the Center for Water Security, Sanitation, and Hygiene must be clearly linked to the Global Health Bureau. This will ensure better integration of hygiene and nutrition programs and outcomes for poverty alleviation, health and nutrition.
- Retaining priorities in a multi-sectoral bureau. Resilience and food security are multi-sectoral issues that engage cross-cutting programs and require a diversity of responses throughout the agency and regions. Nutrition, WASH, climate and the environment, and agricultural research are related issues, but each has distinct aspects that cannot be overlooked. As the RFS Bureau will be engaging in a variety of issues simultaneously, vital aspects of these sectors must maintain priority and connections to other sectors, like gender or global health.
- Clearly define resilience and engage local governments in resilience efforts. Resilience is an amorphous term with varying interpretations depending on the perspective and type of program; the bureau should evaluate what resilience means for USAID as a whole and the distinct sectors that it covers. To ensure resilience frameworks are effective and sustainable, gender, climate, and environmental expertise as well as input from local governments and stakeholders must continue to be key elements of resilience work. Further, resilience efforts must work in humanitarian and post-conflict settings where communities are often prone to backsliding into poverty.
- Clearly connect with humanitarian food assistance. Food security is both a short- and a long-term need; restructuring must not lose sight of the unique but connected aspects of humanitarian and development food security programs. RFS must clearly articulate its vision to address food systems and continue to focus on sustainable structures and value chains. Particularly, it must define and connect work addressing Food for Peace and Feed the Future initiatives which address global food needs in different, yet related, ways.
- **Build upon existing strategies.** Existing agency strategies should not be forgotten, instead they should be augmented or updated to best incorporate new agency structures. Integrating effective strategies, like the Global Food Security Strategy, the Multi-Sectoral Nutrition Strategy, and Global Water Strategy, will build a secure foundation for RFS as it addresses systemic food security challenges.



Proposed USAID Bureau for Humanitarian Assistance (HA)

For many years, InterAction has engaged with U.S. Government (USG) efforts to reform humanitarian assistance to ensure it is more efficient and effective. To compliment the discussion around global humanitarian system reform, parallel opportunities to improve USG-specific activities should also be pursued. In its paper on <u>Humanitarian Reform Outcomes</u>, InterAction highlighted alignment between USG commitments in international fora and potential USG humanitarian reforms. As USAID unveiled structural reforms for input, InterAction and its members engaged in a series of briefings with USAID officials at both leadership and working levels, including those engaged in shaping the proposed Bureau for Humanitarian Assistance. While efforts to achieve further reforms must be ongoing – including for offices that sit within different U.S. agencies engaged in humanitarian assistance activities – improvements to USAID's restructuring marks a positive step forward.

Proposed Bureau Overview:

Lead by an Assistant to the Administrator (AtA), the proposed HA Bureau will bring together different modalities (sectors) of humanitarian assistance managed across USAID into a single bureau. This primarily impacts the existing offices of Foreign Disaster Assistance and Food for Peace – which together manage nearly \$6 billion in annual appropriated funding. The HA Bureau will combine various programmatic and policy functions into a single management structure with eight offices underneath it. These include offices for: Humanitarian Business and Management Operations; Field and Response Operations; Partnerships and Strategic Communications; Humanitarian Policy, Programs and Partnerships, Technical and Program Quality; Africa; Asia, Latin American and the Caribbean; and the Middle East, North Africa and Europe.

Areas of Increased Effectiveness and Coordination:

- Streamlining all forms of humanitarian assistance. Combining food and non-food humanitarian assistance into a single bureau could allow USAID greater coherence, efficiency and effectiveness in providing life-saving assistance, regardless of sector or modality.
- **Higher priority.** Elevating USAID's humanitarian functions to a bureau level could elevate USAID leadership on humanitarian priorities in the inter-agency process within USG.
- **Speaking in unison.** Combining core humanitarian offices could allow for higher-level representation in international fora and for the USG to speak in them with a more united voice.
- Bridging humanitarian and development work. Continuing and potentially expanding support for
 programming that bridges humanitarian and development objectives such as the resilience and
 development work implemented under Food for Peace non-emergency programs—could lead to more
 holistic and effective responses to humanitarian challenges.

- **Pursue additional reforms.** In accordance with the Grand Bargain, we recommend USAID:
 - Explore how to engage in increased multi-year funding in protracted conflict and/or displacement settings;
 - o Develop a mechanism to provide more timely response in sudden onset emergencies;
 - Better plan and coordinate humanitarian activities across the government, including with other agencies;
 - Implement a broader strategy that integrates people affected by protracted crises and/or state fragility into country/regional strategic planning and development programming.
- **Connect policy, assistance, and programming.** To better connect policy, humanitarian assistance and evidence-based programming, a strong two-way information channel should be established between the proposed HA bureau and other critical bureaus and offices including: the proposed Bureaus for Policy, Resources and Performance, and Development, Democracy, and Innovation, as well as, the Hubs on Gender Equality and Women's Empowerment and Youth and Inclusive Development, and Centers on Education and Environment, Energy, and Infrastructure.
- Integrate humanitarian work in the field. As USAID integrates humanitarian assistance functions into a single bureau in Washington, it must also harmonize humanitarian activities at the field level. This includes providing a seamless approach between food and non-food programming and better coordinating with other USG agencies providing humanitarian assistance in the same locations.
- Identify how to best achieve integration across modalities without losing technical expertise. Institutional knowledge and mechanisms that should be preserved – including those dealing with finance, procurement, and personnel.
- Accommodate and internalize appropriate oversight. As the accounts that fund the current USAID humanitarian offices being combined into the proposed Bureau of Humanitarian Assistance have different statutory authorities' coherent congressional oversight across separate authorizing committees and appropriations subcommittees will be required.



Proposed USAID Bureau for Conflict Prevention and Stabilization (CPS)

Violent conflict is currently the leading driver of the world's humanitarian needs and the largest displacement of people in human history. Without investing in ending the violence that generates this need, these costs may continue to rise and will continue to be a threat to American interests at home and abroad. To address this challenge, InterAction's members work to prevent, mitigate, and respond to violent conflict worldwide. Through creation of the proposed Bureau for Conflict Prevention and Stabilization (CPS) of USAID is taking much-needed steps to promote peace, resilience, and stability. In taking these steps, USAID consulted with InterAction and its members for support, advice, and critiques of its transformation process.

Proposed Bureau Overview:

Lead by an Assistant to the Administrator (AtA), the proposed Bureau for Conflict Prevention and Stabilization (CPS) aims to solve three key problems: First, U.S. missions abroad are often faced with the daunting challenge of addressing violent conflict, yet lack the flexible funding, political cover, and skilled personnel to do so in the most effective, tested ways. Second, "hair-on-fire" crises currently dominate the attention of USAID's top leadership and staff, leaving them little time, energy, and resources to focus on the one thing that can avert the need for humanitarian or military assistance altogether: prevention. Third, there is a need and demand to clarify the military's role in supporting USAID's development agenda. These changes are occurring within the context of the U.S. National Security Strategy, the Stabilization Assistance Review; the Women, Peace, and Security Act; the associated Defense Support to Stabilization proposal; and the proposed Global Fragility and Violence Reduction Act (H.R. 5273/S. 3368).

The proposed CPS Bureau would bring together four of the nine Offices that are currently part of the Bureau for Democracy, Conflict, and Humanitarian Assistance (DCHA), as well as other DCHA staff, including personnel dedicated to countering violent extremism (CVE). The four offices are The Offices of Transition Initiatives (OTI), Conflict-Management and Mitigation (CMM), and Civilian-Military Cooperation (CMC), and The Office of Policy, Program and Management (PPM). The current conflict-focused offices that will be included under the CPS Bureau manage approximately \$750 million in appropriated funds.

Areas of Increased Effectiveness and Coordination:

- **Prevention as a priority.** Prioritization of prevention alongside crisis management.
- Elevated roles. The new Center for the Prevention of Conflict and Violence will hold more resources to focus on political issues surrounding responses and preventing crises. The office will also partner with many different implementers, including women's rights organizations, to better ensure peace.
- Coordination across agencies. The agency will ensure the coordination rather than duplication of roles and activities with the Department of State (State), including the Bureaus of Conflict Stabilization Operations and Democracy, Human Rights and Labor.

- Earlier engagement of CPS staff in country planning process. Increased authority via a new R3 Associate Administrator and the CPS Assistant to the Administrator will help ensure CPS staff will be involved in Country Development Cooperation Strategies planning and review, which will help ensure conflict sensitivity in programming.
- **Flexibility in conflict-affected contexts.** CPS will better serve those in crisis-prone contexts by focusing on strengthening local capacities and peacebuilding systems.

- Ensure non-elite, in-country civil society organizations have a key role in procuring, designing, implementing, and evaluating conflict prevention and stabilization work from start to strategic transition. NGOs strongly encourage USAID to reform its procurement mechanisms and IDIQ's in ways that open space for local and regional civil society that represents marginalized populations, particularly women-led NGOs. How will gender and meaningful participation of women be integrated into the analysis, program design, policy, and prioritization of CPS, given the Women, Peace and Security Act?
- Increase flexible funding. In addition to utilizing the Complex Crisis Fund for conflict prevention as planned, CPS should continue to explore the viability of Section 385 (Transfer Authority) of the FY17 NDAA to fund conflict prevention. Additional flexible funding is also necessary.
- Continue to prioritize development and humanitarian goals within the implementation of the Stabilization Assistance Review (SAR). While State Department oversight of stabilization appears on paper, NGOs urge CPS and CMC specifically to implement the DoD-USIP Guidelines for Relations Between U.S. Armed Forces and Non-Governmental Humanitarian Organizations in Hostile or Potentially Hostile Environments and to continue to ensure DoS as the coordinator of stabilization efforts. This is critical to ensure that USG policies and programs do not inadvertently undermine humanitarian work in complicated conflict-affected areas.
- **Employ evidence-based approaches.** Some approaches, such as countering violent extremism, have mixed evidence supporting their effectiveness, yet have permeated the development, peacebuilding, and humanitarian arenas. To address root causes of conflict, CPS should continue to pursue programs that have supporting evidence and apply monitoring and evaluation tools to newer approaches.
- Prevent new silos and ensure conflict and gender mainstreaming. The CPS Bureau must, in practice, maintain ties to the new Bureau for Democracy, Development, and Innovation, as it addresses key factors in conflict prevention such as poor governance and inequalities between groups. As planned, conflict sensitivity and gender analysis should be further mainstreamed across USAID. How will the CPS Bureau create connectivity with all other relevant USAID departments and the interagency, especially when in-country USAID contacts have ties to one bureau over another?
- **Clarify the humanitarian-peace-development-diplomacy nexus.** How will CPS work to ensure these fields are not working at cross-purposes, and bridge them more effectively where appropriate?
- Seek on-going feedback from U.S.-based civil society. Civil society coalitions are ready and willing to provide USAID with ideas and best practices to implement conflict prevention and stabilization reform.