Consolidated NGO Feedback on the Bureau for Humanitarian Assistance's Emergency Application Guidelines

InterAction

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on the Bureau for Humanitarian Assistance's Emergency Application Guidelines

January 2022

EXECUTIVE SUMMARY

Background

In mid-2020, USAID's Office for Foreign Disaster Assistance (OFDA) and Food for Peace (FFP) merged into the Bureau for Humanitarian Assistance (BHA) and instituted Emergency Application Guidelines (EAGs) for funding. After reviewing the draft guidelines, InterAction and 46 NGO members wrote to the Assistant to the Administrator to raise concerns about the implications of the EAGs and urge deepened engagement with implementing partners as BHA develops its partnering practices.

The Emergency Application Guidelines have been in place for now more than one year and BHA is seeking feedback to understand how they can be improved. InterAction conducted a survey to collect quantitative and qualitative inputs regarding the NGO partner experience in using these new guidelines. This survey was created with the intention of clearly outlining challenges with the EAGs and to start identifying potential solutions that support mutually beneficial partnering practices between BHA and NGOs.

InterAction shared a survey via email to the 46 NGOs working across more than 130 country contexts to gather feedback. 25 organizations responded, with one survey response per NGO submitted via SurveyMonkey.

Key Findings

The survey results have been eye-opening, with NGO respondents indicating across the board that:

A. NGO field response to humanitarian crises is significantly delayed due to the current EAGs. Of the survey respondents, **65% indicated that they are responding, on average, at least three weeks more slowly than in the past** due to the level of detail required by the guidelines. Given the critical need for humanitarian NGOs to rapidly respond in changing contexts, this significant slowing is troubling and bears real consequences.

B. Based on the survey results, **EAG-related delays can be attributed to three major factors:**

    1. An **increase in annexes** to complete per funding application;
    2. **Submission turnaround times** for funding applications, especially initial proposal submission, are prohibitive given the level of detail expected in the EAGs;
    3. An **increase in issues letters/requests for additional information** during the proposal review process.

These were rated as very or extremely challenging issues by 83%, 88%, and 83% of NGO partners, respectively, when applying for BHA funding. Several commonalities were identified across NGO feedback in these areas. For example, 58% of NGO respondents indicated that significantly more annexes are required for submission of funding proposals under the EAGs, with the **average number of annexes per submission reaching 31**. Several NGOs indicated they submitted more than 50 annexes, on average, per funding application; **one NGO indicated the average number of annexes required per submission was 71**. Issues Letters also pose a significant challenge with almost half **(46%) of respondents indicating that they receive 3-4 Issues Letters**, on average, per application and **86% of respondents reporting an average of at least 26 questions per Issues Letter**.

It is essential to note that the vast majority of **NGOs are reporting submitting the same number of applications for funding under these new EAGs** as in previous years. This means that, given the increase in annexes, Issues Letters, and the length of time added to the funding approval process as a result, **NGOs are taking on a significantly higher administrative burden to comply with these requirements**. By stretching already precious human and financial resources, this potentially compromises the ability of humanitarian organizations to effectively meet and alleviate needs of populations of concern.

C. Monitoring and evaluation requirements also pose significant challenges, with two clearly complex components: **the level of specificity required for M&E inputs per proposal in relation to program length** (noted by 63% as very or extremely challenging) **and contextual flexibility of M&E inputs based on the current guidelines** (found by 46% to be very or extremely challenging).
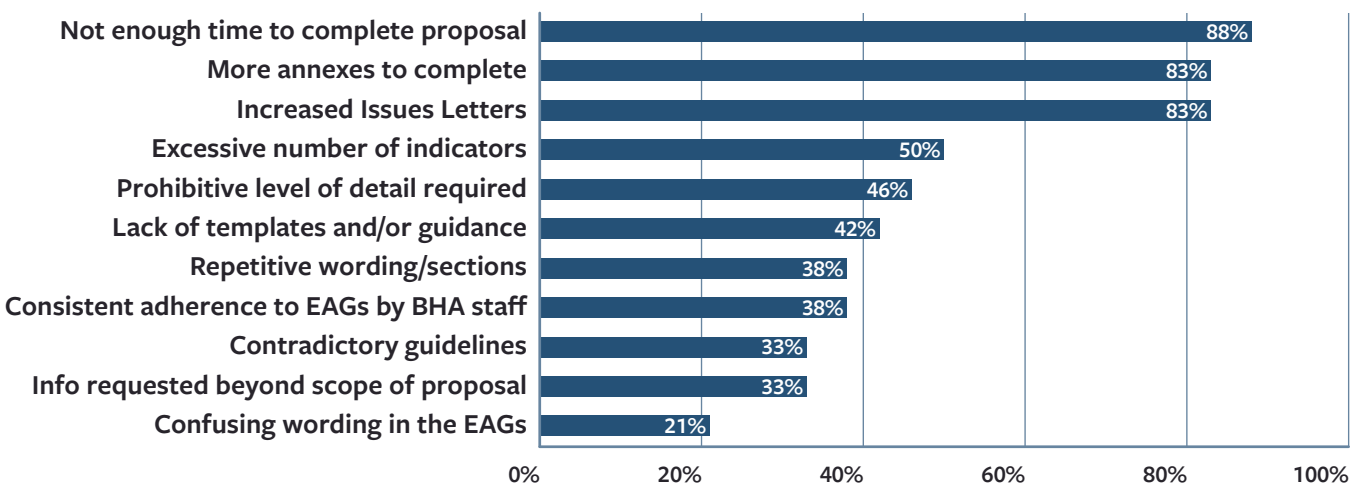
Recommendations

- Increase flexibility of EAGs, especially in terms of level of detail required at the proposal stage, by distinguishing between required components and those that can be clarified once implementation has begun. This could be done by establishing different submission timelines and proposal requirements for sudden-onset disasters and protracted crises and creating a set of minimum requirements for all proposals, with additional information (such as needs assessments or the Supply Chain/Logistics annex) required for approval of funding in more protracted crisis contexts.
- Decrease the number of questions per Issues Letter and reduce the overall administrative burden on NGO partners during the proposal process by determining which components of the Technical Narrative are required for approval and which can be clarified after implementation has begun. In the case of funding the continuation of a program under a new grant, ensure BHA staff review previous Issues Letters and responses previously submitted to reduce or eliminate repetitive questions.
- Revise the EAGs to reduce repetitive sections and better enable compliance with page limitations. For example, establishing one section focusing on Accountability to Affected Populations (AAP) across all program activities, sectors, and outputs, rather than requesting this information throughout the technical narrative and in additional annexes.
- Establish and share more samples, templates, and offer trainings to NGO partners to ensure that NGO submissions match BHA expectations and limit questions raised in Issues Letters, particularly for the following components: proposal/narrative template, needs assessment template, workplan template, Risk and Mitigation (Annex D), pre-approval requests or waivers.
- Establish technical M&E requirements that are adjustable per program, commensurate with program length and which reflect the scope and timeline for projects (i.e. more indicators for longer and/or more complex projects and fewer indicators required for shorter projects).
- Engage with NGO partners regularly to determine major pain points and areas for improvement in the partnership process.

FINDINGS

Major Challenges with Submission of Funding Applications

NGO survey respondents were asked to gauge the level of difficulty their organization faced, on a scale from not at all challenging to extremely challenging, with different components of their user experience in applying for BHA funding. As shown in the graph below, all challenges were selected as very or extremely challenging. However, **three particular components stand out as very or extremely challenging: the time needed to complete the funding proposal, the increase in annexes required for submission, and the increase in issues letters/requests for information from BHA** (marked as "very" or "extremely" challenging by 88%, 83%, and 83% respectively).

% of Respondents Selecting These as Very or Extremely Challenging

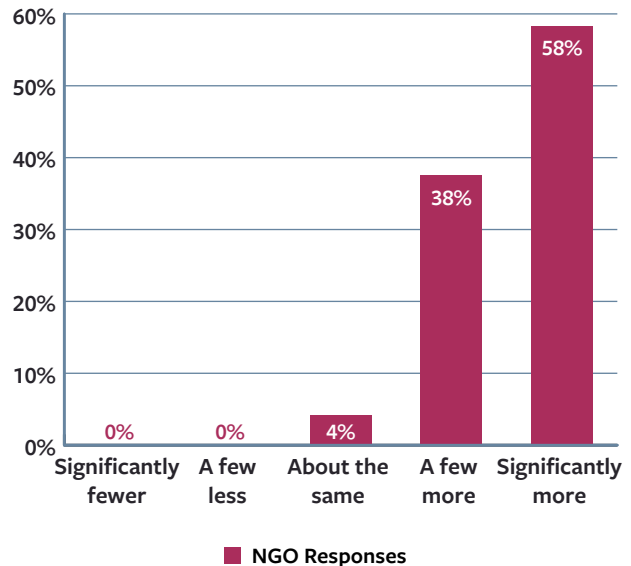| Challenge	%
Not enough time to complete proposal	88%
More annexes to complete	83%
Increased Issues Letters	83%
Excessive number of indicators	50%
Prohibitive level of detail required	46%
Lack of templates and/or guidance	42%
Repetitive wording/sections	38%
Consistent adherence to EAGs by BHA staff	38%
Contradictory guidelines	33%
Info requested beyond scope of proposal	33%
Confusing wording in the EAGs	21%

Annexes

The number of annexes and the level of detail required within them has been reported by most NGO respondents as a major impediment in applying for funding under the EAGs. As shown to the right, **most respondents (92%) indicated that more annexes are required** for submission of funding under the EAGs. In practice, **NGOs report that 31.3 annexes are required** on average per funding submission**, with the average ranging from 10 to 71 annexes per funding proposal** across the NGO responses.

One NGO partner notes that "previous OFDA proposals had an average of no more than 20 annexes; previous FFP proposals had about 15," whereas now under the BHA guidelines, "a minimum of 20 annexes are required for all applications." This has translated to a commensurate increase in

Approximately how many annexes are required for submission of funding under the EAGs, compared to to in the past?

Response	NGO Responses
Significantly fewer	0%
A few less	0%
About the same	4%
A few more	38%
Significantly more	58%

pages: one NGO reported that a program under FFP required 29 annexes (totaling 169 pages), whereas the same program under BHA resulted in 46 annexes (426 pages).

In some cases, annexes are used by NGOs to circumvent prohibitive page limitations in the proposal guidelines. It is important to note, however, that the EAGs include additional mandatory annexes, several of which have been noted as remarkably challenging to complete within the standard proposal timeframe, especially given the level of detail required. Annexes for Accountability to Affected Populations, Risk Assessment Plan, Procurement Plan, Indicator Tracking Table (ITT), and the MEAL Plan/Needs Assessment have been named as particularly challenging for NGOs.

However, while certain annexes that have been identified as more burdensome than others, it is **repetitiveness and the intense level of detail required across all annexes, and subsequent need to update information in the technical narrative and all annexes in a proposal during BHA review, that combine to cause significant burden for NGO colleagues**. One NGO explained, "while certain annexes do require more effort and detail, what is most burdensome in relation to the annexes is the need to reflect changes across annexes over the course of BHA review and revision process. …During the short time frames to respond to Issues Letters – in some cases 1-2 days – it's extremely challenging to ensure all corresponding changes are made throughout all applicable documents."

Redundancy of information was also noted by many NGOs: for example, "the risk annex overlaps with accountability to affected populations, protection, adaptive management," which results in repeating the same information in multiple places of the proposal. Additionally, while BHA's emphasis on program quality is commendable, the same repetition is notably present across many components of the guidelines:

> *"The requirement to discuss Protection Mainstreaming, Prioritize Safety and Dignity, and Avoid Causing Harm, Meaningful Access, Accountability, Participation and Empowerment, Gender Analysis and Integration, GBV Risk Mitigation, Local Capacity Building, Disaster Risk Reduction Mainstreaming and Relationship to Resilience Programming, and Environmental Considerations for every sector is duplicative and challenging to comprehensively articulate when integrated interventions must be split out in the narrative. More cumbersome, some required annexes, such as Accountability to Affected Population (AAP), Gender Analysis, and the M&E Plan, address these same issues. Example: The M&E Plan has an AAP section, in addition to the separate AAP annex and Accountability section per sector in the Technical Narrative. BHA has been clear that the M&E Plan and AAP should remain separate annexes. To respect this and reduce duplicative efforts, the AAP section in the M&E Plan effectively just says, "Please see the AAP Annex," as we then expand on our AAP work in that annex. While most reviewers have accepted this, some BHA staff do ask us to expand on the AAP section in the M&E Plan itself, which can cause confusion, duplication, and inconsistencies."*
>
> *– NGO respondent*

This repetition impacts NGOs' ability to comply with page limitations, as the same information is required to be incorporated in different sections. **NGOs emphasize the need for simplification of the proposal requirements and annexes to comply with both tight turnaround times for proposal submission and page limitations set by BHA**. As outlined above, limiting the need for reiteration throughout the technical narrative and in various required annexes is one possible solution: for sections where an annex is required, such as Accountability for Affected Populations, remove the requirement within the technical narrative, leaving only the annex.

NGOs also note that establishing "essential" annexes and information required to approve funding proposals under the EAGs, as opposed to "nice to know" or information that can be shared after funding approval (such as the Supply Chain/Logistics annex) be differentiated to lessen the burden of the application process and improve the overall funding approval timeline. This is especially important to contextualize humanitarian response: for

protracted crises and/or for proposals that are approved as a continuation of previously BHA-funded programs, more detail can be shared and submitted; **for sudden-onset crises, however, NGOs must be able to respond to urgent humanitarian needs as quickly as possible, and less complicated application guidelines would better enable timely response**.
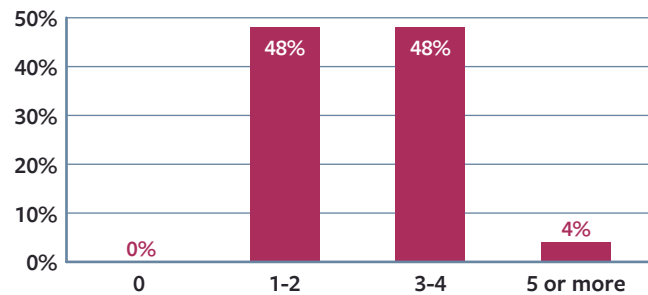
Issues Letters

Issues Letters were another major factor flagged by NGO respondents as significantly challenging. As shown to the right, **48% of respondents indicated 1-2 Issues Letters (ILs) received on average, with another 48% indicating 3-4 ILs are received on average**. Survey results indicate that this number has not increased significantly with the implementation of the EAGs; however, it is the number of questions received per EAG that has caused significant strain on NGOs.

Average Number of Issues Letters Received Per NGO

A bar chart titled "Average Number of Issues Letters Received Per NGO" shows: 0 at 0%, 1-2 at 48%, 3-4 at 48%, 5 or more at 4%.

The majority (58%) of respondents indicated that they receive 26-50 questions per IL, on average, with a further 21% saying they receive between 51-75 questions per IL. Considering that NGOs report receiving 1-4 ILs, on average, and the majority receive 26-50 questions per IL, **NGOs are responding to anywhere from 26 to 200 questions per funding proposal**. NGOs also made note of the very tight turnaround times given by BHA when sharing an Issues Letter: several NGOs reported receiving ILs with two- or three-day turnaround times. **One partner shared that they received an IL with 85 comments with a deadline for responses in three days**, which, given the number of staff needed to respond to the technical level of detail required in these questions, was exceedingly difficult and required staff to divert their attention to this proposal rather than other priorities to submit on time.

Average Number of Questions Per Issues Letter

A bar chart titled "Average Number of Questions Per Issues Letter" shows: N/A / Don't Know at 8%, Less than 10 at 0%, 11-25 at 12%, 26-50 at 58%, 51-75 at 20%, 76-100 at 0%, More than 100 at 0%.

This increase in Issues Letters and questions is even borne out for applications to continue programs, i.e., BHA-funded programs and activities approved in 2020 that are applied for again in 2021 under a new award. For programs whose activities remain the same from one funding year to the next, NGOs are finding themselves being asked new questions in the Issues Letters, or having questions which were answered in previous years' ILs asked again before funding is awarded.

Furthermore, the questions asked in ILs are especially troublesome for technical approval of the application which, as noted above in the annexes, could be given while smaller issues such are cleared up in the early stages of implementation. **NGOs would recommend focusing on priority issues that are absolutely necessary to approve the award first, while giving a 90-day turnaround to address less essential identified issues.** Level of detail is a critical factor, particularly in annexes such as the Risk Mitigation Annex or the Supply Chain/Logistics Annex in which BHA requires significant amounts of information to be shared before funding can be approved. This
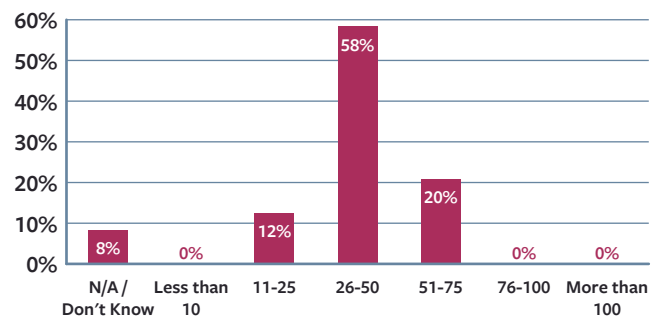
level of detail is not often available in many implementation contexts, particularly before implementation has begun, making it extremely challenging for partners to provide.

Responding to this volume of questions poses a significant amount of administrative burden on NGOs per funding proposal, and since most NGOs submit multiple proposals to BHA in a given funding year, there is a cumulative impact. Responding to issues letters requires effort from not only proposal development/grant-writing staff, but from technical and program implementation staff who are directly involved supporting affected populations.

Time Needed to Complete the Proposal

The third major challenge faced by NGOs in application for funding under BHA is proposal timing, which NGOs reported experiencing in two ways:

1. Submission deadlines for proposals and/or Issues Letters being prohibitive given human resources and the level of detail required by the EAGs;
2. Significantly delayed award times under the EAGs in light of the urgent humanitarian needs for which NGOs are seeking funding.

Submitting applications within the BHA-established application window, especially given the number of highly detailed annexes that must be completed for submission, causes significant strain for partners. One NGO said that the "level of detail and annexes required can be a huge challenge for rapid onset proposals with very short turnarounds." Another shared that **they "often [face] two weeks or less for complex proposal submission, [which] constrains [their] ability to engage partners, communities on needs; focus becomes proposal."**

Several others noted the level of detail required by the EAGs directly impacts their ability to apply, with one explaining that they receive "critiques on lack of detail but face insufficient time to provide all the detail expected. It is not reasonable both to ask for very short turnaround time and to have high expectations for great level of detail." **NGOs note highly compressed turnaround times, with many reporting 24 hours for a concept note or as little as five days for a full application with many underscoring that the level of detail required by the EAGs is simply not achievable in these timeframes.** This, in combination with the established page limitations, often results in a high number of questions received in the Issues Letters, especially in acute or sudden-onset emergencies: "it is very difficult to complete the full requirements and address extensive Issues Letters in a matter of days," said one NGO. As outlined above, these factors have resulted in some NGOs hiring additional staff to comply with the EAGs (often resulting in increased indirect staffing costs) or redirecting technical staff attention away from program implementation toward BHA funding proposals.

However, it is not simply an NGO human resources issue: when asked if the EAGs have affected their organization's response time to humanitarian needs, as shown in the table on the following page, **65% of NGOs report that they are responding at least three weeks more slowly than in the past due to the new EAGs**, with 29% reporting responding more than one month more slowly now than under previous USAID funding guidelines.

Difference in Time Taken to Respond to Humanitarian Needs Under New EAGs
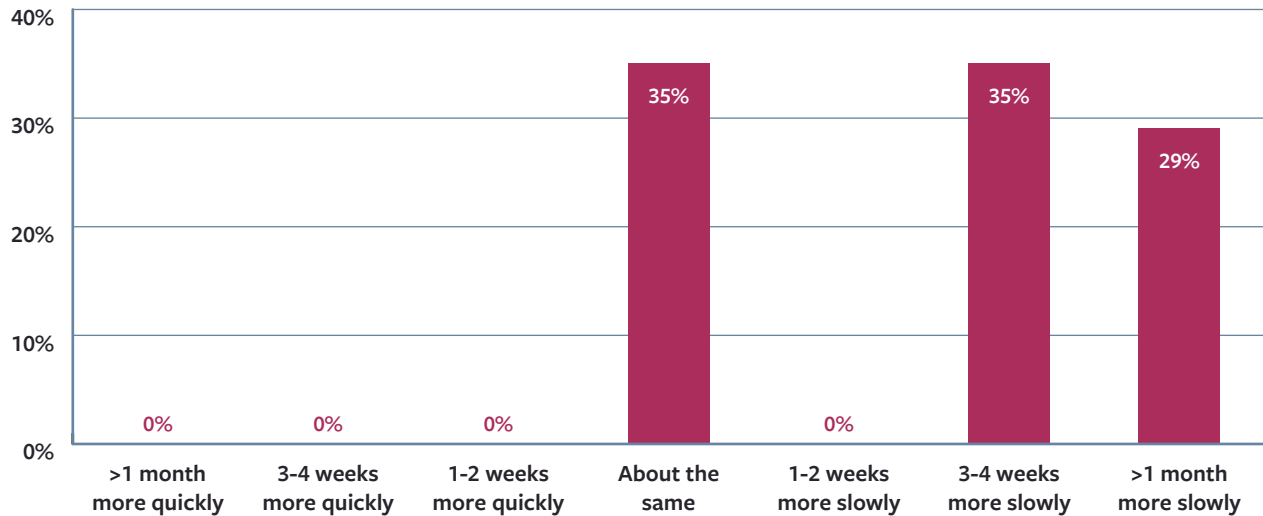
This delay is especially apparent, and attributed by many NGO respondents, as being due to the Issues Letters. As shown below, **83% of NGOs indicated that the funding process takes more than one month from reception of the first Issues Letter to the funding award/project start date**, which occurs after the initial proposal has been submitted. Given the average number of Issues Letters and questions per IL outlined above, it is no surprise that this requires a significant amount of time in the funding award process; however, it does indicate a concern either in the timing of ILs or the level of detail being requested in them before approval.

Average Time Between Receiving First Issues Letter and Reception of Award
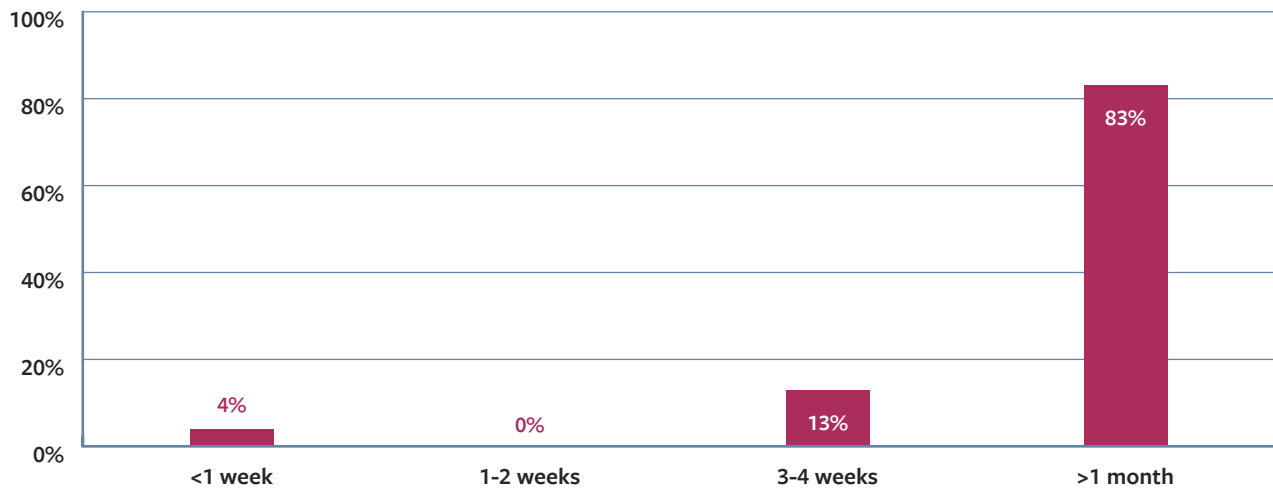
Monitoring & Evaluation

Given preliminary feedback on the EAGs from InterAction's NGO membership, one aspect of the survey focused on the M&E and data collection components. Overall NGO respondents reported that the Monitoring & Evaluation and data collection components of the EAGs as not challenging to moderately challenging. From the chart below, however, there is one major challenge facing the majority of NGO respondents: **63% indicated that the requirements of the M&E guidelines are excessive as compared to program length for their organization**. To a lesser extent, M&E guideline flexibility is of concern, with 46% indicating that M&E guideline flexibility across multiple contexts is very or extremely challenging. Both of these factors indicate space for improvement in terms of flexibility of the M&E components of BHA's EAGs.

% of NGO Respondents Indicating Level of Difficulty with EAG M&E Guidelines
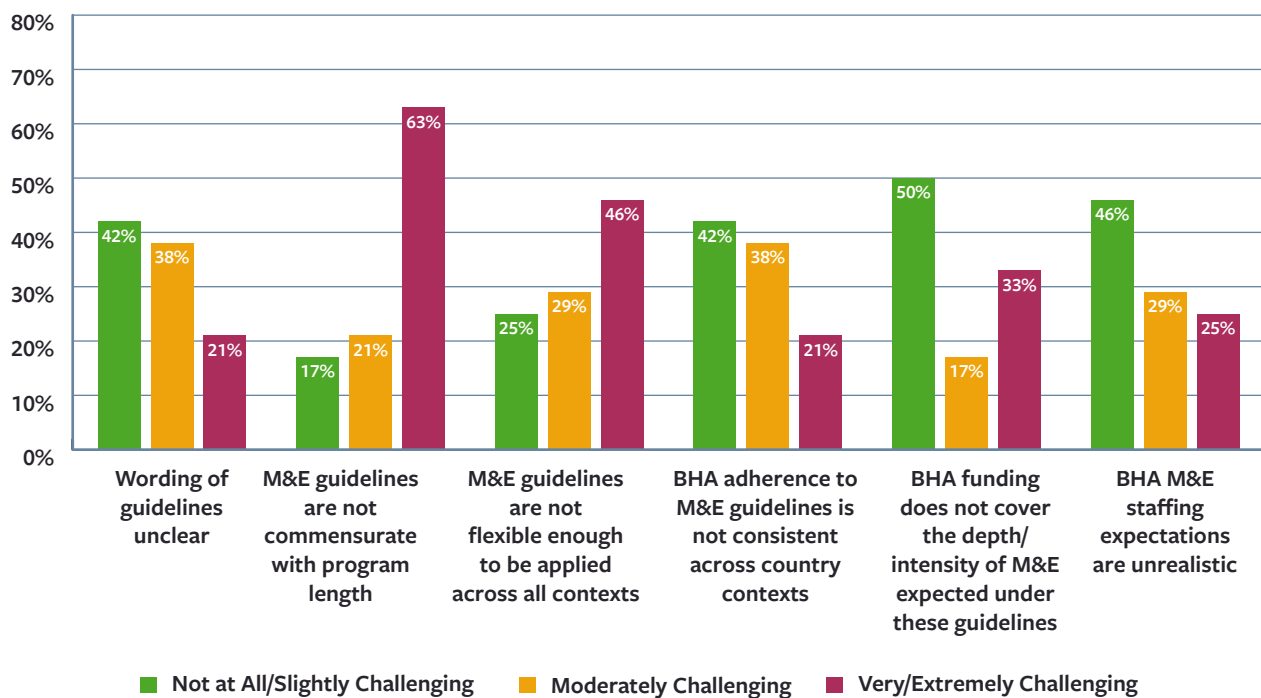
Some NGOs reported that they appreciate the M&E guidelines as they are. However, **several key components were found to be particularly challenging when submitting proposals, including: the number of indicators, overlapping information required across annexes and the technical narrative, and the level of detail required in both areas not being commensurate with the established proposal submission or turnaround times**. Much like the concerns outlined above, this leads to a negative cycle: the level of detail required is difficult to address within the required page limits, resulting in an increase in the questions asked by BHA per Issues Letter, which leads to increased administrative burden for NGOs, and lengthens thetime between proposal submission and reception of award. In their own words, one respondent outlined the concerns and their impact:

> *"The overall burden on M&E teams at the application stage has grown considerably. M&E staff have to rush to complete a thorough and specific needs assessment summary, a full M&E plan with a full list of indicators and their details, plans for implementing certain assessments, budget details, and more."*
>
> *– NGO respondent*

NGOs also had feedback to share regarding BHA's indicators, especially for multi-sectoral programs. One respondent said that the "number of indicators, especially for multisector programs, is incredibly burdensome." Another responded that "M&E requirements should facilitate adaptive management, but the complexity of the number of indicators and disaggregates makes analysis and use of the data for adaptive management more difficult." This is especially apparent for shorter-term projects:

> *"It has been challenging to complete the baseline study and report within the 90-day deadline. For many shorter awards, this has resulted in the baseline process being completed close to the end of the award, with M&E teams needing to move right into endline data collection. This leaves little room for quality monitoring or reflection on the baseline findings before implementation begins. It would be helpful if BHA could offer more rapid assessment options and guidance, especially for awards shorter than 12 months."*
> *– NGO respondent*

Several annexes are directly related to M&E, such as the Indicator Tracking Table (ITT) and the M&E Plan. Here, too, NGOs had concerns to share and suggestions for change that might improve partnership and implementation: developing a more "user-friendly" ITT template that allows automatic completion for activities or indicators that are static, removing labeling of results statements from the ITT, removing the context monitoring section from the M&E plan, and removing budgeting and staff from the M&E plan (as it is already listed in the budget itself).

To address these issues, there is a need for increased flexibility of the M&E guidelines, either in terms of timing (i.e., decreased M&E requirements for shorter-term programming), proposal submission (i.e., decreasing information required for approval of funding, with clarification of some issues in the early stages of implementation), or contextually (i.e., enabling a more contextually-appropriate level of M&E planning given the project type, sectors, and location).
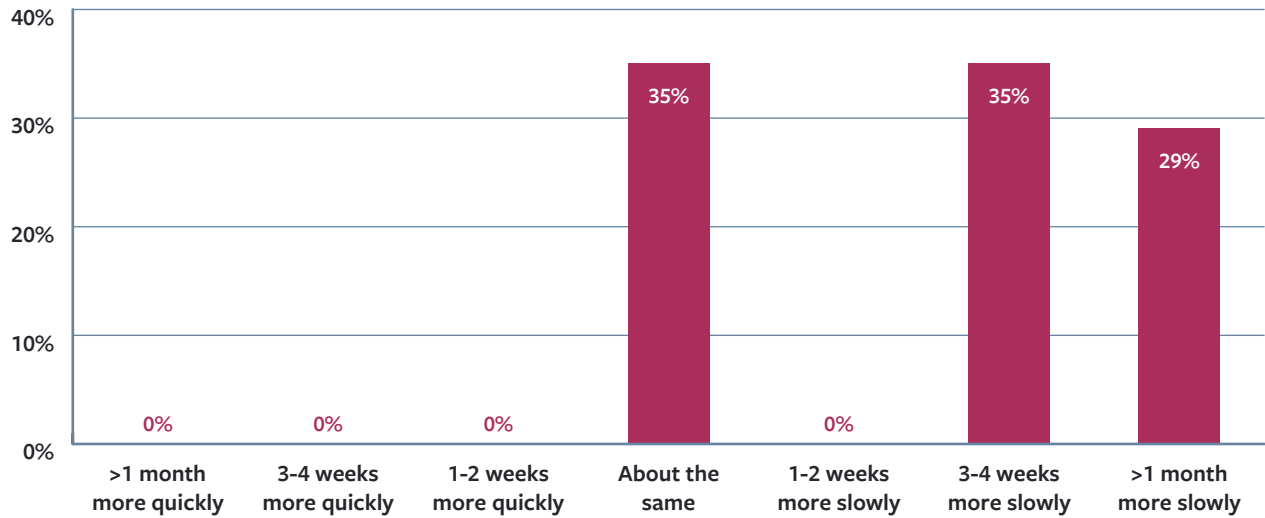
Operational Consequences

The combination of these factors presents significant operational consequences for NGO partners. **One NGO reports that they have "had to invest over $300k [USD] in additional funds to scale up capacity... to support [their] BHA portfolio**, largely because of the increased level of effort with each funding application and the increased rigor required." **NGOs report anywhere from 20-50% more staff time needed to apply per funding proposal under the EAGs** than previous funding guidelines, with one NGO estimating that "between 20-25 staff in country and HQ were directly involved" in the proposal development process to meet the EAGs' rigorous standards. Engagement of this many staff equates to substantial indirect costs to NGO partners, and which are often not fully covered by donors such as USAID. Therefore these expenses must come out of limited unrestricted organizational resources: something that proves challenging for large INGOs, but is likely prohibitive for smaller NGOs and local and national organizations operating in humanitarian crises.[1]

This has real impacts on NGOs' ability to implement timely and urgent humanitarian programming in the field, as the combination of these factors has resulted in significantly slowed humanitarian response time. As shown in the graph on the following page, **64% of NGO respondents indicated that it takes them three weeks or longer under the new EAGs to respond to humanitarian needs than they were able to do in the past**. Almost one-third (29%) of respondents indicated that the EAGs currently add more than one month to the funding process overall.
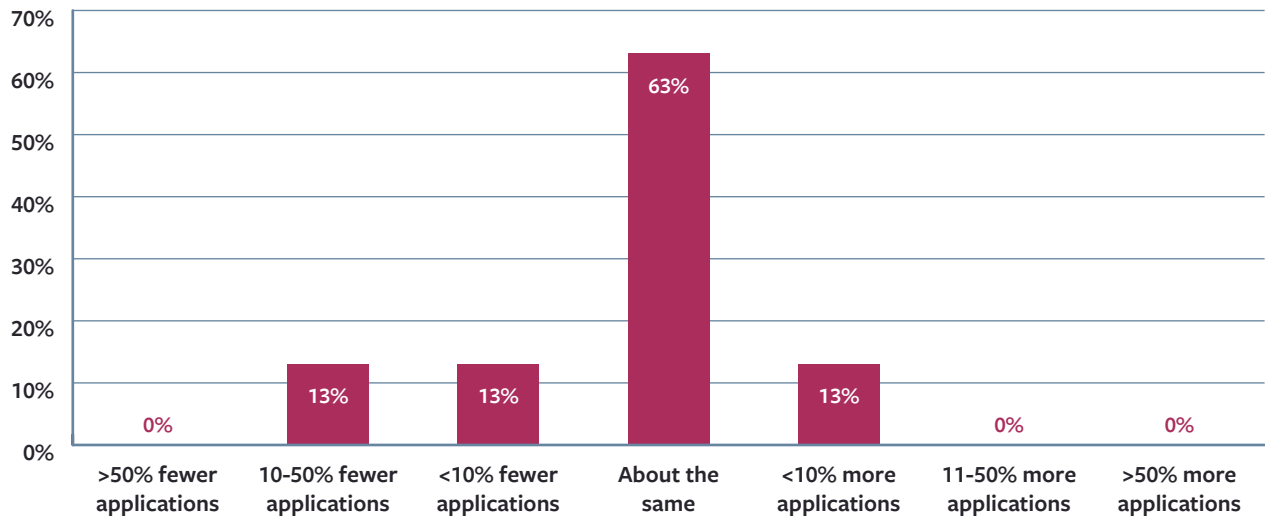
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1 This is especially critical to note given USAID's recent commitments in Administrator Power's speech at Georgetown University in November 2021, which committed 25% of USAID funding going to local partners within the next four years.

Difference in Time Taken to Respond to Humanitarian Needs Under New EAGs

>1 month more quickly	3-4 weeks more quickly	1-2 weeks more quickly	About the same	1-2 weeks more slowly	3-4 weeks more slowly	>1 month more slowly
0%	0%	0%	35%	0%	35%	29%

However, despite the challenges laid out above, more than 60% of NGO respondents indicate that they submit about the same number of funding applications under the new guidelines, showing the importance of BHA funding and the strong desire for NGOs to engage in improving the EAGs to better meet the needs of affected populations. Beyond the impact on NGO partners, these challenges will have a trickle-down effect that impacts the individuals and communities in need.

Number of Annual Funding Applications Submitted Under New Guidelines

>50% fewer applications	10-50% fewer applications	<10% fewer applications	About the same	<10% more applications	11-50% more applications	>50% more applications
0%	13%	13%	63%	13%	0%	0%

CONCLUSION

NGOs appreciate the hard work of BHA and the challenges that the Bureau is facing in its response to multiple emergencies during a time of institutional change. We also note the importance of complying with international commitments to humanitarian reform, such as the ones defined by Grand Bargain. In light of BHA's commitment to increased localization and inclusivity[2], NGOs encourage BHA to continue to engage with all partners to address these and other components. We therefore offer this feedback and the above recommendations in the spirit of partnership to achieve our mutually-shared goals of more timely and effective programming that better meets the needs of populations affected by crisis, conflict, and disaster.

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2 As outlined in USAID Administrator Samantha Power's speech at Georgetown University on November 4, 2021.