NGO COMMUNITY RESPONSE TO THE DRAFT 2022 RESILIENCE POLICY REVISION
March 2023

The draft 2022 Resilience Policy Revision ("the draft policy") introduces a comprehensive, forward-looking framework for expanding and strengthening USAID's resilience programming. The number of people living in complex risk environments has risen over the past decade due to the destabilizing effects of climate change, conflict, the COVID-19 pandemic, and more. The draft policy provides a strong framework to support the intertwined goals of improving well-being and resilience in the new global reality. As USAID finalizes the draft policy, further detail is needed to ensure that a common vision can be effectively translated into impactful operationalization and implementation.

The revision updates and expands USAID's previous policy—the 2012 Resilience Policy: Building Resilience to Recurrent Crisis—which focused on food system resilience to climate-related shocks. It extends a resilience focus across new sectors, including health, education, WASH, climate mitigation, and conflict, and establishes the necessity of transcending traditional siloes to build holistic resilience programming. InterAction welcomes the new multisectoral scope of the policy and appreciates USAID's consistent affirmation of the need for coordination. We also gladly recognize that the revised policy embeds humanitarian-development-peace (HDP) coherence and locally led development as necessary elements of any successful resilience program. The annexes highlighting data, evidence, and strategic alignment to other USAID sectoral policies and strategies are also a strong addition. Finally, we commend USAID's acknowledgment of the organizational and capacity barriers that may hinder implementation of the draft policy. This is critically important to recognize upfront.

To help ensure the successful implementation of the policy's vision, some sections require additional focus or more detailed guidance. USAID should provide a more detailed discussion of what resilience will look like extended across the newly covered sectors and levels. It should also strengthen the language on equity, rights, and justice; the risk analysis section; and the discussion of links between resilience and climate change. Looking ahead to implementation, USAID must strategize about how to truly make local ownership and HDP coherence a reality despite various organizational barriers. It should also enable more flexible funding structures to support long-term, adaptive resilience programming and set standards for purposeful evidence gathering.

InterAction provides the following recommendations to further strengthen the draft policy and support future implementation materials and discussion. This collective response drew from expertise across the InterAction community, feedback shared during a consultation with USAID in January 2023, and input submitted directly to InterAction. InterAction appreciates the policy drafting team's flexibility and coordination, and the extended 3-week comment period for stakeholder feedback. This allowed InterAction to engage a wider audience during consultation. Prior to the draft consultation, InterAction hosted USAID to give feedback on two occasions: first, in June 2021 for the 2012 Resilience Policy, and second, in May 2022 for the Policy Implementation Assessment of USAID's Building Resilience to Recurrent Crisis Policy and Program Guidance. During these consultations, InterAction Members shared best practices of
resilience programming and gave the INGO community insight on USAID’s evolution of thinking on resilience.

**OPPORTUNITIES TO STRENGTHEN THE DRAFT 2022 RESILIENCE POLICY REVISION**

Provide more discussion and detail on the expansion of the resilience framework across sectors and levels.

The draft policy’s multi-sectoral approach to resilience is critical to ensure countries, communities, households, and individuals can withstand shocks and stressors. Shocks and stresses have pervasive impacts across all traditional development sectors. Sources of resilience must be built both within and across sectors.

The draft policy states that resilience must be a central consideration of programming in all individual sectors—including food security, education, WASH, health, climate mitigation, and more—but should also “transcend traditional sectoral programming.” This is crucial recognition. However, USAID should include greater discussion, examples, and metrics on what resilience looks like within the newly added sectors. This additional guidance is particularly important given that newly included sectors will need expanded support as they work to incorporate the draft policy’s guidance.

In addition, the draft policy notes the differences between resilience at the individual, household, community, country, and system levels. It refers to these levels frequently throughout the paper. This is an important framework for analyzing and understanding resilience. However, it should be more fleshed out. USAID should provide greater specificity about what resilience looks like at each different level.

**RECOMMENDATIONS:**

- Incorporate greater discussion, examples, and metrics on resilience within new sectors, particularly the WASH, education, and health sectors.
- Identify what resilience means at different levels. What does resilience look like at the community level, the country level, and the system level?
- Build a framework to understand where communities, countries, and systems are situated along the trajectory from crisis to resilience. Identify what the most effective intervention points might be along this trajectory.
- Include tools and standards that directly relate to the concepts of resilience as described in the policy draft. Examples include the new USAID-funded SEADS standards, a guide for supporting crop-related livelihoods in emergencies.

**Reaffirm an equity-, justice-, and rights-based approach throughout the policy.**

An equity-, justice-, and rights-based approach must be thoroughly embedded in the draft policy. Marginalized groups are disproportionately affected by shocks and have more difficulty accessing resources after exposure. To mitigate this, assistance efforts should be gender-sensitive and attuned to local patterns of marginalization. Equity and justice are also sources of resilience in and of themselves. They must be a guiding principle of all resilience programming, but will likely require additional training, resources, and capacity to effectively implement.
RECOMMENDATIONS:

- Introduce an equity- and rights-based approach as a guiding principle for resilience programming early in the policy. “Principle 7: Ensure Equity and Inclusion” is too little, too late.
- Include requirements for sex- and age-disaggregated data in all monitoring mechanisms, as outlined in Action 2.
- Integrate language on labor rights throughout the policy. For example, replace the phrase “formal and informal employment” on page 22, Figure 4 with “access to decent work and fundamental labor rights.”
- Annex 2 should incorporate gender-related strategies and policies including, but not limited to, the Gender Equality and Women’s Empowerment Policy, the National Strategy for Gender Equity and Equality, and the U.S. Strategy to Prevent and Respond to Gender-based Violence Globally.
- Consider working with local stakeholders to develop field-orientated guidance on equity and justice for partners and staff.

Elevate and expand risk analysis in the program cycle.

Different communities face varying combinations of shocks and stressors, so it is essential that USAID tailor its resilience programming to each complex risk environment. This requires a dedicated, in-depth process of risk analysis, which the draft policy lays the foundation for. However, more can be done to strengthen risk analysis throughout the policy.

The policy should further elevate the importance of risk analysis by embedding it into the resilience framework. USAID can do this by adding an “Aware” resilience capacity to the Resilience Capabilities framework noted in the glossary and outlined on pages 11 and 12. This step would echo the World Bank’s addition of an “Aware” capacity in its new Health Resiliency Policy.

Furthermore, the draft policy does not include political-economic analysis as a component of risk and resilience assessments. Political and economic trends are some of the main causes of shocks and stressors, and they must also be an essential part of building resilience. Folding political-economic analysis into resiliency work would better identify the root causes and drivers of repeated crises and marginalization. It would also incorporate expertise from USAID bureaus that need to be included, such as the Bureau for Development, Democracy, and Innovation and the Bureau for Conflict and Stabilization.

RECOMMENDATIONS:

- Add “Aware” to “Absorptive, Adaptive, Transformative” in the Resilience Capabilities framework to highlight the necessary central role of risk analysis.
- Incorporate political-economic analysis into risk assessments to better understand the root causes and drivers of repeated crises. This focus can be incorporated under Principle 1 on pages 15 and 16.
- Add language requiring consideration of the unique needs of marginalized groups, including women and children, in risk analysis.
Strengthen the links between climate and resilience.

Climate change is one of the main drivers of fragility and crisis across the world today. However, the environment can also be a powerful source of resilience for communities and must therefore be central in risk mapping and resilience programming.

Climate and environmental concerns are well integrated into the draft policy. The direct linkage drawn to the USAID Climate Strategy is critically important and appreciated, but there are several points where the links between climate and resilience should be further strengthened.

First, the draft policy lacks clarity on how USAID will approach climate adaptation and resilience. What is the relationship between climate adaptation and resilience? How will adaptation and resilience programming intersect? How should implementers coordinate?

The policy should also emphasize the importance of diverse environmental programs in building resilience, including nature-based solutions, natural resource management, and agricultural system transformation.

RECOMMENDATIONS:

- Further clarify and describe the links between climate adaptation and resilience.
- Include discussion on the importance of nature in resilience (e.g., ecosystem services, nature corridors, sustainable natural resource management, nature-based solutions in general).
- Discuss agricultural system transformation, including food loss and waste solutions. Agricultural system transformation is an effective way to improve resilience while reducing emissions.
- Avoid using the term “natural disaster” (e.g., in Figure 1). Many events described as “natural disasters” are in fact driven by climate change and social or political factors.

LOOKING AHEAD TO THE 2022 RESILIENCE POLICY REVISION IMPLEMENTATION

Ensure implementation centers local leadership.

The draft policy emphasizes the importance of centering local leadership at all levels of development. As the draft notes, local leadership is essential in achieving resilience goals—localization builds organizations’ capacity, human capital, and agency to allow communities to better respond to future shocks. Thus, all resilience programming must center local leadership.

However, despite longstanding discussion on the importance of locally led development, a true power shift has remained elusive because of numerous organizational and logistical challenges. These challenges include the large administrative lift necessary to access international funding, language and cultural barriers, and organizational capacity.

The draft policy does not address the organizational and capacity barriers to localization. To ensure impact, it should move beyond language establishing the importance of local leadership and provide concrete examples of how USAID staff and implementers can enable successful implementation of this vision. These examples should attempt to address the concerns outlined above. The policy could also more clearly prioritize localization by introducing it as a guiding principle earlier in the paper.
RECOMMENDATIONS:

- Include greater discussion and metrics regarding the interim actions necessary to enable successful local ownership. Outline examples of possible actions for USAID staff and implementers.
- Ensure the policy aligns with guidance included in USAID’s Local Capacity Strengthening Policy and outline connections in the policy itself.
- Put “Principle 6: Enable Local Ownership at All Levels” as the first principle, placing greater emphasis on local leadership.

Further enable and outline coordination across the humanitarian, development, and peacebuilding nexus.

Resilience connects the traditionally siloed humanitarian and development sectors. The draft policy consistently highlights the need for humanitarian, development, and peacebuilding (HDP) coherence in resilience. However, despite this inclusion in policy, structural barriers frequently hinder HDP coherence during implementation. Adjusted language in the draft policy, greater recognition of the challenges of thorough coordination and program alignment, and the need for more investment during implementation will better support staff and help ease HDP coherence.

First, it is necessary to build resilience into humanitarian programming from the outset. This is particularly the case in complex risk environments where there have been frequent or longstanding humanitarian activities. Integrating resilience into humanitarian programs will strengthen the foundation for future resilience-focused programs. It will ensure that communities which face the greatest exposure to shocks and stressors—and therefore deal more frequently with humanitarian programs rather than development programs—also focus on long-term resilience-building.

Second, USAID should discuss the sequencing, layering, and integrating (SLI) of programs more in the draft policy. Operating across the HDP nexus puts a heavy administrative burden on mission staff and implementers. Further guidance on what effective HDP coordination looks like would be useful.

Third, USAID should join other leading actors, such as the G20 and the OECD, and invest in country platforms to strengthen coordination. The draft policy must emphasize the need for coordination; investments in country platforms that bring together local organizations, businesses, NGOs, and government ministries would be a clear, meaningful step toward making that priority a reality.

RECOMMENDATIONS:

- Emphasize that humanitarian programs should consider resilience from the beginning of their programming.
- Provide more examples of how to successfully coordinate SLI in resilience programming.
- Promise to invest in consortia, sub-regional platforms, and country platforms to enable coordination.
Allow for more flexible, long-term funding for resilience programs.

Building resilience takes time. Programs should not be focused on short-term relief, but rather on longer-term capacity building, systems-change, and independence. They must be flexible to respond to emerging crises and encourage HDP coherence.

First, USAID should provide more flexible, long-term funding to create space for effective resilience programming. Current funding is typically limited to five years—Bureau for Humanitarian Affairs funding is often just six months. This structure limits implementers’ ability to undertake strategic, long-term projects. USAID should look at the approaches of other donors—such as the Swiss Agency for Development and Cooperation, which has a 10-year horizon for programming—for strategies to expand funding timelines.

Second, to enable a larger range of organizations—particularly smaller, local organizations—to access funding, USAID should provide a wider range of budgets for its projects. This would clear the way for implementers with smaller teams, less capacity, and less institutional expertise.

Third, USAID should include more discussion on anticipatory action, early action, and crisis modifiers to encourage flexible funding models that adapt to periods of increased need while still maintaining long-term resilience-building goals. These flexible funding models are mentioned a handful of times; however, the policy should include greater detail and guidance to ensure their use in practice.

**RECOMMENDATIONS:**

- Expand funding opportunities from 5-6 years to 10-15 years to allow for long-term programming.
- Provide a wider range of budgets, including smaller awards that are more accessible to local organizations who may not have the experience or capacity to manage larger funds.
- Include more emphasis and guidance on anticipatory action, early action, and crisis modifiers.
- Streamline the process of applying for funding. Burdensome applications limit the diversity of implementors and types of organizations that can partner with USAID.

Outline the monitoring and evaluation of resilience programs in greater detail.

The draft policy includes a necessary focus on evidence-gathering and evaluation. The outline provided in Action 2 and the learning demonstrated in Annex 1 are particularly useful. However, there should be more clarity on specific indicators that show progress towards resilience. USAID should also explore opportunities to aggregate and summarize resilience evidence on an on-going basis, perhaps through a tool such as the REAL awards public dashboard. These steps would help USAID and implementers understand and reduce the gap between what has been outlined in the policy and how resilience programming is realized on the ground.

**RECOMMENDATIONS:**

- Identify and discuss resilience indicators to guide monitoring and evaluation programs.
- Continue efforts to aggregate, summarize, and publicize resilience evidence.
- Look to other organizations and donor approaches to monitoring and evaluation resilience.