

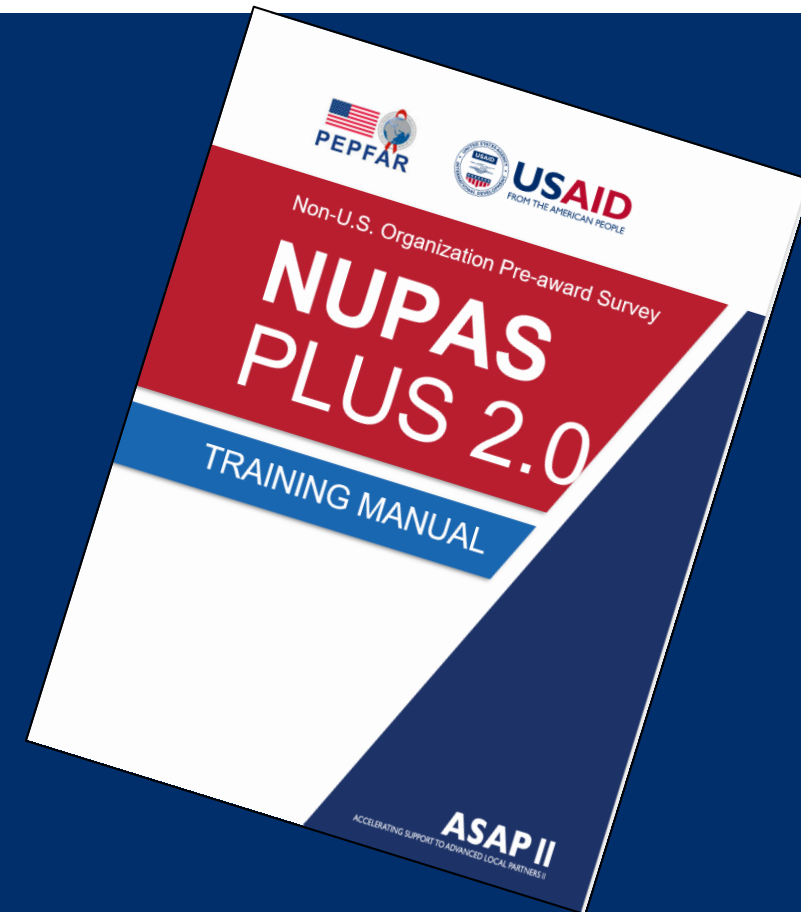


# NUPAS PLUS 2.1 TRAINING

Presenter:

Catherine Brokenshire Scott, ASAP II Project Director

Date: February 15, 2024



**ASAP II**  
ACCELERATING SUPPORT TO ADVANCED LOCAL PARTNERS II

# OUTLINE

1. Project Overview
2. NUPAS Plus 2.0 Training Manual
3. NUPAS Plus 2.1 development process
4. Key changes to NUPAS Plus Tool domains and subdomains
5. Special Award Conditions (SACs)
6. Rapid Reassessment
7. Lessons learned from conducting assessments and experience with local organizations
8. Writing a NUPAS Plus 2.1 Report
9. Developing a capacity-building plan
10. How a NUPAS Plus 2.1 report can aid in the capacity building plan development?

# PURPOSE OF THIS TRAINING

**DOCUMENT**



TRAINING FOR INTERNAL AND EXTERNAL USERS

**OBTAIN**



LESSONS LEARNED

**DISCUSS**



NEW MODULES

**DEFINE**



WAY FORWARD FOR NUPAS PLUS 2.1

# ASAP II'S PURPOSE

“Rapidly prepare Local Partners to have the capabilities and resources to serve as Prime Partners for USAID/PEPFAR programming, in compliance with USAID and PEPFAR procedures, for PEPFAR program implementation in FY20 and FY21”.

## Objectives:

1. Strengthen Local Partners as they transition to receive PEPFAR funding as a USAID Prime Partner to comply with regulations.
2. Prepare Local Partners to directly manage, implement, and monitor PEPFAR programs, and maintain consistent PEPFAR program achievement and quality.

# ASAP II STEPS

1

- Work Order Discussions, several weeks or months

2

- Building Relationships -Entry to country and local partner

3

- Document Review

4

- **External baseline assessment:** NUPAS, NUPAS+, NUPAS + 2.1

5

- Capacity Development Plan

6

- Implementation, Embedded TA – local consultants with right skill set and good match with partner

7

- **Internal self-assessments**, continuous measurement

8

- External assessments

# NUPAS & ITS DOMAINS

**Non-U.S. Organization Pre-award Survey (NUPAS)** - is a USAID assessment tool that provides the agency with the information needed to evaluate the ability of local partners to adequately fulfill the terms of an award (ADS 303 and 2 CFR 200.205).

This assessment determines whether the organization's financial management and internal control systems are adequate to manage, control, account for, and report on the uses of potential USAID funds to protect the U.S. Government from fraudulent practices.

## **NUPAS Objectives:**

1. Determine whether a non-U.S. organization has sufficient financial and managerial capacity to manage USAID funds following U.S. Government and USAID requirements.
2. Determine the most appropriate method of financing to use under the potential USAID award.

## **NUPAS Domains: 6**

**1. Legal Structure, 2. Financial Management and Internal Control Systems, 3. Procurement Systems, 4. Human Resources Systems, 5. Project Performance Management, and 6. Organizational Sustainability**

# NUPAS PLUS & ITS DOMAINS

**Non-U.S. Organization Pre-award Survey (NUPAS) Plus** - The ASAP I project developed the NUPAS Plus tool between May and August of 2019 to supplement the original NUPAS and identify root causes of deficiencies and significant weaknesses by adding modules that go beyond the original six areas of assessment.

## **NUPAS Plus Objectives:**

1. Determine whether the Non-U.S. Organization has sufficient financial and managerial capacity to manage USAID funds following U.S. Government and USAID requirements.
2. Provide recommendations to USAID on areas of support needed for the local partner to succeed as a prime recipient with increased funding.

## **NUPAS Plus Domains:16**

**1.** Legal, **2.** Finance, **3.** Risk Management, **4.** Procurement, **5.** Property Management, **6.** Information Technology, **7.** Human Resources, **8.** Monitoring and Evaluation, **9.** Gender and Social Inclusion, **10.** Governance, **11.** Business Development, **12.** Sustainability, **13.** Mandatory Standard Provisions, **14.** Required as Applicable Provisions, and **15.** Environmental Mitigation and Monitoring

# NUPAS PLUS 2.1 & ITS DOMAINS

**Non-U.S. Organization Pre-award Survey (NUPAS) Plus 2.1** - ASAP II developed the NUPAS Plus 2.1 Tool to have a comprehensive, consolidated assessment tool by combining the original NUPAS and NUPAS Plus, revising the sub-criteria/questions or adding new ones to the NUPAS and NUPAS Plus domains.

## **NUPAS Plus Objectives:**

1. Determine whether non-U.S. organizations have sufficient financial and managerial capacity to manage USAID funds in compliance with USG and USAID requirements.
2. Identify the root causes of deficiencies and significant weaknesses of partner non-U.S. organizations and provide recommendations to USAID on areas of support needed for them to become and succeed as a prime recipient.
3. Provide baseline data for the organizations for self and external reassessments.

**NUPAS Plus Domains: 19** domains, which include NUPAS Plus domains plus four new domains (Award Management, Subaward Management, Communications & Key Population).



# STEPS FOR CONDUCTING NUPAS PLUS 2.1

## 1. Preparations

1. Hold an initial briefing with USAID without the local organization present
2. Hold an introductory meeting with the senior leadership of the organization, with USAID present
3. Review the tool
4. All assessors **sign non-disclosure agreements** (NDA) and send them to USAID mission and local organization
5. Sign a **Memorandum of Understanding** (MOU) to state the expectations and roles of each party
6. Send the NUPAS Plus 2.1 tool to the organization
7. Send a list of required documents
8. Create a Dropbox or other file for required documents

## 2. Assessment

1. Conduct a desk review of documents and score
2. Schedule a site visit
3. Schedule staff interviews
4. Record all scores in NUPAS Plus 2.1 tool and add comments
5. Include justification for scores
6. If not applicable, adjust the formula to eliminate the rating from the average section rating
7. Hold a ground truthing meeting

## 3. Report Writing

1. Prepare report
2. Submit the report within two weeks of the assessment
3. Schedule a time to reassess the organization and repeat the NUPAS Plus 2.1

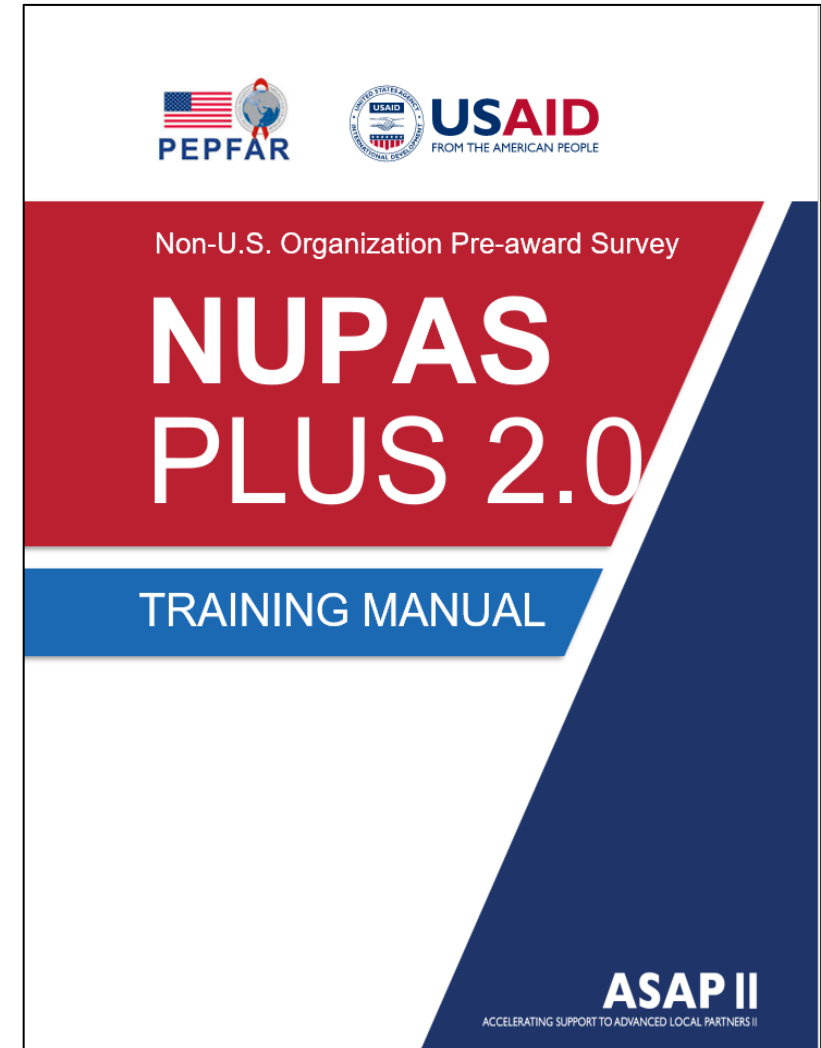
# NUPAS PLUS 2.0 TRAINING MANUAL

## PURPOSE

- Serves as a standard guide to reduce the level of effort needed to carry out a NUPAS Plus 2.0 and 2.1 Assessment.
- Helps local organizations not only to understand the NUPAS process as they are being assessed by external assessors but also to learn how to use it to assess their sub-awardees.

## AUDIENCE

- Those involved in assessing organizations to become primes to receive funding from USAID and other prime funders
- Local organizations



# NUPAS PLUS 2.0 TRAINING MANUAL

## STRUCTURE AND CONTENT

- Divided into Six Major Sections
- Has 19 Modules, each covering in detail a domain and its sub-criteria.
- Overview of NUPAS, NUPAS Plus and NUPAS Plus 2.1 (Objectives and Modules)
- Special Award Conditions
- Implementation Guide
- NUPAS Plus 2.1 Modules and Tool
  - Background
  - Objectives
  - Implementation Methods and Procedures
  - Necessary Documents for Verification
  - Practical Application Examples, Role-Plays, and Case Studies

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# NUPAS PLUS 2.0 TRAINING MANUAL

## STRUCTURE AND CONTENT

- **Training Facilitation Guidance**
- **Appendices**
  - [NUPAS Plus 2.1 Tool in Excel Format](#)
  - [PowerPoint Slide Presentation on Each Module](#)
  - [Sample Capacity Development Plan](#)
- **Glossary**

## SECTION V: CAPACITY DEVELOPMENT PLAN

Click here [for a link to the USAID/Accelerating Support For Advanced Local Partners \(ASAP\) Capacity Development Plan worksheet](#)

ASAP CAPACITY DEVELOPMENT PLAN										
Name of Organisation		<input type="text"/>								
Country		<input type="text"/>								
Date		<input type="text"/>								
DOMAN AND CRITERIA	NUPAS SCORES	KEY ACTIVITIES	EXPECTED RESULTS	NAME OF CAPACITY ADVISOR OR INITIALS	LOCAL PARTNER COUNTERPART	TOOL USED OR DEVELOPED	START DATE	END DATE	REASSESSMENT DATE	REASSESSMENT SCORE BETWEEN 3-6 MONTHS
<b>INSTRUCTIONS</b>		<b>CUT and PASTE NUPAS PLUS ACTIVITIES OR CUSTOMIZE AN ACTIVITY REFER TO ASAP TECHNICAL APPROACH AND SELECT SCORES</b>								
<b>Domain and Categories</b>										
<b>1. Legal</b>										
1		Definition of Local Organization								
2		Compliance with legal requirements								
3		Organizational Structure								
4		Governance								
5		Control Environment								
		Other								
		Average Score								
<b>2. Financial</b>										
6		Banking Relationship and Accounts								
7		Accounting Bookkeeping System								
8		Chart of Accounts General Ledger								
9		Variance Analysis								
10		Allowable and unallowable costs								
11		Direct and Indirect								
12		Payments - Segregation of Duty								
13		Accounting - Segregation of Duty								
14		Financial Records Management								
15		Sources of Funding								
16		Financial Reporting								
17		Audit and Review of Financials								
18		Financial Management Personnel								
		Other								
		Average Score								
<b>3. Procurement</b>										
19		Procurement Policies, Procedures and Practices								
20		Compliance with Policies and Procedures - Reasonableness of Price								
21		Procurement and Sub-awards								
		Other								

You can access the Training Manual and all accompanying materials online at [intrahealth.org/nupas-plus-training-manual-resources](http://intrahealth.org/nupas-plus-training-manual-resources).

# NUPAS PLUS 2.1 DEVELOPMENT PROCESS

**May to August: 2019:** Adapted NUPAS tool to determine the root cause of significant weaknesses.

**September 2019 to March 2020:** Conducted ten NUPAS Plus in Ethiopia and two in Uganda.

**February 2020:** Held Technical Working Group with 15 INGOs to review tool.

**March 2020:** Volunteers reviewed modules provided feedback and sent them to three final reviewers.

**March 31, 2020:** Sent revised tool to the technical working group (TWG) for final review.

**April 7, 2020:** TWG meeting to finalize the tool.

**Mid-2020 to August 2021:** Applied NUPAS Plus tool to 33 LIPs.

**January 2023:** Requested SustainAbility Solutions to revise NUPAS Plus based on new policies and the assessor's experiences.

**February 2023:** Circulated NUPAS Plus updates to all Capacity Advisors (50) and Consortium members (2) and allocated assignments.

# NUPAS PLUS 2.1 DEVELOPMENT PROCESS

## **March 2023:**

- Incorporated changes.
- Facilitated Workshop 1 for small groups of subject matter experts to review all proposed changes and make recommendations.

## **May 2023:**

- Incorporated the changes.
- Facilitated Zoom Workshop 2 to review recommendations.
- Met with SustainAbility Solutions to finalize changes.

## **June – August 2023**

- Made final edits.
- Conducted quality checks.
- Pre-tested Rapid Reassessment in Cote d'Ivoire.
- Updated Training Manual.

**September 2023:** Submitted to USAID for review and approval.

# NUPAS PLUS 2.1 DOMAINS



NON-US ORGANIZATION PRE-AWARD SURVEY (NUPAS) Plus Tool

Prepared by: Accelerating Support to Advanced Local Partners II (ASAP II) (Task Order 7200AA19F00004)

Version 2.1- May 6, 2024

## Navigation Links

Click the boxes below to access the respective worksheets to the selected domain

Instructions for USAID  
NUPAS

Instructions for NUPAS  
Plus 2.1

Detailed Scores

Summary Scores

USAID NUPAS

1. LEGAL

2. FINANCE

3. FRAUD

4. PROC. & LOGISTICS

5. PROPERTY MGT.

6. IT

7. HR

8. M&E

9. GENDER

10. GOVERNANCE

11. SUBAWARD MGT.

12. COMMUNICATION

13. KEY POPULATION

14. BUSINESS DVT.

15. AWARD MGT.

16. SUSTAINABILITY

17. MSP

18. RAA

19. EMMP

# METHODS AND PROCEDURES

A team of multidisciplinary experts conducts the assessment, which includes:

- Introductory meeting
- Requested documents sent to:
- Desk review of documents
- Site visit
- Interview key staff members
- Analysis of financial statements and records
- Conduct sample verification of systems and practices
- Out brief meeting with SAMRC
- Final Report submitted to USAID



# STEPS FOR CONDUCTING NUPAS PLUS 2.1

1	Review the tool to familiarize yourself with all the domains and categories
2	Send the NUPAS Plus 2.1 tool to the organization so they can familiarize themselves with the assessment questions
3	Send a list of required documents to the local organization two weeks before starting the assessment
4	All assessors sign non-disclosure agreements (NDA) and send them to USAID mission and local organization
5	Create a Dropbox or other file for the local organization to store all the required documents
6	Conduct a desk review of the documents and score all applicable categories
7	Schedule a site visit (or virtual) to a local organization with USAID Mission
8	Hold an initial briefing with USAID without the local organization present
9	Hold an introductory meeting with the senior leadership of the organization, with USAID present
10	Have a discussion on the terms to be included in Memorandum of Understanding (MOU) to state the expectations and roles of each party
11	Senior officials sign the MOU between assessors and the organization
12	Schedule staff interviews
13	Record all scores in NUPAS Plus 2.1 tool and add comments
Note	All assertions should be analyzed and scored with adequate remarks justifying the score given. If an assertion/assessment area is not applicable, please indicate N/A in column 1 “Comments for Report” and provide justification as to why it is not applicable. The overall rating represents the best judgments of those making the assessment after all evidence has been considered.
Note	Upon concluding that an assertion is not applicable, please adjust the formula to eliminate the rating from the average section rating. Otherwise, the average rating will be understated.
15	Hold a ground truthing meeting with local organizations, review scores, and provide an opportunity to clarify any matters they may disagree with. This step can lead to changing scores when additional information is provided
16	Prepare report
17	Submit the report within two weeks of the assessment
18	Schedule a time to reassess the organization and repeat the NUPAS Plus 2.1

# ASSESSMENT SCALE

Scoring	Scale	Description
1.0 -1.5	Inadequate	Significant control weaknesses could expose the organization to significant financial or other loss or otherwise significantly impair its ability to manage USAID funds.
1.51 -2.5	Weak	Significant control weaknesses exist that could expose the organization to unacceptable/inadequate levels of unmanaged risk.
2.51 -3.5	Adequate	Although a control weakness was noted, compensating controls and other factors exist to reduce the residual risk within the organization to acceptable levels.
3.51 -4.0	Strong	Overall, a strong control framework is in place. Some improvements may be recommended. No deficiencies or low risk.)

# EXAMPLE FROM ONE NGO

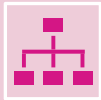
NUPAS		
Domain and Categories		Score
<b>1. Legal</b>		
1	Definition of Local Organization	4.00
2	Compliance with Legal Requirements	2.10
3	Organizational Structure	3.50
4	Governance	4.00
5	Control Environment	2.10
	<b>Average Score</b>	<b>3.10</b>
<b>2. Finance</b>		
6	Banking Relationship and Accounts	3.25
7	Accounting Bookkeeping System	3.50
8	Chart of Accounts General Ledger	3.38
9	Variance Analysis	3.00
10	Allowable and Unallowable Costs	3.13
11	Direct and Indirect Costs	3.75
12	Payments - Segregation of Duty	4.00
13	Accounting - Segregation of Duty	4.00
14	Financial Records Management	2.75
15	Sources of Funding	3.33
16	Financial Reporting	2.50
17	Audit and Review of Financials	3.75
18	Financial Management Personnel	4.00
	<b>Average Score</b>	<b>3.41</b>

# **SPECIAL AWARD CONDITIONS (SACs)**

# EXAMPLE OF SACs



The Board of Directors must comply with Professional Standards of Conduct within 30 days.



Management must perform an organization-wide policy review for alignment and subsequent updates within 60 days.



NGO must provide proof of reconciliation on top-up fuel cards in each quarterly financial report in the new award. Reconciliation **MUST** be implemented within 30 days of the date of the award.



NGO must hire a dedicated M&E Advisor at HQ and one for the Center of Excellence within 60 days of the new award.

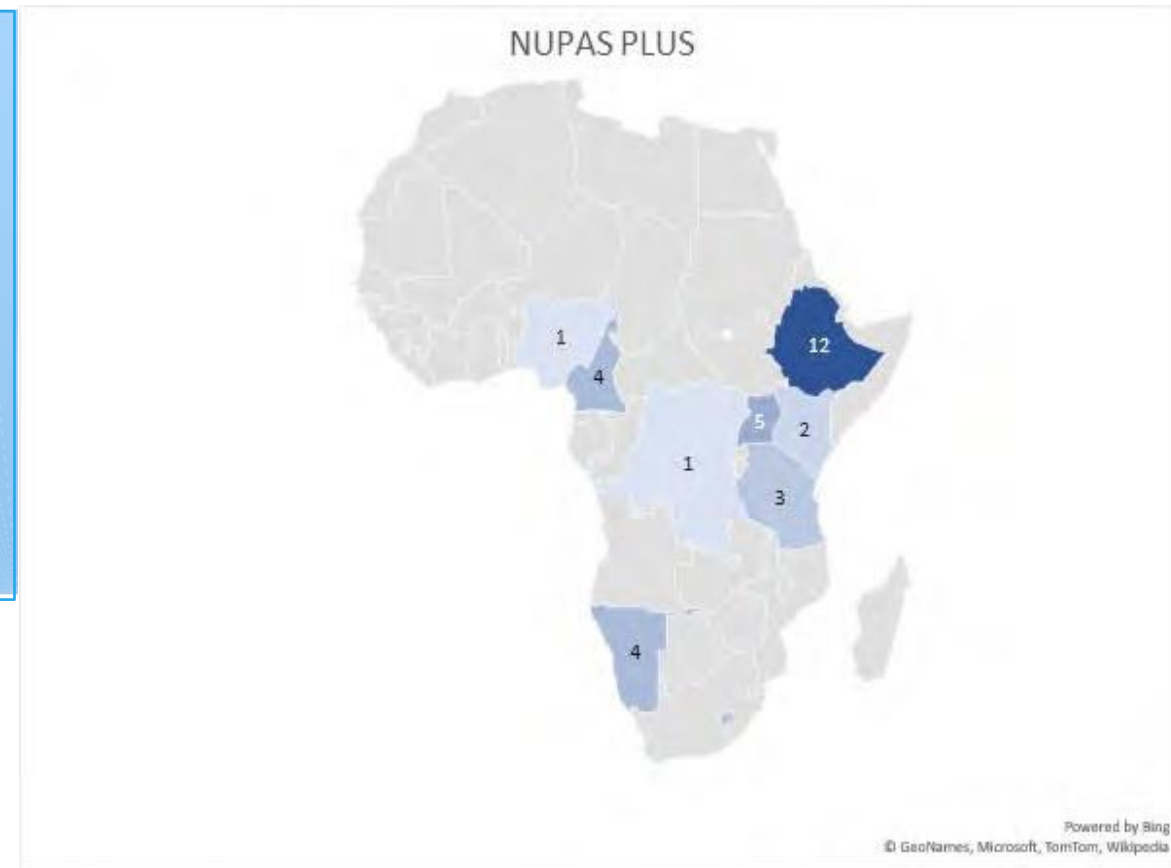


NGO must develop and use a timesheet for the organization and provide training in timekeeping within 30 days.

# CONDUCTED NUPAS / NUPAS Plus

2 NUPAS-7 “in progress” in Mozambique 31  
NUPASPlus

31 Current Partners in:  
Cameroon, Democratic Republic of Congo,  
Ethiopia, Kenya, Lesotho, Namibia, Nigeria,  
Tanzania, and Uganda

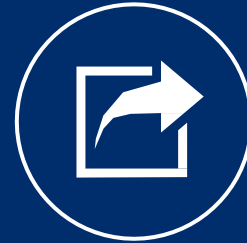


# EXAMPLE FROM ETHIOPIA

2019



2021



2020



2022



## STARTUP

ASAP Kicks off

## ASSESSMENT

NUPAS / NUPAS Plus Assessment for 10 local organizations

## TRANSITIONS AND REASSESSMENTS

- 5/10 Prime organizations transitioned to CoAg
- 4/10 transitioned to subawards
- Reassessment 4/5 LIPS
- 2 New FAA Agreements
- Assess FAA

## REASSESSMENT PLANNED

- Conduct follow-up NUPAS to BPDO
- Reassess 2 FAA recipients
- Access to 3rd round of NUPAS database

# NUPAS DATABASE

to Advanced Local Partners (ASAP) SYSTEM USER : GIRUM

---

2- Select NUPAS

**NUPAS**   NUPAS+

NUPAS+1 Legal

NUPAS+2 Finance

NUPAS+3 Fraud

NUPAS+4 Procurement

NUPAS+5 Property

NUPAS+6 IT

NUPAS+7 HR

NUPAS+8 M&E

NUPAS+9 Gender

NUPAS+10 Governance

NUPAS+11 Business

NUPAS+12 Sustainability

NUPAS+13 MSP

NUPAS+14 RAA

NUPAS+15 EMMP

## NON-US ORGANIZATION PRE-AWARD SURVEY (NUPAS) Plus Tool

### NUPAS Scoring Summary

Assessment Main:

Organization Name:    Date of Assessment:  4/20/2021   Name of Assessors:    Baseline/Followup:    IdNo:

Search By:




OrganizationName	DateOfAssessment	NamesOfAssessors	BaselineOrFollowup	IdNo
ISHIDO	4/20/2021	ASAP Ethiopia Team	Baseline	

Assessment Detail

Score Range:

1 INADEQUATE CAPACITY Key Deficiencies	2 WEAK CAPACITY Some Deficiencies	3 ADEQUATE CAPACITY No Deficiencies	4 STRONG CAPACITY No Deficiencies
Not Remediable Before	Not Easily Remediable Before	Remediable Before Award	No Significant Weaknesses
High Risk	Moderate to High Risk	Low to Moderate Risk	Low Risk

OVERALL SCORE	3.02	3.37	Improved
Legal Average	3.7	3.79	3.7
SECTION	Baseline	Follow-up	Remark
1. Definition of Local Organization	4.00	4.00	Maintained
2. Compliance with Legal Requirements	3.50	3.75	Improved
3. Organizational Structure	3.50	3.70	Improved

Note

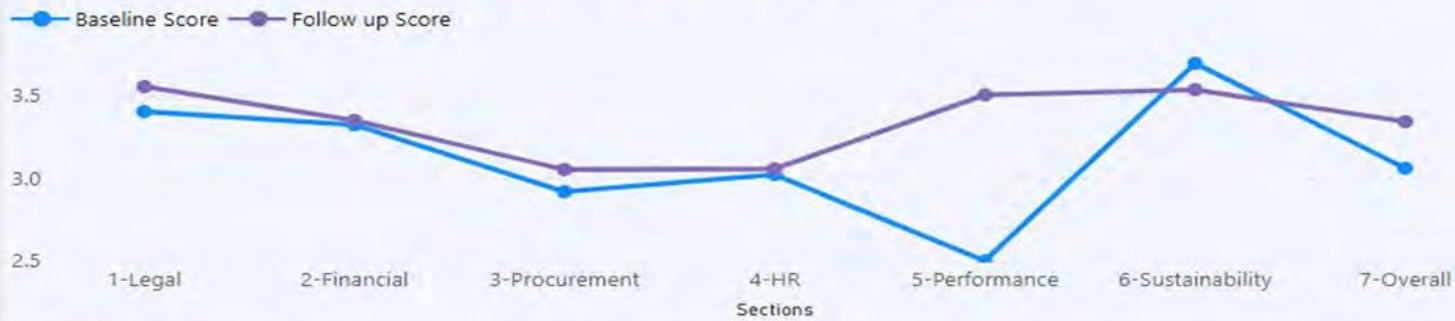


# Non-US Organization Pre-Award Survey (Regular NUPAS)

Organization	Assessment Date	Overall Average	Overall Average	Proportion of Baseline and Follow up Score
Organization Name	12/20/2019 Baseline : m/dd/yy 1/27/2021 Follow up	3.13 Baseline Score	3.34 Follow up Score	

Baseline Score: 21.90 (48...)  
Follow up Score: 23.37 (51...)

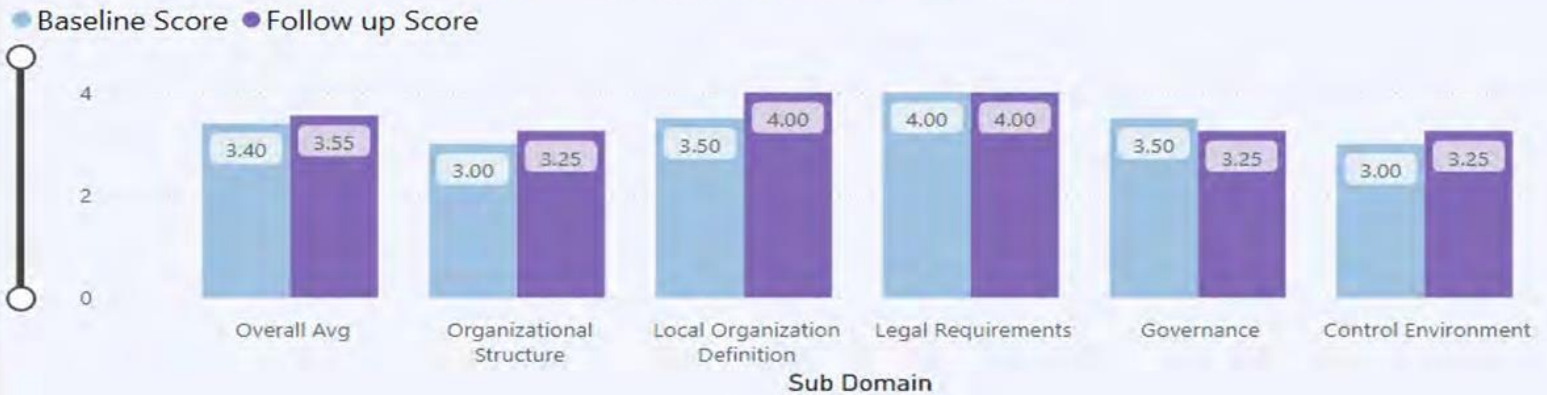
## Average Score By Regular NUPAS Major Domain



Sections	Baseline	Follow up
1-Legal	3.40	3.55
2-Financial	3.32	3.35
3-Procurement	2.92	3.05
4-HR	3.02	3.05
5-Performance	2.50	3.50
6-Sustainability	3.69	3.53
7-Overall	3.06	3.34

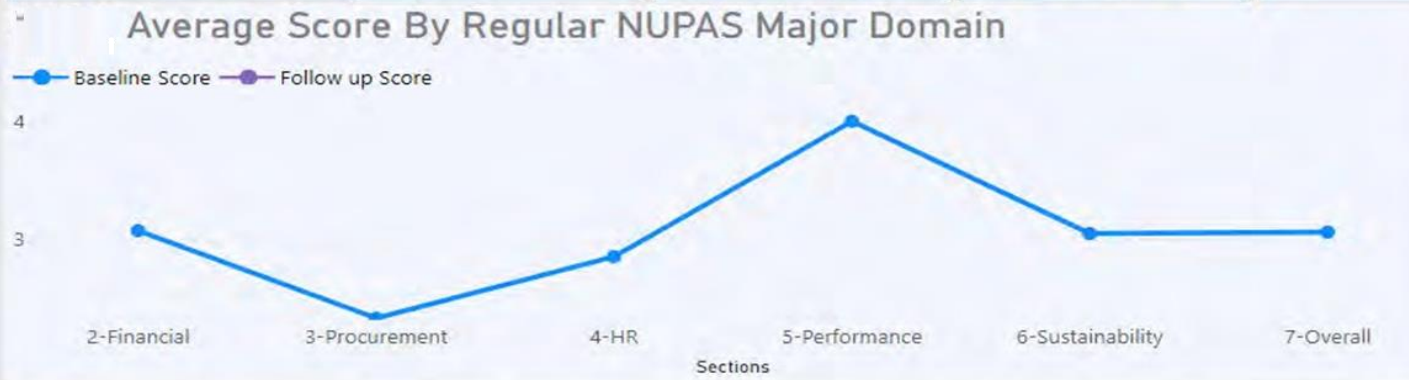
- Major Domain
- 1-Legal
  - 2-Financial
  - 3-Procurement
  - 4-HR
  - 5-Performance
  - 6-Sustainability

## 1-Legal Average Score By Regular NUPAS Sub Domain



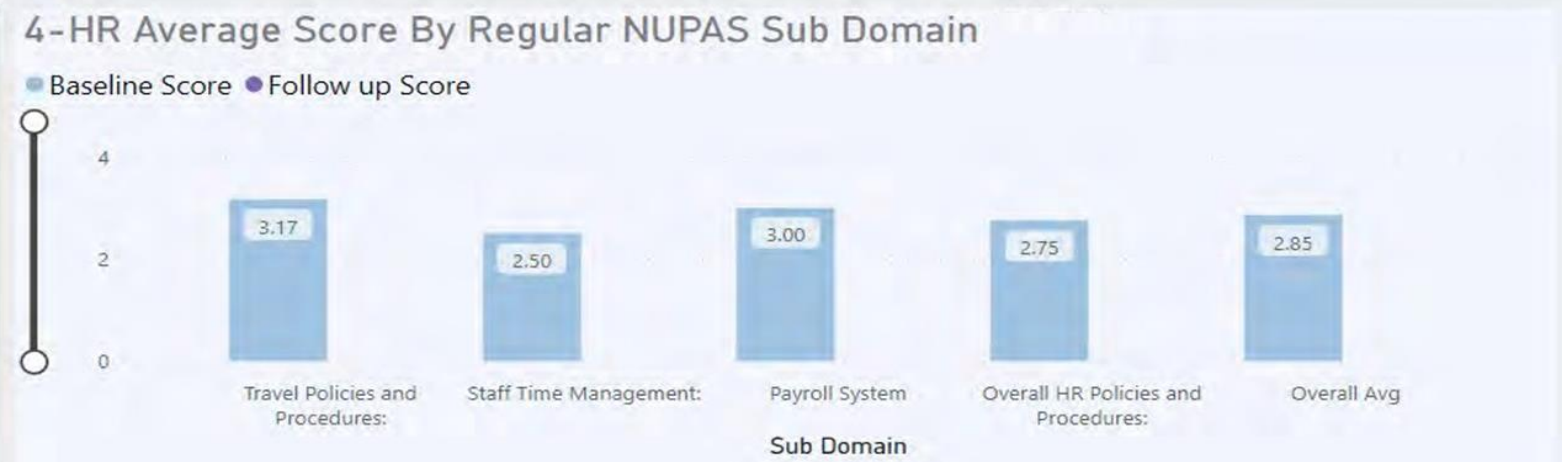
# Non-US Organization Pre-Award Survey (Regular NUPAS)

Organization	Assessment Date	Overall Average	Overall Average	Proportion of Baseline and Follow up Score
Organization Name	9/24/2020 Baseline : m/dd/yy (Blank) Follow up	3.06 Baseline Score	(Bla... Follow up Score	Baseline S... 18.37 (1...)



Sections	Baseline	Follow up
2-Financial	3.07	
3-Procurement	2.33	
4-HR	2.85	
5-Performance	4.00	
6-Sustainability	3.05	
7-Overall	3.06	

- Major Domain
- 1-Legal
  - 2-Financial
  - 3-Procurement
  - 4-HR
  - 5-Performance
  - 6-Sustainability



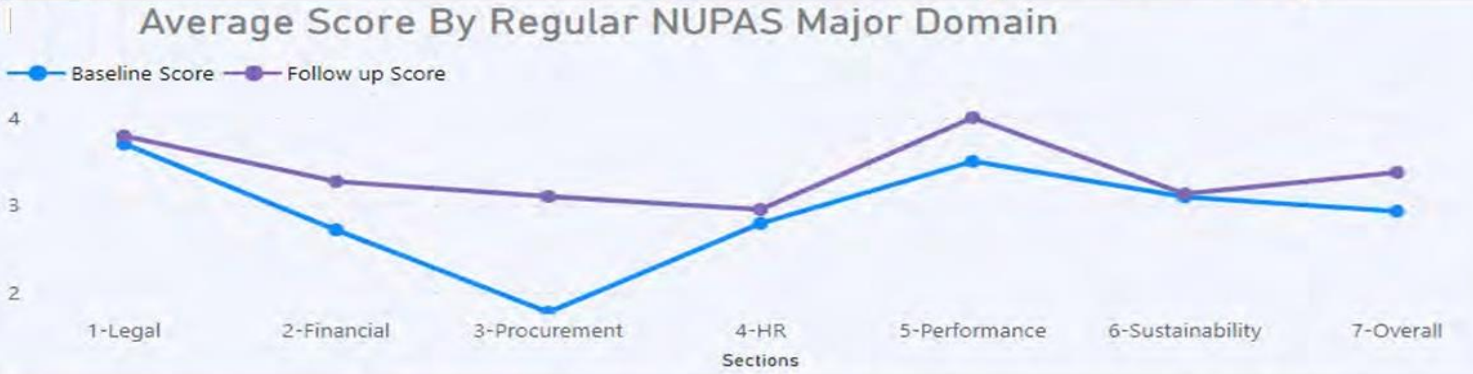
# Non-US Organization Pre-Award Survey (Regular NUPAS)

Organization	Assessment Date	Overall Average	Overall Average	Proportion of Baseline and Follow up Score
Organization Name	2/14/2020 Baseline : m/dd/yy 3/4/2021 Follow up	2.93 Baseline Score	3.37 Follow up Score	

Follow up ... 23.61 (5...)

Baseline Score 20.51 (46...)

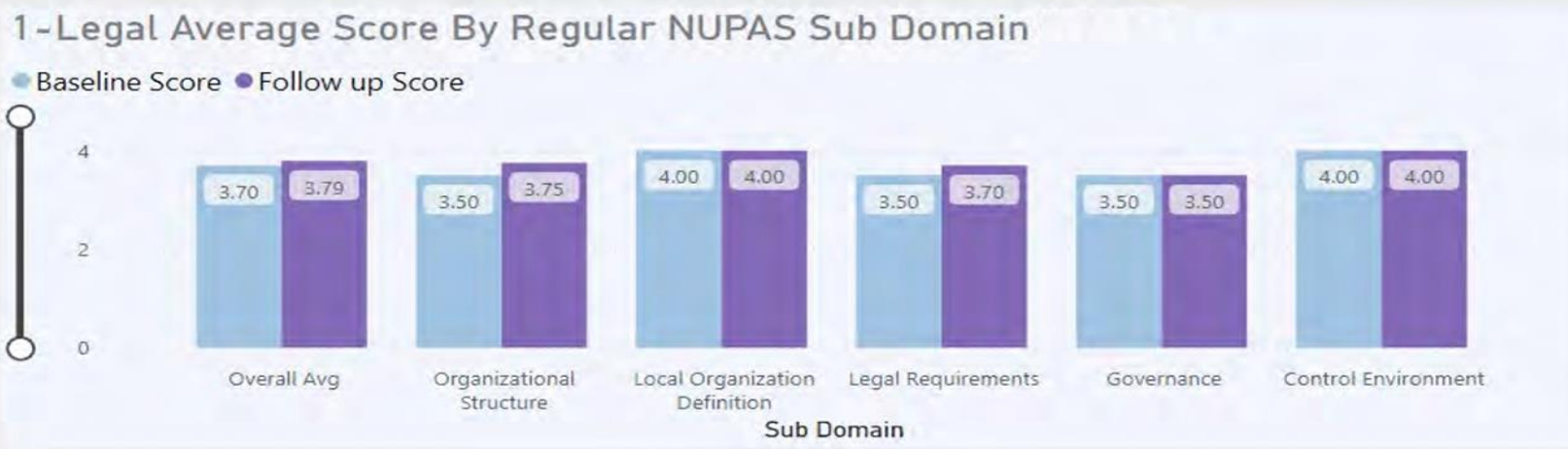
Legend: Baseline Score (Blue), Follow up Score (Yellow)



Sections	Baseline	Follow up
1-Legal	3.70	3.79
2-Financial	2.72	3.27
3-Procurement	1.78	3.10
4-HR	2.79	2.95
5-Performance	3.50	4.00
6-Sustainability	3.10	3.13
7-Overall	2.93	3.37

Major Domain

- 1-Legal
- 2-Financial
- 3-Procurement
- 4-HR
- 5-Performance
- 6-Sustainability



# Non-US Organization Pre-Award Survey (Regular NUPAS)

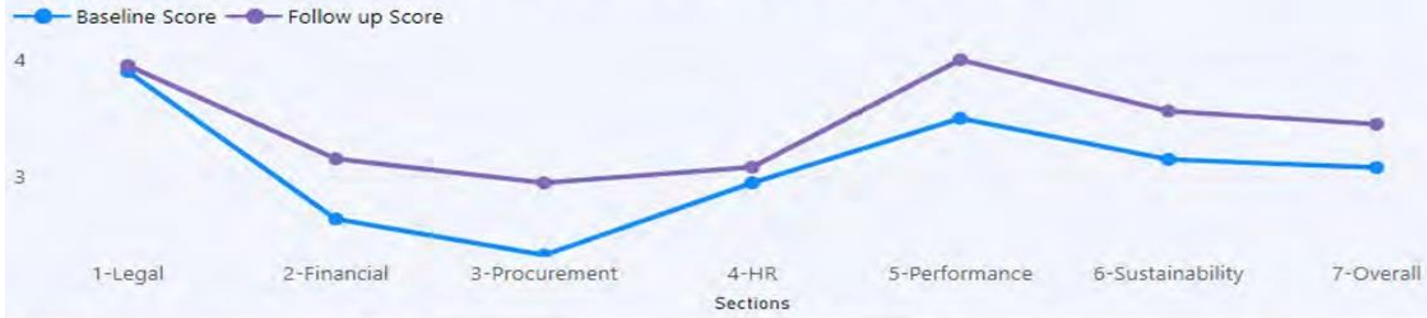
Organization	Assessment Date	Overall Average	Overall Average	Proportion of Baseline and Follow up Score
Organization Name	2/25/2020 Baseline : m/dd/yy 2/10/2021 Follow up	3.08 Baseline Score	3.45 Follow up Score	

Follow up ... 24.15 (5...)

Baseline Score 21.55 (47...)

Legend: Baseline Score (Blue), Follow up Score (Yellow)

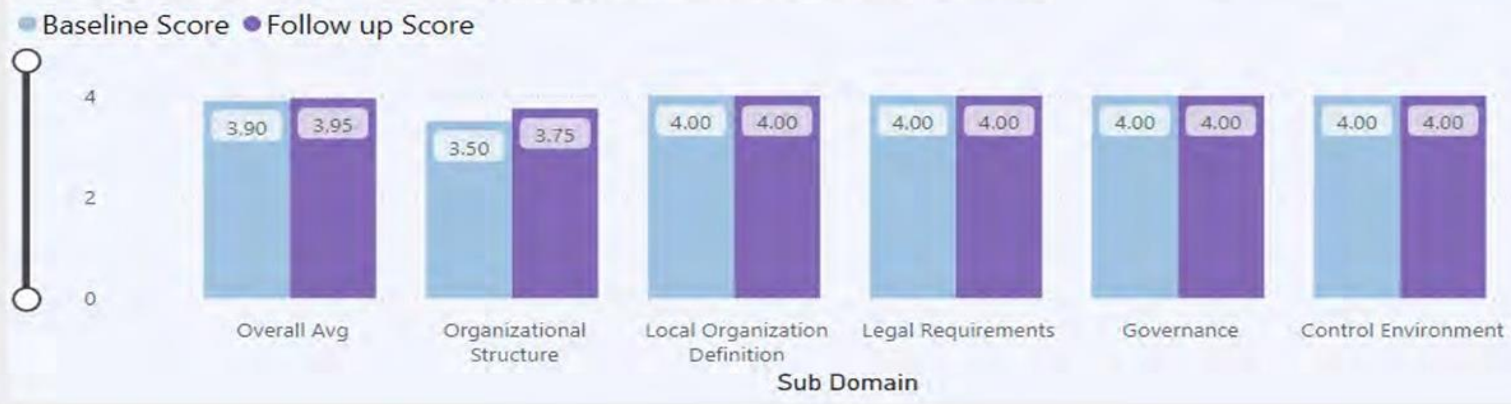
Average Score By Regular NUPAS Major Domain



Sections	Baseline	Follow up
1-Legal	3.90	3.95
2-Financial	2.64	3.16
3-Procurement	2.33	2.95
4-HR	2.95	3.08
5-Performance	3.50	4.00
6-Sustainability	3.15	3.56
7-Overall	3.08	3.45

- Major Domain
- 1-Legal
  - 2-Financial
  - 3-Procurement
  - 4-HR
  - 5-Performance
  - 6-Sustainability

1-Legal Average Score By Regular NUPAS Sub Domain



# Non-US Organization Pre-Award Survey (Regular NUPAS)

Organization	Assessment Date	Overall Average	Overall Average	Proportion of Baseline and Follow up Score
Organization Name	5/4/2020 Baseline : m/dd/yy 5/14/2021 Follow up	3.00 Baseline Score	3.35 Follow up Score	

Follow up ... 23.44 (5...)

Baseline Score 21.03 (47...)

Legend: Baseline Score (Blue), Follow up Score (Yellow)

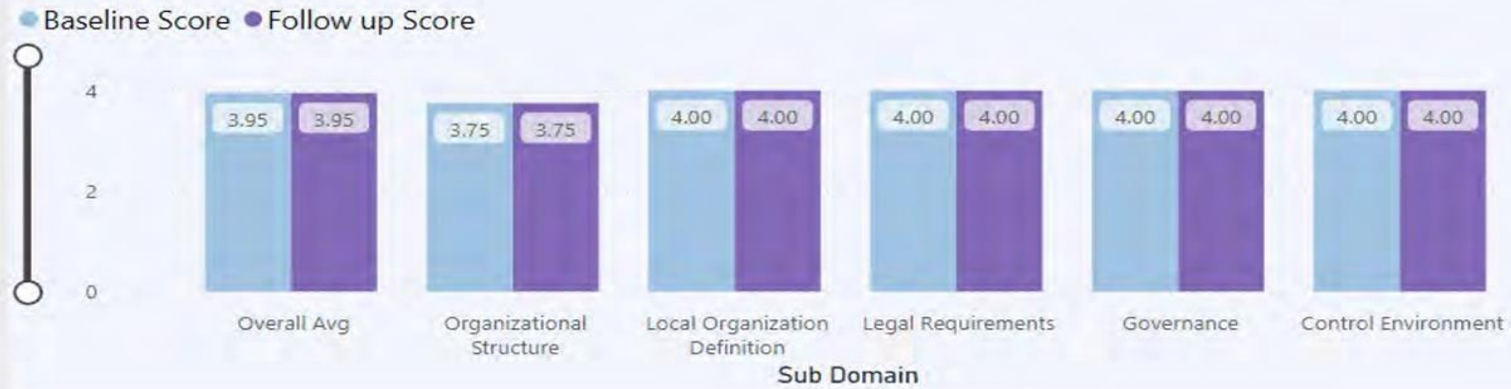
## Average Score By Regular NUPAS Major Domain



Sections	Baseline	Follow up
1-Legal	3.95	3.95
2-Financial	2.74	3.38
3-Procurement	2.33	3.01
4-HR	2.49	3.00
5-Performance	3.50	3.50
6-Sustainability	3.02	3.25
7-Overall	3.00	3.35

- Major Domain
- 1-Legal
  - 2-Financial
  - 3-Procurement
  - 4-HR
  - 5-Performance
  - 6-Sustainability

## 1-Legal Average Score By Regular NUPAS Sub Domain





# EXPERIENCE

## **Experience with Local Organizations**

- Generally, there is a lot of cooperation in providing documents and information. Senior management tends to be keenly involved in the review process.
- LIPs are eager to improve their systems to be ready to work with USAID. This includes the readiness to accept and implement recommendations from the review. Some recommendations were implemented during the review, even before the NUPAS report was shared with the organization and USAID.
- The more the LIPs are reviewed, the more efficient assessors become.
- Administering the tool is a learning process for LIP improvements identified and for making recommendations that aid in the efficient administration of USAID projects.
- The Sustainability Domain includes key criteria for rapid reassessments.

# EXPERIENCE (CONTINUED)

## **Experience with the Missions**

- There is great cooperation for the smoothness of the review regarding administration and information requests.
- Missions appreciate recommendations on SACs and apply them to new awards.
- Missions show commitment to assisting the IPs to reach the acceptable standards to properly administer USAID programs.
- Mission staff are willing to provide relevant material for local country legal requirements.
- Mission staff are keen to learn about the NUPAS Plus 2.1 tool and how to manage local organizations.



# LESSONS LEARNED

- 1 Each organization has unique challenges and assessments are essential to provide capacity building
- 2 ASAP is serving advanced high performing partners with significant weaknesses in operations
- 3 Even in high scoring domains, there are high risk areas which need to be strengthened
- 4 Capacity building support is needed the most in Finance and Internal Control, Legal, Procurement, and M&E

Need to capture more lessons learned ...

# **NUPAS PLUS 2.1 MODULES**

# NUPAS AND NUPAS PLUS 2.1



NON-US ORGANIZATION PRE-AWARD SURVEY (NUPAS) Plus Tool

Prepared by: Accelerating Support to Advanced Local Partners II (ASAP II) (Task Order 7200AA19F00004)

Version 2.1, May 6, 2024

## Navigation Links

Click the boxes below to access the respective worksheets to the selected domain

Instructions for USAID  
NUPAS

Instructions for NUPAS  
Plus 2.1

Detailed Scores

Summary Scores

**USAID NUPAS**

1. LEGAL

2. FINANCE

3. FRAUD

4. PROC & LOGT

5. PROPERTY MNGT

6. IT

7. HR

8. M&E

9. GENDER

10. GOVERNANCE

11. SUB AWARD MGT

12. COMMUNICATION

13. KEY POPULATION

14. BUSI. DVT

15. AWARD MGT

16. SUSTAINABILITY

17. MMP

18. RAA

19. EMMP

# USG FEDERAL RULE WHICH USAID MUST COMPLY WITH

## **§200.206 Federal awarding agency review of risk posed by applicants.**

(b) In addition, for competitive grants or cooperative agreements, the Federal awarding agency must have in place a framework for evaluating the risks posed by applicants before they receive Federal awards. This evaluation may incorporate results of the evaluation of the applicant's eligibility or the quality of its application. If the Federal awarding agency determines that a Federal award will be made, special conditions that correspond to the degree of risk assessed may be applied to the Federal award.

# USAID ADS303 Guidance

## 303.3.9 Pre-Award Risk Assessment

Effective Date: 11/19/2020

The recommendation or selection of an application for award by a Planner or a Selection Committee does not in any way guarantee the award. The AO must evaluate the risks posed by applicants before making the award. The AO must evaluate risk in accordance with the principles established by USAID and the Office of Management and Budget (OMB). This includes a review of the applicant in the Federal Awardee Performance Integrity and Information Systems (FAPIIS) available through the SAM at <https://beta.sam.gov/> (see **2 CFR 200.206**). The AO must also check the Agency Secure Image Storage and Tracking System (ASIST) for completed performance reviews to inform the risk assessment of the applicant.

Depending on the result of this pre-award risk assessment, the AO may either:

- Make the award,
- Deny the recommendation of the Planner and not execute the award, or
- Award with "specific conditions" (**2 CFR 200.208** and **303.3.9.2**).

# STANDARD PROVISIONS



## Standard Provisions for Non-U.S. Nongovernmental Organizations A Mandatory Reference for ADS Chapter 303

Partial Revision Date: 03/31/2021  
Responsible Office: M/OAA/P  
File Name: 303mab\_033121

## Prime Review of Sub

§200.332 Requirements for pass-through entities.

All pass-through entities must:

- (b) Evaluate each sub-recipient risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraphs (d) and (e) of this section, which may include consideration of such factors as:
- (1) The sub-recipients prior experience with the same or similar subawards
  - (2) The results of previous audits, including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program
  - (3) Whether the subrecipient has new personnel or new or substantially changed systems

# **MODULE 1: LEGAL**



# LEGAL

**Overall Objective:** To assess if the organization complies with the local legal registration requirements and has adequate and effective governance and management structures in place.

## **NUPAS Legal Domain Categories:**

- 1) Local Organization Definition: The organization meets the USAID definition of ""local entity""
- 2) Legal Requirements: The Organization is legally registered
- 3) Organizational structure: The Org has an organizational charter, by-laws or other foundational/operational documents
- 4) Governance: The Org emphasizes practice and procedures for good corporate governance
- 5) Control Environment: Adequate safeguards ensuring fidelity to fiduciary obligations are in place

## **NUPAS Plus 2.1 Legal Domain Categories/Sub-categories:**

- 1) Subawards
- 2) Pre-award Questionnaire
- 3) Agreement
- 4) Compliance
  - 1) Monitoring
  - 2) Audit
  - 3) Tracking
  - 4) Taxes
  - 5) Delegation of Authority
  - 6) Lawsuits

# BACKGROUND AND METHODS

## **Methods**

- Document review
- Interviews

## **Recommended interview participants:**

- Executive Director/Chief Executive Officer
- Financial Director
- Board Member(s)

# KEY RISKS

## **Key risks to be considered:**

- Lack of proper registration to comply with all relevant legal requirements (of the 26 reviews conducted so far, only one organization failed to comply with a legislative registration requirement)
- Non-compliance with legal and governance requirements (non-compliance with some governance requirements is a common gap identified from reviews)

# LEGAL CATEGORIES/SUB-CATEGORIES

CODE	A. Legal Structure : <i>This section of NUPAS reviews the governance structure, legal registration, and internal controls at the management level. Note, all entities receiving USAID funding must be legally registered in the country of ope</i>	KEY DOCUMENTS FOR ASSESSMENT
A.1	Does the organization meet the USAID definition of "local entity" for purposes for limiting competition to local organizations?	Legal Registration, By-Laws
A.2	Is the organization legally registered under the laws of the country of performance? This includes valid/unexpired legal registration, tax authority registration, and other material licenses or permits required under the host country law.	Legal Registration, By-Laws, Tax Authority Registration
A.3	Is there an organizational charter, by-laws or other foundational/operational documents support its mission and goals?	organization Charter, By-Laws, Mission Statement
A.4	Does the organization emphasize in its practice and procedures the importance of good corporate governance in all key areas.	Mission Statement, Code of Ethics, By-Laws, statements in Financial Policies and other fundamental policies
A.5	Are there adequate safeguards ensuring fidelity to fiduciary obligations and preventing officials from obtaining financial or non-financial benefits on the basis of decisions made or actions taken in their official capacity.	Code of Ethics, By-Laws, statements in Financial Policies and other fundamental policies

# LEGAL CATEGORIES/SUB-CATEGORIES

CATEGORY/SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Local Organization Definition	Confirm if the organization meet the USAID definition of "local entity" for purposes for limiting competition to local organizations	Legal Registration, By-Laws
Legal Requirements	Confirm the organization legally registered under the laws of the country of performance.	Legal Registration, By-Laws, Tax Authority Registration
organizational charter	Confirm if there is an organizational charter, by-laws or other foundational/operational documents support its mission and goals	organization Charter, By-Laws, Mission Statement
Good corporate governance	Confirm if the organization emphasizes in its practice and procedures the importance of good corporate governance in all key areas	Mission Statement, Code of Ethics, By-Laws, statements in Financial Policies and other fundamental policies
fidelity to fiduciary obligations	Confirm if there is adequate safeguards ensuring fidelity to fiduciary obligations and preventing officials from obtaining financial or non-financial benefits on the basis of decisions made or actions taken in their official capacity.	Code of Ethics, By-Laws, statements in Financial Policies and other fundamental policies

# LEGAL CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Pre-award questionnaire		Confirm whether there is a pre-award questionnaire/process that the organization administers to select sub-awardees.	Pre-award Questionnaire/ Pre-award risk assessment
Agreement		Confirm whether there is a signed agreement/contract in place for each award and whether all program staff are oriented on the terms and conditions, and standard provisions.	Signed agreement(s)/contract(s) for all award(s)
Compliance	Monitoring	Confirm that there are documented procedures for monitoring local organizations and contractors that are consistently applied.	Documented procedures for monitoring local organizations and contractor
	Audit	Confirm that the organization fully complies with the terms and conditions of the awards.	Audit reports
	Tracking	Confirm that the organization has a tracking mechanism in place and a responsibility assigned for donor reports and award compliance.	Monitoring reports
	Taxes	Confirm if the organization complies with tax regulations.	Local Tax legislation documents Tax Clearance Certificates
	Delegation of Authority	Confirm if there is a policy on delegation of authority within the organization.	Delegation of Authority
	Lawsuits	Confirm that there are no disqualifying legal issues or risks relating to the organization, its partners, or project, through verifications in due diligence databases (where available), and those to determine any links to terrorism, tobacco, or arms industries.	Vetting Clearance Proof

# COMMON AREAS OF IMPROVEMENT

- Board members not declaring Conflicts of Interest (sometimes in contravention of legislation)
- Non-compliance with local legislation governance requirements (board member numbers, terms, frequency of meetings, etc.)
- Non-compliance to organizations' governance manual requirements (e.g., setting up sub-committees, meetings held without quorums, etc.)
- No approved Delegation of Authority policy

# KEY RISKS

## Key risks to be considered:

- Lack of proper registration to comply with all relevant legal requirements.
- Noncompliance with legal and governance requirements. (Noncompliance with some governance requirements is a common gap identified from reviews.)



# RECOMMENDATIONS

- **Founder's syndrome creates opposition to change.** At organizations that suffer from founder's syndrome, leadership often resists the changes prescribed by ASAP. This can be further complicated when board members double as staff members at the organization. ASAP recommends revising charters and committees to change board composition to reflect the organization, which will create more autonomy and independence at the board level.

# **MODULE 2: FINANCE**

# FINANCE

**Overall Objective:** To assess the adequacy of the **Financial Management Policies and Procedures** and to determine if **Internal Controls** are in place.

**Categories/Sub-categories:**

1. Annual Budget
2. Staff involvement
3. Planned Activities
4. Budget Notes
5. Donor Budgets
6. Board Approval
7. Budget Manager
8. Adequately funded
9. Indirect Costs
10. Cost Allocation Policy
11. Authorized Payments
12. Documentation
13. Pre-Numbered Receipts
14. Records
15. Cross Referenced
16. Monthly Updates
17. Reconciliation
18. Proof of Payment
19. Financial and narrative reports
20. Vouchers
21. Petty Cashbox
22. Daily Reconciliations
23. Monthly Reconciliations
24. SOPS
25. Requests
26. Documentation
27. Budget Variance
28. Cash Flow Budgets
29. Accounting System
30. Accounting Records

# BACKGROUND AND METHODS

## **Methods**

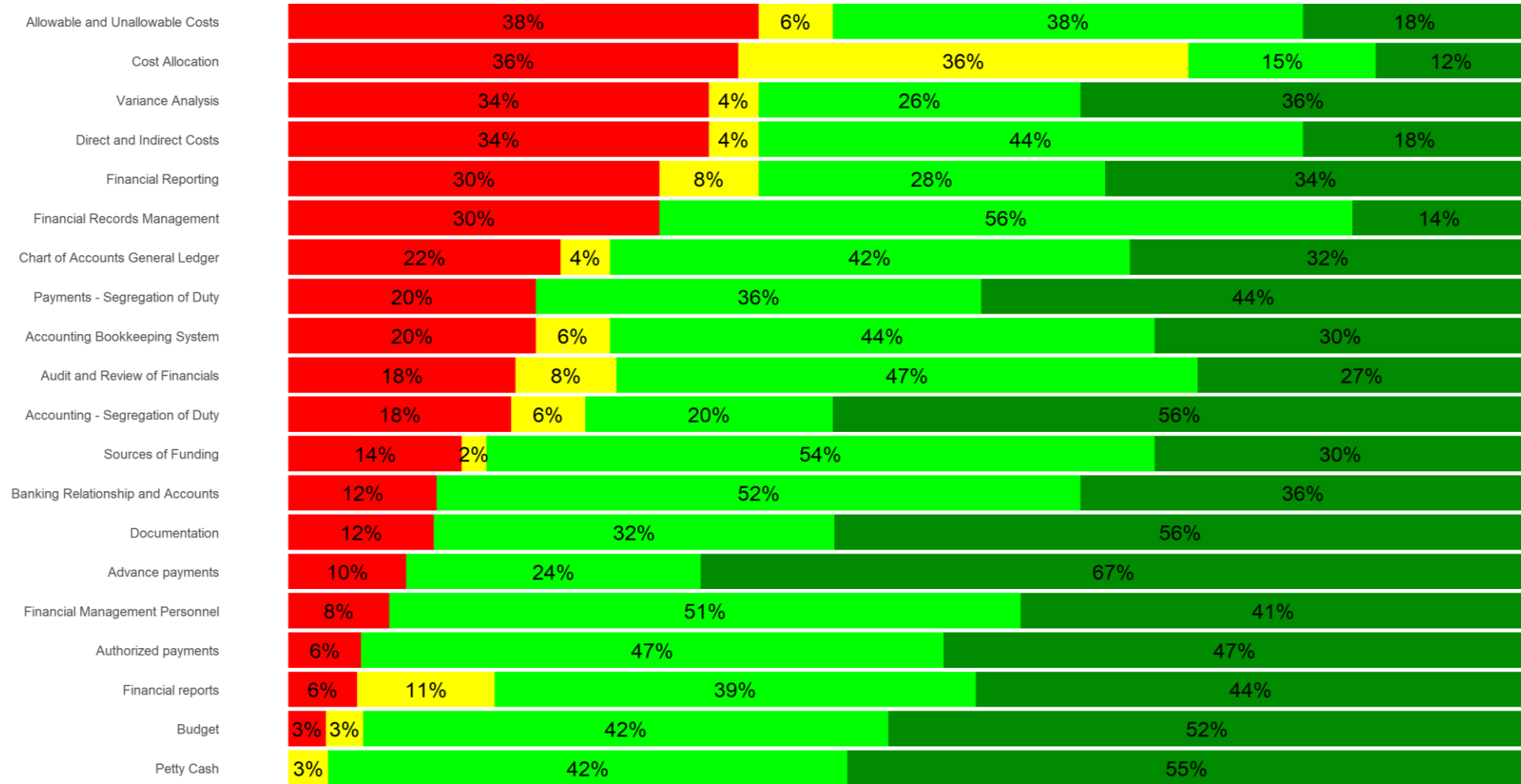
- Document review
- Interviews
- Substantive Testing

## **Recommended interview participants**

- Financial Director
- Finance Manager
- Senior Finance Manager

# NUPAS PLUS 2.1 CHART

Financial Management - Relative Proportion of LIP Risk Category by Subdomain



# FINANCE CATEGORIES/SUB-CATEGORIES

Code	<b>B. Financial Management and Internal Control Systems:</b> <i>This section reviews financial systems and controls of the organization, including existence of written financial policies or procedures, practices for bank management and reconciliation, budget oversight, audit reports and financial statements, as well as staff understanding of basic financial concepts and internal procedures.</i>	<b>KEY DOCUMENTS FOR ASSESSMENT</b>
B.1	Check if the organization have a bank account in its legally registered name at a commercial bank in the country of operation	Formal letter from Bank confirming account existence, bank statements, etc
B.2	Confirm if the organisation has financial policies and procedures	financial policies and procedures
B.3	Confirm if the organization have an accounting/ bookkeeping system and are financial transactions entered into the system on a consistent basis in accordance with applicable standards, policies and procedures	Accounting and book keeping system
B.4	Check if the organizations bank accounts reconciled on a regular (monthly, quarterly, etc.) basis and at an appropriate frequency?	
B.5	Confirm if the chart of accounts and corresponding General Ledger are used to prepare financial statements on a regular and consistent basis	financial management policies,
B.6	Confirm if policies, procedures and practices address segregation of allowable and unallowable costs	
B.7	Confirm if the organization's accountants/bookkeepers have an understanding of direct costs and indirect costs (including cost allocation principles)?	
B.8	Confirm if organization has policies, procedures and practices for financial records management and retention	Financial record tentation policy

# FINANCE CATEGORIES/SUB-CATEGORIES

Code	B. Financial Management and Internal Control Systems(Ctnd)	KEY DOCUMENTS FOR ASSESSMENT
B.9	Confirm if the organization have other funding sources that supports the sustainability of operations?	
B.10	Confirm if there are policies, procedures and practices in place to produce reliable monthly and year-to-date financial statements (income and expenditure report and balance sheet)	
B.11	Confirm if financial statements are audited or reviewed on a regular basis by a third party recognized under the laws of the country, such as a chartered accounting firm or regulatory body? Is the frequency of statement review adequate and reasonable?	
B.12	Confirm if the individual(s) responsible for accounting and financial management functions have the requisite accounting and other financial management qualifications and experience?	job description for the position
B.13	Confirm if all disbursements are properly documented with evidence of receipt of goods or services	
B.14	Confirm if controls to prevent expenditure of funds are in excess of approved, budgeted amounts	
B.15	Confirm that the organization demonstrates good discipline in developing, monitoring and using cash flow budgets effectively and in actually managing its cash and payables in a responsible manner	

# FINANCE CATEGORIES/SUB-CATEGORIES

Code	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
<b>B.16</b>	Are there controls to prevent expenditure of funds in excess of approved, budgeted amounts?	
<b>B.17</b>	Does the organization demonstrates good discipline in developing, monitoring and using cash flow budgets effectively and in actually managing its cash and payables in a responsible manner?	
<b>B.18</b>	Is the organization using the de minimis indirect cost rate (10%) as per 2 CFR 200.414(f)? If so, does the organization have capacity, systems, procedures in place to comply with the requirements of using the de minimis, including properly applying the rate to modified total direct costs (MTDC)?	
<b>B.19</b>	Does the organization have capacity to ensure records comply with accounting principles generally accepted in either the U.S., the cooperating country, or by the International Accounting Standards Board (a subsidiary of the International Financial Reporting Standards Foundation)?	
<b>B.20</b>	Does the organization have the ability to ensure accounting records and supporting documentation include, at a minimum, all costs incurred under the award; receipt and use of goods and services acquired under this award; the costs of the program supplied from other sources; and the overall progress of the program.?	



# FINANCE CATEGORIES/SUB-CATEGORIES

CATEGORY/SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
<b>Annual Budget</b>	Confirm that the annual organizational budgets are prepared, reviewed and approved on time	Financial Management Policies/Procedure Manuals Bank Reconciliations
<b>Staff involvement</b>	Confirm that both the finance and program staff are involved in preparing the budget.	Financial Management policies/procedures/ manuals Chart of Accounts
<b>Planned Activities</b>	Confirm that the organizational activities are always based on the costs of the planned activities.	Financial Management Policies/Procedure Manuals Chart of Accounts Financial Reports
<b>Budget Notes</b>	Confirm that the organizations budgets include budget notes and clear calculations.	Financial Management Policies/Procedure Manuals Financial Reports
<b>Donor Budgets</b>	Confirm that the organization prepares separate budgets for each donor and project.	Financial Management Policies/Procedure Manuals
<b>Board Approval</b>	Confirm that the organization annual budgets are always reviewed and approved by the Board of Trustees	Financial Management Policies/Procedure Manuals
<b>Budget Manager</b>	Confirm that the organization has a named individual (budget manager) who is responsible for implementing and managing each budget	Financial Management Policies/Procedure Manuals
<b>Adequately funded</b>	Confirm that the all planned operational costs are adequately funded	Financial Management Policies/Procedure Manuals

# FINANCE CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
<b>Indirect Costs</b>	Confirm that the organization has properly calculated the MTDC and has an accounting system which consistently and accurately tracks indirect costs OR the organization did not include indirect costs in the budget	Financial Reports
<b>Cost Allocation Policy</b>	Confirm that the Cost Allocation Policy is applied consistently when allocating shared costs.	Financial Management Policies/Procedure Manuals
<b>Authorized Payments</b>	Confirm that all checks or wire transfers are authorized/signed by at least two authorized signatories	Financial Management Policies/Procedure Manuals  Audit Reports
	Confirm that all cash received is banked intact, i.e. without any being spent	Financial Reports
	Confirm that there is a written policy detailing who can authorize expenditure of different types or value and is consistently used	Financial Management Policies/Procedure Manuals  Contingency Plan

# FINANCE CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Documentation	Documentation	Confirm that every payment has sufficient and appropriate supporting documentation.	List of payments/transactions and supporting documents for the past 6 months
	Pre-numbered Receipts	Confirm that all cash or checks received are recorded on pre-numbered receipts.	Pre-numbered payment receipts/checks
	Records	Confirm that all payments and receipts are recorded in cashbooks (date, description, amount).	Cashbook
	Cross Referencing	Confirm that every entry into the cashbook is cross-referenced to a supporting document.	Cross-referenced documentation of payments on cashbook for last 6 months
	Monthly Updates	Confirm that all cashbooks are updated at least once a month.	Cashbook for the last 6 months
Advance Payments	Reconciliation	Confirm that all expense claims for staff advances are checked against the advance amounts and reconciled.	Advances Reconciliation Documentation/Reports
	Proof of Payment	Confirm the documentation proving the receipt of requested advances by the staff	Proof of advance payments
	Financial and Narrative Reports	Confirm the preparation of quality financial and narrative reports to the donor and AFS regularly.	Financial and narrative reports

# FINANCE CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Petty Cash	Vouchers	Confirm that the supporting documentation for petty cash disbursements has a Payee.	Petty cash vouchers issued in the past 6 months
	Petty Cashbox	Confirm that the cash is kept safely in a locked cashbox or safe in the custody of one specific individual.	Inspection of cashbox
	Daily Reconciliations	Confirm that the physical petty cash count is made regularly (weekly/monthly) and is checked by a senior staff member and documented.	Supporting document
	Monthly Reconciliations	Confirm that a reconciliation of petty cash is done at least monthly.	Supporting document
	SOPs	Confirm that all disbursements are made within the predetermined maximum amount for petty cash disbursements.	Petty cash policy & SOP
	Requests	Confirm that the supporting documentation for disbursements contains the description of disbursements.	For a sample of payment disbursements, inspect the supporting documents
	Documentation	Confirm that the supporting documentation for disbursements shows the date of disbursement.	For a sample of payment disbursements, inspect the supporting documents

# FINANCE CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Additional Criteria from USAID NUPAS	Budget Variance	Confirm that the organization has a budget and controls to prevent excessive expenditure of funds are in place	Financial Management Policies/Procedure Manuals
	Cash Flow Budgets	Confirm that the organization has a budget and consistently demonstrates good discipline in developing, monitoring and using cash flow budgets effectively and in managing its cash and payables in a responsible manner	Financial Management Policies/Procedure Manuals
	Accounting System	Confirm that the organization's accounting systems complies with International Accounting Standards Board and is consistently used and verified	Supporting document
	Accounting Records	Confirm that the organization's accounting records consistently includes supporting documentation which align with line items in the approved budget and factors in other resources.	Supporting document

# ROLE PLAY



# COMMON AREAS OF IMPROVEMENT

- Bank reconciliations – not prepared, not dated by officials, incorrect
- Financial reports – inadequate reports (variances not explained, only prepared for the donor – none for assessment of financial performance/position of the organization overly)
- Poor controls for managing advances to staff members – salary advances not recovered on time, no reconciliations for advances
- Segregation of duties for payments – only one (1) signatory releasing all payments

# KEY RISKS

## Key risks to be considered:

- Inadequate financial management policies and procedures
- Bank reconciliations – not prepared, not dated by officials, and incorrect
- Financial reports – inadequate reports (variances not explained, only prepared for the donor – none for assessment of the overall financial performance/position of the organization)
- Poor controls for managing advances to staff members – salary advances not recovered on time, no reconciliations for advances)
- Segregation of duties for payments – only one signatory releasing all payments



# RECOMMENDATIONS

- **Continue support and spot checks:** Close mentorship and support, including third-party financial monitoring to check the effectiveness of financial management and compliance efforts, as they adapt to the changes which they have made over the last three years.
- **Consider and adjust to local context:** Financial, legal, political, and banking systems can vary widely by country and affect the local organization's ability to implement processes that comply with USG rules and regulations. When conducting an assessment and technical assistance, it is important to consider what challenges the local context may involve.
- **Ensure that financial management and compliance are a priority for COPs:** As per ASAP's work with local organizations, finance staff often admitted to feeling that financial management and compliance were low on the priority list for their respective Chiefs of Party (COP), many of whom focused on M&E and program management.
- **Standardize and apply job descriptions for finance team:** Job descriptions for finance staff often differ by country (e.g., an accountant in Angola often has different roles and responsibilities from one in Mozambique). Providing standard job descriptions for staff would be an important way to align human resources with USG rules, regulations, and expectations.

# **MODULE 3: RISK MANAGEMENT**

# RISK MANAGEMENT

**Overall Objective:** To verify whether the organization has adequate and effective policies and procedures in place to deal with potential risks and whether these are followed as per practice.

## **Categories/Sub-categories:**

### **1. Policy**

1. Policy
2. Zero Tolerance

### **2. Reporting**

1. Whistleblower

### **3. Risk Assessment**

1. Organizational Risk Assessment
2. Program Risk Assessment

### **4. Training**

### **5. Subawards**

### **6. Compliance**

### **7. Internal Controls**

# BACKGROUND AND METHODS

## **Methods**

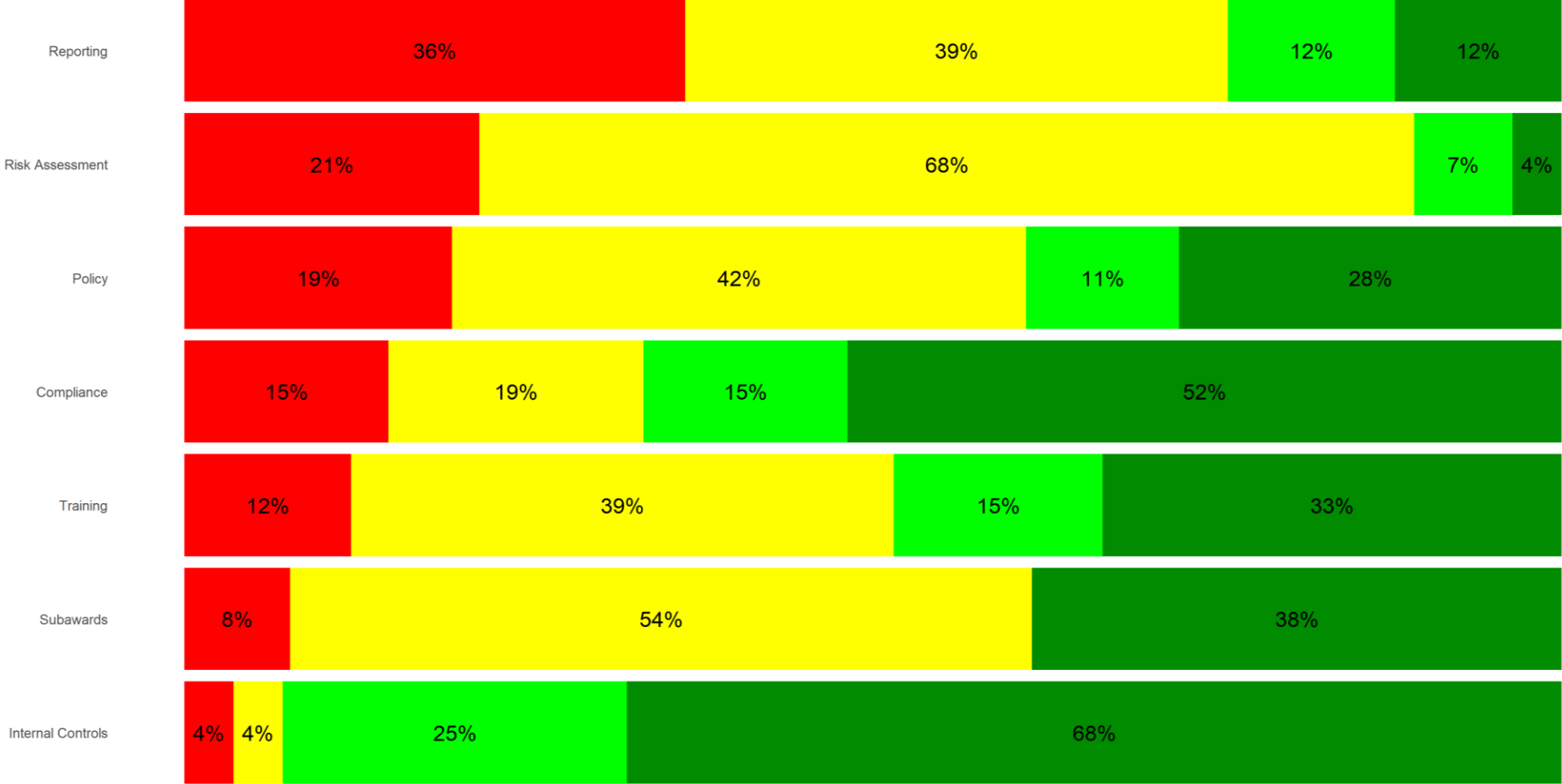
- Document review
- Interviews
- Substantive Testing

## **Recommended interview participants**

- Executive Director/Chief Executive Director
- Finance Director
- Finance Manager
- Internal Audit Manager/Internal Auditor

# NUPAS PLUS 2.1 CHART

Fraud - Relative Proportion of LIP Risk Category by Subdomain



# RISK MANAGEMENT CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Policy	Policy	Confirm that there is a risk management policy in place and is reviewed/updated at least annually or when significant operational changes occur.	Fraud Management Policy (FMP)
	Zero Tolerance	Confirm that the risk management policy addresses the intangibles such as deterrence, zero-tolerance policy, detection, investigation, and follow-up.	Review Reports
Reporting		Confirm that a whistle-blowing hotline is in place, user-friendly, and functioning correctly and that all employees are aware of it.	FMP or Whistle-blowing Policy (if not included in FMP)
Risk assessment	Org. Risk Assessment	Confirm that an organization-wide fraud risk assessment is performed involving all key individuals (across the organization) and addressing all the steps of a risk assessment process, and results are completely and accurately applied organization-wide and used to inform updates to the policy.	Annual Risk Assessment Reports
	Program Risk Assessment	Confirm that program-specific fraud risk assessment is performed involving all key individuals (across the organization) and addressing all the steps of a risk assessment process and that the results are completely and accurately applied program-wide.	Program Assessment Reports
Training		Confirm whether training/ awareness sessions were held, directed at all key employees throughout the organization (in their native language), whether presentation material covered all relevant information, and whether training is frequent and includes the latest updates (e.g., tri-annually as necessary – depending upon the complexity of operations, number of awards, size, etc.).	Evidence of training (attendance registers, training material)
Subawards		Confirm that fraud reporting is required in the subaward agreements, that the procedure is clearly defined, and that staff are fully versed in the process and motivated to report suspected wrongdoing.	Subaward agreement
(Advance) Compliance		Confirm that the organization has an adequate & effective compliance framework in place including comprehensive anti-corruption policy & procedures such as a conflict-of-interest policy ( for staff, suppliers, and/or external advisors.) and efficient systems & structures to detect instances of non-compliance.	Verification of country-specific legislation and compliance
Internal controls		Confirm that the organization has adequate internal control systems and procedures to safeguard its assets, manage internal risk, and ensure the accuracy and reliability of its financial information, all of which are consistently reviewed and updated	Finance, Procurement, HR, Fraud, and related policies

# ROLE PLAY



# COMMON AREAS OF IMPROVEMENT

- Fraud management policy – Important aspects not addressed
- Whistleblowing Hotline – Not operational, display boards reflecting outdated hotlines
- Training – Not documented, hasn't taken place
- Risk assessments – Not performed, not understand why it needs to be performed
- Compliance - No procedures to ensure compliance with applicable laws and regulations



# KEY RISKS

## **Key risks to be considered:**

- Whistleblower hotline is out of date/not in place.
- Fraud training is not performed.
- Fraud risk assessment is not performed.

# RECOMMENDATIONS

- **Review USAID thresholds for audits:** While the current threshold for a USAID audit is \$750,000, most local partners have annual budgets below this amount. USAID should consider contracting audit firms to conduct annual audits for all new prime recipients.
- **Independent audits:** Local partners should engage the services of an auditor/independent reviewer to review the internal controls throughout the organization.
- **Fraud Risk Assessments:** Each local partner should conduct risk assessments, keep a risk management tracker, and share this information with USAID. This will create a transparent and clear vision for fraud risk mitigation.
- **Third-party whistleblowing at the country or regional level:** Local partners are small in size which creates challenges in using any “anonymous” reporting structure. A third party, such as an audit firm would be able to ensure anonymity.

# RECOMMENDATIONS

- **The Office of the Inspector General (OIG):** OIG may need to look at its staffing structure to see if enough personnel are available to investigate claims arising from the new local partners.
- **Additional training on fraud and whistleblowing procedures:** Education and communication on fraud prevention and procedures for whistleblower complaints need to cascade from the Board through the organizational chart. Staff often do not understand the Board's role in oversight or do not trust that the Board will act on complaints. Thus, it is recommended that external whistleblowing providers or vendors be considered to improve the perceived and actual anonymity and security of whistleblowers through, for example, hosting an external hotline.
- **The process of reporting fraud needs strengthening:** More training and communication are needed on the steps to take after a complaint is made to promote transparency about, and trust in, the process of reporting fraud. For example, boards can be further empowered to handle whistleblowing concerns.

# **MODULE 4: PROCUREMENT AND LOGISTICS**

# PROCUREMENT AND LOGISTICS

**Overall Objective:** To verify whether the organization has adequate and effective policies and procedures in place, and to determine whether these are followed as per practice.

## **USAID NUPAS Procurement Categories:**

1. Written policies and practices on procurement
2. Procurement Policies, Procedures, and Practices – address conflict of interest (COI), bias fraud competition etc.
3. Designated unit/Individual responsible for procurement
4. Compliance with Policies and Procedures – Competitive vendor selection
5. Compliance with Policies and Procedures –check vendors against lists OFAC SDN
6. Compliance with Policies and Procedures – micro- purchase threshold
7. Procurement practices comply with USAID requirements
8. Procurement Policies, Procedures, and Practices –establish procedures for documenting the selected entity
9. Agreements with vendors are documented through written contracts
10. Individuals responsible for procurement have experience managing donor-funded procurements
11. Procurement Policies, Procedures, and Practices – Documented process for review and acceptance of for goods and services
12. Property records periodically checked by physical inventory
13. Property and assets covered by insurance

## **NUPAS Plus 2.1 Procurement Categories:**

1. Approval Process
2. Final Documentation
3. Procurement Forms
4. Selection Process
5. Terrorism Financing Check
6. Sole Sourcing
7. Vehicle Management
8. Travel
9. Lease Agreement

# BACKGROUND AND METHODS

## **Methods**

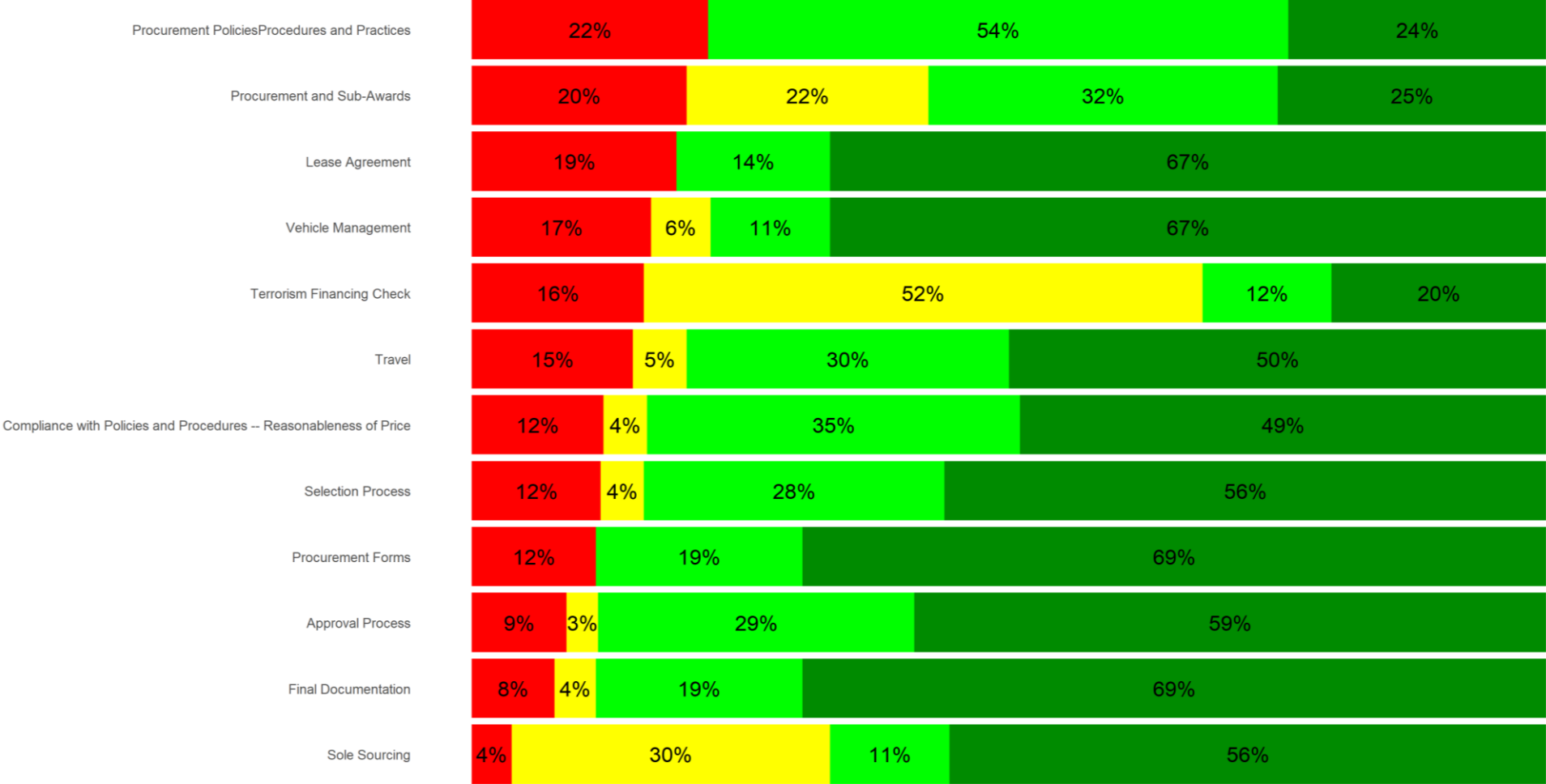
- Document review
- Interviews
- Substantive testing

## **Recommended interview participants**

- Financial Director
- Procurement Manager
- Procurement Committee member(s)

# NUPAS PLUS 2.1 CHART

Procurement - Relative Proportion of LIP Risk Category by Subdomain



# PROCUREMENT AND LOGISTICS CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Procurement Policies, Procedures, and Practices	Confirm that the organization has procurement policies, procedures, and practices in place that are adequate. [Note: Procurement policies, procedures, and practices include those relating to processes for purchasing, resolving, and settling disputes and claims; safeguards and controls over assets; and related records management].	Procurement Policy
Compliance with Policies and Procedures – Reasonableness of Price	Confirm that the organization complies with its own policies and procedures for how determinations of reasonableness are made for purchases and who in the organization is responsible.	Procurement Policy Sample of procurement transactions – assess the reasonableness of price
Approval Process	Confirm that procurement policies contain an Approval Matrix or Delegations of Authority alternatively.	Procurement Policy Delegations of Authority
Final Documentation	Confirm that the organization prescribes which information to maintain as it relates to contracts.	Procurement Policy Contracts with vendors
Procurement Forms	Confirm that the Procurement Policy specifies which documentation should be maintained for all types of procurement.	Depends on the policy, but could include purchase request, purchase order, invoice, delivery note/acknowledgment of receipt of goods



# PROCUREMENT AND LOGISTICS CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Selection Process	Confirm that the Procurement Policy specifies the procedure for the selection of vendors.	Procurement Policy Sample of procurement transactions
Terrorism Financing Check	Confirm that the organization performs terrorism financing checks.	SAM verifications OFAC verifications UN Security Council verifications
Sole Sourcing	Confirm that the organization has a policy on sole sourcing.	Procurement Policy Sample of procurement transactions
Vehicle Management	Confirm that a Travel and Vehicle Management Policy is in place and is consistently implemented/followed.	Travel and Vehicle Management Policy
Travel	Confirm that the organization's travel advance forms have a breakdown of requested amount and are signed by the program manager, finance, and supervisor consistently.	Travel and Vehicle Management Policy Vehicle Expenses Logbooks Sample of travel-related transactions
Lease Agreement	Confirm that proper lease agreements are in place for leased assets	Lease Agreements

# PROCUREMENT AND LOGISTICS CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Thresholds	Confirm whether the organization has a tiered ceiling threshold which includes micro purchases, the staff are aware and it is correctly applied consistently	Procurement Policy Sample of procurement transactions
Basis for award cost	The organization's procurement practices comply with USAID requirements and includes requirement for justification for award cost or price. These polices are consistently applied correctly.	Procurement Policy Sample of procurement transactions
Staff Skill Set	All Individuals responsible for procurement have the required experience managing donor-funded or similar procurements in a competitive, transparent manner free from conflicts of interest	Procurement Policy Sample of procurement transactions
Insurance	All property and assets are covered by insurance	Purchases listing for the past six (6) months

# COMMON AREAS OF IMPROVEMENT

- Policies and procedures not being periodically reviewed
- Procurement staff not trained on USAID Rules and Regulations
- Organization not performing checks for debarred or suspended suppliers as well as terrorism financing checks
- Non-compliance with the organization's procurement policy (approval thresholds, procurement forms not used)
- Unmotivated sole sourcing

# KEY RISKS

## **Key risks to be considered:**

- Mandatory verifications are not performed.
- Procurement Forms are inconsistently used.
- Procurement Transactions are not approved.

# RECOMMENDATIONS

- **Provide real-world examples of sole-source procurements:** Organizations are sometimes unclear about how or when to use sole sourcing.
- **Support cascading of procurement capacity to subs:** In the transition from sub to prime, LIPs should develop systems that cascade their knowledge and support their sub-grantees/awardees in procurement processes.
- **Prevent fraud with improved procurement processes:** As procurement is a common domain for fraud, certain steps can be taken to build policies and procedures to reduce the likelihood of fraud or ensure oversight to catch any incidences. ASAP II recommends that local organizations:
  - Ensure that all staff, including Boards of Directors, sign the conflicts-of-interest declaration, and include it in every procurement request for vendors.
  - Require additional training on conflicts of interest and the procurement process.
  - Ensure that procurement contracts have fixed prices, and support organizations to develop a preferred vendors list.
  - Conduct spot checks on procurement transactions and create guidance for organizations on the process.
  - Build a culture of fraud prevention in procurement through training and communicating fraud prevention policies and procedures.

# **MODULE 5: PROPERTY MANAGEMENT**

# PROPERTY MANAGEMENT

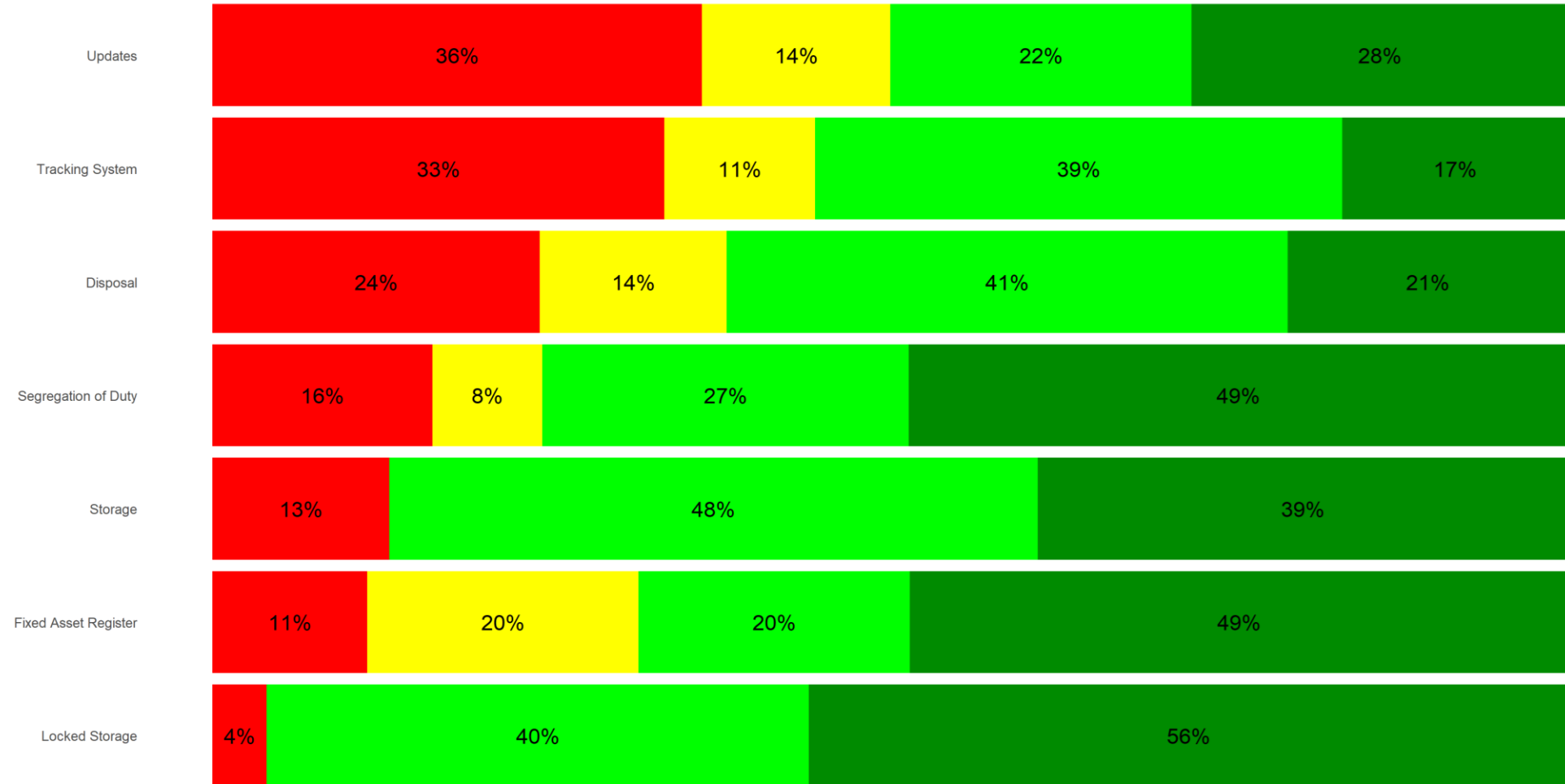
**Overall Objective:** To assess the adequacy of the Property Management processes and procedures.

**Procurement Categories:**

1. Fixed Asset Register
2. Tracking System
3. Segregation of Duty
4. Updates
5. Disposal
6. Storage
7. Locked Storage
8. Property Management Policy and Procedures
9. Fixed Assets/Equipment Disposal Process
10. Safekeeping/Safeguarding of Fixed Assets

# NUPAS PLUS 2.1 CHART

Property Management - Relative Proportion of LIP Risk Category by Subdomain





# PROPERTY MANAGEMENT CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Fixed Asset Register (FAR)	Confirm that the organization has a FAR to record its property, plant, and equipment.	FAR
Tracking System	Confirm that the FAR is adequately completed with all the relevant information, i.e., that all fields are completed, including the location of relevant assets.	FAR
Segregation of Duties	Confirm that there is adequate segregation of duties between the purchasing function and updating of the FAR.	Property Management Policy
Updates	Confirm that frequent asset verifications are performed and that FAR is updated with any changes/differences identified.	Assets verification reports
Disposal	Confirm that the organization has mostly adequate controls to ensure obsolete commodities are not distributed and there is no documentation.	Policy/ Procedure Manual
Storage	Confirm that an adequate facility for the storage of drug inventories/medical supplies is being used for project activities.	Inspection
Locked Storage	Confirm the existence of restricted access control through the locking of storage facilities.	Inspection
Property Management Policy and Procedures	Confirm the existence of property management policies, procedures, and practices that meet its needs and reflect best practices.	Property Management Policy and Procedures
Fixed Assets/Equipment Disposal	Confirm whether a property disposal process is in place in compliance with property management policies.	Property Disposal Guideline/Procedure
Safekeeping/safeguarding of Fixed Assets	Confirm the existence of insurance coverage for all fixed assets, including donor assets.	Insurance Policy

# COMMON AREAS OF IMPROVEMENT

- Inadequate Fixed Asset Register (FAR)

# KEY RISKS

## **Key risks to be considered:**

- Inadequate Fixed Asset Register.
- Failure to document procedures for handling program medical supplies.
- Absence of property management policies and procedures, including those on property disposal and fixed asset insurance.

# RECOMMENDATIONS

- **Training is required** for both the local partners' organizations and their subs to gain **an understanding of how to maintain assets by USG property standards.**
- Provide **additional support** on how to maintain **a fixed asset register through training and mentorship.**

# **MODULE 6: INFORMATION TECHNOLOGY**

# INFORMATION TECHNOLOGY

**Overall Objective:** To assess if the organization has an adequate IT Policy, if adequate structures and resources are in place to support the IT function, and if adequate IT internal controls are in place.

## IT Categories:

1. IT Committee
2. IT Plan
3. IT Risk Mitigation
4. Cybersecurity
5. Access
6. Staff Terminations
7. Data Retention
8. Error Tracking System
9. Disaster Recovery
10. Segregation of Duties
11. Back-ups
12. Antivirus
13. Firewall
14. Guest Network
15. Operating System Update
16. Updating Workstations, Laptops, and Computers
17. Software Installation and License
18. Passwords
19. Automatic Shutdowns
20. Licenses

# BACKGROUND AND METHODS

## **Methods**

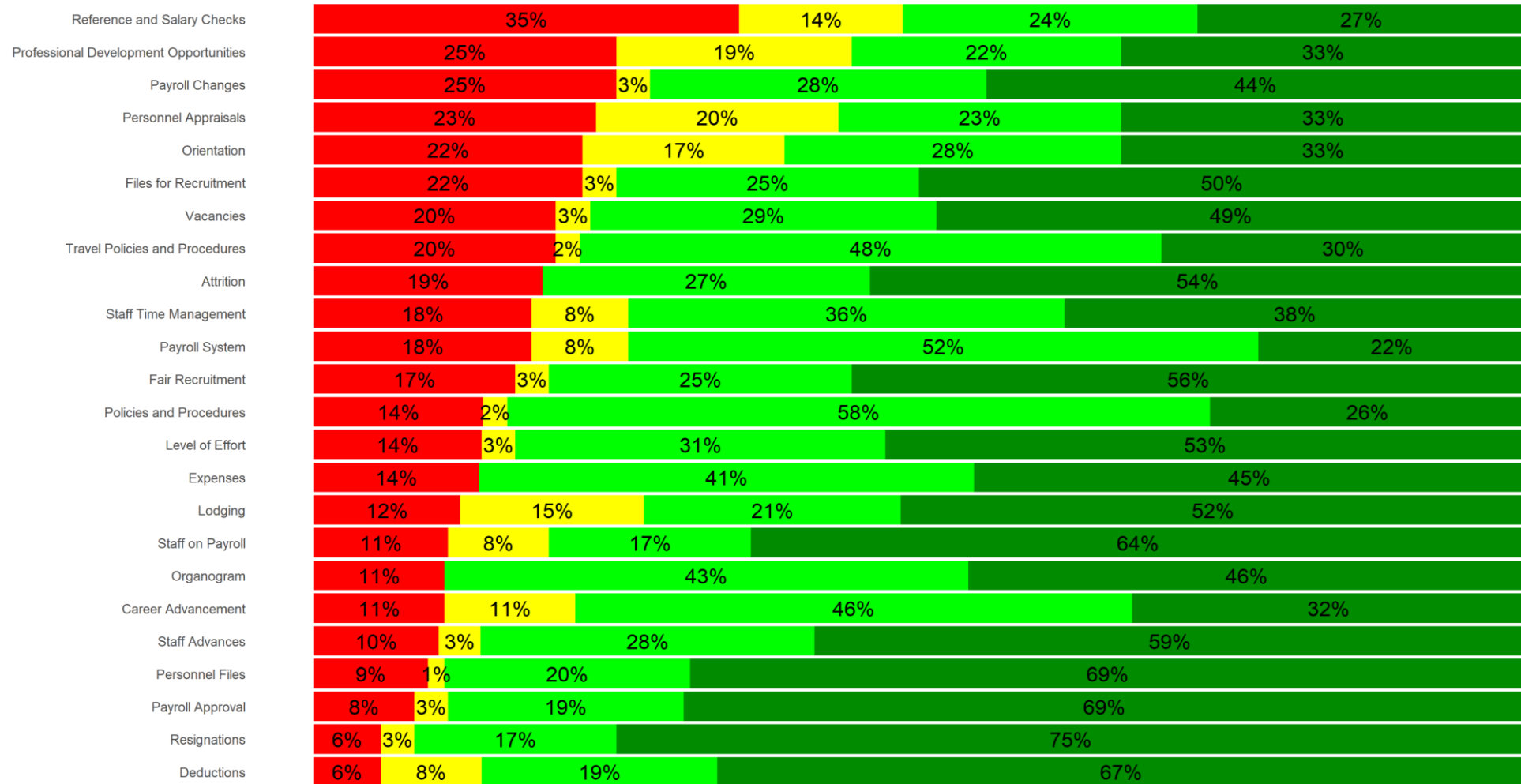
- Document review
- Interviews
- Physical Verification
- Observations (photos and videos used in virtual reviews)

## **Recommended interview participants**

- Chief Information Officer
- Financial Director
- Information Technology Manager
- External Information Technology Consultants

# NUPAS PLUS 2.1 CHART

Human Resources - Relative Proportion of LIP Risk Category by Subdomain





# IT CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
IT Committee	Confirm if there is an IT Committee in place to provide oversight of the IT function	IT Committee terms of reference IT Committee minutes
IT Plan	Confirm if an IT plan is in place and if it addresses the following: <ul style="list-style-type: none"> <li>- Hardware requirements</li> <li>- Software requirements (including updates)</li> <li>- Staffing requirements</li> </ul> Training of IT staff members and users	IT Plan
IT Risk Mitigation	Confirm if the organization performs IT risk assessments and if their risk assessment process is robust and adequately documented.	IT Risk Report
Cybersecurity	Confirm that the organization has cybersecurity insurance to mitigate losses from cyber incidents, including data breaches, business interruption, and network damage.	IT security risk assessments Cybersecurity Insurance Policy
Access	Assess if the organization has a policy or procedures for data and network access rights	IT Policy or Access Rights Policy
Staff termination	Confirm if there is a documented procedure for the return of hardware equipment and the restriction of access rights to terminated staff members.	IT Policy or HR Policy
Data retention	Confirm whether the organization has a data retention policy to help organizations keep track of how long information must be kept and how to dispose of the information when it's no longer needed.	IT Policy or Data Retention Policy
Error tracking system	Confirm whether procedures are in place to ensure that systems incidents, problems, and errors are reported, analyzed, and resolved on time.	IT Policy Help desk procedures

# IT CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Disaster recovery	Confirm that the organization has documented IT disaster recovery procedures and determine if disaster recovery tests are performed on data.	IT Policy Disaster Recovery Policy or procedures Disaster recovery test results
Segregation of duties	Assess if there is adequate segregation of duties within the IT function, with database administration clearly segregated from the other duties	IT Policy IT function organizational chart Job descriptions for IT staff members
Back-ups	Confirm if data back-ups are addressed in a policy and if local and off-site back-ups are conducted at a reasonable frequency.	IT Policy Back-up procedures Server back-up log reports
Antivirus	Confirm if the organization has up-to-date antivirus software installed on all laptops, computers, and servers.	IT Policy Antivirus license
Firewall	Confirm if the organization has a working firewall to establish a barrier between the internal network and incoming traffic from external sources (such as the internet) in order to block malicious traffic like viruses and hackers.	IT Policy
Guest network	Confirm whether the organization has a separate network for guests, without access to the organization's network.	IT Policy

# IT CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Operating system updates	Confirm that the organization's servers and client computers are updated with the latest operating system and third-party software patches, drivers, and firmware.	IT Policy Server update log reports Patch and update log reports
Updating workstations – laptops and computers	Confirm if the organization's workstations are configured and maintained in the same way, with a standard set of software installed (standard operating environment).	IT Policy
Software installation and license	Confirm if the installation of software is addressed in the IT policy, and whether software may only be installed by a delegated IT staff member.	IT Policy Access Policy or procedures
Passwords	Confirm if there is a documented policy or procedure on passwords to access workstations, as well as system access.	IT Policy
Automatic shutdowns	Confirm if the organization has automatic shutdowns, as well as system locks if computers are idle for a defined period.	IT Policy
Licenses	Confirm whether the organization has valid licenses for all software used.	Software licenses

# COMMON AREAS OF IMPROVEMENT

- Organizations often do not have Cybersecurity Insurance. Most organizations do not understand that they are at risk of a data breach or cyber-attack as a result of having a network, online presence, and holding or accessing confidential data.
- Back-ups are done on disks that are kept onsite, in office drawers, with no off-site or cloud back-ups.
- Lack of IT policies
- Lack of IT plans

# KEY RISKS

## Key risks to be considered:

- Lack of adequate IT policies in place
- Non-compliance with IT policies and procedure requirements
- Lack of IT plans
- No IT risk assessments performed
- Inadequate access controls
- Loss of information or data

# RECOMMENDATIONS

- **Conduct IT assessments and address the gaps found:** Before any work with LIPs, as their technology—or lack of it—can affect all aspects of implementation and organizational sustainability.
- **Encourage a culture of IT management:** IT committees govern and ensure that technology supports the organization's objectives and strategies and provides guidance on information security. IT policies or plans, automatic storage of electronic files and records more mature backup strategies, and skilled or qualified technicians to ensure proper IT governance and management are essential components of IT infrastructure.
- **Provide funding and encourage updates to IT systems:** The use of modern computers; licensed software; good bandwidth; networked servers, and intranet to simplify administration, storage, backups, and collaboration; enhanced data security with more administrative control; use of corporate email addresses; digitized HR/payroll management systems; databases to track company assets and other information; functional, well-designed websites; and IT training in Microsoft Office packages.

# RECOMMENDATIONS

- **Corporate email systems:** The use of corporate email at LIPs is important for security as personal emails do not allow for data back-up, are less secure, and are more prone to hacks than a corporate address.
- **The development of comprehensive IT Plans:** Each LIP should receive the technical support and funding they need to develop and implement a strategic, comprehensive, individualized IT Plan. This is the most effective and concrete way to identify, articulate, and address specific areas for improvement.

# **MODULE 7: HUMAN RESOURCES**



# HUMAN RESOURCES

**Overall Objective:** To verify whether the organization has adequate and effective HR policies and procedures in place and whether these are followed in practice.

## **USAID NUPAS Human Resources Categories:**

1. HR Policies and Procedures on HR
2. Time keeping policy
3. Payroll System
4. Policies and Procedures for staff Travel
5. Qualifications and experience for HR Functions
6. Staff and consultants hired on contract
7. Presence of a Code of Conduct or Code of Ethics
8. Written policies on child safeguarding, anti-fraud/anti-bribery/anti-corruption, whistleblowing, conflicts of interest, prevention of sexual exploitation and abuse, combating trafficking in persons, non-discrimination
9. personnel records housed in a restricted secured location

## **NUPAS Plus 2.1 HR Categories:**

### **5. HR Policies and Procedures**

1. Fair Recruitment
2. Files for Recruitment
3. Reference and Salary Checks
4. Vacancies
5. Personnel Files
6. Orientation
7. Career Advancement
8. Professional Development Opportunities
9. Personnel Appraisals
10. Attrition
11. Resignations

# HUMAN RESOURCES (CONT.)

## **NUPAS Plus Categories:**

### **6. Staff Time Management and Payroll**

1. Staff on Payroll
2. Payroll Changes
3. Payroll Approval
4. Deductions
5. Levels of Effort
6. Organizational Chart (Organigram)

### **7. Staff Time Management and Payroll**

1. Expenses
2. Staff Advances
3. Lodging

### **8. Personnel Data Protection**

### **9. Diversity, Equality, and Inclusion (DEI)**

### **10. Staff Wellness**

### **11. HR Reports**

### **12. Exit Interviews**

### **13. Staff Engagement**

### **14. Compensation**

### **15. Security & Safety**

### **16. Employee Relations**

### **17. Timesheet**

# BACKGROUND AND METHODS

## **Methods**

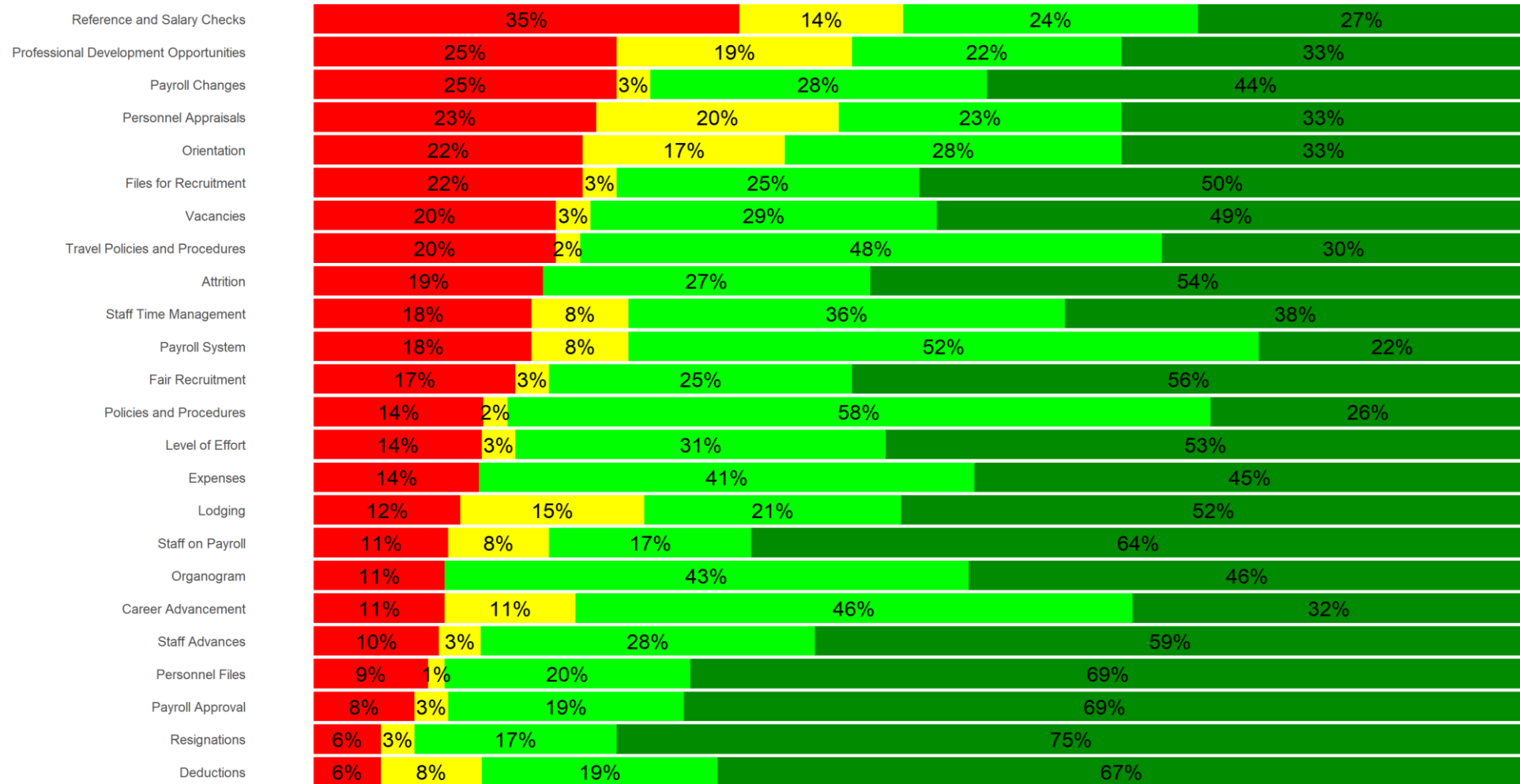
- Document review
- Interviews
- Substantive testing

## **Recommended interview participants**

- Human Resources Director
- Human Resources Manager
- Logistics Manager
- Payroll Manager

# NUPAS PLUS 2.1 CHART

Human Resources - Relative Proportion of LIP Risk Category by Subdomain



# HR CATEGORIES/SUB-CATEGORIES (CONT.)

Code	<b>C. Human Resources:</b> <i>This section reviews human resources (HR), e.g. personnel, systems and controls of the organization, including existence of HR policies or procedures, code of conduct, personnel travel and transportation, payroll, timekeeping, as well as mandatory disclosures and procedures for reporting violations.</i>	KEY DOCUMENTS FOR ASSESSMENT
C.1	Are there policies, procedures and/or practices on Human Resources (HR)? Do these meet the applicable standards found in 2 CFR 200 Subpart E Cost Principles?	Staff timesheets -
C.2	Is there a timekeeping policy or practice? Is the timekeeping procedure followed by all staff?	Compensation Policy
C.3	Is there a payroll system? If so, is it adequately tracking payout to staff, tax withholdings, and social security deposits (for example)?	
C.4	Are there policies or procedures governing staff travel? (e.g. types of allowable travel, criteria and rates for per diem, lodging, transportation, etc.)	HR Policy/Manual Employee handbook
C.5	Does the individual(s) responsible for HR functions have the requisite qualifications and experience?	Minutes of interviews/interview reports
C.6	Are employees and consultants hired by signing written contracts? If so, are the staff who will work on the award contracted and are the contracts valid (unexpired)?	Evidence of references and salary checks
C.7	Is there a Code of Conduct or Code of Ethics? How are staff trained and oriented on the code of conduct?	Organizational chart and vacancy profiles
C.8	Are there written policies to address any or all of the following: child safeguarding, anti-fraud/anti-bribery/anti-corruption, whistleblowing, conflicts of interest, prevention of sexual exploitation and abuse, combating trafficking in persons, non-discrimination? For any/all of these policies, how are staff trained and oriented on these policies?	Staff timesheets
C.9	Are personnel records (contracts, address/phone number, medical information, copies of IDs/passports/etc., other personally identifiable information (PII)) housed in a secured location and accessible only to authorized staff?	

# HR CATEGORIES/SUB-CATEGORIES (CONT.)

	CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
HR Policies and Procedures	Fair recruitment	Confirm the organization has a fair effective recruitment system. All staff are recruited freely and fairly on the basis of merit only. All filled positions match qualifications and experience described in their JD.	-
	Files for recruitment	Confirm all staff files show a record of the recruiting process, approved request for staff forms, advertising(internal or external or head hunting), interview results and decisions taken thereafter	
	Orientation	Confirm if there is an orientation of new employees	Signed declaration by employee. Attendance registers for induction sessions (if more than one person is employed at a time)
	Career advancement	Confirm if the organization has prospects of career development, growth, and salary increases for employees	Salary increase letters, Promotion letters
	Professional development opportunities	Confirm if the organization has prospects for career development and growth for employees.	Authorization letter for development (e.g., for starting a course)
	Personnel appraisals	Confirm that the organization's all staff have received a personnel appraisal every six or 12 months for the past three years.	Proof of personnel appraisals
	Attrition	Verify if the organization has a practice in place to manage their staff complement (i.e., prevent large reductions in the workforce).	Written strategy for managing staff attrition
	Resignations	Verify if the organization has a procedure in place to guide the resignation process.	Resignation/ termination letter

# HR CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
HR Policies and Procedures	Orientation -	Confirm if there is an orientation of new employees	Signed declaration by employee  Attendance registers for induction sessions (if more than one person is employed at a time)
	Career advancement	Confirm if the organization has prospects of career development, growth, and salary increases for employees	Salary increase letters  Promotion letters
	Professional development opportunities	Confirm if the organization has prospects for career development and growth for employees.	Authorization letter for development (e.g., for starting a course)
	Personnel appraisals	Confirm that the organization's all staff have received a personnel appraisal every six or 12 months for the past three years.	Proof of personnel appraisals
	Attrition	Verify if the organization has a practice in place to manage their staff complement (i.e., prevent large reductions in the workforce).	Written strategy for managing staff attrition
	Resignations	Verify if the organization has a procedure in place to guide the resignation process.	Resignation/ termination letter

# HR CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Staff Time Management and Payroll	Staff on payroll -	Confirm that the organization has documented measures in place to ensure that the staff on the payroll are valid.	Payroll report Approved payroll reconciliations
	Payroll changes	Confirm that changes in salary/ allowances were approved.	Payroll change report
	Payroll approval	Confirm that the payroll is approved.	Payroll report
	Deductions	Confirm that all deductions are included on the payroll.	Payroll report
	Level of effort	Confirm that all staff working on the project have the LOE, the capacity, and the ability needed, and have been trained.	Donor agreement (LOEs will be stated here) Staff time sheets
	Organizational chart	Confirm that the organization has an up-to-date and approved organizational chart	Organizational chart Minutes in which the organizational chart was approved



# HR CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Staff Travel	Expenses -	Confirm that all reimbursed expenses are supported by valid source documents and that there are procedures to provide guidance	General ledger (to select a sample relating to employee expenses, such as travel/refreshments) Source documents
	Staff advances	Confirm that the organization reconciles expense claims for amounts advanced and that there are procedures to guide this process.	Expense claim reconciliations, together with supporting documents
	Lodging	Confirm that the local organization has a lodging policy and consistently applies it.	Lodging Policy
Data Protection		Confirm whether the organization has a Data Protection Policy and implements it.	Data Protection Policy
Diversity, Equality, and Inclusion (DEI)		Confirm whether there is a DEI policy in place and is effectively used, and there is evidence that the organization considers DEI issues when hiring, promoting, and in the development of staff, particularly there are initiatives to ensure minority groups are considered and represented in the organization.	DEI Policy
Staff Wellness		Confirm whether the organization has a staff wellness policy and implements initiatives to promote the physical and mental health of the employees, including through counseling services.	Staff Wellness Policy
HR Reports		Confirm that HR reports are prepared regularly providing management with HR data to track retention and staff engagement levels in the entire employee life cycle.	HR reports

# HR CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Exit Interviews	Confirm that exit interviews are conducted with every staff separation, data from exit interviews is analyzed to identify the general trends for staff separation, and efforts are made to address the causes of exit.	Evidence of staff exit interviews and analysis of causes for staff separation
Staff Engagement	Confirm whether there is scheduled and/or regular communication to staff by management through staff meetings, town hall meetings, bulleting, and general communication from management, and the management always seeks and considers staff opinion on matters affecting staff.	Evidence (meeting minutes/rundown) of staff meetings, and town hall meetings as communication channels between staff and management
Compensation	Confirm that salary scales are available and have been adjusted at least every 3 years with Board approval and that the organization conducts market salary surveys at least every other year to ensure salaries are in line with the market.	Updated salary scale
Security & Safety	Confirm whether there are safety and security policies in place and whether all incidents are reported, investigated, and action taken to address the risk.	safety and security policies and procedures
Employee Relations	Confirm whether the organization has clear procedures for staff to raise their grievances, whether there is a prompt response to address them, and whether there are no pending labor/employment disputes.	Complaints management procedure/policy
Timesheet	Confirm whether the timesheet includes budget codes for all the different projects and that ALL staff consistently submit on time without errors	Timesheet template

# HR CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Staff Skill Set	Confirm that all the individual(s) responsible for HR functions have the requisite qualifications and experience	
Employee and consultant contracts	Confirm that all employees and consultants are hired by signing written contracts and all current staff have updated contracts	
Code of Conduct or Ethics	Confirm that there is a Code of Conduct or Code of Ethic and staff are trained and oriented on the code of conduct and signed it	
Training on Code of Ethics	Confirm that there are written policies are in place and all staff are trained or oriented on these polices	
Personal Identifiable Information	Confirm that the has a policy which is consistently applied for personnel records housed in a secured location and accessible only to authorized staff	

# ROLE PLAY



# COMMON AREAS OF IMPROVEMENT

- Payroll costs allocation – use of budget LOEs under COAGs
- Payroll changes – poor controls for approving payroll changes
- Performance management – no performance appraisals
- Payroll reconciliations – timing (only done after payment of salaries)

# KEY RISKS

- Completion of timesheets (using budgeted time instead of actual, non-completion)
- Timesheets not approved
- Key vacant positions not filled
- Payroll reconciliations not performed/approved
- Salary scales not in existence/approved
- Personnel files incomplete

# RECOMMENDATIONS

- To avoid high staff turnover, LIPs should **use the competitive market salary data** in their proposals to prepare USAID-funded staff budgets; (2) share their **respective national FSN scales** to guide LIPs on the salaries payable to staff in USAID projects; and (3) include a **line item for staff development** in USAID proposals.
- Provide a **standard organizational chart** for guidance, with support to customize the chart for the local context and organization's unique situation, because organizational charts are missing key positions.
- Provide **additional guidance and training in local labor laws**, particularly in the areas of severance and related payments as the LIPs were struggling to understand and comply with the laws.

# **MODULE 8: MONITORING AND EVALUATION (M&E)**



# MONITORING AND EVALUATION

**Overall Objective:** To assess if the organization has an adequate M&E system in place that complies with the reporting requirements for PEPFAR-sponsored projects, with an effective M&E structure.

## **Categories/Sub-categories:**

### **1. M&E Unit**

1. Organigram
2. Skills
3. Experience
4. Decision Making

### **2. M&E Plan**

1. AMELP
2. Budget
3. Workplan Analysis
4. Performance Indicators

### **3. Routine Monitoring**

1. Equipment
2. Forms
3. Tools
4. Tool Analysis
5. SOPs

### **5. Databases**

1. PEPFAR Database
2. Database Reporting
3. Monitoring Reports

### **6. Supervision and Data Quality**

1. Tools
2. Documentation
3. Data audit
4. Audit reports
5. Use of Audit reports
6. Training

### **7. Data Use**

1. Plan
2. Documentation
3. Course Correct
4. Data Reviews

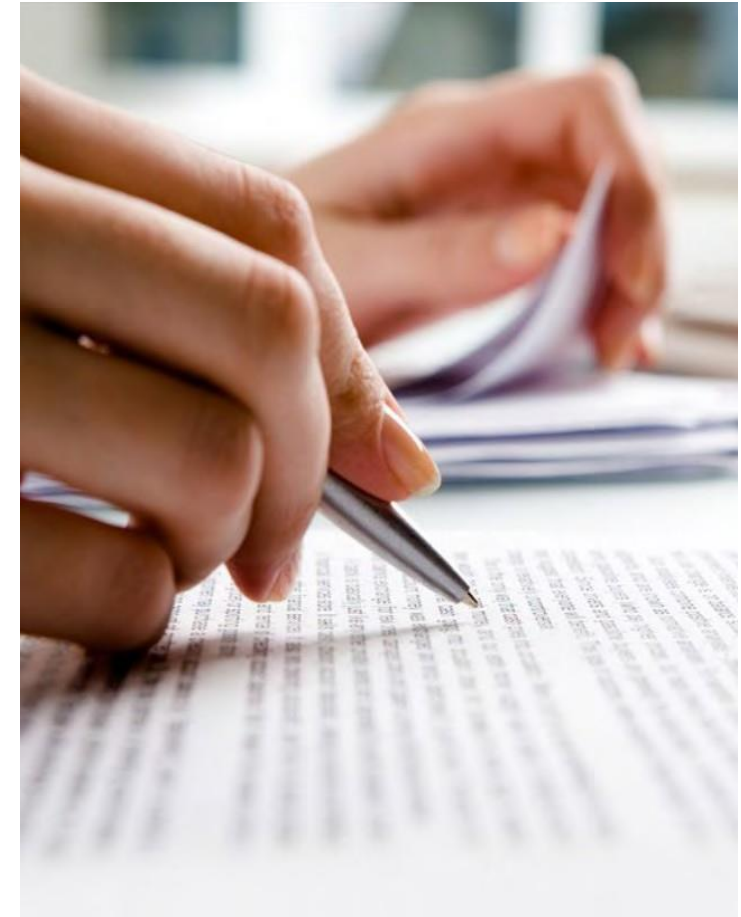
# DOCUMENTS FOR REVIEW

## **NUPAS 5: Project Performance Management**

- Project Performance Manual/Results Framework
- Organization's training calendar for the current reporting period
- Progress project(s) performance reports
- Previous performance ratings from the donor(s)
- Beneficiaries' satisfaction survey

## **NUPAS Plus 7: Monitoring and Evaluation**

- M&E policies and procedures
- Organization or project M&E plan for open USAID projects
- Annual work plan for open USAID projects
- USAID M&E Reports for the previous 12 months
- Data analysis and presentation guidelines
- M&E data quality audit reports (previous year)
- Proof of most recent training on M&E (attendance register, minutes of the training session, certification, etc.)



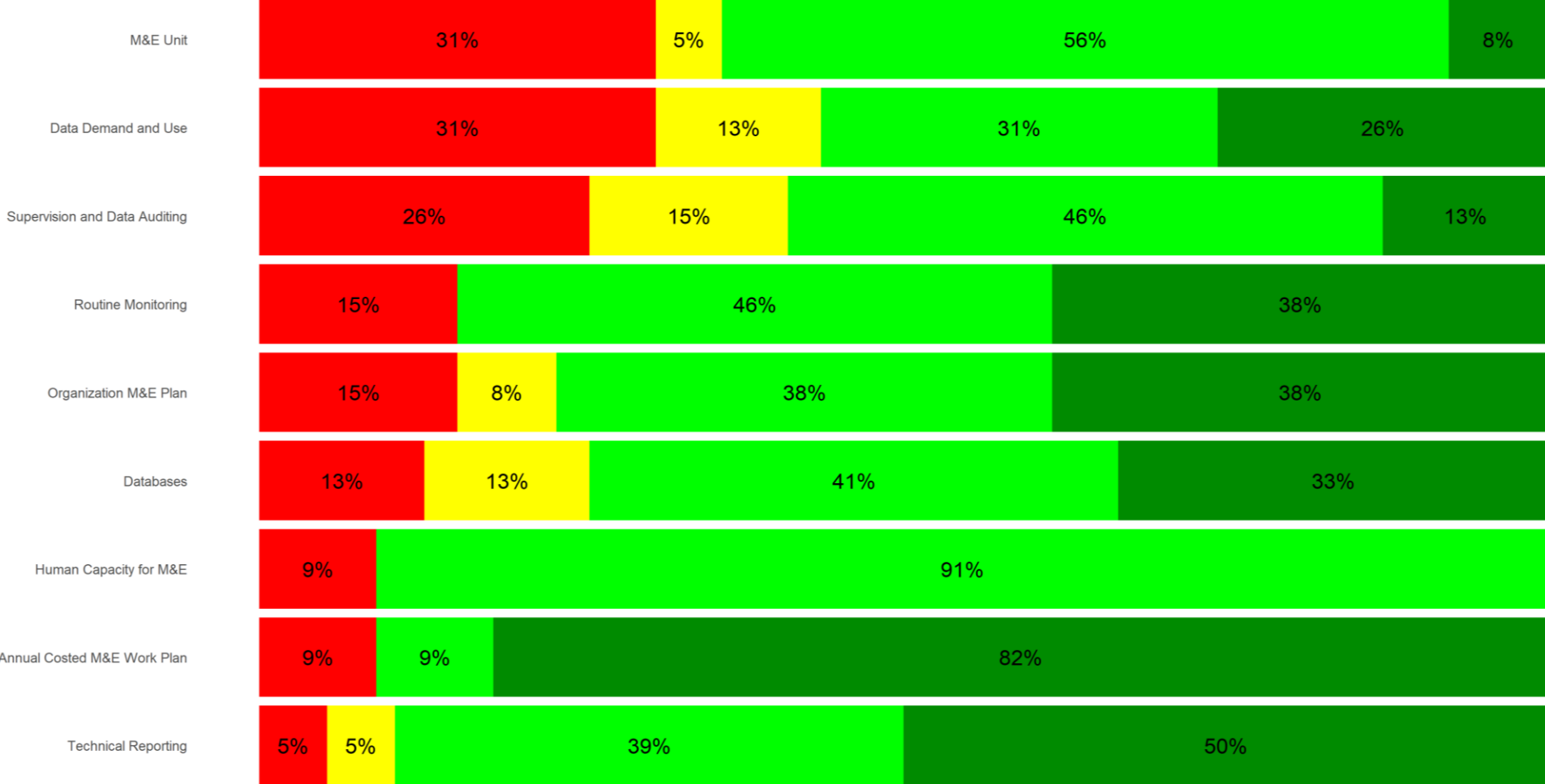
# RECOMMENDED INTERVIEW PARTICIPANTS

- M&E (Director, Manager, Officers)
- Executive Director
- COP/Program Director
- Finance Director (?)



# NUPAS PLUS 2.1 CHART

M&E - Relative Proportion of LIP Risk Category by Subdomain



# M&E CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
M&E Unit	Organigram	Confirm that the organization has an M&E unit, responsibilities are clearly defined in job descriptions and the number of permanent positions is adequate.	Organizational chart, CVs, and job description
	Skills	Confirm if all staff at the M&E unit have qualifications and experience that are specific to M&E.	CVs and job description
	Experience	Confirm if staff are expertly able to collate, process, and analyze data.	CVs, and job description
	Decision Making	Confirm if staff are expertly able to package the data to support decision-making, including preparing PowerPoint slides.	data presentation / visualization

# M&E CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Organizational M&E Plan	AMELP	Confirm if the organization has an M&E plan for its PEPFAF-funded project (or other projects) with all required components including Performance Indicators Reference Sheet.	M&E plan as per USAID's AMELP template
	Budget	Confirm that specific resources (human, financial, and physical) have been committed to implementing the M&E plan with no gaps.	M&E budget
	Workplan Analysis	Confirm if activities in the work plan are allocated and have specific time frames for implementation with no gaps.	Annual work plan
	Performance Indicators	Confirm if the work plan contains clear and specific goals, activities, timelines, responsibilities, or performance indicators and targets.	Annual work plan

# M&E CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Routine monitoring	Equipment	Confirm if essential tools and equipment for data management are consistently available.	Data collection and reporting tools and equipment
	Forms	Confirm if all tiers of data collection and reporting are using standard data collection forms with no gaps.	Standard data collection forms
	Tools	Confirm if there are tools used to capture essential indicators for routine performance monitoring.	Data collection and reporting tools and equipment
	Tool Analysis	Confirm if the organization has consistently identified gaps in the existing tools that need to be updated.	Relevant documentation
	SOPs	Confirm if there are M&E guidelines to document the procedures for recording, collecting, collating, and reporting routine data from the health information system.	SOPs

# M&E CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Databases	PEPFAR Database	Confirm if the organization's database for capturing and storing PEPFAR data is up to date.	PEPFAR Database observations
	Database reporting	Confirm if the database consistently captures all data elements required by the organization's M&E system.	Project M&E Reports
	Monitoring Reports	Confirm if the organization can generate routine monitoring reports using its databases	Project M&E Reports



# M&E CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Supervision and Data Audit	Tools	Confirm if guidelines and tools for supportive supervision are available.	Routine Data Quality Assessment (RDQA) tool and reports
	Documentation	Confirm if the last supportive supervision was conducted in accordance with the current guidelines with no gaps.	Relevant supporting documents
	Data audit	Confirm if policies, procedures, and tools for data quality audits are available and always used.	Relevant policies, procedures, and tools
	Audit reports	Confirm if data quality audits are conducted as per the stipulated procedures and proper post-RDQA follow-up action items are implemented.	Routine Data Quality Assessment (RDQA) tool and guidelines and audit reports
	Use of Audit reports	Confirm whether the findings and feedback from the data quality audit are shared with stakeholders.	M&E data quality audit reports
	Training	Confirm if staff are appropriately trained to carry out tasks relating to the assessment of data quality (completeness, timeliness, accuracy, reliability) with no gaps.	Relevant supporting documents

# M&E CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Data Demand and Use	Plan	Confirm if the organization has a data use plan for its PEPFAR-funded project.	Data use plans, AMELP/M&E Plan
	Documentation	Confirm if the data use plan is fully implemented.	Relevant supporting documents
	Course Correction	Confirm if routine data is used to design effective remediation measures.	Meeting minutes/notes; presentations or dashboards
	Data Reviews	Confirm if the organization regularly conducts a systematic review of data involving technical and M&E staff, learns from it, and makes performance improvement decisions.	Meeting minutes/notes; presentations, decision makings

# COMMON ISSUES

## **Performance Management**

- No Performance Management Manual
- No MEL Plan/AMELP/MEAL Plan
- Staff lack skills in performance management
- Performance Management Software with dashboards

## **Monitoring and Evaluation**

- Not having enough M&E staff
- Poor data management systems and lack of proper disaggregation of data in small NGOs
- Poor RDQA, lack of evidence of implementing follow-up action items
- Low level of use of data for program improvement and lack of data analysis skills

# RECOMMENDATIONS

- **Make continued training of staff** in data collection, storage, and analysis, both for new and current primes and sub-recipients **a priority**.
- **Project Management Manual:** Processes and procedures around data collection, storage, and analysis should be laid out in a Project Management Manual institutionalized with routine data for decision-making with leadership.
- **Focus on M&E staff retainment:** Addressing M&E staff turnover should include a two-fold approach of equalizing pay bands between local and international organizations to even the playing field for all LIPs to obtain and retain qualified staff.

# **MODULE 9: GENDER AND SOCIAL INCLUSION (GESI)**

# GENDER AND SOCIAL INCLUSION (GESI)

**Overall Objective:** To create a useful and easy-to-use tool for undertaking gender audits as well as social inclusion interventions.

**This tool has the following two specific objectives:**

1. Assess an organization's capacity for gender mainstreaming and social inclusion at three levels: organizational level, project/program level, and individual level.
2. Identify existing gender mainstreaming and social inclusion gaps useful for designing a gender strategy/ gender mainstreaming capacity development plan.

# BACKGROUND AND METHODS

## Methods

- Document review
- Interviews or focus groups with staff, in-person or remotely

## Recommended interview participants

- Gender focal person, program manager, M&E director, HR manager, and finance staff

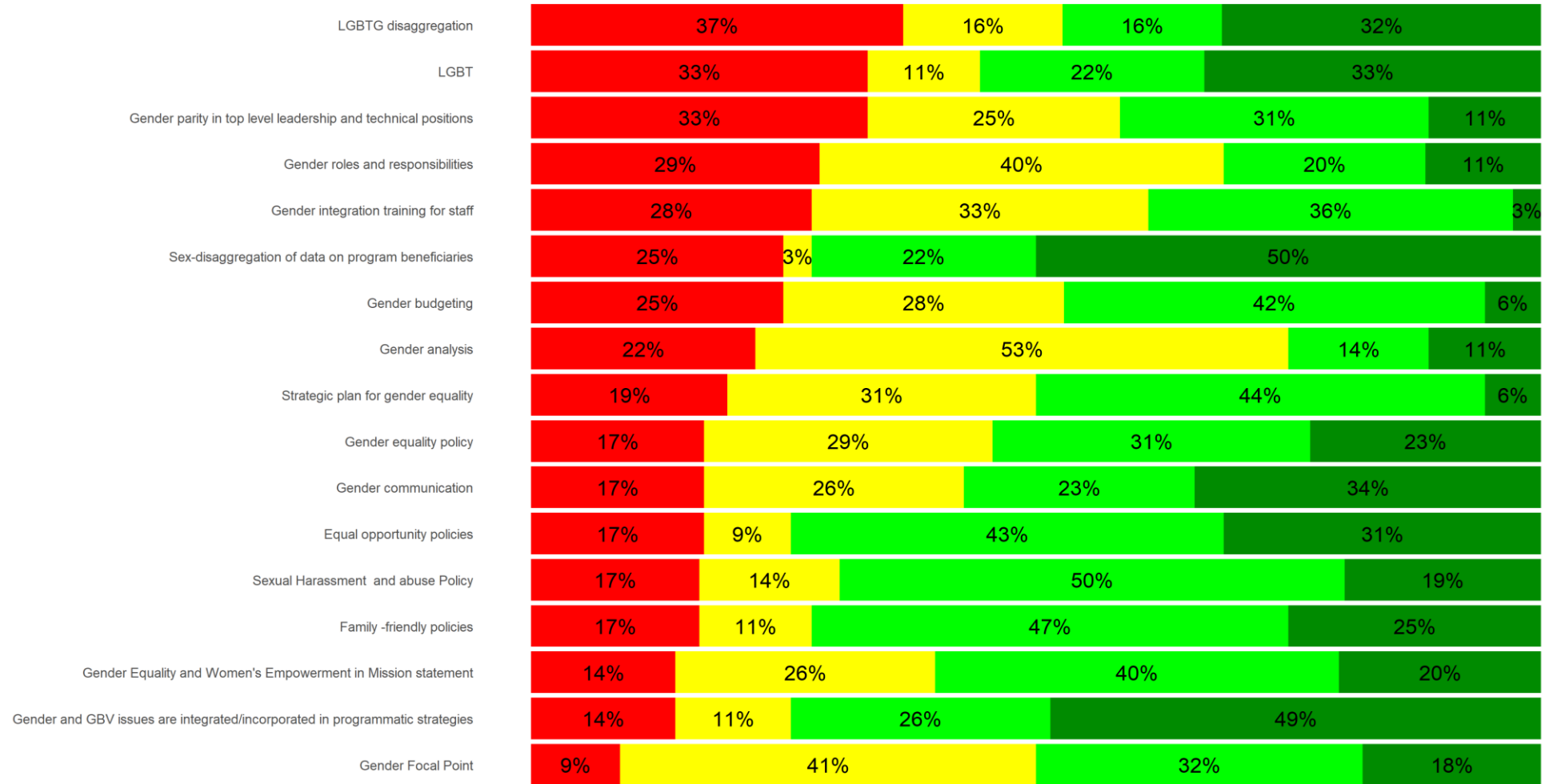
## Gender terminology

- Check that participants understand the terminology



# NUPAS PLUS 2.1 CHART

Gender - Relative Proportion of LIP Risk Category by Subdomain





# GESI CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Gender Equity Policy	Assess if the organization has a gender policy and/or gender mainstreaming guidelines.	Gender policy and implementation guideline/ manual
Gender Integration Training for Staff	Assess if the organization has regular mandatory gender integration training for its staff.	Gender integration training minutes; training attendees
Gender Budgeting	Assess if the organization employs gender budgeting at both institutional and project levels.	Check the budget and ask if a percent of the budget is allocated to implement the gender policy
Gender Equality and Women Empowerment in Mission Statement	Assess if the organization has a mission statement that clearly promotes gender equality and women's empowerment, with a strategy that facilitates its achievement.	Strategic plan (read mission statement)
Gender Focal Point	Assess if the organization has assigned a gender focal person with clear roles and responsibilities for integrating gender, both at the institutional and program/project level.	Organizational chart; job description of assigned gender focal person (if any)
Gender and GBV Issues Integrated into Programmatic Strategies	Assess if the organization addresses gender and gender-based violence in programs targeting men and women, as well as girls and boys.	Workplan and other project documents

# GESI CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Sex Disaggregation of Data on Program Beneficiaries	Assess if the organization has a policy or procedures on sex disaggregation of beneficiaries for targets and results	Gender policy; organizational/program database or reports
Gender Analysis	Assess if the organization conducts a gender analysis, including all five categories and includes five categories: access; knowledge, belief, and practices; practices and participation; time/space as well as legal).	Gender analysis report
Strategic Plan for Gender Equality	Assess if the organization has a strategic plan with gender equality or women's empowerment activities, monitors it regularly, and is on track.	Strategic plan; gender audit report
Gender Roles and Responsibilities	Assess if the organization's gender roles and responsibilities are integrated into all staff job descriptions (including those of top-level leadership) and assess if staff is monitored for their respective gender mainstreaming mandates during performance appraisal.	Sample of staff job descriptions (gender focal person, top management, human resource, project staff)
Sexual Harassment and Abuse Policy	Assess if the organization has a zero-tolerance sexual harassment policy with a code of conduct that is signed by all staff and a reporting system.	Sexual harassment and abuse policy; human resource policy

# GESI CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Gender Communication	Assess if the organization has incorporated gender equality in its communications and media strategies and reflects a gender perspective in its communication materials (such as brochures, and newsletters).	Gender policy; communication strategy; brochures, flyers, newsletter
Gender Parity in Top-Level Technical and Leadership Positions	Assess if the organization has planned and achieved gender parity at top-level leadership (including board and higher-level management) and level of project/ program/ technical staff.	Gender policy/strategy; current sex-disaggregated staff data
LGBTG Disaggregation	Verify if the organization has planned and achieved gender parity in both top-level leadership (including board and higher-level management) and project/program/technical staff.	Supporting documents
Equal Opportunity Policies	Assess if the organization has a human resources policy promoting equal opportunity, and nondiscrimination, and uses affirmative measures in hiring and promotion.	Human resources policies; staff recruitment/promotion minutes
Family-Friendly Policies	Assess if the organization has a family-friendly human resources policy for ensuring gender equity at the workplace.	Human resources policies; gender policy
LGBTQ Policy	In countries where it is legal, assess if the organization has LGBTQ inclusive policy	Human resources policies; gender policy

# EXAMPLES OF CAPACITY BUILDING PLAN ON GESI

- Provide gender integration training for staff
- Conduct monthly/quarterly gender group discussion sessions at the workplace and identify a gender action plan
- Gender roles and responsibilities
- Develop a strategic plan for gender equality
- Provide tools so that LIPs can conduct a gender audit regularly, without external assistance, and assign a budget for hiring a consultant
- Prepare guidelines and establish a reporting system for sexual harassment and abuse

# RECOMMENDATIONS

- **Look at national policies:** Use national gender policies as a starting point to build internal processes and practices.
- **Follow up to ensure that policies are practiced:** The existence of policies is important, but actual implementation is crucial.
- **Continue to promote the gender module of NUPAS Plus 2.1**
- **Look beyond the project:** Promoting policy adoption at the organizational level for integration of gender policies.
- **Start with the basics:** Training is necessary for the concept of gender integration in all departments and roles.
- **Ensure that gender focal points are in place:**
- **Ask about the next steps:** Policy dissemination is an important next step.
- **Ensure buy-in from leadership and staff:** Successful gender integration is possible only through engagement in discussions and training.
- **Incorporate gender training when working with Boards**
- **Consider a hotline for harassment and discrimination complaints**
- **Develop a manual for standardized Preventing Sexual Exploitation and Abuse (PSEA) training**

# **MODULE 10: GOVERNANCE**

# GOVERNANCE

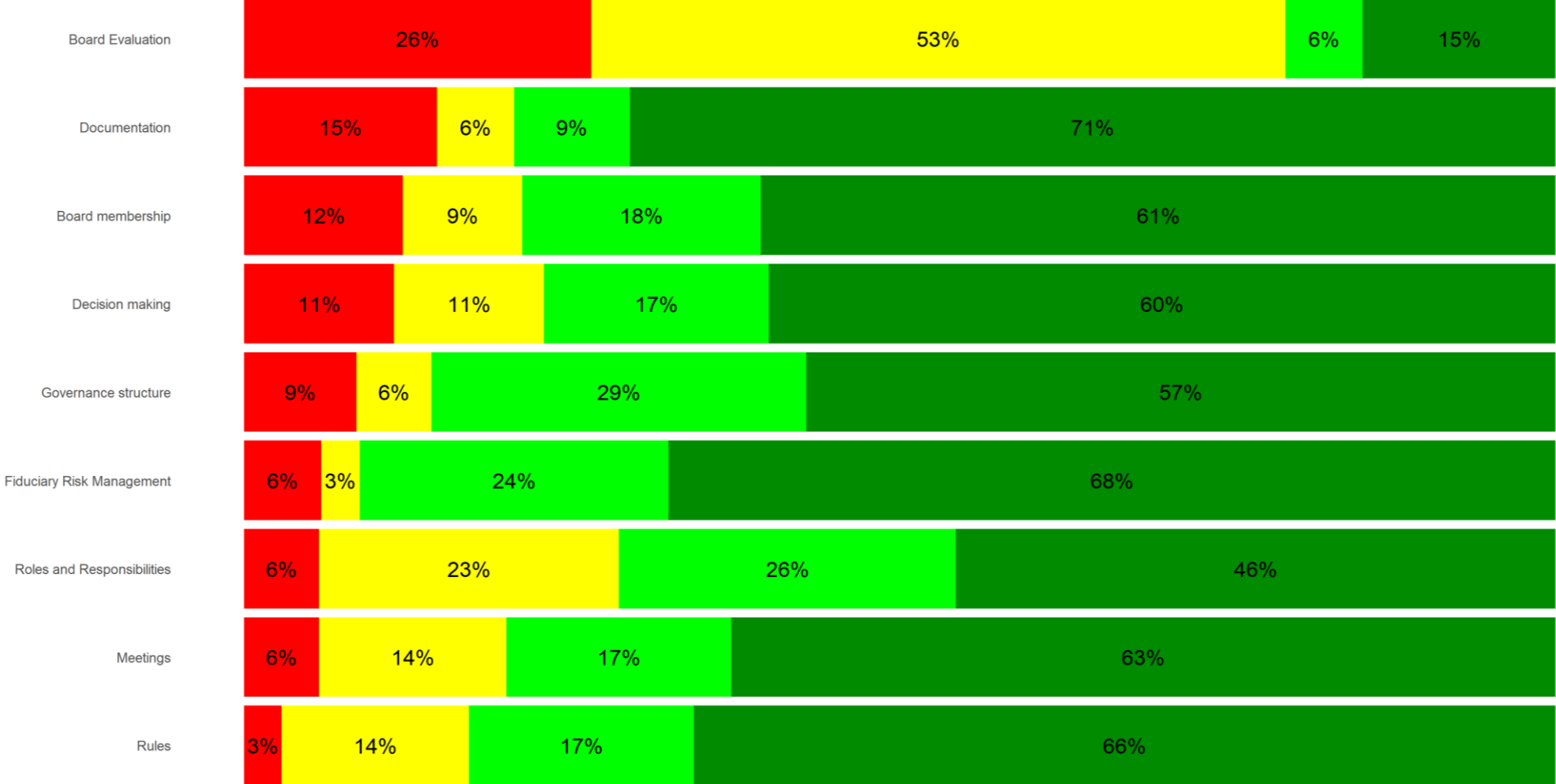
**Overall Objective:** To assess if the organization complies with local legal requirements on governance and has adequate and effective management and governance structures in place.

**Categories:**

1. Governance Structure and Accountability
2. Board Membership
3. Membership Rules
4. Roles and Responsibilities
5. Board Meetings
6. Documentation
7. Decision Making
8. Fiduciary Risk Management
9. Board Evaluation
10. Board and Main Governance Committee Structure
11. Finance Management
12. Strategic and Business Planning
13. Performance Management
14. Risk Management
15. Executive Leadership
16. Succession Plans

# NUPAS PLUS 2.1 CHART

Governance - Relative Proportion of LIP Risk Category by Subdomain





# GOVERNANCE CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Governance Structure	Confirm if the governance structure complies with local laws and has done so for the past three years.	Board TOR/bylaws
Board Membership	Confirm if board members and officers are elected/appointed/ removed in accordance with applicable laws and by approved written procedures.	Board TOR/ Governance Manual/ bylaws Companies Act/ Relevant legislation
Membership Rules	Determine if the organization has/does not have rules for membership, eligibility, suspensions, and expulsion.	Board TOR/ Governance Manual/ bylaws
Roles and Responsibilities	Confirm if all board members have clear roles and responsibilities which are aligned with all components of the Strategic Plan.	Board TOR/ Governance Manual/ bylaws
Board Meetings	Confirm whether at least a minimum number of governing board meetings per year are held, as required by the Companies Act and the Governance Manual.	Board TOR/ Governance Manual/ bylaws Companies Act/relevant legislation Board meeting minutes
Documentation	Confirm if all board meeting minutes are documented in the stated period, cover discussions, include action items, and are approved by all board members.	Minutes of Board meetings

# GOVERNANCE CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Decision Making	Confirm if the Board has procedures in place for decision-making, including the number needed for a quorum, how to vote, and decision recording.	Board TOR/ bylaws
Fiduciary Risk Management	Confirm if the board oversees fiduciary risk controls for its members, officers, and employees; and if effective mechanisms exist for the enforcement of such policies.	Board TOR/ Governance Manual/ bylaws Companies Act/relevant legislation Conflict of interest declarations
Board Evaluation	Confirm if the board conducts structured, annual self-assessments to identify governance gaps.	Board TOR/ Governance Manual/ bylaws
Board and Main Governance Committee Structure	Confirm whether the organization has a functional Board and committee.	TORs for Board and Committees
Finance Management	Confirm whether finance is a standing agenda item at every board meeting, with the organization's senior management and Board making collective financial decisions collectively, and whether there are highly effective internal control systems and regular financial information communication systems in place.	

# GOVERNANCE CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Strategic and Business Planning	Confirm whether the organization has a strategic plan with a clear mission statement, vision, and key goals, as well as an operational/implementation plan in place.	Strategic Plan
Performance Management	Confirm whether the organization has a concrete performance management process in place based on which the Board Chair reviews the performance of the executive director who then reviews the performance of reviews of all senior staff with clear performance objectives and development plans, on an annual basis.	Performance management process and tools
Risk Management	Confirm whether the organization has a risk management plan, and Risk Management Committee, with risk management being a standing agenda item at board meetings and ensure that risks are being systematically evaluated and effectively managed throughout the organization.	Risk management plan and procedures
Executive Leadership	Confirm whether the organization has a coherent senior management structure, including the executive leadership with demonstrable distinction between the roles and responsibilities of the Board and the Executive Director, including in matters related to compliance, risk, legal, finance, and audit.	Board and Executive Management TORs
Succession Plans	Confirm whether the organization has policies for succession planning for the Board Chair, Members, and Executive Leadership which are consistently applied.	Policies on succession planning for Board Chair, Members, and Executive Leadership

# KEY RISKS

- Noncompliance with legal and governance requirements.
- Ineffective Boards and committees appointed by the board.
- No finance and risk management oversight.
- Lack of approved strategic plan for sustainability.

# RECOMMENDATIONS

- **Encourage recruitment of young people to LIP Boards:** The negative effects of “founders’ syndrome”.
- **Board members need standardized roles and responsibilities:** Oftentimes, Board members are unclear about their roles and do not always function as per their technical roles.
- **Spotlight transparency:** Transparency is crucial and should be fully communicated to the entire organization and backed by policy.
- **Involve Boards in the whistleblower reporting process:** Fraud is always a risk when resources are involved
- **Require separate finance and audit committees:** No relationship between board/committee members and leadership/the founder that involves a conflict of interest.
- **Consider remuneration for Board members**
- **Help Board directors network through a shared forum:** Opportunities such as a community of practice to network and knowledge-share with one another.

# **MODULE 11: SUBAWARD MANAGEMENT**

# SUBAWARD MANAGEMENT

**Overall Objective:** To assess the organization's sub-award management technical capacity, including the sub-award management manual, processes, and procedures in place to ensure compliance and identify/mitigate risks to enable the organization to achieve the appropriate capacity to successfully manage sub-awards.

## **Subaward Management Categories:**

1. Subawards
2. Subaward Manual
3. Mechanism Types
4. Subaward Planning
5. Competitive Solicitation
6. Non-Competitive Solicitations
7. Prime Approvals
8. Pre-award Assessment
9. Special Award Conditions (SAC)
10. Flow downs
11. Budget
12. Indirect Costs
13. Annual Workplan
14. Subaward Reporting
15. Capacity Strengthening
16. Modifications
17. Monitoring Plan
18. Deficiencies
19. Financial Management
20. Inventory
21. Site Visits
22. Closeout
23. Evaluation of Proposals
24. Staff Skill Set

# SUBAWARD MANAGEMENT CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Subawards	Confirm that the organization has the appropriate capacity and strong legal frameworks for successfully managing subawards.	Relevant documentation, including manuals, policies, and procedures
Subaward Manual	Confirm that the organization has a recently (1-3 years) Board approved complete subaward manual which includes all of the following: 1. Roles and Responsibilities for Grants Management and Administration; 2. Pre-Award Process and Procedures; 3. Post-award Process and Procedures; 4. Implementation of Grant Project; 5. Project Evaluation; 6. Compliance, audits, and audit readiness; Project Close-out; and is consistently applied.	Subaward manual
Mechanism Types	Confirm whether all templates exist and are fully compliant in terms of Cost or Firm Fixed Price Contract, Cost Plus Fixed Fee, Time and Materials, Indefinite Delivery/Indefinite Quantity, and whether the right mechanism is correctly and consistently applied.	Relevant templates and sub-awarding mechanisms
Subaward Planning	Confirm that all subs are identified when applying for the award and appear explicitly in the approved award.	Subaward
Competitive Solicitation	Confirm that the Request for Applications (RFA) includes all components: organizational background, project goals and targets, geographical scope, thematic area, SOW, deliverables, budget with appropriate categories, RFP instructions, and eligibility criteria, and are posted on all relevant and appropriate websites.	RFAs in the last two years
Non-Competitive Solicitations	Confirm that sole source awards are fully justified and approved by USAID.	Sole source awards in the past two years
Prime Approvals	Confirm whether the Request for Approvals is submitted on time with all relevant information, and USAID has approved all subawards.	Approval letters and/or emails
Pre-award Assessment	Confirm if the organization consistently uses the NUPAS Plus 2.1 or any other internationally recognized tool that employs verifiable evidence for scoring risk, its staff are trained in using the tool, and it is carried out before the award is issued.	Pre award assessment of the grantee/subawardee



# SUBAWARD MANAGEMENT CATEGORIES/SUB-CATEGORIES

CODE	<b>H. Subaward Management:</b> <i>This section reviews subaward management policies and/or procedures, including competitiveness, prevention of conflicts of interest, evaluation of applications, staffing, etc</i>	<b>KEY DOCUMENTS FOR ASSESSMENT</b>
H.1	Are there written policies and practices for subaward management and monitoring?	
H.2	Do policies and/or practices require open, competitive, and transparent solicitation of applications?	
H.3	Do policies/procedures describe application evaluation, evaluation committee, avoidance of COI, etc.?	
H.4	Are there subaward agreement templates with adequate terms and conditions to safeguard USAID funding?	
H.5	Does the organization's financial systems have capacity to segregate, track and monitor subaward expenses?	
H.6	Do the individuals responsible for subaward management have the requisite qualifications and experience, including experience or understanding of USAID rules and regulations? Be sure to describe.	
H.7	Are there procedures for maintaining up-to-date, complete documentation of subaward management (e.g. subaward records), including subaward monitoring?	
H.8	Are there procedures describing subaward monitoring requirements, as well as roles and responsibilities?	

# SUBAWARD MANAGEMENT CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Special Award Conditions (SAC)	Confirm whether the organization consistently develops SACs based on pre-award assessment findings and with realistic timeframes for completion.	Pre-award assessment and sacs in subawards
Flow downs	Confirm whether all Flow-downs are included in subawards: 1. Fraud Reporting; 2. Prohibition of Terrorism Transactions; 3. Suspension; 4. Trafficking Persons; 5. Child Safeguarding; 6. Voluntary Population Planning; 7. Anti-corruption; 8. Conflict of Interest; 9. Whistleblower; 10. Procurement of Restricted Goods; and 9. all Mandatory Standard Provisions (MSPs).	Terms and conditions of prime and sub-awards
Budget	Confirm whether the sub-award budget includes all categories such as 1. Salaries 2. Fringe 3. Consultants STTA 3. Travel and transport 4. Equipment 5. Supplies and Consumables 6. Activities 7. Indirect cost, Operations, and Overhead 8. Cost Share/Marching Costs 9. NICRA or 10% de minimus 10. Budget Notes and has the right funding level to meet performance and compliance requirements.	Sub-award budgets
Indirect Costs	Confirm whether the organization has a policy for indirect costs for sub-awards and consistently applies 10% de minimus or NICRA to all sub-awards.	Indirect cost policy
Annual Workplan	Confirm that all sub-awards have work plans approved by technical leads, and include all activities, targets, and timeframes.	Sub-award work plans
Subaward Reporting	Confirm whether the organization has a sub-award reporting template that includes activities, performance indicators, financial reports, challenges, and success stories and whether all subs use the template consistently.	Sub-award reporting template
Capacity Strengthening	Confirm whether all sub-recipients receive ongoing training on how to comply with the terms and conditions of their sub-awards and whether all weaknesses are identified in the pre-award assessment and included in a capacity-building plan.	Capacity-building plan
Modifications	Confirm whether all sub-recipients understand through training or documentation when modifications are required, and whether the Prime anticipates the need and issues all modifications on time and retains all fully executed copies on file.	Modifications

# SUBAWARD MANAGEMENT CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Monitoring Plan	Confirm whether all sub-awards, when applicable, have an approved Monitoring Plan that is fully compliant and includes monitoring approach, process, systems, indicators, and reporting timeframes, and is consistently used as a reference document during site visits or desk reviews.	Sub-award monitoring plans
Deficiencies	Confirm whether all deficiencies identified during monitoring are properly addressed, through site visit reports, modification, corrective actions, or termination, when necessary.	Sub-award monitoring findings
Financial Management	Confirm whether there are adequate financial monitoring and management processes and procedures in place and are compliant with the terms and conditions of awards.	Financial monitoring and management processes and procedures
Inventory	Confirm whether all grantees and sub-recipients understand when prior approvals are needed and submit regular reports. These are retained on file and are submitted to the prime sufficiently in advance.	Inventory of approvals
Site Visits	Confirm whether the organization has a site visit schedule for all subs that includes a review of activities, performance results, compliance with the award, and a checklist or report template that is consistently applied.	Site visit policy and reports
Closeout	Confirm that the organization has a closeout policy and procedures for sub-awards and are consistently applied.	Closeout policy for subawards

# SUBAWARD MANAGEMENT CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Evaluation of Proposals	Confirm the organization has policies/procedures for reviewing and selecting applications which includes signed COI for evaluation committee members and is consistently applied.	
Staff Skill Set	Confirm that all Individuals responsible for subaward management have the requisite qualifications and experience, including experience or understanding of USAID rules and regulations	

# KEY RISKS

## Key risks to be considered:

- Prime local organizations do not “flow down” agreement provisions to subrecipients.
- Prime local organizations do not have policies and procedures to effectively select and manage subrecipients.
- Prime local organizations do not provide capacity strengthening to subrecipients.

# **MODULE 12: COMMUNICATIONS**

# COMMUNICATIONS

**Overall Objective:** To assess the organization's effectiveness of external and internal communications capacity and systems by reviewing the organization's communications strategy/plan to assess its adequacy, determine whether it is implemented as designed, and whether it yields the intended results.

## **Communications Categories:**

1. Communications Strategy and Goals
2. Staff Capacity
3. Information Management/Knowledge Management
4. Monitoring and evaluation of Communication Activities
5. Knowledge Management and External Linkages
6. Internal Communications and Decision Making
7. External Communications
8. Branding
9. USAID Logo
10. Marking Plan
11. Disclaimer
12. Exceptions

# COMMUNICATIONS CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Communications Strategy and Goals	Confirm that the organization's communication plan or strategy is in place, updated, and aligned to organizational goals; communications practices are in place and donor-funded programs/projects have a clear understanding of their branding/marketing/communication requirements, and the organization understands who its audience is and has plans for communicating with these audiences with the appropriate channel(s) and messaging.	Communications Strategy
Staff Capacity	Confirm if the organization has at least one staff member dedicated to communication-related activities and this is well reflected in his/her title and job description; the individual has the appropriate skills and experience for the role and feels supported by the organization to succeed in it, and there are opportunities for effective training and professional development in communications.	Job description and qualification of Comms Staff
Information Management/Knowledge Management	Confirm whether there is an organized data collection process in place and whether the information is stored in a centralized database with a formal backup process to protect the data; the appropriate staff have access to the information and can effectively utilize the system and are aware of photo consent/release forms and have processes in place to obtain consent before publishing any items including personally identifiable information or graphics.	Information/Knowledge Management System
M&E of Communication Activities	Confirm if the organization has formal methods for monitoring & evaluating its communication activities that align with the organization's goals & mission. Data collection is done in an organized way & an appropriate staff member has been dedicated to ensuring that communication-related activities are evaluated for effectiveness regularly.	Communications M&E Tracker
Knowledge Management and External Linkages	<p>Confirm if the organization:</p> <ul style="list-style-type: none"> <li>▪ Has proven analytical capacity to identify good practices and lessons learned, and strong systems for documenting, storing, and disseminating program knowledge.</li> <li>▪ Analyzed and shared good practices and lessons learned internally at least twice a year.</li> <li>▪ Frequently participated actively in formal networks and a leadership role.</li> <li>▪ Frequently and routinely participated in discussions with donors, governments, and civil society organizations on approaches, lessons learned, and good practices.</li> <li>▪ Frequently presented its approaches and results at external events.</li> </ul>	<p>Information/Knowledge Management System</p> <p>External Communications Strategy/Approach</p>



# COMMUNICATIONS CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Internal Communications and Decision Making	<p><b>Confirm whether:</b></p> <ul style="list-style-type: none"> <li>▪ The organization has clear two-way communications between management and staff, and across departments, and regular structured settings to exchange ideas and discuss problems and opportunities.</li> <li>▪ Management consistently listens to staff ideas and seeks staff input.</li> <li>▪ Staff frequently initiate discussions with management and raise challenging issues.</li> <li>▪ The organization has a decision-making process with extensive staff involvement for shared responsibility, ownership, and accountability, and proper space and infrastructure to facilitate internal communications.</li> </ul>	Internal Communications Strategy and interviews with management and staff
External Communications	<p><b>Confirm whether the organization has:</b></p> <ul style="list-style-type: none"> <li>▪ A well-written strategy for identifying audiences, channels, and materials for external communications.</li> <li>▪ A written external communications strategy that is consistently followed.</li> <li>▪ Good capacity for implementing the external communications strategy and overseeing written and oral products.</li> <li>▪ A good process for pre-testing and revising external communication messages and materials and monitoring their effectiveness.</li> <li>▪ Proper templates or style guides for documents and the website.</li> <li>▪ A strongly positive reputation among key stakeholders.</li> </ul>	External Communications Strategy/Approach
Branding	Confirm whether the organization has a Branding Plan	Branding Plan
USAID Logo	Confirm USAID Logo is correctly used	External Communication
Marking Plan	Confirm whether the organization has a Marking Plan	Marking Plan

# KEY RISKS

## Key risks to be considered:

- Non-compliance with USAID Branding and Marking requirements.
- External communication does not consistently reflect the strategic vision.
- Two-way communication is not consistent, and lessons learned are not effectively communicated internally.

# **MODULE 13: KEY POPULATIONS (KP)**

# KEY POPULATIONS (KP)

**Overall Objective:** To assess the processes and procedures in place to ensure KPs in the organization's core structure and their meaningful engagement in all aspects, and relevant strategies, plans, and policies, and their adequacy by reviewing its legal framework and structures and to determine whether they are implemented as designed and whether they yield the intended results. **KP Categories:**

## 1. Legal

1. Legal Requirements
2. Organizational Registration
3. Organizational Structure
4. KP in Management

## 2. Governance

1. Governance Structure
2. KP Board Membership
3. Board Membership Rules
4. Board Compliance
5. Roles and Responsibilities (Board)
6. KP Roles and Responsibilities
7. Board Evaluation (General)

## 8. Vision and Mission

### 3. Human Resources

1. Fair recruitment
2. Targeted recruitment (Staff/Field workers)
3. Targeted Recruitment (Management)
4. Job competencies\*
5. KP sensitization training for staff
6. KP Focal Person

### 4. Organizational Sustainability

1. Diversified Funding
2. Indirect Costs

### 5. Community Outreach for KP

1. Planning
2. Mapping

## 3. Implementation

4. Monitoring
5. Evaluation
6. Communication Materials

### 6. Country Environment

1. Legal Environment
2. Stigma and Discrimination
3. Acknowledgment of Diversity in Sexual Orientation and Gender Identity
4. Confidentiality and Informed Consent
5. Physical Infrastructure of KP-led Organization

# NUPAS PLUS 2.1 CHART

# KP CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Legal	Legal Requirements	Confirm whether the organization is legally registered; has, and is fully compliant with, all required permits and licenses to operate; and is aware of its tax status and fully compliant with applicable tax, labor, occupational health, and safety, environmental, and other material laws and regulations relevant to its operations.	Legal registration requirements Deeds of Trust/ Articles of Association/ Memorandum of Incorporation/NPO certificate Appropriate NGO Permit Tax - letter of good standing Environmental compliance Manual
	Organizational Registration	Confirm whether the organization is locally registered with no affiliation with an international partner.	Registration documents
	Organizational Structure	Confirm whether the organization has a strong organizational structure, is well-designed, and is highly relevant to its mission and goals, and whether the roles and responsibilities of departments or functions and lines of communication are well-defined and highly appropriate.	Organization's charter, by-laws, and other foundational/operational documents Organogram
	KP in Management	Confirm whether the organization has KPs on Board and Executive Leadership.	Presence of KPs in Board and Executive Leadership

# KP CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Governance Structure	Confirm whether the organization's governance structure is in full compliance with local laws and has been for the past three years.	Terms of Reference or By-Laws
KP Board Membership	Confirm whether the organization's 40% to 60% of Board Members are KP.	Constitution/Governance Structure
Board Membership Rules	Confirm whether the organization's board members and officers are elected for a specified period and removed as per applicable laws and approved written procedures and whether a minimum number of Board members always meet, and the Chairman of the Board schedules meetings, sets agenda, and leads discussions.	Board TOR and selection criteria
Board Compliance	Confirm whether the organization's membership rules specify eligibility, suspensions, and expulsions and are always upheld for the past three years.	Board TOR
Roles and Responsibilities (Board)	Confirm whether the organization's all Board members have clear roles and responsibilities which among other things include: knowing and supporting the mission of the organization, attending Board meetings regularly, preparing for meetings in advance, maintaining confidentiality, offering informed and impartial guidance, avoiding conflicts of interest, fulfilling the duties of the office (e.g. treasurer), participating in committees and special events, as well as in resource development, supporting the Director representing the organization externally, and whether all have fulfilled their roles for the past three years.	Terms of Reference or By-Laws
KP Roles and Responsibilities	Confirm whether there is a KP subcommittee on the Board to ensure KP inclusion in planning, implementing, and evaluating services, which are minuted with action items and updates.	Job description or SoW of Board members
Board Evaluation (General)	Confirm whether the organization's board conducts a structured annual self-assessment to identify governance gaps, which cover: 1) setting measurable objectives for improving governance that foster enhancement of services that the organization renders; 2) gathering information to assess effectiveness in improving organizational performance; 3) drawing conclusions based on findings & developing and implementing an improvement plan; 4) evaluating performance to support sustained improvement; AND has completed a self-assessment for past 3 years.	Assessment procedures
Vision and Mission	Confirm if KP is the main component of vision & mission statement & consistently reflected in project work plans.	Mission and Vision Statements

# KP CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Human Resources	Fair recruitment	Confirm whether all staff are recruited freely and fairly only based on merit.	Relevant HR policies
	Targeted recruitment (Staff/Field workers)	Confirm whether more than 60% of the organization's outreach staff members include KPs who are hired from within the communities served by the organization and meet all the job qualifications.	Job advertisements, job descriptions, recruitment data, and job competencies
	Targeted Recruitment (Management)	Confirm whether more than 60% of the organization's senior leadership includes KPs who are hired from within the communities served by the organization and meet all the job qualifications.	Same as above
	Job competencies*	Confirm whether the organization's hired KPs meet 90% of the job requirements.	Same as above
	KP sensitization training for staff	Confirm whether the organization has mandatory annual training on KP sensitization and whether all staff attend it.	KP policy, minutes, and training attendance sheets
	KP Focal Person	Confirm whether there is at least one full-time KP focal person with clear roles and responsibilities.	Organogram
Org. Sustain	Diversified Funding	Confirm whether the organization has a diversified funding base capable of sustaining its programs over the long term, and that no single funding stream is over 25%.	Funding tracker and award budgets
	Indirect Costs	Confirm whether the organization generates income and has multiple sources of funding for projects that provide indirect costs.	Award budgets
Community Outreach for KP	Planning	Confirm whether KPs from the community are consistently included in developing annual work plans.	Meeting minutes and draft work plans with comments
	Mapping	Confirm whether KPs are consistently included in developing and updating community maps.	Same as above
	Implementation	Confirm whether the KPs from the community are consistently hired to provide outreach services.	Meeting minutes
	Monitoring	Confirm whether the KPs from the community are consistently involved in monitoring services.	Draft reports
	Evaluation	Confirm whether the KPs from the community are consistently involved in the design, data collection, analysis, and dissemination of the evaluation results.	Evaluation reports
	Communication Materials	Confirm whether the KPs are consistently involved in developing and pre-testing outreach materials.	Meeting minutes and draft reports



# KP CATEGORIES/SUB-CATEGORIES (CONT.)

	CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Country Environment	Legal Environment	Confirm whether the KP rights are protected by antidiscrimination and protective laws derived from human rights standards.	Relevant policies and tools  Latest laws on homosexuality, transgender, sex work, and drug use
	Stigma and Discrimination	Confirm whether the organization has nondiscrimination policies for sexual and gender minorities, as well as mechanisms to monitor and enforce appropriate sanctions.	Nondiscrimination policies
	Acknowledgment of Diversity in Sexual Orientation and Gender Identity	Confirm whether the organization consistently uses data collection forms that include gender nonconforming identities, not just "male" or "female" or nicknames.	Intake forms, registration forms
	Confidentiality and Informed Consent	Confirm whether documents with identifying information are stored in a locked cabinet and only a few staff have access to it, and whether clients are informed of their rights as 'participants' before participating.	Consent forms, and observation of where they are stored (in locked cabinets)
	Physical Infrastructure of KP-led Organization	Confirm whether the organization has facilities that include single occupancy or gender-neutral restrooms.	Facility observation

# KEY RISKS

## **Key risks to be considered:**

- Organization not legally compliant with local laws.
- KP local organizations not effectively incorporating KP in planning and implementation.

# **MODULE 14: BUSINESS DEVELOPMENT**

# BUSINESS DEVELOPMENT

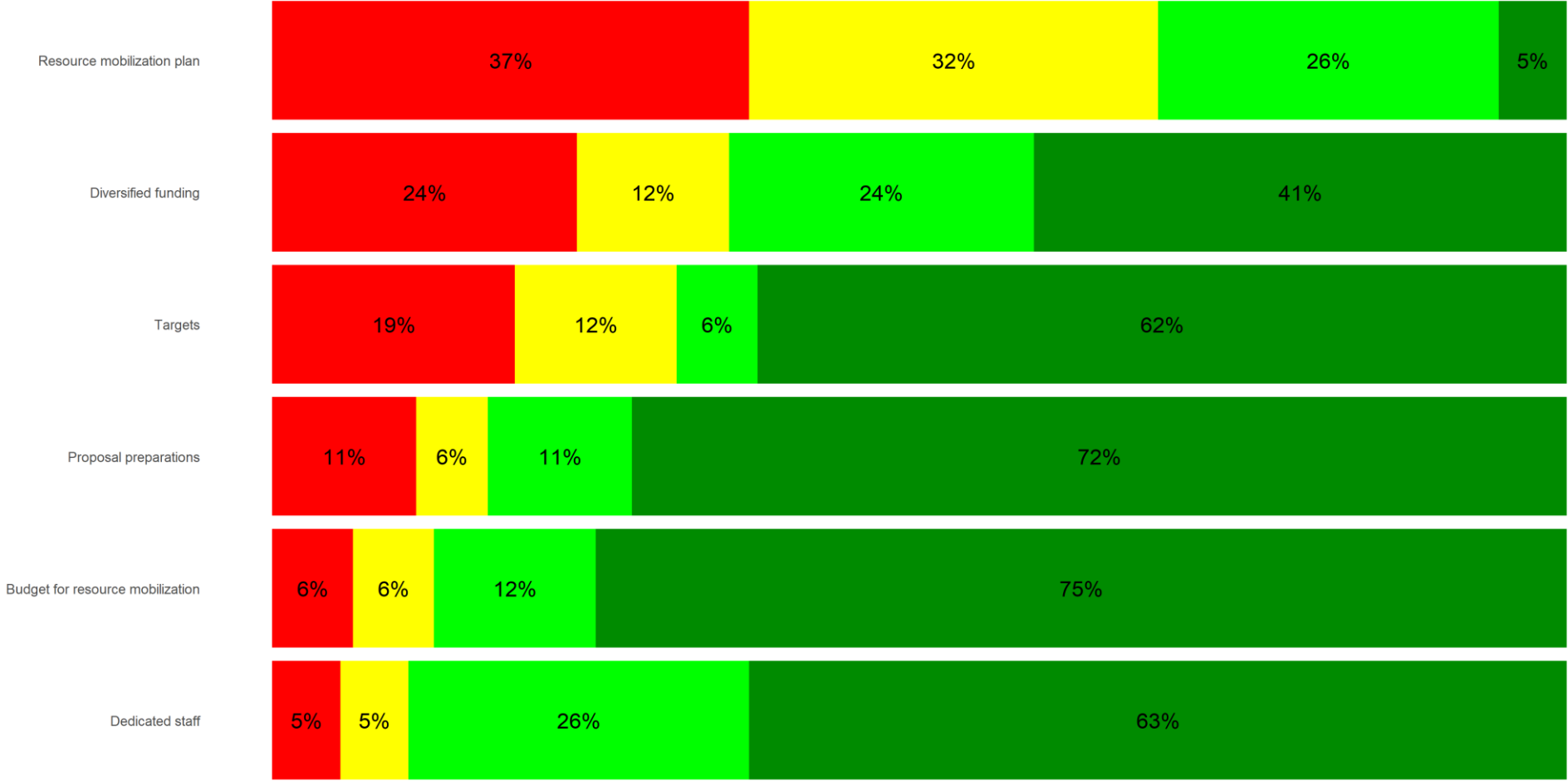
**Overall Objective:** To assess the processes and procedures in place to raise funds to enable the organization to continue as a going concern, as well as the organization's business development and resource mobilization strategy/plan to evaluate its adequacy, determine whether it is implemented as designed and whether it yields the intended results.

## **Business Development Categories:**

1. Resource Mobilization Plan
2. Dedicated staff
3. Targets
4. Proposal Preparation
5. Budget for Resource Mobilization
6. Advocacy and Influence
7. Diversified Funding

# NUPAS PLUS 2.1 CHART

Business Development - Relative Proportion of LIP Risk Category by Subdomain



# BUSINESS DEVELOPMENT CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Resource Mobilization Plan	Confirm whether the organization has a formally adopted process for identifying and responding to funding opportunities timely.	Resource Mobilization Plan (RMP)
Dedicated staff	Confirm the existence of suitably qualified resource mobilization staff.	RMP
Targets	Confirm whether the RMP has reasonable targets that are being monitored.	RMP
Proposal Preparation	Confirm whether the organization has an established process for responding timely to funding opportunities.	Proposals
Budget for Resource Mobilization	Confirm whether funding is available for resource mobilization activities.	Annual budget
Advocacy and Influence	Confirm whether the organization has: <ul style="list-style-type: none"> <li>▪ An objective of advocacy on policies and issues.</li> <li>▪ Regularly carried out significant advocacy activities over the past three years.</li> <li>▪ A well-written plan or strategy for advocacy work, and an effective website.</li> <li>▪ Enough skilled staff for effective advocacy.</li> <li>▪ Been good at mobilizing its clients and developing alliances with other stakeholders for advocacy.</li> <li>▪ Significant influence on the formulation or implementation of government policies at the national or local level, on the general public's views, and on donor or regional organization policies.</li> </ul>	Advocacy plan/strategy
Diversified Funding	Confirm whether the organization has significant and diversified funding sources.	Funding grid

# KEY RISKS

## **Key risks to be considered:**

- No documented Resource Mobilization Plan or Inadequate Resource Mobilization Plan.

# RECOMMENDATIONS

- Local partners should benefit from additional training opportunities on proposal writing and sharing their stories. This should be done in a manner that does not give any local partner an advantage that others do not have.



# **MODULE 15: AWARD MANAGEMENT**

# AWARD MANAGEMENT

**Overall Objective:** To assess the organization's award management technical capacity, including the award management manual, and processes and procedures in place to ensure their adequacy and compliance, and determine whether they are followed as designed and whether they yield the intended results.

## **Award Management Categories:**

### **1. Start-Up**

1. Award Read
2. SACs
3. Files
4. Bank Account
5. Key Personnel and Other Staff
6. Branding and Marking Plan
7. Procurement Plan
8. Workplan
9. Workplan Budget
10. AMELP

### **2. Leadership**

1. USAID Meetings
2. Consortium Meetings
3. Staff Meetings
4. Operations Meetings
5. Technical Meetings

### **3. Procurement**

1. Subrecipients
2. Equipment
3. Supplies

### **4. Financial Management**

1. Requesting Funds
2. Accruals

3. Budget Modifications

4. Travel Approvals

### **5. Monitoring**

1. Performance Reports
2. Reporting Calendar
3. Annual Audit
4. Foreign Tax Reporting
5. SF 425
6. Cost Share

### **6. Closeout**

1. Closeout Policy
2. Closeout Plan Template

# AWARD MANAGEMENT CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Start-Up	Award Read	Confirm whether all key personnel, management, operations, technical, and leadership have read the award and signed the confirmation.	Check understanding of award
	SACs	Confirm whether the SACs in the award have an action plan for correction and are completed on time.	SACs
	Files	Confirm whether the organization has filed the fully executed award(s) and letter of delegation for AOR/COR and updated them with the latest versions.	Filing system
	Bank Account	Confirm whether the organization has created a separate bank account and used it exclusively for awards.	Bank Account
	Key Personnel and Other Staff	Confirm whether most key personnel and 50% of other staff were hired during the start-up phase.	Staff joining dates & employment contracts
	Branding & Marking Plan	Confirm whether the organization has its Branding and Marking plan approved by USAID.	Branding and Marking Plan
	Procurement Plan	Confirm whether the organization's Procurement Plan has been submitted to and approved by USAID.	Procurement Plan
	Workplan	Confirm whether the Workplan was submitted to and approved by USAID.	Workplan
	Workplan Budget	Confirm whether the budget was submitted to and approved by USAID.	Workplan Budget
	AMELP	Confirm whether the organization's AMELP is approved by USAID.	AMELP
Leadership	USAID Meetings	Confirm whether the meetings with AOR or COR are participated regularly (weekly, bi-weekly, or monthly) with agenda or minutes.	Relevant documentation, such as agenda, minutes, attendance at meetings, presentations, etc.
	Consortium Meetings	Confirm whether consortium meetings are held regularly (monthly, bimonthly, quarterly) with agenda and minutes.	Same as above
	Staff Meetings	Confirm whether staff meetings are held regularly (weekly, bi-weekly, monthly) with agendas and minutes.	Same as above
	Operations Meetings	Confirm whether operations meetings are held regularly (weekly, bimonthly, monthly) with agenda and minutes.	Same as above
	Technical Meetings	Confirm whether technical meetings are held regularly (weekly, bi-weekly, monthly) with agendas and minutes.	Same as above

# AWARD MANAGEMENT CATEGORIES/SUB-CATEGORIES (CONT.)

	CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Procurement	Subrecipients	Confirm whether subawards are issued on time, with flow-downs, and regular monitoring meetings with minutes.	sub-awards, progress, and financial reports
	Equipment	Confirm whether all equipment in the budget is purchased on time, in compliance with internal procedures, and added to asset inventory.	Purchase requisition forms, budget, invoice, payments, and asset inventory
	Supplies	Confirm whether all supplies in the budget were purchased on time and in compliance with internal procedures.	Purchase requisition forms, budget, invoice, payments, and asset inventory
Financial Management	Requesting Funds	Confirm whether all previous SF 270 or SF 1034 consistently covers activities, are calculated correctly, and are submitted on time.	SF 270 or SF 1034
	Accruals	Confirm whether Accrual reports are consistently submitted on time and accurately.	Pipeline documentation
	Budget Modifications	Confirm whether budget modifications are needed or not, and if needed, they are discussed with and approved by USAID, and whether some of them include major scope changes, key personnel changes, additional funding, changes to indirect costs, adding commodities, training, or sub-recipients; and ensure that approvals are received before spending; reasons are justified; and the amount is reasonable.	budget modifications approvals
	Travel Approvals	Confirm that all travel requests are approved before travel is initiated, and expenses and reimbursements are submitted on time.	Travel Policy
Monitoring	Performance	Confirm whether most targets and progress are reviewed monthly and appropriate course correction measures are taken.	targets vs. progress and corrective measures
	CLA	Confirm whether all Collaboration, Learning, and Adaptation (CLA) work plan activities are approved and implemented per the schedule and whether findings are disseminated on time.	CLA plans

# AWARD MANAGEMENT CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Reporting	Performance Reports	Confirm whether all monthly or quarterly performance reports are submitted on time and whether 80% of targets are achieved.	Performance Reports
	Reporting Calendar	Confirm whether the organization maintains an up-to-date project calendar on reporting and all parties understand their role and deadlines.	Reporting Calendar
	Annual Audit	Confirm whether the auditor is approved by USAID, sufficient budget is provided for the audit, all annual schedules are maintained, and audit findings are closed within 12 months.	Audit Reports
	Technical Reporting	Confirm the organization's capacity to prepare technical/progress reports for the donor that are complete, reliable, and on time.	Quarterly reports/annual reports or other technical reports
	Foreign Tax Reporting	Confirm whether all purchases above \$500 are listed; exempt and non-exempt taxes are included, and the report is submitted on April 16.	Supporting documents
	SF 425	Confirm whether all reports on financial status, cost share, and program income are correct and timely.	Financial status reports
	Cost Share	Confirm whether all cost share items are captured on time using a tool and reported correctly.	cost share capturing tool
Closeout	Closeout Policy	Confirm whether the Closeout Policy and SOPs are approved by the Board and include 1. Designated team with roles and responsibilities; 2. Timeline; and 3. Checklist.	Closeout Policy
	Closeout Plan Template	Confirm whether the closeout plan template is complete and has been submitted on time for previous projects.	Closeout Plan

# KEY RISKS

## Key risks to be considered:

- Award Mandatory Standard Provisions and Required as Applicable Provisions are not fully understood and systems are not in place for compliance.
- Special Award Conditions are not closed within the required time frame.
- Costs are not allocated appropriately; full costs are not recovered and there may be disallowable costs.

# **MODULE 16: SUSTAINABILITY**

# SUSTAINABILITY

**Overall Objective:** To assess whether the organization is sustainable by reviewing the organization's ability to manage additional funding and determining whether controls are in place about knowledge management and external linkages, internal communications and decision-making, external communications, and advocacy and influence.

## **Sustainability Categories:**

### **1. Legal**

1. Governance Structure and Accountability (NUPAS)
2. Taxes (NUPAS PLUS)

### **2. Governance**

- Board Terms of Reference or By-Laws (NUPAS PLUS)
- Board Membership (NUPAS PLUS)
- Board Roles and Responsibilities (NUPAS PLUS)



# SUSTAINABILITY

## **3. Sustainability**

1. Absorptive Capacity (NUPAS)
2. Funding Diversification (NUPAS PLUS)
3. Project Management Capacity (NUPAS)

## **4. Finance**

1. Accounting and Bookkeeping (NUPAS)
2. Segregation of Duties (NUPAS)
3. Organizational Risk Assessment (NUPAS PLUS)

## **5. Human Resources**

1. Staff Attrition (NUPAS PLUS)

## **6. Information Technology**

1. IT Assessment (NUPAS PLUS)

## **7. Gender**

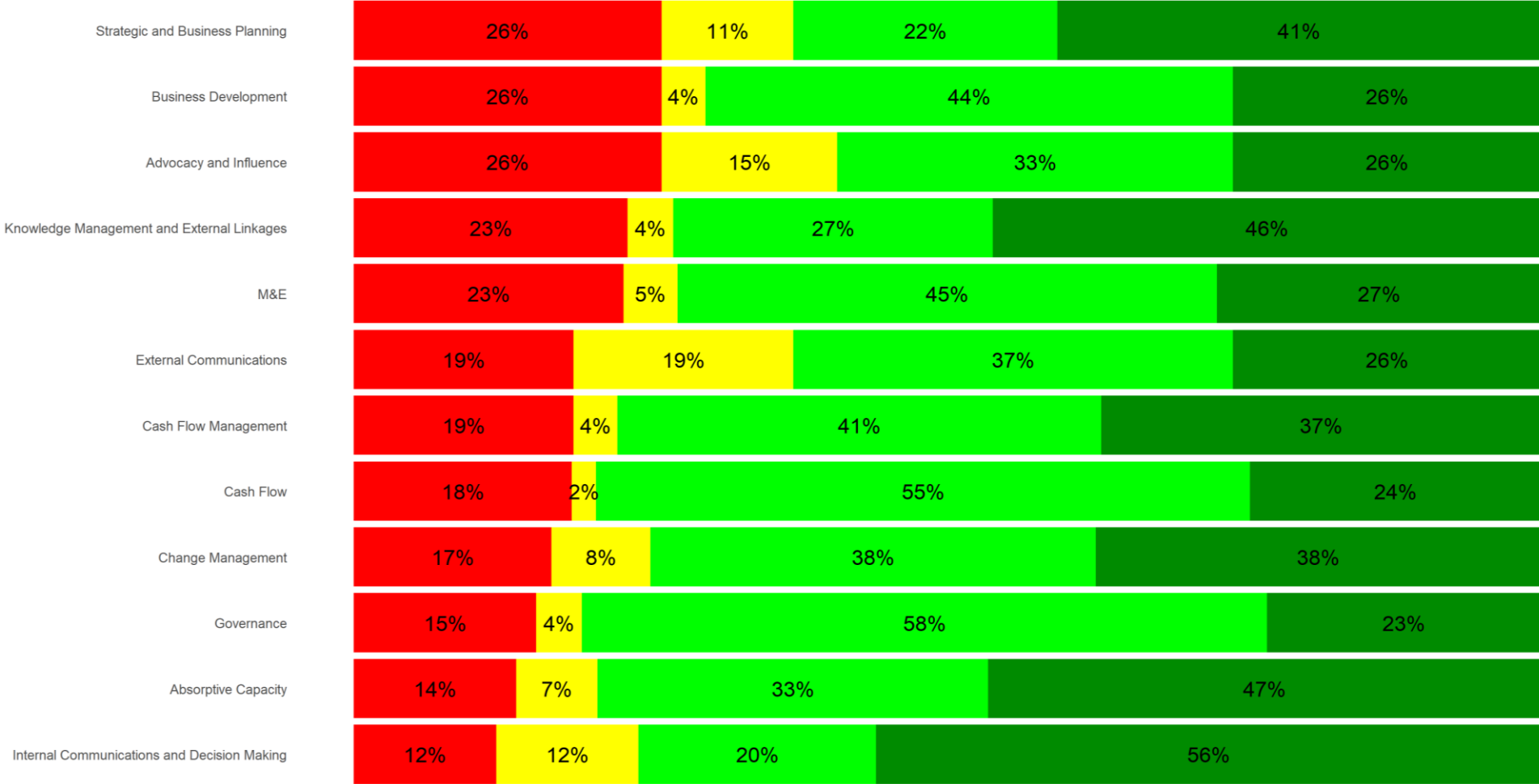
1. Gender Equity Policy (NUPAS PLUS)
2. Gender Budget (NUPAS PLUS)
3. Gender Focal Person (NUPAS PLUS)

## **8. Strategic Information**

1. Data Use (NUPAS PLUS)
2. Performance (NUPAS PLUS)
3. Technical Reporting (NUPAS PLUS)

# NUPAS PLUS 2.1 CHART

Sustainability - Relative Proportion of LIP Risk Category by Subdomain



# SUSTAINABILITY CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Legal	Governance Structure and Accountability	Confirm whether the organization is legally registered; has, and is fully compliant with, all required permits and licenses to operate; and is aware of its tax status and fully compliant with applicable tax, labor, occupational health, and safety, environmental, and other material laws and regulations relevant to its operations.	legal registration requirements Deeds of Trust/ Articles of Association/ Memorandum of Incorporation/NPO certificate Appropriate NGO Permit Tax - letter of good standing Environmental compliance Manual
	Taxes	Confirm that the organization consistently complies with payroll tax, VAT, and other applicable tax regulations.	Tax - letter of good standing (Tax clearance certificate)
Governance	Board Terms of Reference or By-Laws	Confirm: <ul style="list-style-type: none"> <li>▪ The board has determined a governance function and appropriate policies and structures are in place.</li> <li>▪ The board works as a cohesive body with a Board Chair and 5-7 board members providing oversight.</li> <li>▪ Presence of a board constitution and code of conduct.</li> <li>▪ Ongoing updating of the constitution, interpretation of its mandate, and ensuring a governance system is in place.</li> <li>▪ Board performance review self-assessment structure in place.</li> </ul>	The organization's charter, by-laws, and other foundational/operational documents Board TOR or By-Laws Code of conduct Organogram
	Board Membership	Confirm if the organization has rules for board membership, eligibility, suspensions, and expulsion.	Board TOR and selection criteria Governance Manual
	Board Roles and Responsibilities	Confirm whether the organization's all Board members have clear roles and responsibilities, including knowing and supporting the mission of the organization, attending Board meetings regularly, preparing for meetings in advance, maintaining confidentiality, offering informed and impartial guidance, avoiding conflicts of interest, fulfilling the duties of the office (e.g. treasurer), participating in committees and special events, as well as in resource development, supporting the Director representing the organization externally, and whether all have fulfilled their roles for the past three years.	Terms of Reference or By-Laws  Job description or Scope of Work of Board members

# SUSTAINABILITY CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Sustainability	Absorptive Capacity (NUPAS)	Confirm that the organization has more than adequate absorptive capacity (i.e., that it can rise to the level of effort required to implement an additional project/activity).	Relevant documentation, including current staff complement, including skill set and level of experience
	Funding Diversification (NUPAS PLUS)	Confirm whether the organization has a diversified funding base capable of sustaining its programs over the long term, and that no single funding stream is over 25%.	funding tracker and award budgets
	Project Management Capacity (NUPAS)	Confirm whether the organization has a comprehensive and well-documented project management system in place to monitor progress on projects regularly; and whether the organization consistently produces useful project management reports.	Project Management Manual Results Framework/ other tools
Finance	Accounting and Bookkeeping (NUPAS)	Confirm that the organization has a reliable double-entry accounting/ bookkeeping system that meets its needs and is otherwise appropriate; that financial transactions are entered into the system consistently, per applicable standards, policies, and procedures daily; and that system has functionalities to automatically reconcile subsidiary ledger to the main ledger.	Double-entry accounting/bookkeeping system
	Segregation of Duties (NUPAS)	Confirm that there are well-thought-out and documented policies, procedures, and practices that safeguard the payment process.	Relevant policies, procedures, and practices
	Organizational Risk Assessment (NUPAS PLUS)	Confirm that an organization-wide fraud risk assessment is performed involving all key individuals (across the organization) and addressing all the steps of a risk assessment process, and results are completely and accurately applied organization-wide and used to inform updates to the policy.	Annual Risk Assessment Reports
HR	Staff Attrition (NUPAS PLUS)	Confirm whether staff attrition is low for the organization's size, type, and location.	Staff Retention Policy and any other official documents/reports

# SUSTAINABILITY CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY		OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
IT	IT Assessment (NUPAS PLUS)	Confirm whether staff attrition is low for the organization's size, type, and location.	IT risk assessment
Gender	Gender Equity Policy (NUPAS PLUS)	Confirm whether the organization has a Gender Equality Policy, and implementation guidelines and consistently uses them to mainstream gender into policies and practices.	Gender Equity Policy
	Gender Budget (NUPAS PLUS)	Confirm whether 100% of needed financial resources are available for the implementation of the organization's gender policy both at the institutional and programmatic levels.	Gender budget
	Gender Focal Person (NUPAS PLUS)	Confirm if the organization has assigned at least one full-time gender focal person with clear roles and responsibilities.	organogram
Strategic Information	Data Use (NUPAS PLUS)	Confirm whether the organization has a data use plan for its PEPFAR-funded project and conducts regular data review meetings, whether the data use plan is fully implemented, and whether routine data is used to design effective remedial measures.	data use plan, data review meeting notes, action items/work plans, and presentations or dashboards
	Performance (NUPAS PLUS)	Confirm whether most targets and progress are reviewed monthly and appropriate course correction measures are taken.	targets vs progress
	Technical Reporting (NUPAS PLUS)	Confirm the organization's capacity to prepare technical/progress reports for the donor that are complete, reliable, and on time.	sample reports for the donor MER indicators guide

# RAPID ASSESSMENT

DOMAIN	SUB-CRITERIA/QUESTIONS	BASELINE AVERAGE SCORE	REASSESSMENT AVERAGE SCORE
<b>LEGAL</b>	1. Governance Structure and Accountability (NUPAS)		
	2. Taxes (NUPAS PLUS)		
<b>GOVERNANCE</b>	1. Board Terms of Reference or By-Laws (NUPAS PLUS)		
	2. Board Membership (NUPAS PLUS)		
	3. Board Roles and Responsibilities (NUPAS PLUS)		
<b>SUSTAINABILITY</b>	1. Absorptive Capacity (NUPAS)		
	2. Funding Diversification (NUPAS PLUS)		
	3. Project Management Capacity (NUPAS)		
<b>HR</b>	1. Staff Attrition (NUPAS PLUS)		
<b>FINANCE</b>	1. Accounting and Bookkeeping (NUPAS)		
	2. Segregation of Duties (NUPAS)		
	3. Organizational Risk Assessment (NUPAS PLUS)		
<b>IT</b>	1. IT Assessment (NUPAS PLUS)		
<b>GENDER</b>	1. Gender Equity Policy (NUPAS PLUS)		
	2. Gender Budget (NUPAS PLUS)		
	3. Gender Focal Person (NUPAS PLUS)		
<b>STRATEGIC INFORMATION</b>	1. Data Use (NUPAS PLUS)		
	2. Performance (NUPAS PLUS)		
	3. Technical Reporting (NUPAS PLUS)		

# KEY RISKS

## **Key risks to be considered:**

- Strategic planning not performed
- No External Communications Policy
- No Advocacy and Influence Plan

# RECOMMENDATIONS

- As sustainability is an ongoing process and starts with working with the Board of Directors, we recommend that USAID request the organization's Strategic Plan to ensure the organization is considering sustainability after USAD funding ends.



**MODULE 17:  
MANDATORY STANDARD  
PROVISIONS (MSPs)**

# MANDATORY STANDARD PROVISIONS (MSP)

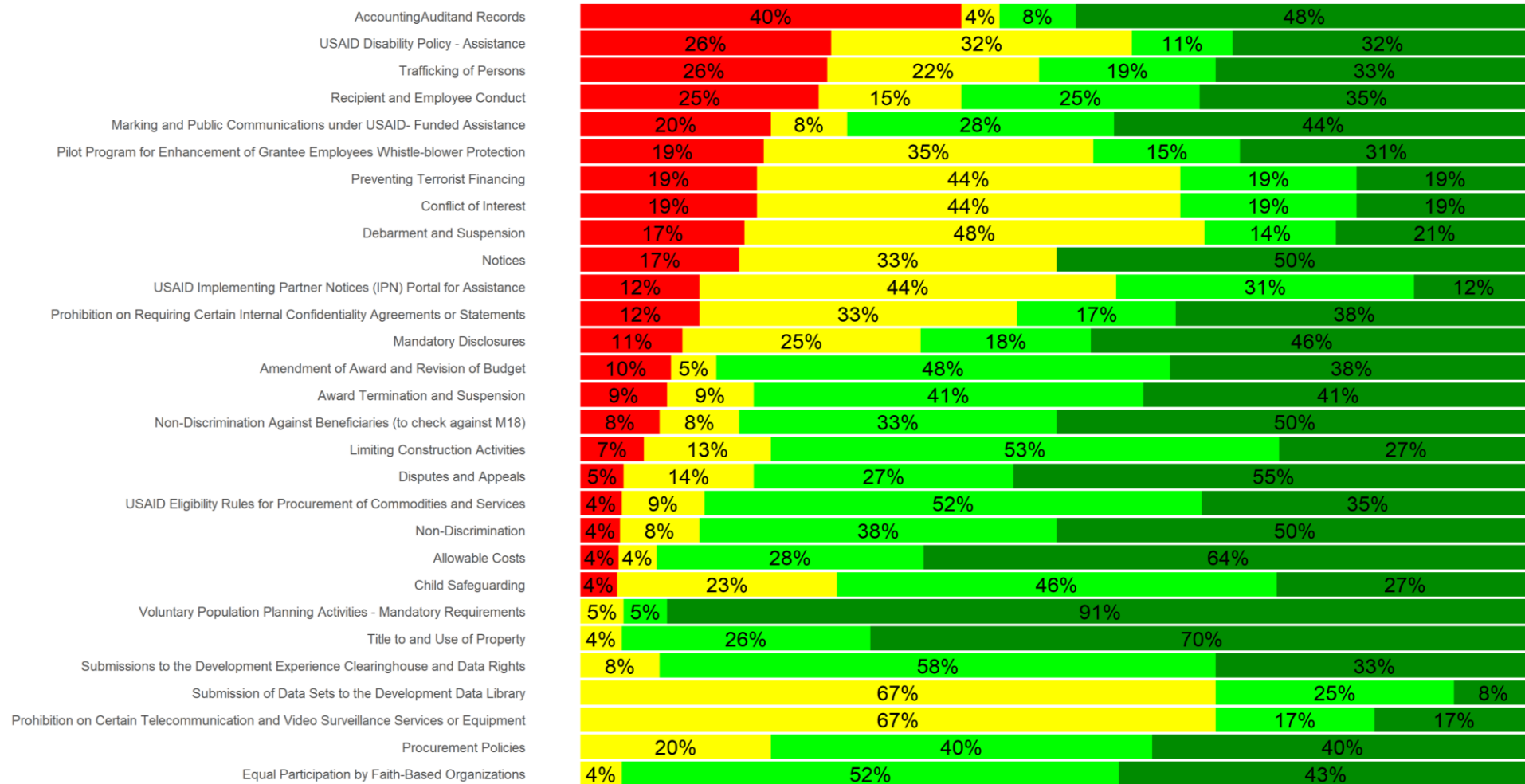
**Overall Objective:** To assess the organization's understanding and application of the Mandatory Standard Provisions (MSPs), especially for recipients of USAID funding, and verify whether the organization is complying with MSPs as specified in their award/subaward.

Important Note: Visit the Standard Provisions website from time to time to verify whether any amendments or additions (usually highlighted in yellow) have taken place.

Furthermore, the 32 procedures listed in the following slides refer to the most important and general situations encountered. We strongly advise you to consult the latest Standard Provisions when performing assessments, due to technicalities that may affect compliance requirements.

# NUPAS PLUS 2.1 CHART

MSP - Relative Proportion of LIP Risk Category by Subdomain



# MSP CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
M1 Allowable Costs	Determine whether the organization incurred costs in accordance with the prescriptions of the prime /subaward.	Donor Agreement Representative sample of purchases Document retention register
M2 Accounting, Audit, and Records	Determine whether the organization accounted for expenditure in terms of recognized accounting frameworks, was subject to a federal audit if expenditure exceeded the established threshold, and whether records are maintained for all charges to the award.	Accounting policy Document retention register
M3 Amendment of Award and Revision of Budget	Determine whether the organization deviated from the original agreement only in terms of revisions to the original award and the original budget.	Modifications to the original agreement
M4 Notices	Determine whether communications are directed to the USAID AO or the recipient, via mail/e-mail/in person.	Communications to the prime/AO
M5 Procurement Policies	Determine whether the recipient has its own policies and procedures for the procurement of commodities and services necessary for the award.	Procurement Policy Sample of procurement transactions
M6 USAID Eligibility Rules for Procurement of Commodities and Services	Determine whether certain types of goods, which are prohibited or require prior approval, were not purchased without prior approval.	Donor Agreement Sample of procurement transactions
M7 Title to And Use of Property	Determine whether the title rests in the party as per the award terms and conditions and whether the property is used in accordance with the award prescriptions.	Donor Agreement Fixed Assets Register Fixed Assets Verification Property Disposition Report
M8 Submissions to The Development Experience Clearinghouse and Data Rights	Determine whether any intellectual property (IP) developed by the recipient using donor funding submitted the IP to USAID via the prescribed portal.	Proof of submission of IP to the Development Experience Clearinghouse

# MSP CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
M9 Marking and Public Communications Under USAID-Funded Assistance	Determine whether marking (branding) recipient items (e.g., vehicles, tents) are in accordance with USAID prescriptions.	Photos of USAID- branded material (if the review is performed virtually)/physical inspection of USAID-branded items.
M10 Award Termination and Suspension	Determine whether the recipient is aware that the award may be terminated/suspended at any time.	Award termination/suspension letters
M11 Recipient and Employee Conduct	Assess whether the recipient has written policies and procedures to prevent personal conflicts of interest and to prevent its officers, employees, or agents from using their positions for personal gain or presenting the appearance of a personal conflict of interest.	Human Resources Policy Conflict of Interest Policy Code of Conduct
M12 Debarment and Suspension	Verify that the recipient does not transact with debarred or suspended individuals or entities under a USAID award unless prior approval is received from the Agreement Officer (AO).	SAM Verifications are performed on employees, contractors, subrecipients, vendors, and any other parties involved with the execution of the USAID award.
M13 Disputes and Appeals	Determine if the recipient is aware of the process to raise disputes/appeals.	Disputes/Appeal letters Other related correspondence
M14 Preventing Transactions With, Or the Provision of Resources or Support To, Sanctioned Groups and Individuals	Verify that the recipient will not engage in transactions with, or provide resources or support to, any individual or entity that is subject to sanctions administered by OFAC or the United Nations (UN), including any individual or entity that is included on the Specially Designated Nationals and Blocked Persons List maintained by OFAC.	Proof of OFAC verifications performed Proof of UN verifications performed
M15 Trafficking in Persons	Verify that the organization, sub awardee, or contractor, at any tier, or their employees, labor recruiters, brokers, or other agents are not engaging in any trafficking of persons (as defined in the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, especially Women, and Children, supplementing the UN Convention against Transnational Organized Crime).	Trafficking in Persons policy

# MSP CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
M16 Voluntary Population Planning Activities – Mandatory Requirements	Verify that the organization does not use USAID funds to pay for involuntary sterilization or Abortion-Related Activities.	None – will be guided by interviews with management
M17 Equal Participation by Faith-Based Organizations (FBO)	Verify that FBOs may participate on the same basis as any other organization, in any USAID program for which they are otherwise eligible, and that explicitly religious activities are prohibited.	None – will be guided by interviews with management
M18 Nondiscrimination	Verify that no U.S. citizen or legal resident shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination based on race, color, national origin, age, disability, or sex under any program or activity funded by this award when work under the grant is performed in the U.S. or when employees are recruited from the U.S.	Procurement policy (otherwise interviews with management in the absence of a procurement policy)
M19 USAID Disability Policy – Assistance	Verify that the recipient does not discriminate against people with disabilities in the implementation of USAID-funded programs & determine whether they demonstrate a comprehensive and consistent approach for including men, women, & children with disabilities.	Disability policy
M20 Limiting Construction Activities	Verify that the recipient does not engage in construction activities unless explicitly approved by the AO.	Donor Agreement (and modifications) Construction-related expenses (to compare with prescriptions in the donor agreement/modifications)
M21 USAID Implementing Partner Notices (IPN) Portal for Assistance	Verify that the recipient has registered on the IPN Portal after receiving an assistance award.	Proof of registration on the IPN (Not required for subrecipients)

# MSP CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
M22 Pilot Program for Enhancement of Grantee Employee Whistleblower Protections	Verify that the recipient has notified its employees working under this award, in the predominant native language of the workforce, that they are afforded the employee whistleblower rights and protections provided under 41 U.S.C. § 4712; and that they include this requirement in any subaward or subcontract made under this award.	Fraud Management Policy Whistleblower Policy (if not included in the Fraud Management Policy)
M23 Submission of Datasets to The Development Data Library	Verify that Intellectual Work (IW) (similar to M8) is submitted to the Data Development Library (DDL).	Proof of submissions to the DDL
M24 Prohibition on Requiring Certain Internal Confidentiality Agreements or Statements	Verify that employees, subrecipients, or contractors are not prevented from lawfully reporting waste, fraud, or abuse, related to the performance of a Federal award, to a designated investigative or law enforcement.	HR Policy (also to inquire with management)
M25 Child Safeguarding	Verify that activities that include the risk of child abuse, exploitation, or neglect within USAID-funded programs are adequately mitigated.	HR Policy (also to inquire with management) Child Safeguarding Policy (if separate)
M26 Mandatory Disclosures	Verify that applicants and recipients must disclose, in writing and a timely manner, to the USAID Office of the Inspector General, with a copy to the cognizant Agreement Officer, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Subrecipients must also disclose, in writing and a timely manner, to the USAID Office of the Inspector General and to the prime recipient (pass-through entity) all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award.	Any communications relating to what is stipulated in the objective column sent to the correct address

# MSP CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
M27 Nondiscrimination Against Beneficiaries	Verify that the recipient does not discriminate against any beneficiaries in implementing the award (such as, but not limited to, by withholding, adversely impacting, or denying equitable access to the benefits provided through this award based on any factor not expressly stated in the award).	Procurement Policy
M28 Conflict of Interest	Verify that the recipient has a policy in place to prevent/manage potential conflicts of interest (e.g. when office-bearers have financial interests in vendors).	Conflict of Interest Declarations (all implicated parties)
M29 Prohibition on Certain Telecommunication and Video Surveillance Services or Equipment	Verify that the recipient does not procure telecommunication and video surveillance services or equipment from prohibited vendors, using grant funds, including direct and indirect costs, program income, and any cost share.	Purchase documentation of telecommunication and video surveillance equipment



# MSP CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB- CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
M30. Exchange Visitors Visa Requirement s	<p>To verify that the organization:</p> <ul style="list-style-type: none"> <li>▪ Has a full understanding of the provision requirements, and consistently includes this provision in all sub awards and contracts.</li> <li>▪ Complies with this provision with no gaps for all Exchange Visitors, Participant Training, or Invitational Travel activities, and accurately reports Exchange Visitors' and Participants' progress through Trainet.</li> <li>▪ Is accurate and consistent in (i) considering health and Accident Insurance coverage in line with Department of State and USAID minimum coverage requirements for Exchange Visitors traveling to the United States, (ii) obtaining health and accident insurance coverage for all Participants traveling to a third country, and (ii) determining whether specific in-country participant training activities subject them to any risk of health and accident liability for medical costs.</li> <li>▪ Is accurate and consistent with no gaps in ensuring (i) that all USAID-sponsored Exchange Visitors obtain, use, and comply with the terms of the J-1 visa, issued in conjunction with a USAID-issued Certificate of Eligibility for J-1 Visa Status (DS-2019) for Exchange Visitors traveling to the United States, and (ii) that all Participants obtain, use, and comply with the terms of all applicable immigration, visa, and other similar requirements for Participants traveling to a third country or within the host country.</li> <li>▪ Accurately and consistently, with no gaps, verifies (i) English language proficiency for Participants in a U.S.-based activity, and (ii) Proficiency in the language of training for Participants of third-country or host-country training (and makes arrangements for an interpreter).</li> <li>▪ Accurately and consistently conducts pre-departure orientation for U.S-bound Exchange Visitors and Participants of third-country training programs with no gaps.</li> <li>▪ Accurately and consistently, with no gaps, ensures (i) that all Exchange Visitors read and sign the Conditions of Sponsorship for U.S.-Based Activities, (ii) that all Participants of long-term (six months or longer) third-country training read and sign the form Conditions of Sponsorship for Third-Country Training, and (iii) that the Agreement Officer is notified of any known violations by Exchange Visitors of visa or other immigration requirements or conditions."</li> <li>▪ Accurately and consistently comply with the "International Air Travel and Air Transportation of Property" provision.</li> </ul>	Documentation of inclusion of and compliance with all relevant provisions in all sub awards and contracts

# MSP CATEGORIES/SUB-CATEGORIES (CONT.)

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
M31. Contract Award Term and Condition for Recipient Integrity and Performance Matters (December 2022)	<ul style="list-style-type: none"> <li>▪ To verify that the organization:</li> <li>▪ Consistently complies with the contract award terms and conditions for recipient integrity and performance matters,</li> <li>▪ Always maintains the currency of information reported to the System for Award Management (SAM) that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS), and</li> <li>▪ Is accurately aware of reporting procedures and reporting frequency, and the proceedings about which it must report including proceedings in connection with the award or performance of a grant, its final disposition, a criminal proceeding resulting in a conviction, a civil proceeding that resulted in a finding of fault, or administrative proceeding as defined in the standard provisions.</li> </ul>	Documentation of inclusion of and compliance with all relevant provisions in all sub awards and contracts

# KEY RISKS

## Key risks to be considered:

- Non-compliance with any Mandatory Standard Provision violates the terms of the contract.
- Local organizations do not “flow down” all provisions to subrecipients.

# RECOMMENDATIONS

- Documentation on the provisions be made available in French, Portuguese, and local languages whenever possible to further capacitate staff at all levels of the organization and improve both understanding and compliance with United States Government, USAID, and PEPFAR regulations and rules.

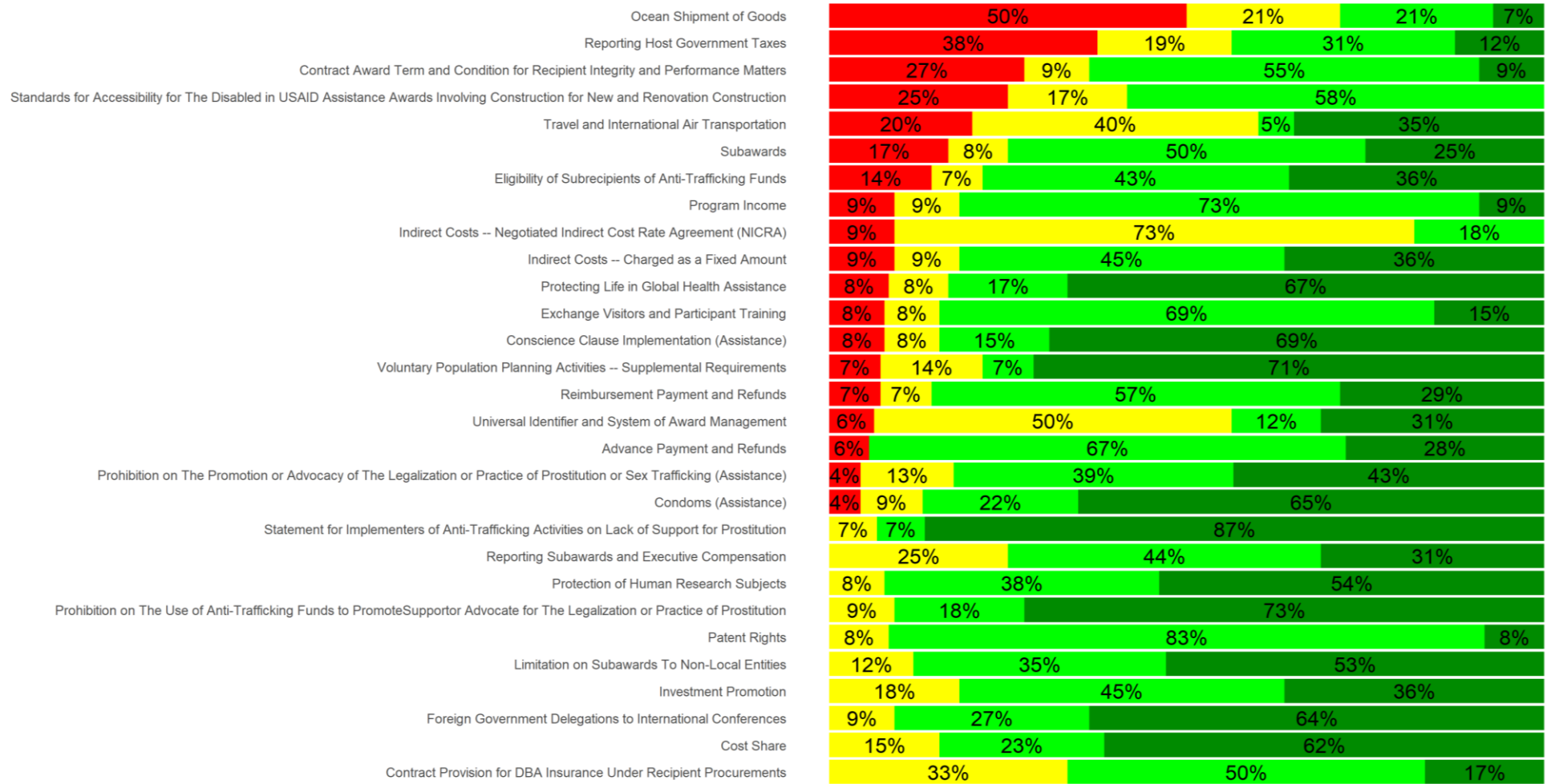
**MODULE 18:  
REQUIRED AS APPLICABLE  
PROVISIONS (RAAs)**

# REQUIRED AS APPLICABLE PROVISIONS (RAAs)

**Overall Objective:** To assess the organization's understanding and compliance with the RAAs requirements, where applicable, especially for recipients of USAID funding. This is ensured through continued training on the USG Rules and Regulations.

# NUPAS PLUS 2.1 CHART

RAA - Relative Proportion of LIP Risk Category by Subdomain



# RAA CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
RAA1. Advance Payment and Refunds (Nov. 2020)	Assess the applicability of the provision to the organization under review, as well as the organization's understanding of the provision and implementation of, and compliance with, the provision's requirements.	Award agreement Bank statement(s) – (confirmation of interest income earned)
RAA2. Reimbursement Payment and Refunds (Dec. 2014)	Same as above.	Award agreement
RAA3. Indirect Costs – Negotiated Indirect Cost Rate Agreement (NICRA) (Nov. 2020)	Same as above.	Award agreement NICRA Agreement Cost Policy Statement
RAA4. Indirect Costs – Charged as a Fixed Amount (Nonprofit) (June 2012)	Same as above.	Award agreement
RAA5. Indirect Costs – 10% de minimis rate (Nov. 2020)	Same as above.	Award agreement Cost Policy Statement
RAA6. Universal Identifier and System for Award Management (Nov. 2020)	Same as above.	Award agreement Proof of an active SAM registration
RAA7. Reporting Subawards and Executive Compensation (Nov. 2020)	Same as above.	Award agreement Proof of reporting first-tier subawards to <a href="http://www.fsrs.gov">www.fsrs.gov</a> Proof of reporting recipient's and subrecipient's total compensation
RAA8. Subawards (Dec. 2014)	Same as above.	Award agreement Subaward agreements Pre-award assessment results



# RAA CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
RAA9. Travel and International Air Transportation (Dec. 2014)	Same as above.	Award agreement Travel Policy
RAA10. Ocean Shipment of Goods (June 2012)	Same as above.	Award agreement
RAA11. Reporting Host Government Taxes (June 2012)	Same as above.	Award agreement Proof of submission of Host Government Taxes (report to USAID)
RAA12. Patent Rights (June 2012)	Same as above.	Award agreement <u>Subawards</u> (flow downs) Proof of disclosure of the invention to the National Institutes of Health (NIH) EDISON Patent Reporting and Tracking System
RAA13. Exchange Visitors and Participant Training (June 2012)	Same as above.	Award agreement Proof of health and accident insurance for the U.S., third-country visitors Signed Conditions of Sponsorship for U.S.-Based Activities and Conditions of Sponsorship for Third-Country Training
RAA14. Investment Promotion (Nov. 2003)	Same as above.	Award agreement AO's written approval (If the organization used USAID funding for investment promotion <u>Subawards</u> (flow downs)
RAA15. Cost Share (June 2012)	Same as above.	Award agreement Cost share plan Cost share reports
RAA16. Program Income (Aug. 2020)	Same as above.	Award agreement Program General Ledger(s) (review whether there is program income)

# RAA CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
RAA17. Foreign Government Delegations to International Conferences (June 2012)	Same as above.	Award agreement AO's written approval (If the organization used USAID funding to finance the travel)
RAA18. Standards for Accessibility for The Disabled In USAID Assistance Awards Involving Construction (Sept. 2004)	Same as above.	Award agreement AO approved the program budget
RAA19. Protection of Human Research Subjects (June 2012)	Same as above.	Award agreement Consent forms/documentation Submission to the AOR for USAID approval, a justification memorandum asserting that research conducted outside the United States provides protection at least equivalent to those in 22 CFR 225
RAA20. Statement for Implementers of Anti-Trafficking Activities On Lack of Support for Prostitution (June 2012)	Same as above.	Award agreement
RAA21. Eligibility of Subrecipients of Anti-Trafficking Funds (June 2012)	Same as above.	Award agreement <u>Subawards</u> (flow downs)
RAA22. Prohibition On the Use of Anti-Trafficking Funds To Promote, Support, or Advocate for the Legalization or Practice of Prostitution (June 2012)	Same as above.	Award agreement Project Plan (review of program activities) <u>Subawards</u> (flow downs)

# RAA CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
RAA23. Voluntary Population Planning Activities – Supplemental Requirements (Jan. 2009)	Same as above.	Award agreement Consent forms Subawards (flow downs)
RAA24. Conscience Clause Implementation (Assistance) (Feb. 2012)	Same as above.	Award agreement
RAA25. Condoms (Assistance) (Sept. 2014)	Same as above.	Award agreement Organization's educational material on the use of condoms Subawards (flow downs)
RAA26. Prohibition On <u>The</u> Promotion Or Advocacy of The Legalization Or Practice of Prostitution Or Sex Trafficking (Assistance) (Sept. 2014)	Same as above.	Award agreement Any policy that may have the organization’s position on prostitution or sex trafficking or the organization’s website Subawards (flow downs)
RAA27. Limitation On Subawards to Non-Local Entities (July 2014)	Same as above.	Award agreement
RAA28. Contract Provision for DBA Insurance under Recipient Procurements (Dec. 2014)	Same as above.	Award agreement Proof of DBA insurance (work done abroad) Subawards (flow downs)
RAA29. Contract Award Term And Condition for Recipient Integrity And Performance Matters (April 2016)	Same as above.	Award agreement Reports on civil, criminal, or administrative proceedings that have taken place Proof of FAPIIS submission
RAA31. Never Contract with The Enemy (Nov. 2020)	Same as above.	Award agreement Proof of ( <u>SAM</u> , <u>U.N.</u> Sanctions list, <u>OFAC</u> Checks Subawards (flow downs)

# KEY RISKS

## Key risks to be considered:

- Lack of understanding or outdated knowledge of the RAAPs.
- Advance funding that met RAA1 criteria not kept in an interest-bearing bank account.
- Poor controls for reporting Host Government Taxes (RAA11).

# RECOMMENDATIONS

- Documentation on the provisions be made available in French, Portuguese, and local languages whenever possible to further capacitate staff at all levels of the organization and improve both understanding and compliance with United States Government, USAID, and PEPFAR regulations and rules.

**MODULE 18:  
ENVIRONMENTAL MONITORING  
AND MITIGATION PLAN (EMMP)**

# ENVIRONMENTAL MONITORING AND MITIGATION PLAN (EMMP)

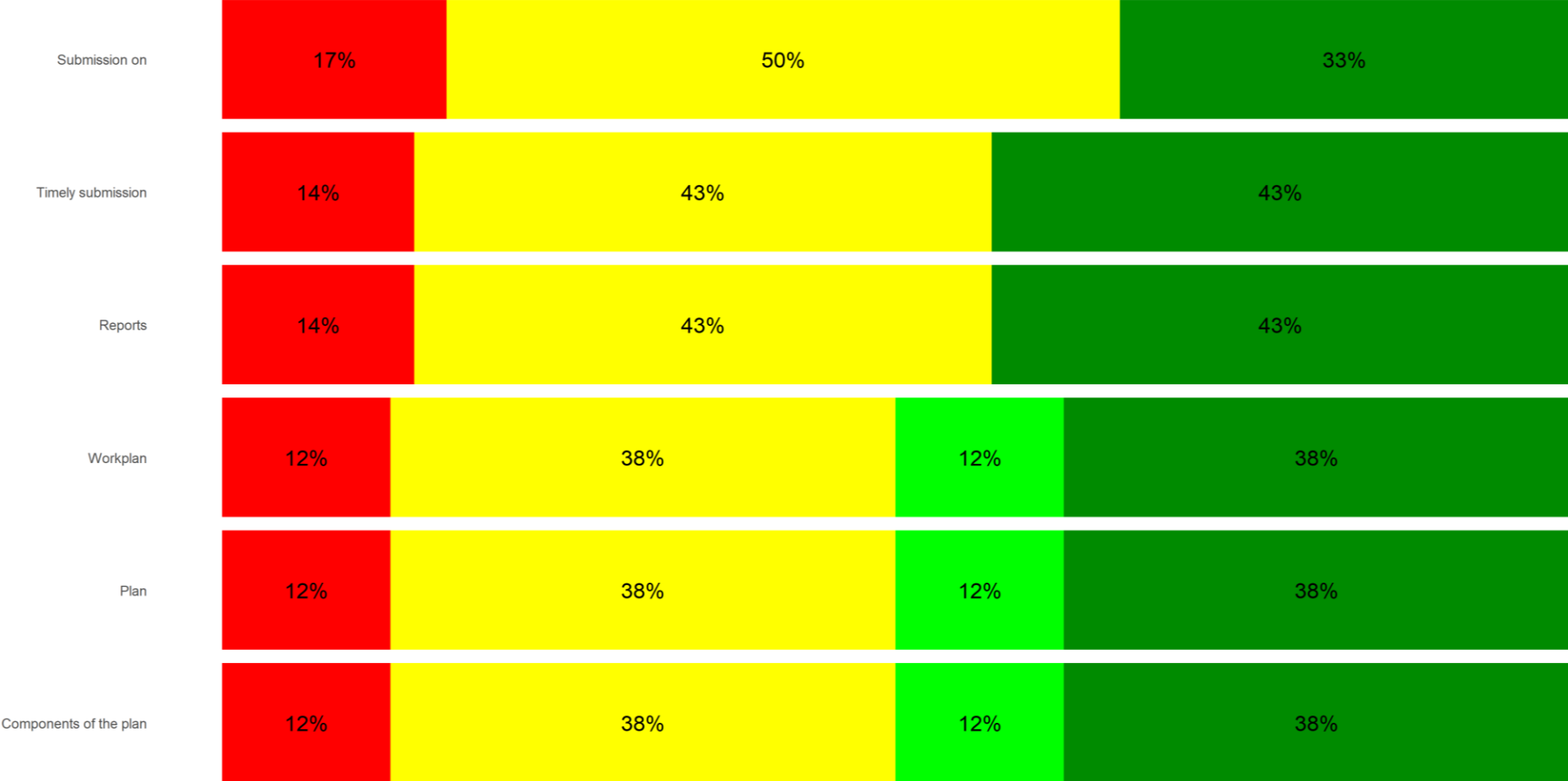
**Overall Objective:** To assess if the organization complies with the Environmental Monitoring and Mitigation Plan (EMMP) requirements in its award agreement, as stipulated in USAID Rules and Regulations.

## **EMMP Categories:**

1. Plan
2. Project/Activity Data
3. Organizational/Administrative Data
4. Initial Submission
5. Environmental Conditions
6. Workplan
7. Corrective Action Plan
8. Timely Annual Submissions

# NUPAS PLUS 2.1 CHART

EMMP - Relative Proportion of LIP Risk Category by Subdomain





# EMMP CATEGORIES/SUB-CATEGORIES

CATEGORY/ SUB-CATEGORY	OBJECTIVE(S)	KEY DOCUMENTS FOR ASSESSMENT
Plan	Confirm that the organization has a fully completed EMMP and has submitted it annually to USAID, with all its components addressed accurately: Identified Environmental Aspects/Impacts, Mitigation Measures, Monitoring Indicators, Monitoring Frequency, Responsible Parties, and Monitoring Issues Resolutions.	EMMP
Project/Activity Data	Confirm that the Project/Activity Data section on the EMMP is fully and accurately completed.	EMMP
Organizational/Administrative Data	Confirm that the Organizational/Administrative Data section on the EMMP is fully and accurately completed.	EMMP
Initial Submission	Confirm if the EMMP was submitted to USAID or Prime Recipient in the time specified in the award or subaward.	Confirmation of EMMP submission
Environmental Conditions	Confirm that the EMMP addresses all of the conditions in the approved IEE or EA.	EMMP IEE or EA
Workplan	Confirm whether the EMMP is adequate and includes the following for implementation of corrective action: "EMMP includes all: <ul style="list-style-type: none"> <li>○ Responsible Person for the implementation of corrective actions</li> <li>○ Mitigation Measures</li> <li>○ Monitoring Indicators</li> <li>○ Monitoring Method</li> <li>○ Monitoring Frequency</li> </ul>	EMMP Implementation Workplan
Corrective Action Plan	Confirm if the EMMP report includes all: 1) status of mitigation measures, 2) action implementation dates 3) outstanding issues, and 4) any remarks.	EMMP
Timely Annual Submissions	Confirm if all EMMP reports are submitted by the deadline.	Confirmation of EMMP submission

# KEY RISKS

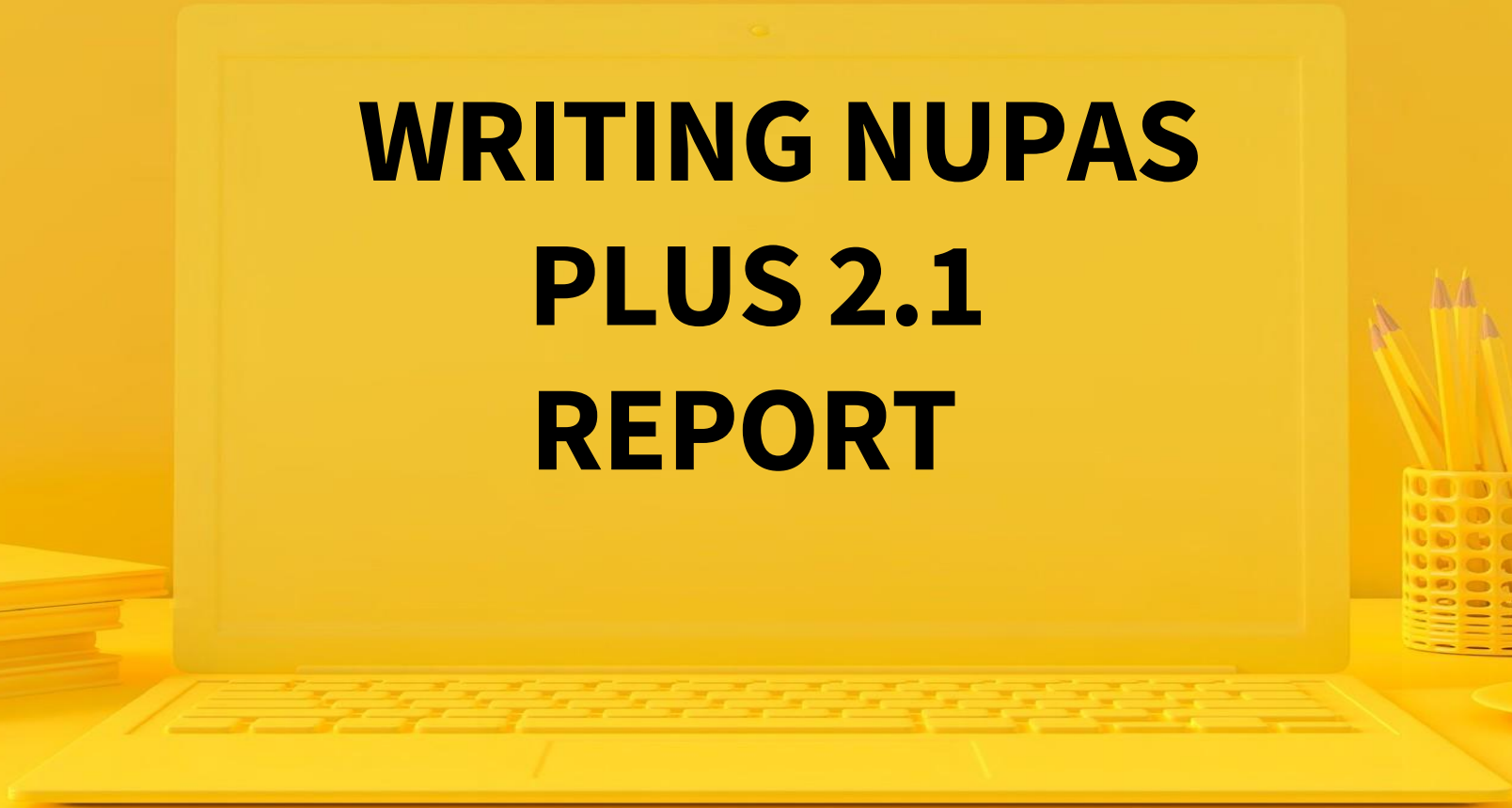
## **Key risks to be considered:**

- EMMPs are not prepared as required by the award.
- Late submission of EMMPs.
- EMMPs do not address all environmental risks from the program activities.

# RECOMMENDATIONS

- Reviewing the EMMPs should be a routine activity for local partners. The EMMP should be included in webinars and training, with instructions on how to complete the required template.

# **WRITING NUPAS PLUS 2.1 REPORT**



# PURPOSE OF NUPAS PLUS 2.1 REPORT

- A NUPAS Plus 2.1 report is a formal document where the Assessors summarize the results of their review and report on the identified areas of improvement and recommendations.
- The NUPAS Plus 2.1 report is provided for the user to make decisions based on the results of the review.
- Apart from disclosing the results of the assessed organization, it also helps the user to evaluate the performance of the Assessors themselves. More often than not, the report becomes a statement of the Assessor's credibility when it is circulated, referred to, and implemented.

# ESSENTIALS OF NUPAS PLUS 2.1 REPORT

The report should be:

1. **Accurate** –Free from errors and distortions
2. **Objective** –Fair, impartial, and unbiased
3. **Clear** –Easily understood and logical (avoid unnecessary technical language)
4. **Concise** –To the point (avoid unnecessary elaboration, superfluous details, redundancy, repetitiveness, and wordiness)
5. **Constructive** –Helpful to the target audience
6. **Complete** –Lack nothing that is essential to the target audience
7. **Timely** –Opportune and expedient

# NUPAS PLUS 2.1 REPORT FORMAT

## 1. INTRODUCTION

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The introduction section of the report includes the following subsections.

1. Background –The background of the organization being reviewed
2. Objectives of the review
3. **Scope –The domains reviewed**
4. **Limitations**
5. **Methodology –Include the methods/procedures of review**

# NUPAS PLUS 2.1 REPORT FORMAT- SCORING MATRIX

## SCORING MATRIX

Each category was made up of multiple criteria/questions and was assigned a rating following the NUPAS Plus guidelines.

The assessment scale per category is as follows:

SCORING ELEMENTS	DEFINITION
Inadequate Capacity (Scoring 1)	Significant control weaknesses could expose the organization to significant financial or other loss or otherwise significantly impair its ability to manage USAID funds.
Weak Capacity (Scoring 2)	Significant control weaknesses could expose the organization to unacceptable/inadequate levels of unmanaged risk. (Some deficiencies and significant weaknesses that are not easily remediable before the award, or moderate to high risk.)
Adequate Capacity (Scoring 3)	Although a control weakness was noted, compensating controls and other factors exist to reduce the residual risk within the organization to acceptable levels.
Strong Capacity (Scoring 4)	Overall, a strong control framework is in place, given the inherent business risks. Some improvements may be recommended to routine detailed control activities.

Overall score per category and domain.\*

Score Range	Description
1.00 – 1.50	Inadequate Capacity
1.51 – 2.50	Weak Capacity
2.51 – 3.50	Adequate Capacity
3.51 – 4.00	Strong Capacity



# NUPAS PLUS 2.1 REPORT FORMAT

## 2. EXECUTIVE SUMMARY

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### **Executive Summary Narrative** (1 -2 paragraphs)

- Provide a narrative summary of the NUPAS Plus 2.1 review results, an overall opinion, and any comments about the review objectives.
- The Assessor's opinion on the assessed organization's compliance levels is included in this section.
- Summary scores table
- Average scores for each domain in tabular form.
- The next slide has an example of one organization's summary scores.
- The color coding helps to quickly interpret the assessment results of each domain, almost at a glance.

# NUPAS PLUS 2.1 REPORT FORMAT- SUMMARY SCORE & RISK AREAS

NUPAS PLUS SUMMARY SCORES		
NUPAS	DOMAINS	AVERAGE SCORE
NUPAS	1. Legal	3,40
	2. Financial	2,23
	3. Procurement	3,08
	4. Human Resources	2,29
	6. Performance Management	3,00
	7. Sustainability	2,75
	NUPAS Plus	1. Legal
2. Finance		2,33
3. Fraud		1,29
4. Procurement and Logistics		2,44
5. Property Management		3,00
6. Information Technology		1,49
7. Human Resources		2,33
8. Monitoring and Evaluation		2,93
9. Gender		2,32
10. Governance		3,67
11. Business Development		1,50
12. Sustainability		1,70
13. Mandatory Standard Provisions		2,61
14. Required as Applicable Provisions		2,36
15. Environmental Mitigation and Monitorin		N/A

## SUMMARY OF IDENTIFIED HIGH RISK AREAS FOR IMPROVEMENT

Summary per Domain		RATING
<b>Legal Structure</b>		
1.	Delegations of Authority not in place	
2.	Annual declaration of conflict of interest not signed (Board Members)	
<b>Financial &amp; Internal Control Systems</b>		
1.	Single User and Offline Accounting Software	
2.	Improvements to the Chart of Accounts	
3.	Formal Training of USG Rules and Regulations	
4.	Inadequate Financial Reporting	
5.	Incorrect Reconciliations	
<b>Human Resources</b>		
1.	Key Positions not Filled	
<b>Project Performance Management</b>		
1.	Project Management Manual in Draft Form	
<b>Information Technology</b>		
1.	Back-ups stored in High Risk Area and Location of storage of back-ups not specified	
<b>Gender (Equity and Social Inclusion)</b>		
1.	Inadequate Sexual Harassment Policy	
<b>Business Development</b>		
1.	No Resource Mobilization Strategy	

# NUPAS PLUS 2.1 REPORT FORMAT

## 3. AREAS OF IMPROVEMENT AND RECOMMENDATIONS

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This is the longest part of the report, normally about 70% of the report content. It has the following sections:

1. Background information about each domain –with general information about each domain
2. Detailed areas of improvement, rated as H, M, and L.
3. Recommendations for each identified area of improvement

# NUPAS PLUS 2.1 REPORT FORMAT

## 4. CONCLUSION

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The Assessor's opinion on the assessed organization's level of compliance, as well as readiness and ability to effectively manage and implement a USAID prime award.

## 5. APPENDICES

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The following are included as appendices:

- Detailed domain category and subcategory scores
- Full list of the identified areas of improvement (rated)
- Full list of persons interviewed
- Full list of documents reviewed

# NUPAS PLUS 2.1 REPORT FORMAT-APPENDICES

NUPAS PLUS DETAILED SCORES	
Organization Name:	
Date of Assessment:	
Names of Assessors:	
<b>NUPAS</b>	
Domain and Categories	Total Score
<b>1. Legal</b>	
1 Definition of Local Organization	4,00
2 Compliance with legal requirements	4,00
3 Organizational Structure	3,00
4 Governance	2,00
5 Control Environment	4,00
Average Score	3,40
<b>2. Financial</b>	
6 Banking Relationship and Accounts	2,33
7 Accounting Bookkeeping System	1,00
8 Chart of Accounts General Ledger	2,00
9 Variance Analysis	2,00
10 Allowable and unallowable costs	2,50
11 Direct and Indirect	2,00
12 Payments - Segregation of Duty	2,00
13 Accounting - Segregation of Duty	3,00
14 Financial Records Management	2,50
15 Sources of Funding	2,67
16 Financial Reporting	2,00
17 Audit and Review of Financials	2,00
18 Financial Management Personnel	3,00
Average Score	2,23
<b>3. Procurement</b>	
19 Procurement Policies, Procedures and Practices	2,75
20 Compliance with Policies and Procedures – Reasonableness of Price	3,25
21 Procurement and Sub-awards	3,25
Average Score	3,08
<b>4. Human Resources</b>	
22 Overall Human Resources (HR) Policies and Procedures	2,50

## AREAS OF IMPROVEMENT LIST

Areas of improvement per Domain		RATING
<b>Legal Structure</b>		
1.	Delegations of Authority not in place	Red
2.	Annual declaration of conflict of interest not signed (Board Members)	Red
3.	Lack of review of completed Declarations of Interest Forms (Procurement/ HR directors)	Yellow
4.	Virtual board meetings not addressed in the Board Constitution	Yellow
<b>Financial &amp; Internal Control Systems</b>		
1.	Single User and Offline Accounting Software	Red
2.	Improvements to the Chart of Accounts	Red
3.	Formal Training of USG Rules and Regulations	Red
4.	Inadequate Financial Reporting	Red
5.	Incorrect Reconciliations	Red
6.	No General Ledger Code on the Purchase Requisition	Yellow
7.	Documents Retention Register	Yellow
8.	Inadequate Cost Accounting and Allocation Policy	Green
9.	No Documented Guidance on Long Outstanding Reconciling Items in the FAM	Green
10.	No Date of Preparer, Reviewer, and Approver on the Reconciliations	Green
11.	Inconsistent Application of the FAM Requirements for Approving Reconciliations	Green
12.	Only One (1) Signatory Releasing Online Payments	Green
<b>Procurement</b>		
1.	No areas of improvement raised under this section	Green
<b>Human Resources</b>		
1.	Key Positions not Filled	Red
2.	Official Travel Requests Not Approved Per Travel Policy	Yellow
3.	Travel Requests Not Approved Per Travel Policy Timing	Yellow
4.	Incorrect Payroll Reconciliations Between GL and Payroll	Yellow
5.	No Proof of Delegation of Authority	Yellow
6.	HR Manual Silent on Duration of Adverts	Green
7.	HR Manual Silent on Policy Consent Form	Green
8.	Salary Scales Signed but Not Dated	Green
9.	HR Manual Silent on Frequency of Performance Appraisals	Green
10.	Performance Appraisal Forms Not Signed by Supervisors	Green
<b>Project Performance Management</b>		
1.	Project Management Manual in Draft	Red
<b>Sustainability</b>		
No findings raised under this section		Green
<b>Fraud Management</b>		

# NUPAS PLUS 2.1 REPORT FORMAT-APPENDICES

Persons interviewed at Org X included:

1. Country Director
2. Finance Director
3. Chief of Party
4. Sr. Technical Director (Programs Focal Person)
5. Chief of Party
6. M&E Advisor (M&E Focal Person)
7. M&E Focal Person
8. Senior Gender Advisor
9. IT Consultant
10. Head of Programs
11. Human Resources Director
12. Board Treasurer
13. Project Manager
14. Programs Manager
15. Finance & Grants Accountant
16. Audit Committee Chairperson
17. Chairperson of the Board

Documents and records reviewed during the review included:

1. Organization Constitution
2. Board of Trustees Charter
3. Board Minutes
4. Conflict of Interest Policy
5. Memorandum of Incorporation and Articles of Association
6. Organogram (December 2019)
7. Signed Conflict of Interest Declaration Forms (Procurement/ Human Resources Officials)
8. Tax Clearance certificate
9. Succession Strategy
10. Monthly submissions in respect of PAYE and NSSF
11. Sub-agreements
12. Bank reconciliations
13. Annual budget
14. Cash projections for the various projects
15. Bank reconciliations
16. Mobile Money reconciliations
17. Asset verification reports
18. Finance policy
19. Procurement, Inventory and Asset Management Policy
20. Sample of procurement transactions
21. Proof of insurance of assets
22. Fleet and Staff travel policy
23. Funding tracker
24. General Ledgers
25. Petty Cash reconciliations
26. Charts of Account
27. Annual training plan
28. List of staff and movements
29. Human Resource Manual
30. Annual training plan
31. Salary scale 2018 – 2020
32. Overhead Cost Recovery and Allocation Policy
33. Payroll reconciliations
34. IT Manual
35. IT Operations Plan
36. Sample of internet access requests
37. Error tracking reports (Database failure-, Gap analysis feedback, issues on virtual load tool)
38. Gender Analysis Report
39. CV's of key staff
40. Completed MSP/ RAA Questionnaire
41. Cost-share supporting documents
42. VAT Reports
43. M&E Data Quality Audit Reports
44. M&E personnel certificates
45. M&E Tools Gap Analysis
46. M&E Training reports
47. M&E Analytics Reports from databases
48. M&E Presentations





# WHY REPORTS MATTER?

**PAINT THE PICTURE OF ALL YOUR HARD WORK**

**PROVIDE GUIDANCE FOR NEXT STEPS**

**REFLECT THE QUALITY OF YOUR PROJECT'S WORK**

**HELP DEMONSTRATE YOUR SKILLS FOR FUTURE PROJECTS**

# A FEW KEY THINGS

**DEADLINES ARE CRUCIAL FOR TEAMWORK**

**MAKE TIME TO RE-READ & EDIT**

**SET DOCUMENTS TO ENGLISH (UNITED STATES)**

**ACRONYMS MATTER**

**TAKE AN EXTRA MOMENT FOR LESSONS  
LEARNED AND CHALLENGES**

# DEADLINES ARE CRUCIAL FOR TEAMWORK

- Allows us all to schedule our time.
- Allows time for review, editing, and changes to be made.

# MAKE TIME TO RE-READ & EDIT

- **Make sure you are re-reading your reports** before sending them in.
- Please take a few extra moments to review your submissions.
- **Use Merriam-Webster.com for spelling.**
- Reach out if you have questions or requests.

# ACRONYMS MATTER

- Keep two windows open, one with a blank Word document to add your acronyms to as you write.
- **Spell out ALL acronyms on first use.**
- Include all acronyms in the acronyms list and **remove any unused ones from the list.**

# SET DOCUMENTS TO ENGLISH (UNITED STATES)

- Unless the Mission has specifically requested otherwise, all reports should be proofed using U.S. English, not British English.
- **In Word, set your proofing language to U.S. English.**
- Reports are often copied into larger reports for USAID/Washington and U.S. English is expected.

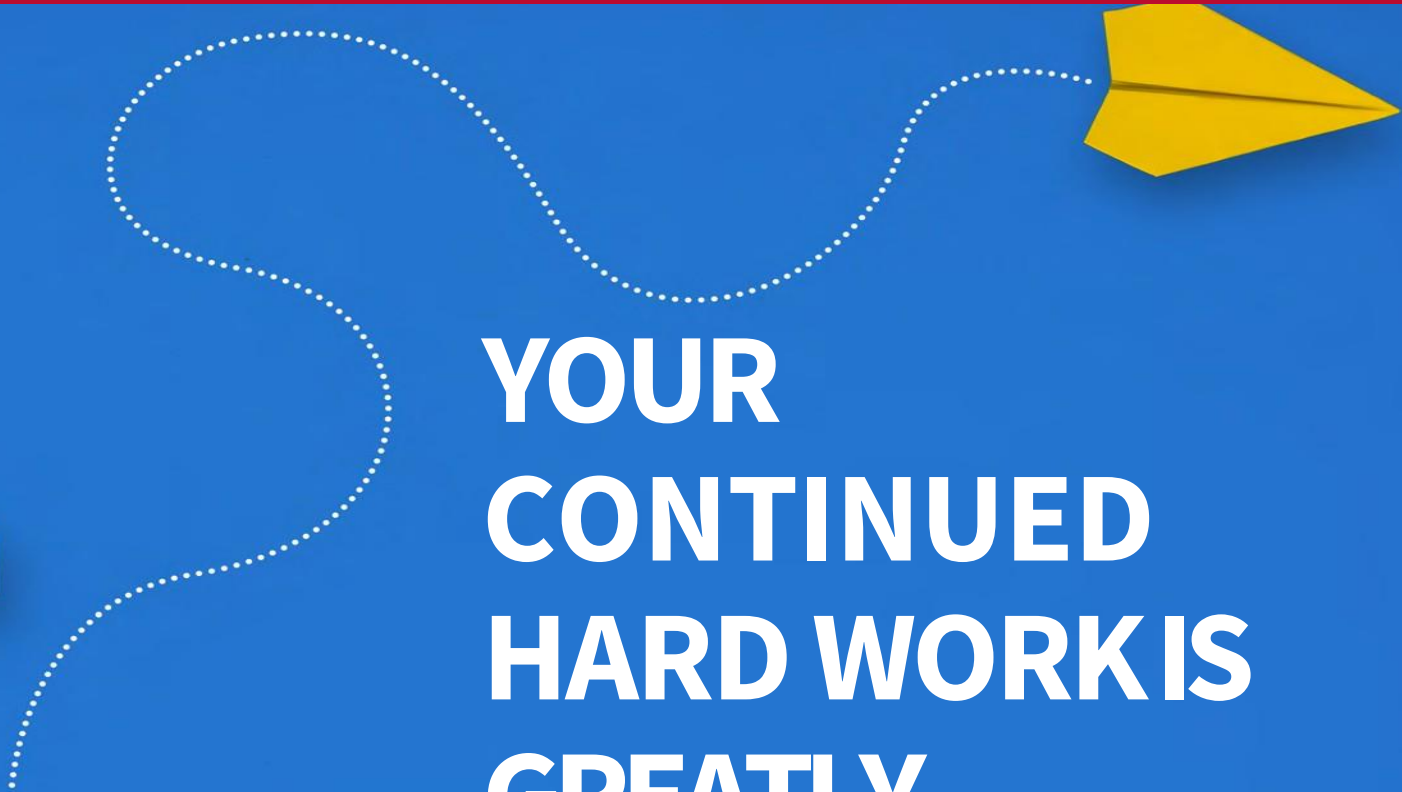
# CONSISTENCY IS KEY

- Use the same **bullets, font, and spelling** throughout the report.
- Dates are always written as **MONTH DAY, YEAR**, or **MONTH YEAR**. **EXAMPLES:** The manual was reviewed in **March 2021** and approved on **April 21, 2021**. The training took place July 21-24, 2021. The board approved the manual on July 24, during the last day of training.
- *The USAID Style Guide should be read by all report writers.*

# TAKE AN EXTRA MOMENT FOR LESSONS LEARNED & CHALLENGES SECTIONS

- Lessons Learned and Challenges sections **help us to document areas for improvement and the impact of our work.**
- Take a few extra moments to write about these areas so that we can communicate it to USAID.
- **Feel free to send us ideas for success stories** and document 'wins'.





**YOUR  
CONTINUED  
HARD WORK IS  
GREATLY  
APPRECIATED.**

# **DEVELOPING A CAPACITY BUILDING PLAN**



# BACKGROUND OF THE CAPACITY BUILDING PLAN REQUIREMENT

- A Capacity Building Plan (CBP) may need to be developed in response to the outcome of the NUPAS Plus 2.1 review. Local Implementing Partners may prepare the CBP themselves or may outsource the service.
- Sometimes USAID Missions or Prime Recipients may request Assessors to recommend that special conditions be applied to address identified significant weaknesses. Usually, Capacity Building Plans are developed for the identified significant weaknesses.
- Because of the above reasons, it is helpful for Assessors to rate the weaknesses identified.

# HOW NUPAS PLUS 2.1 REPORT CAN AID IN THE CAPACITY BUILDING PLAN DEVELOPMENT

- A Capacity Building Plan is meant to address the weaknesses identified from a NUPAS Plus 2.1 review and included in the report.
- The rating of weaknesses helps in determining the significant weaknesses that may need to be included in the Capacity Building Plan.
- Providing good recommendations that effectively address the identified weaknesses. Proper root cause analysis needs to be performed in order to provide a recommendation that will appropriately address the identified weakness.

# HOW NUPAS PLUS 2.1 REPORT CAN AID IN THE CAPACITY BUILDING PLAN DEVELOPMENT (CONT.)

- Assessors may need to indicate, in the report, whether each recommendation may be implemented internally, or if external assistance will be required to address the identified weakness.
- A Capacity Building Plan should include all weaknesses, whether they will be addressed internally or externally.
- The next slide has an example of a weakness identified with recommendations that could be implemented internally and externally

# HOW A NUPAS Plus 2.1 REPORT CAN AID IN THE CAPACITY BUILDING PLAN DEVELOPMENT?

## Budget LoEs used to allocate payroll costs for USAID projects

**HIGH RISK**

In terms of 2CFR200.430(i)(1)(i) *“Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable and properly allocated.”*

Based on the review of the accuracy of the allocation of payroll costs to the XYZ project, it was noted that the organization uses budget Level of Effort (LoE) to allocate payroll costs, and not actual hours worked.

### **Recommendation(s):**

#### **Internal:**

- The allocation of payroll costs to USAID projects should be based on the actual LOE as per the approved timesheets (which accurately capture actual time) as per the 2 CFR 200.430 requirement; and
- The allocation of the payroll costs to the projects should be reviewed for accuracy.

#### **External:**

- Organization staff members should receive training on cost principles;

# CAPACITY BUILDING PLAN DEVELOPMENT PROCESS

The following steps may be followed for a successful and effective Capacity Building Plan:

- 1. Engage all relevant stakeholders:** Engaging all stakeholders throughout the capacity building process, especially the relevant organization staff members, will lead to a sense of ownership of the process.
- 2. Assess capacity needs and resources:** For sustained results of the capacity building process, the capacity building needs should be aligned to the available resources.

# CAPACITY BUILDING PLAN DEVELOPMENT PROCESS (CONT.)

- 3. Formulate a capacity development response:** This will include a collection of capacity development actions that address the capacity development opportunities identified
- 4. Implement a capacity development response:** This includes responding to change when it happens.
- 5. Evaluate capacity development:** This promotes accountability, performance management, and learning. Measurement should be based on clear evidence of change in the organization's performance, adaptability, and stability to meet its goals.



# KEY INFORMATION TO BE INCLUDED IN CAPACITY BUILDING PLAN

1. **Key Activities**
2. **Expected Results** – Deliverables
3. **Responsible Person**
4. **Timeframe** (Deadlines)
5. **Follow-up date** - To measure progress in the capacity after implementation of the plan.

# CAPACITY DEVELOPMENT PLAN TEMPLATE

Summary for each criteria			KEY ACTIVITIES	EXPECTED RESULTS	TIMEFRAME	RESPONSIBLE PERSON	LOCAL PARTNER COUNTERPART	TOOLS USED OR DEVELOPED	REASSESSMENT SCORE	FOLLOW-UP DATE	LONGER TERM GOALS FOR LOCAL PARTNER
Organization X		RATING	IDENTIFY ACTIVITIES FROM ASAP TECHNICAL APPROACH OR ADD A CUSTOM ACTIVITY. PRIORITIZE SCORES OF 2.5 AND BELOW	NAME DELIVERABLES	INSERT GANTT CHART ACCORDING TO AGREED UPON TIMEFRAME	NAME EACH ADVISOR FOR SPECIFIC TASKS	NAME COUNTERPART				
Legal Structure											
1.	Board Constitution Not in Place		Organization X should establish a Board Constitution, providing guidance on aspects such as: -Appointment, removal and power of directors -Procedures for conducting director meetings -Transferring shares and paying dividends -Conducting virtual meetings due to COVID-19/other pandemics and resulting lockdowns	Board Constitution developed	Jul-20	Calvin	Charles	Board Constitution			Organization X should fully comply with its Board Constitution
2.	Annual Declaration of Conflict of Interest not Signed by board members		Ensure that each Board Member signs an annual Declaration of Conflict of Interest as prescribed by the Code of Conduct as soon as possible.	Signed annual declaration of conflict of interest	Jul-20	Calvin	Charles	N/A			
3.	Process of Newly Elected Board Members Not Documented		Organization X should ensure that the process followed with the appointment of Board Members is properly documented and stored for record-keeping.	Process of new elected board included in the constitution	Aug-20	Calvin	Charles	Board Constitution			Organization X should fully comply with its Board Constitution
4.	Continuation of Term of Office Not Specified		Organization X should update their ToR section to specify the number of continuous terms a Board Member may serve in his/her position.	Term of office included in the constitution	Aug-20	Calvin	Charles	Board Constitution			
5.	Board Meetings Not Documented		Organization X should hold quarterly meetings, as prescribed by the Code of Conduct, and minutes should be kept as proof of these	Minutes of board meetings	Aug-20	Calvin	Charles	N/A			Organization X should fully comply with its Board
6.	Terms of Reference Silent on Quorum Requirements		Organization X should update its Code of Conduct to include the requirements for a quorum and the minimum number of votes needed for a decision to be made.	Number of Board members required for a quorum	Aug-20	Calvin	Charles	Board Constitution			Organization X should fully comply with its Board Constitution
7.	Code of Conduct Silent on Procedure for Removal of Board Members		Organization X should update its Code of Conduct with a procedure on the removal of Board Members addressing the following: - Individuals responsible for investigating alleged offences - Timelines for investigations - Officials involved in the decision-making process as it relates to removal of Board Members	Procedure for removal of directors included in the constitution	Aug-20	Calvin	Charles	Board Constitution			Organization X should fully comply with its Board Constitution
8.	Vision and Mission Not Stated in Strategic IT Plan		Organization X management should have a strategy session and decide on an appropriate vision and mission statement and incorporate it into the appropriate document (e.g. the Strategic IT Plan) Organization X management should draft a separate Delegations of Authority document, addressing the following:- Levels to which authority may be delegated, per division-The need for additional approvals at the delegated level-The design of specific Delegation of Authority documents-The process to be followed before and during delegations- Document requirements for audit and review purposes-The current procedure in the HR Manual should also be incorporated into this document.	Vision and Mission included in the IT Strategic Plan	Aug-20	Calvin	Telema	N/A			
9.	Delegations of Authority Not Fully Developed		Organization X management should have a strategy session and decide on an appropriate vision and mission statement and incorporate it into the appropriate document (e.g. the Strategic IT Plan) Organization X management should draft a separate Delegations of Authority document, addressing the following:- Levels to which authority may be delegated, per division-The need for additional approvals at the delegated level-The design of specific Delegation of Authority documents-The process to be followed before and during delegations- Document requirements for audit and review purposes-The current procedure in the HR Manual should also be incorporated into this document.	Delegation of authority developed	Aug-20	Calvin	Charles	Delegation of Authority template			Organization X to ensure full compliance with the delegation of authority
10.	Code of Conduct Not Formalized		At the next Board meeting, the Code of Conduct should be formally approved by a quorum of members and minutes should be recorded.	Code of conduct to be approved by the board	Aug-20	Calvin	Charles	Code of conduct			Organization X applies the code of conduct
11.	Organization X Organogram Incomplete/Not approved		The organogram should be updated to reflect all staff levels and individuals working at Organization X, and should be approved by the	Updated Organogram	Aug-20	Calvin	Ebele	Updated Organogram			Continuously updating the Organogram
12.	Board Self-Evaluations Not Documented		The Board Secretary should ensure that the results of Board self-evaluations are documented and adequately safeguarded	Board Self-Evaluation form	Aug-20	Calvin	Charles	Board Self-Evaluation template, Board skills matrix			Periodic board self-evaluations conducted

## EXAMPLES

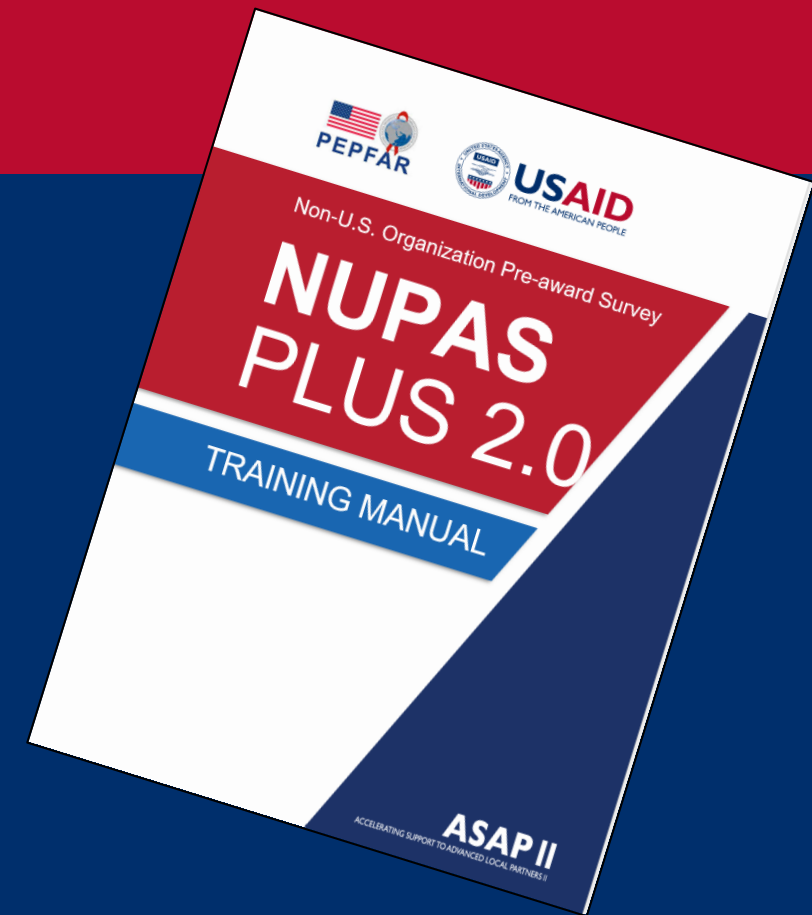
### Capacity Building Plans

# QUESTIONS



**USAID**  
FROM THE AMERICAN PEOPLE

# THANK YOU FOR ATTENDING!



## ASAP II

ACCELERATING SUPPORT TO ADVANCED LOCAL PARTNERS II



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