

Issuance Date: February 16, 2023

Request for Application: MS4G Warehouse Receipt Financing Incentive Program Request for Application Number: RFA-CATALYZE-217772-Ethiopia-2023-0058

Due date for submission of questions: February 22, 2023 Pre-application Conference Date: February 23, 2023

Closing Date for Receipt of Applications: March 10, 2023, at 17:00 EAT

Total funding available (all grants): US \$400,000

Anticipated Number of Grants: 5

REF: USAID/CATLYZE Warehouse Receipt Financing Incentive Program

Prime Contract Number: 7200AA19C00080

Subject: Palladium's Request for Applications (RFA) Number RFA-CATALYZE-217772-Ethiopia-2023-0058

Dear Prospective Applicants,

USAID CATALYZE Market Systems for Growth (CATALYZE MS4G), an initiative funded by the United States Agency for International Development (USAID) and implemented by Palladium LLC, is inviting financial intermediaries (FIs) that are interested in increasing access to capital and financing of Micro, Small and medium enterprises (MSMEs) using Warehouse Receipt Financing (WRF). The agreements with selected FIs resulting from this Request for Application (RFA) will be administered in accordance with USAID regulations, as applicable.

The RFA is comprised of the following main sections:

- I. FUNDING OPPORTUNITY DESCRIPTION
- II. ELIGIBILITY REQUIREMENTS
- III. APPLICATION AND SUBMISSION REQUIREMENTS
- IV. APPLICATION REVIEW INFORMATION
- V. AWARD ADMINISTRATION INFORMATION

Successful Applicants will be responsible for ensuring the achievement of the program objectives. Please refer to the Program Description section of this RFA for a complete statement of goals and expected results.

Subject to the availability of funds, CATALYZE MS4G intends to issue grants for up to US\$400,000 in total for results achieved from April 2023 to December 2023. CATALYZE MS4G reserves the right to fund any or none of the applications submitted.

To be eligible for an award, applicants must provide all required information in their application, including the requirements found in any attachments to this RFA. Applications that are submitted late, or incomplete, will not be considered. Awards will be made to the applicants whose applications best meet the requirements of this RFA and the evaluation criteria contained herein.

If potential applicants have any questions, queries, or clarifications, they may forward them to the following email address before the date stated on the cover page of this RFA:

<u>CATALYZE-Ethiopia.ms4g.grants@thepalladiumgroup.com</u>. CATALYZE MS4Gwill conduct meetings for all interested applicants to answer any questions related to this RFA.

A pre-application conference related to this RFA will be held on **February 23, 2023**. If you want to join the conference, please submit your expression of interest no later than **February 22, 2023**, to CATALYZE-Ethiopia.ms4g.grants@thepalladiumgroup.com.

CATALYZE MS4G requires that applications be submitted electronically (e-mailed) to CATALYZE-Ethiopia.ms4g.grants@thepalladiumgroup.com no later than March 10, 2023, at 17:00 EAT.

Issuance of this RFA does not constitute an award commitment on the part of CATALYZE MS4G, nor does it commit CATALYZE MS4G to pay for any costs incurred in the preparation and submission of an application. Further, CATALYZE MS4G reserves the right to reject any or all applications received. Applications are submitted at the risk of the Applicant, and all preparation and submission costs are at the Applicant's own expense.

Sincerely,

CATALYZE MS4G Grant Team

Attachments

- A. Technical proposal template
- B. Cost application template
- C. Fixed Amount Award (FAA) template

SECTION I: FUNDING OPPORTUNITY DESCRIPTION

I. Program Description

USAID CATALYZE Market Systems for Growth (CATALYZE MS4G) focuses on creating transformative outcomes in the food security and the water, sanitation, and hygiene (WASH) sectors to benefit all Ethiopian people. To achieve these goals, the activity engages youth, mobilizes capital, increases access to finance, connects enterprises to markets, tests and scales inclusive business models, and supports stakeholders to self-advocate towards policy change which will promote opportunities for the private sector community. Additionally, CATALYZE MS4G ensures that women and young people have the skills and opportunities to contribute to and benefit from private sector opportunities in food security and WASH. The activity incentivizes local capacity-building efforts to enhance technical and professional skills and to better connect the supply and demand of labor.

II. Objectives and Scope

As part of its efforts to increase access to finance in the agriculture sector and improve food security, CATALYZE MS4G intends to support the scaling up of quality produce storage and associated warehouse receipt financing (WRF). This intervention will increase the number of partners involved in warehouse receipt financing: engage three certified warehouse operators, up to five private banks, five cooperative unions, 25 primary cooperatives, and three agro-processors (with additional actors in the value chains). Over the course of approximately nine months, CATALYZE MS4G expects to drive benefits to large numbers of Micro, Small, and Medium Enterprises (MSMEs), smallholder farmers, farmers' unions, and cooperatives.

MS4G Proposed Intervention

The National Warehouse Receipt Financing (NWRF) program was developed to increase access to capital for underserved agriculture value chain actors (particularly those with limited or no collateral). Financial institutions have not participated at large in the NWRF program. The CATALYZE MS4G intervention, under a pay-for-result mechanism, will mobilize financing for farmers by creating linkages and incentives for financial institutions to engage in warehouse receipt financing. The intervention also seeks to reduce the time for loan application, approval, and disbursement for those financial intermediaries (FIs) already engaging in WRF.

This activity is complimentary to CATALYZE MS4G's Warehouse Operator Support RFA, which supports the facilitation of proper commodity deposits and management through legally licensed food warehouse management enterprises.

Description of Funding Opportunity

CATALYZE MS4G is issuing this RFA for the MS4G blended finance activity on a pay-for-results basis. Performance-based grants are intended to encourage and drive expanded financing and investments into MSMEs. CATALYZE MS4G, by providing cash incentives, seeks to encourage FIs to extend credit to farmers, aggregators, agro-dealers, unions, cooperatives, and processors through warehouse receipts. CATALYZE MS4G strongly encourages the facilitation of financing for women-led enterprises.

Award Information

This Request for Application (RFA) is a call for Ethiopian Fls committed to expand lending to or investing in, or for the benefit of MSMEs in food security and agriculture. Selected Fls will participate in CATALYZE MS4G's Pay-for-Results Fixed Amount Award (FAA) Grants program to receive incentive payments for mobilizing new financing that meets the qualifications listed in this RFA. CATALYZE MS4G will review grantee performance every six months and evaluate whether adjustments are required.

Determination of the Pay-for-Results Incentive Fees

A. Eligible Sectors and Geographic Scope

Fls will be eligible to receive incentive payments for lending to MSMEs in the food security/agriculture sector using Warehouse Receipts Finance.

CATALYZE MS4G will provide incentives to participating Fls for financing MSMEs throughout Ethiopia, including Addis Ababa. However, at least 50 percent of qualified MSMEs for which a participating Fl receives an incentive payment under this initiative must be located outside Addis Ababa.

B. Parameters for Determination of P4R Incentive Rates

The Pay-for-Results incentive payments for qualified MSME financing under this grant will pay, in USD, an incentive (up to USD 400,000 total across all grants) no higher than 6 percent of the financing or investment approved and received by qualified enterprises per the parameters below:

1. Approval / Disbursement Time

- For approval and disbursement of financing through warehouse receipts within seven working days, the financing FI shall be eligible for 6 percent of the amount approved and disbursed.
- For an approval and disbursement period of more than seven working days, the FI shall be eligible only for 4 percent of the amount approved and disbursed.

2. New Clients and On-Site Presence

CATALYZE MS4G encourages FIs to onboard new borrowers as well as provide banking services at the location of the warehouse to expedite and increase the amount of financing. CATALYZE MS4G will provide additional incentives for these added services which will be determined at the time of contracting with successful bidders.

C. Eligible Enterprise Definitions

CATALYZE MS4G will pay incentives for verified financing to MSMEs in target sectors and geographies that meet the following size parameters:

Enterprise Type	Sector	Employer Size	Total Assets
Micro	Industry	<u><</u> 5	<u><</u> \$4,630
	Service	<u><</u> 5	≤ 2,310
Small	Industry	6-30	\$4,630 - \$69,500
	Service	6-30	\$2,310-\$23,150
Medium *		50-249	> \$23,150

Source: Ministry of Urban Development and Housing, * Medium enterprise is defined primarily on size of employees. Asset size can be between \$23,150 to >\$69,500 (depending on sector type).

Financial institutions participating in the blended finance program can generate and qualify MSME client pipelines in multiple ways including:

I) MSMEs identified through CATALYZE MS4G activities: Through initiatives being undertaken by the CATALYZE MS4G enterprise growth objective area, and the utilization of business advisory service providers, several MSMEs are receiving technical assistance to improve overall firm performance and operations to make the enterprises bankable. CATALYZE MS4G may identify firms within the broader program ecosystem whose profile and financing needs align with the blended finance program objectives.

In these instances, CATALYZE MS4G will provide participating Fls with MSME referrals to consider, understanding that the Fl will need to undertake its own credit assessment. If CATALYZE MS4G recommends a potential borrower for financing to the Fl, then the MSME is considered prequalified for an incentive payment and does not need to undergo additional prescreening requirements.

2) MSMEs identified by participating FIs: Participating FIs may and are encouraged to identify MSMEs outside of the CATALYZE MS4G ecosystem that they would like to extend credit to under this incentive program. These proposed MSMEs will need to meet the criteria set by MS4G, including that at least 50 percent of the borrowers to be financed under the WRF program must be located outside Addis Ababa.

III. Requirements

Full applications must conform to the structure in Attachment A, Technical Application Form, which is described in more detail in SECTION III of this RFA

IV. Anticipated Outcomes

CATALYZE MS4G, through grants issued under this RFA, seeks to raise USD 10 million from partner financial intermediaries.

V. Schedule

CATALYZE MS4G anticipates awarding one or more Fixed Amount Award (FAA) grants because of this solicitation process by April 2023. The expected performance period is between April 2023 to December 2023.

VI. Project Guidance and Post-Award Support

During the grant period, the Grantee will report to the CATALYZE MS4G grants team for overall guidance related to this grant, to appropriate technical staff for technical matters, and to the monitoring and evaluation (M&E) team regarding monitoring deliverables. CATALYZE MS4G will provide the following to the selected Grantee(s):

- Project activity brief
- Simplified report template including, type of MSME, financing type, ownership structure, geography, and loan repayment status, among others
- Kick-off meeting

VII. Monitoring

CATALYZE MS4G will monitor the implementation of the grant to enable sound oversight and management; examples of such monitoring include:

- Monthly meetings with Project Team
- Quarterly Program Reviews
 - Accomplishments in prior period
 - o Planned activities for the upcoming period
 - o Identification of any problematic issues

- Action items list if any
- Modification of deliverables, if required

SECTION II: ELIGIBILITY REQUIREMENTS

In order to be considered eligible for a grant award, prospective grantees must:

- Be legally registered in accordance with the laws of Ethiopia (registration documents required).
- Not be part of a government or any government structure.
- Not appear on any list of debarred or suspended entities (as found on www.sam.gov), or on any terrorist watch list or other published list of ineligible recipients.
- Certify that they are not affiliated with any political party nor engaged in any partisan activities.
- Certify that they are receptive to participation in available learning opportunities and commit to participating in capacity building components.
- Be a registered FI with one or more of the following attributes:
 - Little to no existing MSME loan portfolio, but with clear strategy and resources committed to developing an MSME lending portfolio;
 - Have an existing MSME portfolio with an interest to expand lending to agriculture sector SMEs, using WRF, and a commitment to new MSME lending standards and practices, and types of finance products tailored for agri sector MSMEs;
 - Have a compelling and feasible strategy to initiate or expand financing to MSME clients, with a specific focus on MSMEs operating in the agriculture sector, and women owned MSMEs.
- Must have or be able to obtain a Unique Entity Identifier (UEI) Number to be considered for an award exceeding \$25,000 (or local equivalent). Organizations must provide proof of UEI number or proof of UEI registration.

Note: GSA has developed a useful interactive PDF tool that guides through the most common scenarios about UEI (https://www.fsd.gov/sys_attachment.do?sys_id=af05f8fb1b44851006b09796bc4bcb6d)

SECTION III: APPLICATION AND SUBMISSION INSTRUCTIONS

CATALYZE MS4G will award up to five (5) grants resulting from this solicitation to the responsive applicant(s) that demonstrate the capability to carry out activities conforming to the project objectives and within the funding and other parameters set by this RFA.

This solicitation does not commit CATALYZE MS4G to make an award. Palladium may at its sole discretion (a) accept or reject any or all applications, at any step, in part or in full without assigning a reason; and (b) waive informalities or irregularities in applications received.

Instructions for full application

a. Cover Sheet

The applicant provides basic contact information and information regarding the status of the organization. General information includes these elements:

- i. Legal Name of Organization
- ii. Mailing Address
- iii. Physical Location
- iv. Contact Information
- v. Organization's Legal Representative
- vi. Tax ID number (or other local ID required for organizations to be eligible)
- vii. UEI number, for grants expected to exceed \$25,000

b. <u>Instruction for Preparation of the Technical Application (maximum 11 pages total, excluding annexes)</u>

The Technical Application should be submitted in the English language, and attached with the following annexes, using the template included as <u>Attachment A</u> to this RFA:

i. Company Profile (maximum 2 pages, refer to the technical application template)

Applicants are expected to present a two (2) page summary providing an overview of their current lending or investment activities and provide any relevant details on their overall strategy and financial products and services used in mobilizing credit through WRF.

ii. <u>Project Description (maximum 4 pages. Use provided technical application template)</u>:

Applicants are requested to present a plan to mobilize financing to MSMEs through WRF based on the requirements presented in Section I, including the following elements:

- State the total amount in US dollars to be committed for financing or investment into Ethiopian businesses through WRF for the proposed grant period. To the extent possible, provide details on which types of financial products and services are likely to be offered to or expanded to MSMEs under this program. To the extent possible, estimate the potential number of MSMEs to be served and the average size of a transaction. Provide a brief rationale on how this committed amount is feasible in the grant time frame. (Note: this target financing amount will be used to set milestone targets and milestone grant payment amounts. Final milestones and payment amounts will be negotiated prior to award).
- A strategy to rapidly expand financing to eligible MSMEs. This can include orienting current financial services to MSMEs, introducing new financial instruments and loan products well suited for MSMEs, re-orienting staff resources towards expanding an MSME client base, any potential partnerships, or other actions to reduce obstacles to viable MSMEs to access financing from the applicant. Applicants should include a compelling strategy to provide loans to MSMEs in rural and peri-urban areas and secondary cities and state the number of branches they have outside of Addis Ababa and the percent of loans they plan to be extended in rural and peri-urban areas and secondary cities.
- Outline how the proposed elements will support progress toward the applicant's longerterm engagement in the WRF activity.
- Outline a strategy to conduct outreach and lend to women-owned MSMEs.

iii. Project Implementation Plan (1 page, use provided technical proposal template):

Applicants are expected to present an implementation that outlines when key activities will take place to ensure success under this initiative. Please attach a Gantt chart of planned activities and a timeline for their completion, with a brief description.

iv. Monitoring and Evaluation Plan (2 pages):

Describe the monitoring and evaluation methods implemented by the applicant as well as the tools used to measure and evaluate WRF financing results and impact. CATALYZE MS4G expects collected data to comprise, among others, the type of SME, location, ownership structure, male or female owned, age of the owner, and other parameters.

v. Experience and Capacity (up to 2 pages, please use the template provided):

The applicant lists previous and ongoing experience implementing similar activities. This is a critical factor in assessing the capacity of the grantee to implement the activity. Applicants must include the current level of financing extended to MSMEs in the WRF as a percentage of the total loan portfolio.

c. <u>Instruction for Preparation of the Cost Application</u>

As part of the cost application and in addition to the budget template (Attachment B), the applicant shall include the following:

I. Transmittal Letter

The application must be signed by an individual authorized to commit to the organization.

II. Organizational Information and Certifications

The applicant shall submit the following annexes to the cost application:

- a. Copy of the organization's chart and bylaws and power of attorney of the authorized signer.
- b. Copy of the organization's legal registration under the laws of Ethiopia.
- c. Copies of the last annual financial report(s) completed by an authorized/certified accountant.

III. Budget Narrative and Detail

This section should include a summary of the information provided in the application budget forms and includes the total grant funding request. The applicant must provide a budget, a budget narrative, and adequate cost and historical or unit pricing data to establish a reasonable cost and the assurance that the recipient will not realize any profit above the actual cost.

The applicant shall include a budget narrative that breaks down proposed costs in sufficient detail corresponding to the attached budget template to permit cost analysis. The budget shall be denominated in USD.

Cost estimates must be submitted in Excel format using the attached budget template. The file must be unprotected and there should be no hidden columns, rows, or cells. Each cost element must include a basis for estimate or rationale. Any budget submitted without the accompanying narrative or in a different template will not be accepted and the application will not be considered. Please note that applications will be judged based on the efficiency of costs vs. proposed performance targets and the ratio of investment and loans the FIs commit to provide MSME loans.

The budget template contains the following budget categories:

a. Salaries (activity staff)

The applicant shall provide the individual's name, position title, the unit (days), the number of units (i.e., the level of effort), the unit salary or consultant fee, and the total salary or consultant fee. Unit salaries shall be stated in days. Benefits, fees, and indirect costs should not be included in the unit salary.

b. Fringe Benefits

This could include social security, health insurance, and other mandatory withholdings for relevant grantee staff.

c. In-Country Travel and Transportation

Travel and Transportation include per diem and shall be broken down by traveler, vehicle, number of trips, and the corresponding number of days of per diem. Include a basis of estimate for each trip.

d. Other Direct Costs (ODCs)

As part of the detailed budget breakdown, the applicant shall submit details of all other direct costs (ODCs) required for undertaking the award grant. ODCs include costs of direct program implementation, as well as costs for communication, meetings, expendable supplies and materials, report preparation/reproduction, and publications. Include a basis of estimate for each item.

As illustrative examples only, program implementation costs could include but not limited to the following (or many others):

- Marketing costs: The applicant should provide details of marketing costs that would promote
 its services. Illustratively, marketing costs could include events, signage, and promotional print
 materials.
- Assurance costs: The applicant should provide details of costs for quality improvement/assurance that could include supervisory visits and monitoring mechanisms.

NOTE: USAID Policy Prohibits the Payment of Fee/Profit to recipients under assistance instruments.

Submission of the full Application:

Full applications must be submitted no later than 17:00 EAT, March 10, 2023, electronically (via email) to CATALYZE-Ethiopia.ms4g.grants@thepalladiumgroup.com using the subject line "Subject: MS4G Warehouse Receipt Financing Incentive Program"

IMPORTANT NOTE: Technical and financial applications should be submitted in two separate electronic files.

SECTION IV: APPLICATION REVIEW INFORMATION

The application must be fully completed in all aspects in each Step. An application may not be considered if it is received after the submission deadline. Costs associated with the preparation of the full application shall be at the expense of the applicant.

Evaluation of Full Applications

CATALYZE MS4G intends to issue a grant to the organization(s) considered to provide the best strategic fit, technical approach, past performance and organizational capacity, and gender considerations for the overall project. The criteria below will serve as the basis upon which the application will be evaluated. Selection will also be based on the capabilities of the organizations as detailed in the application.

a. Evaluation Criteria

The technical applications will be evaluated according to the following criteria, which are listed below, with additional details:

Evaluation	Details	Information Source	Maximum
Criteria		(See Annex I-	Score
		Technical Proposal)	
		, ,	

I	Strategic Alignment	Commitment, capacity, resources, and strategy to expand WRF. Must include a plan to serve women-owned businesses to receive full points	Technical Proposal	25
2	Financing Commitment	Amount and reasonableness of financing to be committed (in USD or ETB terms) in target sectors and geographic areas of this initiative. The greater the value of financing to be committed by Fls and deemed reasonable, the greater the points to be awarded.	Technical Proposal and financial statements	30
3	Technical Approach (Geography)	Compelling capacity and strategy to provide loans to MSMEs in rural and peri-urban areas and secondary cities as measured by the number of branches outside of Addis Ababa and the percent of loans extended in rural and peri-urban areas and secondary cities.	Technical Proposal	30
4	Organization al Capacity	The current level of financing extended to MSMEs in the WRF as a percentage of the total loan portfolio. Staff and financial resources committed to WRF.	Technical proposal based on data extracted from the applicant's proposal	15
		Total		

CATALYZE MS4G will award up to five (5) grants under this solicitation to applicants that achieve an evaluation score of 70 or above.

SECTION V: AWARD ADMINISTRATION INFORMATION

Award Notices

Successful applicants can expect to receive the following upon approval by USAID:

- A notice of USAID approval
- Draft Fixed Amount Award grant agreement

Award Administration Standards

Grants resulting from this solicitation will be administered by the approved Project Grants Manual, and the following regulations (as applicable):

- FAR Part 31 Cost Principles for For-Profit organizations used to negotiate award amounts https://www.acquisition.gov/far/part-31#FAR_31_000 and terminations per 2 C.F.R. 200.201 (b)(1)) https://www.ecfr.gov/current/title-2/section-200.201
- Automated Directives System (ADS) Chapter 303 Grants & Cooperative Agreements to Non-Governmental Organizations: 303.3.25 Fixed Amount Awards to Non-Governmental Organizations http://www.usaid.gov/ads/policy/300/303saj
- A Mandatory Reference for ADS Chapter 303: 303_mak Fixed Amount Award Entity Eligibility
 Checklist http://www.usaid.gov/ads/policy/300/303mak as adapted by Palladium
- A Mandatory Reference for ADS Chapter 303: 303_mat Fixed Amount Awards to Non-Governmental Organizations http://www.usaid.gov/ads/policy/300/303saj as adapted by Palladium

- ADS 302.3.4.13 Grants Under Contracts (GUCs) https://www.usaid.gov/ads/policy/300/302
- 2 C.F.R. 200.1 Definition Fixed Amount Awards https://www.ecfr.gov/current/title-2/section-200.201
- 2 C.F.R. 200.201 Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts (as referenced in ADS 303.3.25.a.) http://www.usaid.gov/ads/policy/300/303mak
- 2. C.F.R. 200 Subpart E Cost Principles for non-profit and educational organizations used to negotiate award amounts and terminations per 2 C.F.R. 200.201 (b)(1)) https://www.ecfr.gov/current/title-2/section-200.201

Reporting

Deliverables required for success fee payment

Each of the FIs selected under this RFA will have a quarterly success fee payout until reaching the agreed grant ceiling. The grantee shall invoice CATALYZE quarterly based on the total amount it has mobilized in adherence to MS4G's geographic focus, at least 50 percent of qualified MSMEs should be located within peri-urban (areas that are in some form of transition from strictly rural to urban) and secondary cities, defined as cities with a population size of 100,000 or greater.

The quarterly payment will be determined by incentive percentage rates based on the types of qualified MSMEs receiving financing. To receive payment, the FI must provide evidence of the approval and disbursement of financing or investment in the enterprise. The required documentation is listed below.

Proof of financing or investment disbursement

Disbursement may include legally binding financing or investment offer/acceptance documents.

- i) for debt, **a written or electronic financing commitment** (a legally binding loan agreement) from a finance provider and accepted by the finance seeker
- ii) for non-debt (equity or grants), disbursement of financing

CATALYZE MS4G reserves the right to audit documentation of disbursement results at any time, as the project conducts M&E verifications. CATALYZE MS4G will obtain both the FI and enterprises' approval to release information in publicly reported success stories, periodic reports, and lessons learned reports. The FI may be required to submit additional reporting periodically (reporting format will be provided by CATALYZE MS4G). Participating FIs agree to comply with and respond to requests for information.

Branding & Marking Requirements

Should successful applicants have the plan to publicize any document relating to this grant, they will be required to submit a Branding Strategy and a Marking Plan that complies with the approved Branding and Marking Plan for the project and must follow the mandatory standard provision entitled "MARKING AND PUBLIC COMMUNICATIONS UNDER USAID-FUNDED ASSISTANCE (DECEMBER 2014)" (for standard cost type grants) or "MARKING AND PUBLIC COMMUNICATIONS UNDER USAID-FUNDED ASSISTANCE (JULY 2015)" (for FAAs) in preparing the Branding and Marking Plan for approval.

Environmental Compliance

The grants program anticipates funding only activities that fall under the categorical exclusions of "USAID Environmental Guidelines." Therefore, if all activities under a specific grant are identified as categorical exclusions, the project will not conduct any additional environmental assessment or will not require prior review by USAID's environmental officer. However, in instances where the proposed activity may directly affect the environment outside the exclusions, the project will seek guidance from the COR, to ensure compliance with 22 CFR 216 and the "USAID Environmental Guidelines." https://www.usaid.gov/our_work/environment/compliance/22cfr216#216.1

CATALYZE MS4G will ensure all stipulated environmental measures and conditions in the award are implemented throughout the life of the award, and that timely amendments are undertaken, as needed, by obtaining the relevant USAID Environmental Officer's prior approval in writing to ensure compliance with 22 CFR 216 and the applicable USAID Environmental Guidelines.

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¹ 22 CFR 216