



**ADVOCACY ADVISOR**  
**A Humentum Quarterly Global Advocacy Update**  
**Second Quarter 2021**

**GLOBAL ADVOCACY SPOTLIGHT: THE IMPERATIVE TO DECOLONIZE DEVELOPMENT**

---

In recent months, there has been a growing call to decolonize development and humanitarian assistance. In May 2021, Peace Direct published a [report](#) calling on organizations to ‘Decolonize Aid’. The report shares insights from development practitioners in the Global South and provides recommendations on practical steps to begin the process. In June 2021, Humentum CEO Dr. Christine Sow moderated a [panel](#) with the Center for Global Development discussing the decolonization of governance in the sector. Discussions like these yield important insights and opportunities for action.

To begin, we must first acknowledge that their existence is [rooted in colonialism](#), that structural racism is woven into the sector, and that there are massive power imbalances. To shift those power imbalances, we should [critically examine the language we use](#). While this may seem small or even inconsequential, the way we *discuss* our work profoundly changes the way we *view* our work and partners. A small shift in language from “beneficiaries” to “grantees” or “constituents” can alter power dynamics. By changing this language, the sector asserts that individuals in the Global South have agency and should be included and prioritized in all aspects of program planning and implementation.

Of course, altering language is not enough to bring about systemic change. Humentum contributes to a sectoral shift by addressing exclusionary government donor policies and by leading the work on diversity, equity, and inclusion (DEI) within sector organizations. During the past quarter, we have advocated on behalf of our members to maintain and increase access to Office of Management and Budget (OMB)-extended flexibilities during the pandemic. These flexibilities are crucial to all organizations, especially smaller, local organizations operating in the Global South. We have also urged all agencies across the USG to ensure its implementing partners enjoy full cost recovery - an issue that often prevents non-US based, local organizations from accepting certain USG donor agency funding due to the inability to cover indirect costs. By keeping these roadblocks in place, the USG is ensuring that only international organizations with access to external funding and reserve funds can afford to access USG funding.

Internally and across the sector, we have also examined the role of diversity in development and humanitarian governance. The recent [BRIDGE survey](#), led by a volunteer coalition including Humentum, found that only 27% of leadership teams and 10% of heads of organizations in our sector identify as BIPOC. Perhaps even more

concerning, 58% do not have a DEI plan and have no plans to create one. Data like this is crucial to understanding the weak points in the sector and presents an opportunity for Humentum and other organizations to advocate for sector-wide change.

As the Peace Direct report makes clear, none of this is easy work. It is difficult, complicated, and uncomfortable. However, we cannot ignore the realities of our sector any longer. If we truly want to see sustainable development, lasting peace, and global equity achieved, then organizations in the Global North must be prepared to cede power and transform the sector to be radically inclusive and justice oriented. – *By Humentum's Jenna Thoretz*

## KEY DONOR POLICY AND GUIDANCE UPDATES

---

### ➤ EXECUTIVE OFFICE OF THE PRESIDENT

#### ○ Executive Orders

**Action:** Executive Orders.

**Summary:** Since taking office in January, President Biden has issued 51 Executive Orders. Of note this quarter:

On June 30, 2021, President Biden signed Executive Order 14035, Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce.

On April 27, 2021, President Biden signed Executive Order on Increasing the Minimum Wage for Federal Contractors, increasing the minimum wage for select federal contractors and subcontractors to \$15.00 per hour, effective January 30, 2022. By November 24, 2021, the Secretary of Labor will issue regulations which, in turn, will be followed by implementing regulations by the Federal Acquisition Regulatory (FAR) Council.

#### ○ Presidential Statements

**Action:** Presidential Statement.

**Summary:** On July 1, 2021, the Office of the President issued a statement announcing the US COVID-19 Global Response and Recovery Framework.

### ➤ EXECUTIVE OFFICE OF THE PRESIDENT, OFFICE OF MANAGEMENT AND BUDGET (OMB)

#### ○ OMB/Chief Financial Officers (CFO) Council 2 CFR 200 FAQs

**Action:** 2 CFR 200 (Uniform Guidance) FAQs.

**Summary:** On May 3, 2021, the CFO Council issued answers to frequently asked questions on the November 2020, revisions to 2 CFR 200 – the Uniform Guidance.

- **OMB Memorandum**

**Action:** Memorandum M-21-26

**Summary:** On June 11, 2021, OMB issued [Memorandum](#) M-21-26, entitled “Increasing Opportunities for Domestic Sourcing and Reducing the Need for Waivers from Made in America Laws,” to federal agencies to commence implementation of the President’s January 2021, [Made in America](#) Executive Order. Specifically, the Memorandum establishes the Made in America Office (MIAO) to oversee a government-wide waiver process for all US Made in America requirements.

- **US AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID)**

- **FY2021 Q3 New Business Forecast**

USAID hosted its FY21, 3<sup>rd</sup> Quarter New Business Forecast webinar. A full list of responses to the General, Washington, and Mission questions submitted, as well as a transcript and recording of the webinar, is available on [USAID's Business Forecast page](#).

- **Advancement of the Development Information Solution**

During the quarter, USAID updated implementing partners on its advancement of the [Development Information Solution \(DIS\)](#). On May 25, 2021, USAID published a [30-day notice in the Federal Register](#) for a proposed information collection that will allow USAID to collect indicator information through the DIS. USAID will begin with a 15-Mission pilot where acquisition and assistance awards will be bilaterally modified/amended to require contractors and recipients to submit indicator information through the DIS, following approval of the information collection. In the coming months, USAID will also commence rulemaking to expand the development of the DIS.

- **Rescission of Guidance on Procuring PPE**

Effective April 30, 2021, USAID rescinded its Guidance on Procuring Personal Protective Equipment (PPE) and Covered Material, originally issued June 30, 2020, and updated on August 26, 2020. The Guidance required USAID implementing partners to seek prior written approval of their Agreement or Contracting Officer to procure select categories of essential medical supplies with USAID funds. USAID amended its "[Answers to Frequently Asked Questions on PPE/Covered Materials](#)" to reflect the rescission.

- **Issuance of Final Rule and Technical Amendments**

On May 10, 2021, USAID published in the Federal Register the Final Rule and Technical amendments to [22 CFR Part 228: Procurement of Certain Essential Medical Supplies to Address the COVID-19 Pandemic](#).

## HUMENTUM OUTREACH AND ADVOCACY

---

### ✓ **Humentum Thought Leadership**

[Opinion: Nonprofits need an international standard for financial reporting](#) - by Samantha Musoke, Humentum's Project Director of IFR4NPO (June 28, 2021)

[Watch: Who Represents Whom? Decolonizing Humanitarian Governance](#) - Center for Global Development and Humentum's Dr. Christine Sow (June 22, 2021)

[Watch: How the past year will shape NGOs of the future](#) - Devex Live featuring Humentum's Tim Boyes-Watson (June 21, 2021)

[Opinion: Benchmarking race, inclusion, and diversity in US dev orgs](#) by Humentum's Kim Kucinkas (June 2, 2021)

### ✓ **Advocacy on OMB COVID-19 Flexibilities**

In the first half of the quarter, Humentum advocated for key USG donor agencies to exercise their authority pursuant to [OMB Memo M-21-20](#) to extend certain administrative flexibilities that expired in 2020, to their implementing partners. On April 19, 2021, the CDC issued guidance on [CDC Flexibilities](#). On May 4, 2021, USAID/M/OAA issued a [Memorandum Authorizing Disaster Relief Flexibilities to Reduce the Burden for Financial Assistance Pursuant to OMB Memorandum M-21-20](#). Humentum has continued to [communicate](#) with USDOS about the need to issue uniform guidance to all DOS partners about accessing flexibilities.

### ✓ **Webinar on OMB 2 CFR 200 (Uniform Guidance) FAQs and OMB Flexibilities**

On May 27, 2021, Humentum hosted over 120 members in a webinar with Associate Consultant Bob Lloyd on OMB's 2 CFR FAQs and the COVID-19 flexibilities extended by OMB to the federal agencies. For materials and a recording of the webinar, please see: [Webinar Materials and Recording](#)

### ✓ **Advocacy and Engagement on Equity in Development and Humanitarian Assistance**

During the quarter, the Federal government began implementing [Executive Order 13985](#), Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. As a part of this process, OMB published a broad [Request for Information](#) (RFI) on May 5, 2021.

Key agencies also began the process of engaging the community in dialogue on equity in US Government programming and partnerships. As part of these dialogues, Humentum and its members provided input and insights to both USAID and USDOS. From May 18 - June 11, 2021, USAID, in compliance with the EO, conducted an [assessment](#) to determine how Agency policies and actions can promote full and equal participation in

foreign assistance programs and partnerships. As part of its assessment, USAID convened a series of 90-minute stakeholder workshops, in which Humentum participated on behalf of its members. USAID intends to publish a report on the findings of its assessment.

On June 29, 2021, Humentum invited USDOS/F/Policy Director Roman Napoli and his co-coordinators of the USDOS Agency Equity Team Working Group on Leveraging Programming, Grants, and Foreign Assistance to Advance Racial Equity and Support Underserved Communities to a webinar discussion with Humentum members on equity in DOS programming and partnerships. Member participation and feedback was well received, and we anticipate additional dialogue in the future. Materials and a recording of the webinar can be found [here](#).

#### ✓ **Quarterly Engagement with USAID Office of the Ombudsman**

On May 5, 2021, Humentum hosted Crista Wise, USAID's Ombudsman, for a virtual conversation with our members. During the discussion, the Office of the Ombudsman provided a general overview of the Ombudsman function, addressed questions and concerns presented from the last Humentum engagement in December 2020, and took new questions. Humentum continues to follow-up with the Office for answers to existing and new questions as they arise among members.

#### ✓ **Advocacy on Section 889 of the National Defense Authorization Act (NDAA) FY'19**

Humentum continues to work on finding answers to the myriad challenges related to compliance with Section 889 of NDAA FY19 restrictions on the use of certain prohibited technologies. In recent months, we have both individually and in coalition with other sector associations approached USAID, USDA, USDOS, OMB, and related entities on the issue. Since this is a whole of government challenge, it requires a whole of government solution. No one federal donor agency can ensure clarity and consistency across the government. We will continue our targeted outreach and advocacy on this matter. [Here are some resources](#) for those navigating the 889 landscape.

#### ✓ **Advocacy through the Global Sexual Exploitation, Abuse, and Harassment (SEAH) Community of Practice on Employee Accountability**

During the quarter, Humentum participated in the final 2-day workshop of a seven-month long community of practice on employee accountability convened by USAID and Netherlands Ministry of Foreign Affairs. The community worked to identify and share models, best practices, and practical solutions for preventing the circulation of perpetrators of sexual misconduct among organizations in the sector. The convenings culminated in the development of a [roadmap](#) for continued learning. During a June 2021, final workshop, USAID Administrator Samantha Power, Netherlands Minister of Foreign Affairs, Sigrid Kaag, and OECD SEAH Chair, Susanna Moorehead, and OECD Development Co-operation Directorate Director Jorge Moreira de Silva, committed to carrying forward the community's recommendations for greater employment

accountability, referencing, and screening in the international development and humanitarian aid sector.

#### ✓ **Advocacy for Full Cost Recovery by Non-US Based USG Implementing Partners**

Throughout the quarter, Humentum gathered data from non-US based, “foreign” organizations with funding as either a prime or sub from the Centers for Disease Control and Prevention, and other US Department of Health and Human Services (DHHS) donor entities. On May 29, 2021, Humentum convened a webinar with dozens of local NGOs from across the Continent of Africa to discuss their programmatic and administrative challenges implementing CDC funding, given its 8 percent cap on indirect cost recovery for foreign-based entities. Moving forward, Humentum will be advocating for full cost recover for all USG implementing partners – foreign and domestic alike – in keeping with the Administration’s prioritization of greater locally-led development and increased diversity, equity, and inclusion in the sector.

#### ✓ **Humentum Advocacy for Transparency in UK Aid Budget Cuts**

During the quarter, Humentum continued to push for greater transparency in UK Aid budget cuts. Despite promises to do so, the UK Government failed to convene the High-level Steering Group created to engage the sector. The government also continued to stonewall any questions about cuts, leaving communication to officials to carry out on an organization-by-organization basis. What we do know from our members is that the cuts have been hard, deep, and have often been delivered with the very minimum of notice. Over the quarter, Humentum engaged US officials at USAID, USDOS, and the US Embassy in London to share information on the UK cuts and explore their impact on US development and assistance priorities. The Government has stated that when the fiscal situation allows, it will return funding of the aid budget to 0.7% of the GNP. Interpreting when 'the fiscal situation allows' will probably be more political than arithmetic. CGD published a [blog](#) exploring the key factors around this.

Also during the quarter, the Independent Commission on Aid Impact (ICIA) published [a full review of the process around the 2020 cuts of £2.9bn](#). The review evinces that the motivation to cut funding was primarily political and made at a very high level to 'cut early, cut deep', rendering the UK one of only a handful of OECD countries to slash aid during the pandemic. On average, the 2020 cuts were six times deeper in the more vulnerable countries.

#### ✓ **IFR4NPO – Humentum Advocacy for International Financial Reporting for NPOs**

Humentum and the Chartered Institute of Public Finance and Accountancy (CIPFA) released a [IFR4NPO Consultation Paper](#) to give non-profit organizations around the world the opportunity to contribute to the development of international financial reporting for their sector. There are no common international accounting standards for NPOs, unlike

in the private and public sectors. And, only a few jurisdictions have developed guidance that address the unique characteristics of NPOs and the types of transactions they undertake. Feedback to this Consultation Paper will shape the future of financial reporting in this important but diverse sector. **See how to respond to the consultation paper [here](#).** During the quarter, Humentum continued its regional consultations across the globe, while also convening its [Donor Reference Group \(DRG\)](#). The DRG, which is chaired by Humentum's Director of Government Affairs and Advocacy, Cynthia Smith, is composed of bilateral, multilateral, and private foundation donor agencies, including USAID, UK FCDO, the World Bank, the Ford Foundation, Open Society Foundation, and others to support the initiative.

## HOW YOU CAN BE INVOLVED

---

- ✓ Visit the **Humentum Connect Advocacy Community** for real-time updates on these and other related outreach, engagement, and advocacy opportunities
- ✓ Visit our [Advocacy webpage](#) for a clearinghouse of Humentum advocacy action items and updates
- ✓ **Reach out** to Cynthia Smith, Director of Government Affairs & Advocacy at: [Cynthia.Smith@Humentum.org](mailto:Cynthia.Smith@Humentum.org) with any questions, concerns, or suggestions regarding current or needed advocacy with donor agencies on the sector's behalf. Please also join Cynthia for once quarterly Member Office Hours to discuss any concerns, questions, or information that you are confronting as you implement donor funding.
- ✓ **Take advantage** of Humentum's topical webinars and roundtables on donor policies as they arise.
- ✓ **Participate in peer-to-peer dialogue** and effective practice and tool sharing on Humentum Connect
- ✓ **Engage in Humentum-facilitated collection, analysis, and submission of comments to pertinent USAID and USDOS notices published in the US Federal Register.** For more information on Humentum's advocacy through administrative rulemaking and information collections pursuant to regulation, please see [Humentum Connect](#) or our [Advocacy webpage](#)

**DISCLAIMER:** This *Advocacy Advisor* is intended for informational purposes only and should not be construed as legal or professional advice on any subject matter.