



Humentum Comments on USAID's Policy Framework

[Humentum](#) is the leading global nonprofit working with humanitarian and development organizations to improve how they operate and to make the sector more equitable, resilient, and accountable. Together with our over 270 member organizations, we create and advocate for data-driven policies and standards that address sector-wide challenges. To this end, Humentum has been an active participant in US Government executive branch policymaking for over 30 years.

Humentum appreciates the opportunity to submit these comments in response to USAID's draft Policy Framework. According to USAID's Industry Liaison, the Framework "reflects the core priorities of this Administration and the Agency: extending the reach of human dignity by confronting the greatest challenges of our time (compounding humanitarian crises, corruption and authoritarianism, the climate crisis, COVID-19 and decline in global life expectancy, and conflict, inequality, and other barriers to progress), exercising bold leadership and embracing inclusive partnerships to seek progress beyond programs, and ensuring USAID's enduring effectiveness by investing in our organization."

Overarching Reflections

At the outset, Humentum would like to applaud USAID for building its policy agenda around the centering principle of advancing human dignity. We are heartened to see how USAID is both reflecting on historical power imbalances in the sector *and* seeking to rectify its role in extending those imbalances. Accordingly, we support the Agency's call to institutionalize greater equity and accountability to, and among, all stakeholders in the development and assistance paradigm.

The tone of the document is both aspirational and, at times, inspirational. On page 7, the document declares, in pertinent part, that "USAID is the Agency for International Development, not the Agency for Foreign Assistance. That is, our mission is larger than the means by which we pursue it: we must focus on the enduring progress of our partner nations, not just the programs we administer to support it." By calling for "bold leadership" and "inclusive partnerships," the Framework underscores the Agency's will to reimagine not only how it works, but also broadens its "definition of success." (p. 7) That success should no longer be measured by program results alone, but rather by valuing and assessing the "catalytic" capacity of the Agency's partnerships –

inevitably requiring those partnerships to be ones of consequence, rather than convenience; of long-term strategic relationships, rather than short-term transactional engagements.

We are encouraged by USAID's recommitment to the 2030 Agenda for Sustainable Development and the Sustainable Development Goals. (p. 1) USAID would strengthen this commitment by more clearly articulating how its focus on partnerships, localization, and equity, among other principles embedded in the document, will serve to realize that commitment.

Of equal importance, USAID re-dedicates itself to "development diplomacy" through both multilateral and local spaces to advance its dignity-centered policy agenda. In Humentum's experience, many of the barriers to equity in the sector today are exacerbated and extended by donor community policies that institutionalize an irrational lack of trust in local actors through punitive compliance systems, burdensome and overly prescriptive procurement policies, and the lack of harmonized reporting requirements among like-minded bilateral and multilateral donors. To the extent USAID can convene or participate in communities of practice with donors across the globe on how to streamline access to and administration of donor funds, the greater the possibility of realizing more equity in the sector.

All told, Humentum endorses USAID's emphasis in the Policy Framework on institutionalizing locally led, equitable, accountable, principled, partnership-based, and results-oriented approaches to its strategy. We applaud USAID's embrace of local systems practice (p. 11). And, we support the general framework set forth in the "Rubric for Policy Implementation" (p. 14).

Further, Humentum concurs with USAID's acknowledgement that it must build the internal staffing and infrastructure to fully realize these objectives. We believe that this can only be achieved through 1) change management to further decentralize funding priorities and procurement decision-making to the mission level, with local engagement throughout; 2) training and orientation that will inculcate the workforce in an equity-centered, trust-based, partnership-focused approach to working with local actors; 3) hiring and retention of a diverse, fully-staffed, and trained AO/CO workforce, including FSNs who are able to exercise delegated authorities alongside their US peers; and 4) standardizing of tools and resources across missions to assist local partners in working with USAID.

That said, we would be remiss if we did not note our concern about USAID's lack of meaningful consultation with its stakeholders in finalizing this important document. The Agency initially posted the draft Policy Framework to its website on July 22, 2022, welcoming public comments for a period of only five business days, through August 1. This truncated comment period alone merits concern for its lack of adequate time for interested parties, and particularly local partners, to provide feedback to USAID. This concern is further compounded by the fact that the Agency did not notify implementing partners of the comment period until July 27. Even after doing that, the Agency only extended the comment period for two additional days, through August 3, 2022,

to accommodate an August 2, 2022, one-hour webinar it held on the draft document. While we acknowledge that USAID undertook consultations prior to the draft, without closing the feedback loop with another round of stakeholder engagement on the draft itself, USAID excludes the very voices it deems vital.

Locally Led Development

In her November 2021 remarks at Georgetown University, USAID Administrator Power previewed the Agency's renewed emphasis on locally led development; one that places local actors at the center of the design, development, implementation, and evaluation of interventions in their communities. Those remarks garnered overwhelming support from across the sector – including policymakers, traditional INGO implementing partners, and a bevy of local and national organizations worldwide.

In the time since those remarks, which also set forth the Agency's targets on locally led development, USAID has committed to releasing revised policies and practices that will operationalize those targets. From a revised Risk Appetite Statement and “refreshed” Acquisition and Assistance Strategy to a final Local Capacity Development Policy, these promised documents remain under development. They are crucial to localizing USAID's approach to equitable partnerships and programming and need to be released as soon as possible.

In the draft Policy Framework's “Spotlight on Localization” (p.10), USAID re-articulates its locally led priorities while noting that “development is an inherently local process; it simply cannot happen without local knowledge, local ownership, and local action.” Humentum supports this sentiment. However, USAID does not yet have in place the procurement, staffing, compliance, decision-making processes, or stakeholder-centered accountability mechanisms that will enable the true localization of USAID funding. If USAID truly accepts that program cycles must be localized to achieve equity, efficiency, and efficacy, then it should identify how it will revamp those operational policies and practices that enable localization. Doing this will require, in part, harnessing USAID's inter-governmental relationships with the GSA and OMB, among other US agencies.

Further, and crucially, instead of overtly mainstreaming USAID localization principles and targets throughout the document, this Framework relegates them to a “spotlight.” In so doing, USAID misses the opportunity to fully embrace the global movement in favor of locally led development and signal to local partners that they truly are at the center of the Agency's priorities. As it stands, localization seems relegated to an annex rather than being used as a lens through which USAID plans to achieve its strategic goals.

Finally, Humentum encourages USAID to democratize the way it engages and consults with existing and new partners specifically and civil society more generally. Consultation and

collaboration with non-profits, trade groups, the private sector, associations, and implementing partners, as well as less represented populations, are key to developing and implementing successful, equitable policies. Any policy advisory group and briefings that USAID convenes should include delegates from across this spectrum of civil society.