



Humentum Comments on USAID's Draft Guide to Collecting Beneficiary Feedback

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 guide to collecting beneficiary feedback. USAID has asked that the public provide feedback to ensure the guidance serves the needs of implementing partners who must collect feedback from beneficiaries as a required part of their development program. As such, these comments are based on feedback from Humentum's membership, the majority of whom are implementing partners.

A Note on Terminology

Humentum appreciates USAID's attention to the impact of language on policy in their acknowledgment of the negative connotations of the term 'beneficiary.' Humentum agrees that this term is problematic and can perpetuate outdated and colonial notions of communities as lacking agency and capability. We also appreciate the legislative and policy constraints that require USAID to continue utilizing this term in the interim. However, we would like to draw attention to the significant commentary from practitioners and leaders in the Global South on the use of the term 'beneficiary' and myriad suggestions for alternatives, including 'constituents' or 'partners'. Due to the extensive existing discourse on the subject, we raise concern with the mid-2023 timeline for revision USAID has put forth, and we urge the agency to expedite the replacement of this harmful language.

Sections or Statements Essential to the Guide

Humentum applauds USAID for continuing to place locally-led development at the forefront of policy and programmatic guidance; the emphasis on local participation and inclusion is evident throughout the document. We are heartened that USAID views "collecting and responding to beneficiary feedback" as a "critical part of every implementing partner's local engagement efforts and USAID's larger localization efforts" (p.9). Moreover, we appreciate USAID's clarification that 'beneficiary' feedback is just one component of locally-led development and should not be considered a replacement for other USAID efforts to localize development.

As such, Humentum endorses USAID's emphasis on 'beneficiary' feedback and inclusion in programming. Overall, the guide is an important resource for implementing partners and provides information behind USAID's rationale, general expectations, and insights into various approaches to collecting 'beneficiary' feedback. USAID takes great care to define various types of stakeholders in the development process, and clearly distinguishes between 'beneficiaries' and other stakeholders like implementing partners, local civic groups, and governments.

Humentum appreciates this clarifying exercise and concurs with USAID that such guidance will “encourage practices that center the voices of those intended to benefit from development programming” (p.8).

Additionally, Humentum is encouraged by USAID’s recognition that “even when feedback is voluntary...it may not be risk-free for those providing it” (p.32). By recognizing the various risks (such as exacerbating conflict within a community, soliciting sensitive information, or generating competition over resources) ‘beneficiaries’ may encounter, USAID takes positive steps towards a more mutual and reciprocal concept of risk sharing between implementing partners and affected populations. Attention to such risks is essential for building trust between implementers and communities and shifting power from funders to local communities.

Major Gaps and Areas for Consideration

Although Humentum appreciates the guide’s focus on ‘beneficiary’ feedback as integral to USAID, there are nonetheless gaps and areas for consideration and clarification.

Questions Regarding Scope

According to USAID, the guide is “intended to help USAID implementing partners integrate beneficiary feedback into their USAID-funded development activities” yet it does not “dictate the specific measures an implementing partner should take to collect and respond to feedback from beneficiaries” (p.7). As the guide is not intended to dictate implementing partner activities, it remains unclear how USAID intends to operationalize this guidance, as well as how it aligns with numerous other Agency policies and guidance related to feedback, collaboration, and co-design.

Furthermore, it is unclear why USAID has chosen to isolate feedback from ‘beneficiary’ input in earlier stages of programming. Humentum agrees with USAID’s assessment that “programming is delivered in a cycle of planning, implementing, learning, and adapting” and that “efforts to get input in the early stages lay important groundwork for how feedback may be collected throughout implementation and influence future programming” (p.28-9). As such, it is not necessarily simple to define when ‘beneficiary’ engagement changes from “input” to “feedback” by USAID standards. By only focusing on the ‘feedback’ stage of programming in this guide, USAID may miss opportunities to engage ‘beneficiaries’ from the beginning to the end of the programming cycle in a cohesive way that is well-coordinated with other guidance.

Accountability to Affected Populations

In general, the guidance encourages implementing partners to collect feedback to improve their own practices, rather than focusing on strengthening accountability towards affected populations (AAP). While AAP goes beyond collecting feedback and should include active co-creation, community engagement, and transparency, this guidance does not focus on AAP as a goal of collecting ‘beneficiary’ feedback. The guidance would be strengthened by more clearly stating the impact of collecting feedback on AAP in addition to the benefits for implementing partners’ practices.

Humentum also raises concern with the direction that the guidance does provide on prioritizing certain ‘beneficiaries’ for feedback collection. Although Humentum recognizes that in some

situations it may be more efficient or cost-effective to select a sample of respondents, this practice risks excluding certain members of the population, thus undermining the importance of inclusive development to the Agency. Instead, USAID should ensure that feedback and complaints mechanisms are accessible and inclusive to all population groups and individuals, and that feedback is collected both proactively and reactively. This is essential for accountability to 'beneficiaries,' but also will strengthen programming and activities.

To enhance AAP, USAID should ensure that by sharing feedback, 'beneficiaries' can expect to receive information in return. The guidance states that "procedures for responding to beneficiaries should describe whether or how the implementing partners report back." (p.15). The "whether" should be deleted, as it should not be optional. To this end, Humentum asks USAID for clarification on their willingness to adjust and adapt programming based on 'beneficiary' feedback. By publishing this guidance, will USAID commit to allocating more resources to such processes and allow for more budget flexibility? Without such a pledge of flexibility in funding, collecting 'beneficiary' feedback can be seen as a superficial attempt to include affected populations in programming.

Links to Existing Agency Guidance, Including Locally-Led Development

USAID would also strengthen this guide by clarifying the relationship between collecting 'beneficiary' feedback and existing localization initiatives, such as the Collective Action in USAID Programming guidance, the Collaborating, Learning, and Adapting (CLA) framework, the New Partnerships Initiative (NPI), and Local Works. While each of these endeavors is unique and important individually, the limited coordination and cohesion between each guide may hinder the achievement of USAID's overarching aims. As USAID acknowledges, 'beneficiary' feedback is just one component of localization; it should be thoroughly clear how it fits with additional components, such as local co-creation. In addition to linking this guidance with other USAID localization initiatives, the Agency would strengthen the document by linking feedback regarding the quality of operations and programming to other categories related to safeguarding, fraud, and corruption. While USAID does mention the Agency's safeguarding measures, the guidance should more clearly link programmatic feedback with these important issues.

Power, Risk, and Compliance

Humentum believes that to both strengthen and operationalize this guidance, USAID should outline how it plans to mitigate risks and potential burdens to both implementing partners and 'beneficiaries'. As USAID rightly acknowledges, feedback collection "can be costly for implementing partners" and that "beneficiaries also bear the costs of providing feedback" (p.14). For implementing partners, what steps will USAID take to fund the collection of feedback, which the guide itself recognizes as "prohibitively expensive" (p.14)? As USAID continues to partner with smaller, national, and local NGOs, will they be fully supported in collecting this time and resource-intensive data? To safeguard 'beneficiaries,' how will USAID work to share risks, rather than simply transfer them to implementing partners without support?

To this end, there is limited recognition by USAID of the power differentials between the Agency, implementing partners, and beneficiaries. Although the guide emphasizes that beneficiary reporting should be fully voluntary, it is essential for the Agency to acknowledge the power it

holds over both implementing partners and 'beneficiaries', and how that may impact feedback reporting. Furthermore, USAID should consider and clarify who has ownership over the collected feedback and data. Does any collected data become the intellectual property of USAID or implementing partners? What opportunities exist for 'beneficiaries' to retain ownership of their own information?

Finally, regarding compliance and reporting, USAID should clarify if implementing partners will be required to provide additional information beyond the Activity MEL Plan and regular reporting to USAID. While traditional implementing partners (i.e., large, international NGOs) may have the resources to seek additional feedback from 'beneficiaries,' new implementing partners that are smaller and under-resourced may find additional requirements overly burdensome. As USAID expands its funding to new, local partners, it is essential that they continue to weigh the impacts of existing and new compliance burdens on 'beneficiaries' and locally-based organizations, alike.