

OFFICE OF INSPECTOR GENERAL

U.S. Agency for International Development

Global Labor Program: USAID Generally Followed Policy but Would Benefit From Better Organizational Support and Certification of Reviewers

Report E-000-22-003-M
September 29, 2022



Inspections, Evaluations, and Special Projects Division



OFFICE OF INSPECTOR GENERAL U.S. Agency for International Development

DATE: September 29, 2022

TO: Bureau for Management, Acting Deputy Assistant Administrator; and Office of Acquisition and Assistance, Director, Mark Walther
Bureau for Development, Democracy, and Innovation, Deputy Assistant Administrator, Johnny Walsh

FROM: Inspections, Evaluations, and Special Projects Director, Amy Burns

SUBJECT: Global Labor Program: USAID Generally Followed Policy but Would Benefit From Better Organizational Support and Certification of Reviewers

This memorandum transmits the final report on our evaluation of USAID's Global Labor Program – New Frontiers' design, procurement, and grantmaking processes. Our objectives were to (1) evaluate the extent to which USAID's design planning process for the Global Labor Program – New Frontiers addressed identified needs, adhered to Agency requirements, and considered good practices; (2) determine how USAID chose the procurement procedures for the Global Labor Program – New Frontiers and if those procedures were responsive to program needs; and (3) assess the extent to which the implementation of procurement procedures for the Global Labor Program – New Frontiers aligned with Federal and Agency requirements. In finalizing the report, we considered your comments on the draft and included them in their entirety, excluding attachments, in Appendix B.

The report contains three recommendations to improve USAID's management of program design, procurement, and grantmaking processes. After reviewing information you provided in response to the draft report, we consider one closed (recommendation 1) and two resolved but open pending completion of planned activities (recommendation 2 and 3).

We appreciate the assistance you and your staff provided to us during this engagement.

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Introduction

USAID's Global Labor Program (GLP) was created in 1997 to increase the capacity of worker organizations to promote labor rights, increase access to justice for employees, and advance decent work worldwide. Since fiscal year 2020, GLP has received \$12.5 million in annual funding through congressional directive.

Since 1997, GLP had been implemented by the Solidarity Center, whose website claims it to be the largest U.S.-based international rights organization devoted to helping workers achieve prosperity in the global economy. USAID made awards to the Solidarity Center through its Leader with Associates' cooperative agreements—awards made to a prime recipient—the latest of which for \$50 million over 5 years was slated to end in January 2021 and was later modified to include an additional \$15 million and end in January 2022.¹ However, to ensure that GLP had the ability to respond to COVID-relevant needs during the pandemic, the Agency extended the Solidarity Center's award through September 30, 2022.

In April 2020, USAID updated its process for soliciting proposals for the program in an effort to expand the pool of potential implementers and identify “opportunities for co-creation, co-design, co-investment, and collaboration on development interventions to address challenges with respect to supporting labor rights and strengthening democratic trade unions worldwide.”² USAID renamed the program Global Labor Program – New Frontiers (GLP-NF), noting that it would be managed at USAID by the Center for Democracy, Human Rights, and Governance (DRG Center), housed within the Bureau for Development, Democracy, and Innovation.

According to a concept paper written during the design of the program, GLP-NF sought more innovative and inclusive approaches to increase protection for workers' rights in a rapidly evolving global labor landscape. To realize these objectives, the DRG Center used the updated solicitation and co-creation process to issue an award to the Solidarity Center for \$52 million and awards to two new implementers totaling \$10.65 million over the next 5 years.³

Through the passage of the Consolidated Appropriations Act of 2022, Congress directed OIG to conduct an evaluation of the restructuring of GLP and assess the extent to which USAID followed Agency policies, procedures, and standard best practices.

¹ According to USAID's Automated Directives System (ADS), “A Leader with Associate (LWA) Award involves the issuance of a Leader Award that covers a specified worldwide activity. The Leader Award includes language that allows a mission or other office to make one or more separate awards, called Associate Awards, to the Leader Award recipient without using restricted eligibility. The Associate Award must be within the terms and scope of the program description of the Leader Award and support a distinct local or regional activity.”

² USAID, Addendum 5 to Broad Agency Announcement for Locally Led Development Innovation (BAA-OAA-LLDI-2019), April 2020.

³ “Co-creation” is a design approach that brings USAID staff, potential implementers, and other stakeholders together to collectively produce a mutually valued development outcome. The approach uses a participatory process that assumes some degree of shared power and decision making.

Background

To accomplish the goals of GLP-NF, the DRG Center used a Broad Agency Announcement (BAA) to solicit expressions of interest and later proposals from implementer applicants.

The BAA is a solicitation tool authorized under the Federal Acquisition Regulation (FAR) to acquire basic and applied research and development. According to USAID, a “BAA is general in nature and does not contain a specific statement of work. Rather, the solicitation provides the Agency’s area(s) of research interest, generally by providing a problem statement and laying out the challenge.”⁴ Each expression of interest and proposal submitted under a BAA is examined on its individual merit—as determined by a peer and scientific review process—and is not compared to other submissions.

After receiving expressions of interest from potential implementers, the Agency held a co-creation workshop in August 2020 with select applicants. The workshop brought together prospective implementers to discuss the global labor challenges identified, opportunities for collaboration, and next steps to develop proposals. Twenty-seven organizations participated in the GLP-NF workshop.

After the co-creation workshop, participants submitted concept papers, and a Peer and Scientific Review Board (“the review board”) was convened to review the concept papers and recommend applicants to proceed to the next stage of GLP-NF’s procurement and grantmaking process. The review board included members from USAID as well as the Department of Labor’s Bureau for International Labor Affairs and Department of State’s Bureau for Democracy, Human Rights, and Labor. In the next stage, an agreement officer in the DRG Center engaged in a review of recommended applicants and negotiations, then issued three cooperative agreements.

About This Evaluation

We conducted our work from October 2021 through August 2022 in accordance with the Council of the Inspectors General on Integrity and Efficiency’s Quality Standards for Inspection and Evaluation. The scope was approximately fiscal year 2018 through draft report issuance to the Agency in August 2022 to encompass GLP-NF’s design and award processes.

Our evaluation objectives were to:

1. Evaluate the extent to which USAID’s design planning process for the Global Labor Program – New Frontiers addressed identified needs, adhered to Agency requirements, and considered good practices.
2. Determine how USAID chose the procurement procedures for the Global Labor Program – New Frontiers and if those procedures were responsive to program needs.
3. Assess the extent to which the implementation of procurement procedures for the Global Labor Program – New Frontiers aligned with Federal and Agency requirements.

⁴ ADS, Guidance for Broad Agency Announcements: A Mandatory Reference for ADS Chapter 300, 302, 303, June 2020.

USAID Addressed Programming Needs, Adhered to Agency Policy, and Considered Good Practices in the Design of the Global Labor Program – New Frontiers

USAID’s Design Planning Process Addressed Needs Identified for Continued Global Labor Programming

As the congressionally directed GLP award was coming to the end of its period of performance, the DRG center recognized that it was appropriate to consider if a new program design was needed. As required by USAID policy, during the initial phase of GLP-NF’s design planning process, the DRG Center determined a need for continued global labor programming through regular engagement with operating units, working groups, and other external actors.⁵

After establishing the need for continued global labor programming, USAID identified program objectives for GLP-NF by commissioning research, studying lessons learned from GLP, and engaging with stakeholders. Building on GLP’s design, USAID identified additional goals, including expanding organization inclusivity, locally led development, what was addressed in the world of work, and recognizing the role of technology and the gig economy in workers’ lives. These goals are consistent with USAID’s Acquisition and Assistance Strategy, which seeks to encourage inclusive programming, promote locally led development, and leverage co-creation and collaborative award processes. The goals also support three of the six key principles of the New Partnerships Initiative that aim to diversify USAID’s partner base and change how the Agency partners, including promoting local leadership, improving equity and inclusivity within partner relationships, and seeking innovative approaches to development.⁶

USAID Adhered to Agency Policy Throughout GLP-NF’s Design

USAID adhered to required and suggested actions during the design of the program’s activities. The Agency is required to identify (or revalidate) the need for design, high-level guiding parameters, and a primary point of contact or team to lead the process. USAID provided evidence that it complied with all three required actions. Additionally, the Agency complied with all 12 suggested actions, which included providing an overall plan for analysis and stakeholder engagement, considering timelines and benchmarks, and incorporating various sources of information, such as commissioned analyses. USAID policy also directed operating units to support the Agency’s policy framework, Journey to Self-Reliance (J2SR), at the time that USAID carried out the design planning process for GLP-NF in partner countries during the design and implementation of program activities.⁷ The DRG Center articulated this support

⁵ ADS, Chapter 201, Section 201.3.4.5, “Phase One: Activity-Design Planning,” January 2021.

⁶ The six principles that guide the New Partners Initiative are: (1) promoting local leadership, (2) improving equity and inclusivity within partner relationships, (3) demonstrating accountability to constituents, (4) seeking innovative approaches, (5) lowering barriers to partnerships, and (6) identifying new and nontraditional sources of funding.

⁷ At the time of our evaluation, USAID was developing a new policy framework.

through establishing goals for GLP-NF such as increasing locally led development and placing an emphasis on innovation.

USAID Generally Relied on Good Practices, Results from Related Research, and Lessons Learned to Inform the Design of GLP-NF

Although USAID identified and generally followed good practices for GLP-NF's design process, there were additional good practices that could have been followed. Six current and former USAID employees involved in GLP-NF's design process identified sources of "good practices," including USAID frameworks like J2SR as well as outreach and collaboration with both internal and external stakeholders. While four current and former employees outlined evidence that USAID sought out good practices, two former employees identified additional practices that could have been followed, including additional data collection and engagement with experts in the field.

However, USAID identified and generally followed good practices for GLP-NF's design process. Agency employees cited four major takeaways from related research that supported the GLP-NF design: (1) the need to focus on migrant labor, (2) the importance of broad and deep coalitions, (3) the potential use of technology, and (4) the impact of transnational campaigns. These four takeaways were supported by both USAID-commissioned studies and market research.

USAID employees also identified lessons learned from the previous achievements of GLP—union strengthening, gender integration into unions, and building on successes—as well as areas for improvement, including a focus on research, local ownership, local partnerships, and marginalized communities. OIG confirmed that these successes and areas for improvement are cited in the GLP evaluations.

Finally, USAID integrated results from research and previous GLP evaluations into the GLP-NF concept paper, GLP-NF BAA addendum, and technical review guidance for expression-of-interest submissions. Specifically:

- the GLP-NF concept paper highlighted and emphasized broadening and diversifying the partner base, building coalitions, collaboration, gender integration, and labor organizing;
- the GLP-NF BAA addendum highlighted interest in gender integration, strengthening democratic trade unions, labor organizing, and collaborative partnerships; and
- the technical review guidance for expression-of-interest submissions clearly expressed expectations on digital platforms, migrant labor, and inclusivity.

The Global Labor Program – New Frontiers Procurement Approach Was Chosen to Increase Innovation and Generally Led to Proposals That Were Responsive to Program Goals

USAID Chose to Use the Broad Agency Announcement for the GLP-NF Solicitation After Considering Other Mechanisms

In documentation provided and through interviews, Agency staff gave the following reasons for selecting the BAA as a solicitation tool for GLP-NF's procurement process:

- To increase the focus on local ownership, sustainability, and the impact of local actors engaging on workers' rights through the co-creation process.
- To broaden USAID's partner base or gather more ideas from more entities and actors.
- To solicit new and innovative approaches.
- To understand and respond to the evolving labor environment.
- To improve USAID's ability to pivot to address emerging issues and U.S. national security priorities.

The Agency considered other procurement and grantmaking approaches instead of the BAA, including a traditional request for applications, an annual program statement, and limited competition with co-design. The decision to select the BAA appeared to be motivated at least partially by the ability to co-create and the flexibility the BAA offered. As explained by several Agency staff we interviewed, USAID intended the BAA and co-creation processes to be part of the GLP-NF's design rather than USAID designing the program on its own.

The Broad Agency Announcement Generally Led to Proposals That Were Responsive to GLP-NF's Goals and the Programming Solutions Sought

The review board for GLP-NF was convened in early 2021 to review and recommend applicant proposals for an award. We interviewed all nine members of the review board and found that, in general, the goals for selecting the BAA listed above were achieved.

Six review board members said that proposals successfully increased local ownership, while only one member said they did not, based on the entities the review board chose for funding.⁸ Seven of the nine review board members agreed that the BAA process expanded USAID's partner base, as the previous GLP awards had been given to a single implementer, Solidarity Center.⁹ We found that \$10.65 million of the \$62.5 million directed funds for GLP-NF went to two prime implementers, both of whom have never received USAID labor-sector funding

⁸ Two review board members did not answer the question or were unclear.

⁹ Two review board members did not express an opinion or were unclear in their responses.

according to one Agency official, while the remaining funds were awarded by the DRG Center to the Solidarity Center.

Overall, seven of the nine review board members interviewed said they thought the co-creation process led to innovative solutions while two did not. One of the review board members said that they thought the proposals were simply expanding upon what the applicants were already doing. We also asked review board members about the proposals for each individual award. For two of the GLP-NF awards, a majority of review board members thought the proposals were innovative. However, four members thought the proposal that the Solidarity Center submitted was not particularly new or innovative, while two thought that it was. Some members said that, while there were some new approaches in the concept, it was similar to what the Solidarity Center was already doing.

We also asked Agency staff and review board members who attended the co-creation workshop about the event's effectiveness. Six of eight interviewees said the co-creation workshop was effective, one said it was ineffective, and another said it was neither effective nor ineffective. According to our interviews, the co-creation process' strengths were that it brought together an array of actors, gave USAID the ability to interact with potential implementers and learn more about them or the environment they worked in, and, according to some interviewees, led to better proposals. One person, however, disagreed, saying the proposals were not much different from those received before the co-creation workshop. Regarding challenges, four interviewees noted that a group of academics invited to attend had been notified late, then did not participate beyond observing the workshop. Four also questioned whether workshop participants had felt able to share openly since they were competing against each other.

Lastly, the GLP-NF BAA addendum outlined the following programming solutions sought: (1) increased protection of workers' rights, (2) intersection of emerging trends in labor and inclusive development, (3) civic space and labor rights, and (4) increased local ownership. When we asked review board members whether they thought that GLP-NF submissions were generally responsive to the BAA addendum's goals and solutions sought, eight of nine members said submissions were responsive while none said they were not responsive.

OIG noted concerns raised in USAID documentation during the design of GLP-NF that managing multiple awards would increase management burden. GLP's previous Leader With Associate award to the Solidarity Center was overseen by multiple mission-level activity managers. Current USAID staff agreed that additional staff were needed to manage the GLP-NF awards, and the DRG Center was in the process of hiring two staff members who would support GLP-NF. The Agency stated that a senior labor advisor was hired in May 2022. Given that the DRG Center was in the process of hiring an additional staff member, we are not making a recommendation.

The Global Labor Program – New Frontiers Procurement and Grantmaking Process Adhered to Federal Requirements but Not All Agency Requirements and Guidance

USAID Complied With All Federal and Most Agency Requirements for Broad Agency Announcements

GLP-NF complied with all nine of the requirements we reviewed from the FAR Part 35, which details Federal requirements for research and development contracting. These requirements concern the GLP-NF's work statement, general procedures of the BAA, and specific technical requirements of the BAA.

The Agency also followed its solicitation and award procedures outlined in the BAA for Locally Led Development Innovation and the GLP-NF addendum, meeting all five requirements. We selected key requirements from the BAA and addendum as laid out in the four stages of the BAA process and used collected documents, interviews, and award documentation to verify adherence to these requirements. The requirements we selected detail specific concepts pertaining to the procurement process, specifically starting with soliciting proposals, the co-creation workshop, technical review, and final contract negotiation.

We reviewed requirements found in the Guidance for Broad Agency Announcements ADS Mandatory Reference. Of the 28 applicable requirements that we reviewed, USAID adhered to 22 and did not adhere to 6 requirements. Two of these six requirements related to language to be included in the BAA addendum, which was posted prior to issuance of the ADS guidance. We also reviewed ADS guidance regarding the selection of review board members.

USAID Did Not Adhere to Some Agency Requirements Due to a Lack of Accountability and Clarity Over Staff Roles and Responsibilities

We determined that there was a lack of accountability and clarity among Office of Acquisition and Assistance (OAA) staff about their roles and responsibilities that led to non-adherence for four of these six requirements in the Guidance for Broad Agency Announcements ADS Mandatory Reference. USAID did not adhere to requirements for:

- the involvement of the agreement officer,
- the vetting of proposals in accordance with the Agency's definition of research and development,
- a minimum posting duration for BAAs, and
- proposal documentation.

Specifically, we discovered there was a disconnect among OAA staff about their level of involvement with GLP-NF. Similarly, we found in interviews that there was confusion among

Agency staff about who was screening out proposals that did not meet the FAR definitions of research and development. Furthermore, some key Agency staff involved in GLP-NF reported that they were not aware of the contents of the Guidance for Broad Agency Announcements ADS Mandatory Reference.

Involvement of the Agreement Officer

According to Agency staff, the agreement officer was not involved in drafting the BAA solicitation. However, Agency policy specifies that, while OAA oversees the procurement function for USAID,¹⁰ the agreement officer advises the technical team on specific documentation required during the procurement process.¹¹ Additionally, the agreement officer failed to sign off on the action memo authorizing the posting of the GLP-NF BAA addendum. Although there was space for the agreement officer to indicate that it cleared the memo, no clearance was noted.

The Guidance for Broad Agency Announcements ADS Mandatory Reference requires the agreement officer to be “actively involved in drafting the BAA solicitation.” Although there was no documentation that the BAA addendum was approved by the agreement officer prior to publication, the DRG Center did provide documentation that a member of OAA was involved in the BAA addendum process. However, the requirement for the agreement officer to be involved is still lacking, and the Agency did not adhere to the policy.

Proposal Vetting

Agency staff reported that they did not screen proposals to ensure they met the FAR definitions of research and development—as defined in Table I below—before being provided to the review board.

Table I. FAR Definitions of Research and Development

Term	Definition
Basic Research	Research directed toward increasing knowledge in science. The primary aim of basic research is a fuller knowledge or understanding of the subject under study, rather than any practical application of that knowledge.
Applied Research	The effort that (a) normally follows basic research, but may not be severable from the related basic research; (b) attempts to determine and exploit the potential of scientific discoveries or improvements in technology, materials, processes, methods, devices, or techniques; and (c) attempts to advance the state of the art. When being used by contractors in cost principle applications, this term does not include efforts whose principal aim is the design, development, or testing of specific items or services to be considered for sale; these efforts are within the definition of "development," given below.

¹⁰ ADS, Chapter 101, Section 101.3.1.6, “Bureau for Management,” November 2021.

¹¹ ADS, Chapter 300, Section 300.3.3, “Procurement Action Lead Time (PALT),” March 2021.

Term	Definition
Development	The systematic use of scientific and technical knowledge in the design, development, testing, or evaluation of a potential new product or service (or of an improvement in an existing product or service) to meet specific performance requirements or objectives. It includes the functions of design engineering, prototyping, and engineering testing; it excludes subcontracted technical effort that is for the sole purpose of developing an additional source for an existing product.

Source: FAR 2.101 and 35.001.

According to the Guidance for Broad Agency Announcements ADS Mandatory Reference, “prior to providing the review board with full proposals, the Board Chair, with assistance from the agreement officer, must screen each proposal to ensure that it falls within one of the FAR Part 35 definitions of [research and development].”

An Agency staff member told us that they wanted the review board to be involved in the decision of whether the proposal was for research and development. Since proposals were not vetted to ensure they met FAR definitions of research and development prior to the board’s review, there was a risk that proposals that were not focused on research and development could have been considered by the review board. Board members reported that the large number of proposals to review was a challenge.

Broad Agency Announcement Minimum Posting Duration

USAID posted the BAA for GLP-NF for 42 days rather than the minimum required 45 days. The Guidance for Broad Agency Announcements ADS Mandatory Reference states that “BAAs must allow at least a 45-day response time between the date of posting and receipt of proposals.” While the posting of the BAA addendum predated the release of this guidance, this was an existing requirement under the FAR Part 5. The effect of posting the BAA for less than the 45-day requirement was that some potential applicants may not have seen the posting and been unable to apply. However, all but one staff member we asked thought there was not an impactful difference between the amount of time posted and 45 days.

Proposal Documentation

USAID did not sign required proposal documentation prior to making the two GLP-NF awards. The Guidance for Broad Agency Announcements ADS Mandatory Reference states that “a valid contract requires an offeror to submit a proposal for the Agency’s acceptance. If the offeror (or applicant for assistance) has only submitted a concept note or other pre-proposal submission, the [agreement officer] must request a proposal before an award can be made. This proposal (or application) must include the appropriate Standard Form—an SF-26 for a contract or an SF-424 for an assistance award.” For final awards, an SF-424 documents the proposed funding and description of a proposed project. We requested SF-424s for the three successful applicants. In response, the Agency provided the SF-424s, but they were all signed after the date requested. Two awards had already been made at the time of the request, which means the documents were not completed before the awards were made as required by Agency policy.

USAID Did Not Follow a Formal Process in Selecting the Peer and Scientific Review Board Members

According to DRG Center staff, there was no official certification or documentation of the qualifications of the review board members. However, the Guidance for Broad Agency Announcements ADS Mandatory Reference requires that reviewers have the requisite background and experience to grasp scientific concepts discussed in the proposals and analyze the proposal in accordance with the stated evaluation criteria.

According to USAID's Scientific Research Policy, the agreement officer or technical advisor is responsible for ensuring that peer reviewers selected are appropriate and have necessary expertise. The policy describes how the agreement officer or technical advisor can source suitable candidates for a review board and states that agreement officers and technical advisors "who are not researchers by training are strongly encouraged to reach out to chief scientists or other colleagues with scientific expertise in pillar bureaus for help in selecting reviewers."

There is no official certification process in the Guidance for Broad Agency Announcements ADS Mandatory Reference guidance or the USAID Scientific Research Policy. In interviews, no review board members expressed concern for their lack of experience or expertise to serve on the board. We decided not to individually assess the qualifications nor assess the suitability of the review board members due to the capabilities and priorities of this evaluation, but instead we sought to verify that USAID policy was considered and a part of the GLP-NF procurement process.

According to interviews, the DRG Center selected review board members through an informal process. When asked how they ensured that members had adequate experience, Agency staff reported the individual qualifications of review board members to OIG but stated that they did not submit any verification of their expertise to serve on the board.

Without formal screening, there is an increased risk that review board members may not be fully qualified, which could affect the quality of the scientific review process used to evaluate proposals to be recommended for award. This issue is not specific to the GLP-NF but to the peer review process for all BAAs. In accordance with Federal standards for internal control, the Agency should have identified, analyzed, and responded to risks related to selecting the review board. According to these standards, "Management should design control activities to achieve objectives and respond to risks."¹² Even in the event that internal controls were established for the review board, the documentation of this process was not provided to OIG. Federal standards require proper documentation of established internal controls.

While OIG does not contend that review board members for GLP-NF were in any way unqualified, we assessed that an Agency mechanism to verify and document the qualifications of review board members for future BAAs would dispel any uncertainty of lack of expertise for individual reviewers.

¹² Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), "Appendix I Requirements," Principle 10, September 2014.

Conclusion

USAID recognized the need for continued programming to support labor efforts around the world when designing GLP-NF. The Agency engaged with stakeholders, relied on research, and incorporated good practices in the program design process, and its decision to use the BAA generally led to proposals that were responsive to their goals. USAID also complied with most Federal and Agency requirements and guidance during GLP-NF's design, procurement, and grantmaking processes. However, increased accountability and clarity on the role of OAA staff and technical program teams would improve the Agency's ability to ensure proper adherence to all requirements. In addition, the Agency may face questions regarding the expertise of review board members without a mechanism in place to verify and document their qualifications. Building on current successes, improvements to ensure complete adherence to Agency requirements and documenting review board member qualifications will make future award processes more effective.

Recommendations

We recommend that the Director of the Office of Acquisition and Assistance, as it relates to the Guidance for Broad Agency Announcements Mandatory Reference for Automated Directives System Chapters 300, 302, and 303, take the following actions:

1. Communicate to clarify roles and responsibilities for Office of Acquisition and Assistance staff working on Broad Agency Announcements.
2. Conduct an assessment of trainings and resources to ensure that program teams working with Broad Agency Announcements are sufficiently prepared to fulfill their roles and responsibilities.
3. Create a procedure for future Broad Agency Announcements that will ensure that the Peer and Scientific Review Board Chair verifies and documents the qualifications of the board members.

OIG Response to Agency Comments

We provided our draft report to USAID on August 4, 2022. On September 7, 2022, we received the Agency's response, which is included as Appendix B of this report. The Agency also provided technical comments, which we considered and incorporated as appropriate.

The report included three recommendations and we acknowledge management decision on all three. We consider one recommendation closed (recommendation 1) and two resolved but open pending completion of planned activities (recommendations 2 and 3).

Appendix A. Scope and Methodology

We conducted our work from October 2021 through August 2022 in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation. The scope was approximately fiscal year 2018 through draft report issuance to the Agency in August 2022 to encompass GLP-NF's design and award processes.

Our evaluation objectives were to:

1. Evaluate the extent to which USAID's design planning process for the Global Labor Program – New Frontiers addressed identified needs, adhered to Agency requirements, and considered good practices.
2. Determine how USAID chose the procurement procedures for the Global Labor Program – New Frontiers and if those procedures were responsive to program needs.
3. Assess the extent to which the implementation of procurement procedures for the Global Labor Program – New Frontiers aligned with Federal and Agency requirements.

In planning and performing the evaluation, we reviewed Federal and Agency policy, requested and reviewed Agency documentation, and conducted interviews. From November 2021 through January 2022, we interviewed 22 individuals, including current and former Agency staff as well as staff from the Departments of Labor and State.

To answer the first objective, we reviewed relevant communication and planning documents regarding the design of GLP-NF and interviewed USAID staff about the needs identified for GLP-NF. We also reviewed external studies and interviewed USAID staff to determine if the design incorporated good practices and lessons learned. Lastly, we assessed whether the Agency followed requirements in ADS 201 through a review of documentary and testimonial evidence.

To answer the second objective, we reviewed documents and correspondence relevant to the selection of the BAA as a procurement approach for GLP-NF and interviewed current and former Agency staff about the decision. We also reviewed documentation and interviewed Agency staff to determine if the goals of the design process were met. Finally, we interviewed all nine review board members to assess the extent to which the goals for selecting the BAA were realized.

To answer the third objective, we used documentary and testimonial evidence to determine whether the Agency followed the FAR Part 35 and Agency policy. We also interviewed current and former Agency staff for this objective.

Appendix B. Agency Comments



MEMORANDUM

TO: Acting Inspections, Evaluations, and Special Projects Director, Emily Gardiner

FROM: Office of Acquisition and Assistance, Director, Mark Walther /s/

DATE: September 2, 2022

SUBJECT: Management Comment(s) to Respond to the Draft Report Produced by the Office of Inspector General (OIG) titled, *Global Labor Program: USAID Generally Followed Policy but Would Benefit From Better Organizational Support and Certification of Reviewers* (E-000-23-003-M) (Task No. CC100621)

The U.S. Agency for International Development (USAID) would like to thank the Office of Inspector General (OIG) for the opportunity to provide comments on the subject draft report.

In May 2022, the Professional Development and Training Division (PDT) within the Office of Acquisition and Assistance (OAA) of the Bureau for Management issued a USAID General Notice regarding Broad Agency Announcements (BAA) and Key Stakeholders. In this notice, an explanation of BAAs and appropriate use of BAAs were covered. Additionally, a video was linked, along with other resources for BAA guidance. USAID continues to improve its resources for its stakeholders and provides continuous training and resources which can be found on the PDT site.

The Agency agrees with the following recommendations, and provides plans for implementing them, and reports on significant progress already made.

**COMMENTS BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT
(USAID) ON THE REPORT RELEASED BY THE USAID OFFICE OF THE
INSPECTOR GENERAL (OIG) TITLED, *Global Labor Program: USAID Generally
Followed Policy but Would Benefit From Better Organizational Support and Certification of
Reviewers (E-000-23-003-M) (Task No. CC100621)***

Please find below the management comments from the U.S. Agency for International Development (USAID) on the draft report produced by the Office of the USAID Inspector General (OIG), which contains three recommendation(s) for USAID:

Recommendation 1: Communicate to clarify roles and responsibilities for Office of Acquisition and Assistance staff working on Broad Agency Announcements.

- **Management Comments:** USAID agrees with the recommendation and has completed corrective action to clarify roles and responsibilities of OAA and BAA. In May 2022, M/OAA/PDT issued an Agency Notice clarifying the roles and responsibilities of OAA staff working on BAAs. The Agency Notice is accessible and filed for future reference. The clear roles and responsibilities are also available within the training materials provided through the PDT site.
- **Target Completion Date:** Completed and requesting closure upon issuance of the Final Report.

Recommendation 2: Conduct an assessment of training and resources to ensure that program teams working with Broad Agency Announcements (BAAs) are sufficiently prepared to fulfill their roles and responsibilities.

- **Management Comments:** USAID agrees with the recommendation.

M/OAA/PDT will assess the training and resources of its program teams working with BAAs and mandatory reference, ADS 300mat, Guidance for Broad Agency Announcements, effective June 4, 2020. OAA will provide a written summary of M/OAA/PDT's assessment.

The ADS provides guidance and best practices on use of BAA solicitation in accordance with the Federal Acquisition Regulation. In addition, the M/OAA/PDT issued an Agency Notice in May 2022 covering the appropriate use of BAAs, Key Stakeholders, and other key information to assist teams working with BAAs.

The team reviews course content on a bi-annual basis in alignment with policies, guidance, and best practices (such as ADS 300) and meets more often as new guidance/best practices are released. The BAA training currently provides an overview of the BAA process and covers the details stated above.

The Standard Operating Procedure for Master Scheduling includes several discussion questions that the team reviews at staff meetings and on the bi-annual basis as mentioned

above. The stages of master scheduling involve planning, design, and a set of preliminary tasks. This is a critical phase, one in which the decisions made and the process followed shape the extent to which the final products are successful.

- **Target Completion Date:** August 31, 2023

Recommendation 3: Create a procedure for future Broad Agency Announcements that will ensure that the Peer and Scientific Review Board Chair verifies and documents the qualifications of the board members.

- **Management Comments:** DDI agrees with the recommendation.

M/OAA/P has reviewed the guidance found in [ADS 300mat, Guidance for Broad Agency Announcement](#), issued on June 4, 2020 (two months after the solicitation was issued), and our Agency policies on [Scientific Integrity \(2012\)](#) and [Scientific Research \(2014\)](#). An additional fact sheet expounding on the peer review recommendations for technical evaluation committees was issued in 2019 and can be found here ([Scientific Peer Review with a TEC](#)). This document provides a recommendation to “ensure that all external reviewers are recognized scientific or technical subject matter experts.”

The 2012 Scientific Integrity Policy is currently being reviewed and updated in response to the [White House Memorandum on Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking](#), which focuses on scientific-integrity policies and procedures, including elements that address the need for technical experts’ involvement in the peer review of research and development proposals and products. Following the White House mandated revision of the Scientific Integrity Policy, the Scientific Research Policy will be re-examined and updated or discarded if redundant. Its intended purpose was to fill in research policy gaps and to pull together Agency policies and procedures related to research into one document.

The above mentioned fact sheet on the Scientific Peer Review with a TEC will be updated by January 30, 2023 to include the responsibility for the TEC Chair to verify and document the qualifications of the board members.

- **Target Completion Date:** January 30, 2023

Appendix C. Major Contributors

Members of the evaluation team include:

- Alan MacMullin, Inspections, Evaluations, and Special Projects Director
- Emily Gardiner, Inspections, Evaluations, and Special Projects Acting Director
- Jessica Ernst, Acting Assistant Director
- Alexandra Miller, Lead Analyst
- Paul Donnelly, Analyst
- Christian Krog, Analyst



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