

MFAN Response
USAID Policy Framework
June 2019

With the release of the final USAID *Policy Framework*, the Modernizing Foreign Assistance Network's (MFAN) Accountability and Country Ownership Working Group would like to take the opportunity to highlight areas where we believe there was positive improvement, as well as areas where important language was removed or weakened. We encourage USAID to strengthen and address the elements below as the agency develops or updates existing policies.

We applaud USAID for making several improvements to the *Policy Framework*. Identifying local actors as important partners in the *Journey to Self-Reliance* and committing to invest in domestic resource mobilization (DRM) are both effective ways to incorporate the principles of local ownership into the framework, thereby increasing the sustainability and impact of U.S. foreign assistance. In particular, we were pleased to see the framework includes the following changes which emphasize [MFAN's two aid reform pillars of accountability and country ownership](#):

- **Prioritizing local governments, sub-national governments, and civil society actors as key partners in the *Journey to Self-Reliance*.** The document states that local civil society organizations, private sector, sub-national governments, and community leaders are strong partners in championing local solutions. In particular, we believe that supporting committed partners at the sub-national level is vital to strengthening the citizen-state compact and achieving effective, inclusive, and accountable development outcomes. As USAID considers how best to partner with the private sector through the Private Sector Engagement policy, as well as governments with the Redefining the Relationship with Partner Governments work stream, we encourage the agency also to think about how to engage civil society – especially local civil society – in the *Journey to Self-Reliance*, as a key partner for ensuring self-reliance success.
- **Expressing a clear commitment to invest in domestic resource mobilization and financial self-reliance.** We note our firm support for countries to sustainably finance their development priorities by mobilizing public and private resources that are raised equitably and spent in an accountable, transparent, and effective fashion. USAID calls for incorporating DRM investments into sector programs and budgets by saying they will “create or expand projects specifically to mobilize domestic resources or incorporate a priority for sustainable financing into larger programs, spanning sectors.”ⁱ We welcome continued efforts to collaborate with USAID to identify opportunities to invest in [public sector domestic resource mobilization](#) and to fulfill the requirement in the FY19 appropriations report language requiring USAID to “develop a DRM strategy for assisting countries, and particularly the public sector, to increasingly mobilize country resources for development.”

- **Committing to a robust learning agenda.** We are pleased that USAID identified learning as vital to successful implementation of the *Policy Framework*. Publishing a robust *Journey to Self-Reliance* learning agenda that seeks to fill knowledge gaps and capture lessons learned, including the ways USAID can improve its own practice, is essential to improving future programming.

In addition to supporting these improvements, we want to raise concerns regarding issues left unaddressed or weakened in the final *Policy Framework*. Data access and transparency, eradicating extreme poverty, and addressing country-level inequality including gender equality, are critical to effective development and should have been more strongly discussed. Specifically, we are concerned that USAID is not:

- **Identifying ending extreme poverty as central to a country's *Journey to Self-Reliance*.** Extreme poverty is a major threat to global development, security, and inclusive economic growth. Yet, the *Policy Framework* does not identify ending extreme poverty as important to achieving self-reliance. Instead, ending extreme poverty is seen through the lens of past achievements in poverty reduction rather than as a current goal of sustainable development and a key driver of conflict.
- **Increasing investment in data transparency and measuring results for learning and sustainability.** The *Policy Framework* emphasizes the centrality of ensuring programs demonstrate results, but it pays very little attention to how USAID will invest in measuring results. USAID has significantly built up its monitoring, evaluation, and learning functions over the last ten years. For USAID to meet the *Policy Framework's* commitment to “investing for impact,” “focusing partnerships on measurable outcomes,” and “sustaining results,” it should clearly state its commitment to continued strengthening of the ME&L process, including with sufficient investment and prioritization from leadership. Further, the *Policy Framework* does not adequately discuss the importance of investing in and publishing aid data. Data should be transparent, high-quality, timely, and disaggregated – including at the project and sub-national levels as well as by gender – and published with usability as a priority. Access to data about what investments are taking place, where, when, and how much is spent is essential for accountability and for USAID's work to be collaborative and, ultimately, transformational. More broadly, the *Policy Framework* does not adequately discuss the agency's plans to monitor and evaluate the bigger learning questions around how the agency's internal reforms initiated to operationalize the *Journey to Self-Reliance* would affect the delivery and impact of USAID programs. While USAID's new agency-wide learning agenda addresses some of these questions, their absence in the *Policy Framework* remains a concern.

- **Tackling cross-border development challenges.** The *Policy Framework* articulates a shift toward country-wide self-reliance to tackle development challenges and away from large-scale global development threats. While we applaud alignment of U.S. assistance with countries’ development priorities, we question where this shift leaves important and successful U.S. programs such as PEPFAR, the campaign to combat HIV/AIDs, polio, malaria, Ebola, and programming to address climate change. We are concerned that by not addressing these global problems, the framework now has a gap in its ability to successfully steer the agency’s partnership with countries on their *Journey to Self-Reliance*. How will USAID incentivize investments in innovations to solve these large scale global problems that affect all countries?
- **Ensuring programs seek to reduce inequality.** While the framework makes reference to the fact that not all people share in a country’s progress, the agency’s analysis does not go beyond measuring inequality at the national level through the Country Roadmaps. Using only aggregated, national-level data can mask deep intersectional inequalities across regions or within and between specific segments of the population. As USAID shifts to a focus on country-wide self-reliance, the agency must work with national and sub-national governments to tackle systemic policy and social practices that perpetuate or increase marginalization of some groups.
- **Embedding gender equality as a prerequisite to sustainable development.** All USAID strategies, projects, and activities should be shaped by a gender analysis and should retain language referencing “gender equality.” We remain concerned that the *Policy Framework* does not create a link between gender equality & women’s and girls’ empowerment and the self-reliance of communities and countries. Reflecting years of research, data, and learning, gender equality must be consistently recognized and reaffirmed as a core development objective, vital toward achieving the *Journey to Self-Reliance*. We are particularly concerned about the deletion of language on gender-based violence and the phrase “norms around gender equality” in the section outlining the need for cross-sectoral approaches. Gender equality & women’s and girls’ empowerment should be integrated throughout the program cycle and related processes for strategic planning, project design and implementation, monitoring, evaluation, and learning.

Thank you for your consideration of our input on USAID’s *Policy Framework* and future products of the *Journey to Self-Reliance*.

¹ USAID Policy Framework (2019), p. 40.