Office of Afghanistan & Pakistan Affairs (OAPA)

Request for Categorical Exclusion (RCE)
Amendment 1

PROGRAM/ACTIVITY DATA

<table>
<thead>
<tr>
<th>Country Code:</th>
<th>306</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Area:</td>
<td>Higher Education</td>
</tr>
<tr>
<td>Country or Region:</td>
<td>Afghanistan</td>
</tr>
<tr>
<td>Activity Name:</td>
<td>American University of Afghanistan (AUAF)</td>
</tr>
<tr>
<td>Funding Period:</td>
<td>Aug 1, 2013-July 31, 2018</td>
</tr>
<tr>
<td>Amount:</td>
<td>$40 million</td>
</tr>
<tr>
<td>IEE Prepared by:</td>
<td>Erica Rounsefell</td>
</tr>
<tr>
<td>Date:</td>
<td>January 27, 2014</td>
</tr>
<tr>
<td>Amended IEE (YES/NO):</td>
<td>yes, original IEE: STEP-UP (Tracking OAPA-13-MAR-AFG-0029) and some activities were covered by an IEE for a previous AUAF project, tracking # OAPA-11-APR-AFG-0021</td>
</tr>
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ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

<table>
<thead>
<tr>
<th>Categorical Exclusion</th>
<th>[X]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deferral</td>
<td></td>
</tr>
<tr>
<td>Positive Determination</td>
<td>[ ]</td>
</tr>
<tr>
<td>Negative Determination</td>
<td>[ ]</td>
</tr>
<tr>
<td>Negative Determination With Conditions</td>
<td>[ ]</td>
</tr>
<tr>
<td>Exemption</td>
<td>[ ]</td>
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</tbody>
</table>

1. PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Purpose

The purpose of this amendment is to provide a separate RCE for the American University of Afghanistan activity that was previously covered by the IEE for the Strengthening Tertiary Education Project-University Partnerships (STEP-UP) project which has been divided into two distinct projects, the Afghanistan University Support & Workforce Development Program (AUS-WFD) project and AUAF.

1.2 Background:

AUAF will provide technical support to the American University of Afghanistan (AUAF), a private, independent university offering a U.S.-style curriculum. AUAF will receive assistance to provide high quality courses and programs that are market-driven and within the high demand professions of the public and private sectors. To promote sustainability the follow-on award will also focus on AUAF's accreditation in the U.S., which assures the quality standards are equal to other American universities. To improve AUAF's financial independence it will increase income...
generation by offering more courses through the Professional Development Institute (PDI); collecting increased tuition fees; and increasing fund-raising activities.

1.3 Proposed Interventions:

The activities include:

Support to AUAF to develop high quality courses and programs that are market-driven and within the high demand professions of the public and private sectors, and to assist with accreditation in the U.S.

2.0 RECOMMENDED THRESHOLD DECISIONS AND MITIGATION ACTIONS

Categorical Exclusions:

Per 22 CFR 216.2 (c)(2)(i) and (iii), we recommend categorical exclusions for the following activities as they are not expected to have adverse environmental impact on the natural or physical environment of Afghanistan (Table 1 below).

- Component 1: technical assistance to the MOHE
- Component 2: technical assistance to the selected public universities (including $40 million for AUAF);

Revisions:

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the project might be “major” and the project’s effect “significant,” or if additional activities are proposed that might be considered “major” and their effects significant, this IEE will be reviewed and revised by the originator of the project and submitted to the Bureau Environmental Officer (BEO) for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the USAID Agreement Officer’s Representative (AOR) to keep the Mission Environmental Officer and the BEO informed of any new information or changes in the activity that might require revision of the IEE.
APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

RCE Amendment 1, American University of Afghanistan (AUAF)

Clearances:

Higher Education Team Leader, Iris Young 2/2/14

Mission Environmental Officer Approval, Harry Bottenberg 1/29/2014

Regional Legal Advisor, John Power 2-2-14

Regional Environmental Advisor, Asia & OAPA, Andrei Barannik 1/29/2014

Deputy Mission Director, Carolyn Bryan 2/3/14

Mission Director, William Hammink 4 Feb. 2014

Approval:

Bureau Environmental Officer/OAPA, Gordon Weynand 2/4/14

OAPA Tracking #: OAPA-14-FCB-AFC-0023

DISTRIBUTION: Project files, MEO Tracking, RLA and OAA
Harry - reviewed - looks OK - pls have the RCE Amendment No 1 duly signed in the Mission, put "concurred by e-mail" on REA line and send it to Gordon Weynand, BEO/OAPA for his review and approval. When approved & in view that things happened in the past, pls talk to A/COR to explain that if any structural rehab or procurement of large Q of equip may be considered, the RCE shall be amended and changed into IEE with NDC. W/R from annual leave, Andrei.

On Wed, Jan 29, 2014 at 6:12 AM, Bottenberg, Harry <HBottenberg@state.gov> wrote:
Hi Andrei, please find for your review an RCE for the AUAF project, it is mainly for salary support and some other categorically excluded activities. This was formerly under the STEP UP project but the Mission decided to split it into two distinct activities (AUS-WFD and AUAF) and not use the name STEP UP anymore. So I thought it would be better to do separate IIEEs or RCEs for the two activities. AUS-WFD IEE is with Gordon already.

So the STEP UP IEE resulted in two Amendments: AUS-WFD IEE Amendment 1 and AUAF RCE Amendment 1. Not sure if that makes sense but it is what it is.

harry

Harry Bottenberg, Ph.D.
Mission Environmental Officer
USAID Afghanistan, Kabul
1. PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Purpose and Scope of IEE

The purpose of this IEE is to determine the environmental action categories for the new higher education project called Strengthening Tertiary Education Project-University Partnerships (STEP-UP). The recommended action is for a categorical exclusion for the technical assistance activities, entailing training and document production, and a negative determination with conditions for possible activities undertaken by the universities under the small grants component.

1.2 Background of STEP-UP:

The STEP-UP project will strive to improve the quality and relevance of the higher education system to support economic growth. The program supports the goals of the Afghan Ministry of Higher Education (MOHE) as stated in the Afghanistan National Development Strategy.
(ANDS), NHESP, and the National Priority Program Three (NPP 3), by contributing to increased employment of university graduates through capacity building at the MOHE and university levels and through developing high quality tertiary education programs that prepare graduates with the knowledge, skills, and qualifications to support the needs of modern business, industry, and government.

STEP-UP will also continue technical support to the American University of Afghanistan (AUAF), a private, independent university offering a U.S.-style curriculum. Under the STEP-UP program, AUAF will be awarded follow-on assistance to provide high quality courses and programs that are market-driven and within the high demand professions of the public and private sectors. To promote sustainability the follow-on award will also focus on AUAF’s accreditation in the U.S., which assures the quality standards are equal to other American universities. To improve AUAF’s financial independence it will increase income generation by offering more courses through the Professional Development Institute (PDI); collecting increased tuition fees; and increasing fund-raising activities.

1.3 Proposed Interventions:

The STEP-UP program has two components: one to build the capacity of the MOHE and the second to provide material and/or technical support to up to ten public universities and one private university. The activities include:

Component 1: Provide technical assistance and training to the MOHE.

1. Facilitate capacity building in the MOHE and universities to create more effective governance, management and financial control systems, including monitoring and evaluation;

2. Assist the MOHE and universities to implement quality assurance and accreditation guidelines, and curriculum standards for public and private universities;

Component 2: Provide technical assistance and material support to selected universities

1. Develop and pilot market-driven technical and professional associate degree programs designed in partnership with American and regional universities, the private and public sectors, and with consideration to women’s access to professional employment;

2. Small grants for equipment and refurbishments that support these programs;

3. Create university Career and Partnership Centers linked to the public and private sector, providing services such as internships, job search skills as well as employment placements.

4. Support to AUAF to develop high quality courses and programs that are market-driven and within the high demand professions of the public and private sectors, and to assist with accreditation in the U.S.
Only one of the proposed STEP-UP activities is expected to cause environmental impacts. Small grants to the universities under the second component could have some slight impact caused by minor refurbishment of university libraries and/or laboratories before installing academic or scientific equipment such as computers or laboratory apparatus.

2.0 RECOMMENDED THRESHOLD DECISIONS AND MITIGATION ACTIONS

Categorical Exclusions [96.2% of the project budget ($127.7m)]:
Per 22 CFR 216.2 (c)(2)(i) and (iii), we recommend categorical exclusions for the following activities as they are not expected to have adverse environmental impact on the natural or physical environment of Afghanistan (Table 1 below).

- Component 1: technical assistance to the MOHE
- Component 2: technical assistance to the selected public universities (including $40 million for AUAF);

Negative Determinations with Conditions [3.8% of the project budget ($5m)]:
For small repairs and refurbishments of classrooms and laboratories, the implementer of the STEP-UP project shall provide evidence through regular progress reports that best practices have been adhered and that guidelines in Chapter 3 of Small-Scale Construction of the Environmental Guidelines for Small-Scale Activities in Africa (EGSSA), have been followed.

For equipment procurement, the implementer shall provide evidence that equipment and materials procured will be used in a safe way and that the implementer shall follow all national and provincial environmental laws and regulations, and that after the equipment has completed its useful life, it shall be either returned to the supplier for safe and sound disposal, or disposed of by Government of Afghanistan agencies and/or by the implementer in accordance with relevant legislation and/or USAID rules and regulations.

Table 1. Proposed program activities and recommended threshold decisions

<table>
<thead>
<tr>
<th>Component</th>
<th>Activities</th>
<th>Potential Impacts</th>
<th>22 CFR 216 Environmental Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Component 1</td>
<td>Technical assistance to MOHE</td>
<td>None</td>
<td>§216.2(c)(2)(i): Education, technical assistance, or training programs: No mitigation required</td>
</tr>
<tr>
<td></td>
<td>Workshops and Meetings</td>
<td>None</td>
<td>§216.2(c)(2)(ii): Analyses, studies, academic or research workshops and meetings: No mitigation required</td>
</tr>
<tr>
<td>Component</td>
<td>Activities</td>
<td>Potential Impacts</td>
<td>22 CFR 216 Environmental Determination</td>
</tr>
<tr>
<td>-----------</td>
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<td>---------------------------------------</td>
</tr>
<tr>
<td>Component 2</td>
<td>Provide technical assistance to selected universities</td>
<td>Technical assistance to the selected public universities, Development of market-driven academic programs, including programs at AUAF, Accreditation of AUAF, Salary support for expatriate staff, security support at AUAF</td>
<td>None</td>
</tr>
<tr>
<td>Component 2</td>
<td>Small grants for equipment to support programs</td>
<td>Minor refurbishing of libraries, laboratories or classrooms and purchase of equipment such as computers, learning materials and laboratory apparatus</td>
<td>Limited impact if conditions are adhered to</td>
</tr>
</tbody>
</table>
Revisions:

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the project might be “major” and the project’s effect “significant,” or if additional activities are proposed that might be considered “major” and their effects significant, this IEE will be reviewed and revised by the originator of the project and submitted to the Bureau Environmental Officer (BEO) for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the USAID Agreement Officer’s Representative (AOR) to keep the Mission Environmental Officer and the BEO informed of any new information or changes in the activity that might require revision of the IEE.
APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

Strengthening Tertiary Education Project-University Partnerships (STEP-UP)

Clearances:

Education Team Leader, David A. Bruns 3/20/2013

Mission Environmental Officer Approval, Harry Bottenberg 3/20/2013

Regional Legal Advisor, Ying Hsu 3/20/13

Regional Environmental Advisor, Asia, Middle East & OAPA, Andrei Barannik 3/20/2013

Acting Deputy Mission Director, Peter Duffy 3/25/13

Acting Mission Director, James L. Stein 3/25/13

Approval:

Bureau Environmental Officer/OAPA, Gordon Weynand 3/25/13

DISTRIBUTION: Project files, MEO Tracking, RLA and OAA