ENIRONMENTAL THRESHOLD DECISION

Activity Location: Guatemala

Activity Title: Development Objective Two: Improved Levels of Economic Growth and Social Development in the Western Highlands IR 2.3: Education Quality and Access Improved

Activity Number: TBD

Life-of-Activity-Funding: $28.3 million


IEE Prepared by: Ligia María Alfaro, USAID/Guatemala

Reference Environmental Threshold Decisions (ETD): None

Recommended Threshold Decision: Categorical Exclusion Negative Determination with Conditions

Bureau Threshold Decision: Categorical Exclusion Negative Determination with Conditions

Comments:

A Categorical Exclusion to Development Objective Two: Improved Levels of Economic Growth and Social Development in the Western Highlands IR 2.3: Education Quality and Access Improved activities involving technical assistance, training, analyses, studies, workshops, document transfers, and others that will not have an impact on the environment, pursuant to 22 CFR 216.2(c)(2):
(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);

A **Negative Determination with Conditions** is issued to DO2 IR2.3 activities involving school repairs and refurbishment (including installation of roofs and windows, improved water and sanitation, improved bathrooms and kitchens, construction of walls to increase students' safety, installation of light fixtures, etc.). The Mission will ensure that appropriate environmental guidelines and/or mitigation measures are developed for these building repair-type activities and that adequate monitoring and evaluation protocols are in place to ensure their proper implementation. Conditions include:

- The "Environmental Guidelines for Development Activities in Latin America" will be used, at a minimum, in identifying mitigation measures. Implementing partners shall follow USAID's "Environmental Guidelines for Development of Activities in Latin America and the Caribbean", especially Chapter 2 on Small-Scale Infrastructure. This document is available at the following website:

- Upon identification of site-specific actions, the implementing partner will develop an Environmental Mitigation and Monitoring Plan (EMP) that outlines possible on-site environmental issues, describes specific actions being taken to mitigate these impacts, and presents the monitoring methods that will be used to determine the effectiveness of the mitigation measures.

- The implementing partner will submit the EMP for approval by the AOR/COR, Mission Environmental Officer and Regional Environmental Advisor prior to implementation. In addition, the implementing partner must comply with host country environmental regulations and obtain all required permits from the appropriate host country officials.

- See the following links for guidance on EMP development and implementation:
  - [http://transition.usaid.gov/gt/docs/emp_format.pdf](http://transition.usaid.gov/gt/docs/emp_format.pdf) (English version)

- In case of conflict between host country and USAID regulations, the more stringent regulations will apply. Regular reporting by the implementing partner to the AOR/COR will include a section on environmental compliance.

- Implementing partner will have the capacity and environmental expertise to develop EMPs and carry out their recommendations.
Responsibilities

• Each activity manager or Contracting (or Agreement) Officer Representative (COR/AOR) is responsible for making sure environmental conditions are met (ADS 204.3.4). In addition, COR/AORs are responsible for ensuring that appropriate environmental guidelines are followed, mitigation measures in the IEE are funded and implemented, and that adequate monitoring and evaluation protocols are in place to ensure implementation of mitigation measures.

• It is the responsibility of the Development Objective (SO) Team to ensure that environmental compliance language from the ETD is added to procurement and obligating documents, such as activity-related Development Objective Grant Agreements (DOAGs), program descriptions, and statements of work.

• The Mission Environmental Officer will conduct spot checks to ensure that conditions in the IEE and this ETD are met. These evaluations will review whether guidelines are properly used to implement activities under this ETD in an environmentally sound and sustainable manner according to USAID and applicable U.S. Government policies and regulations.

• The implementing contractor or partner will ensure that all activities conducted under this instrument comply with this ETD. Also, through its regular reporting requirements, a section on environmental compliance (e.g. mitigation monitoring results) will be included.

Amendments

• Amendments to Initial Environmental Examinations (IEE) shall be submitted for LAC Bureau Environmental Officer (BEO) approval for any activities not specifically covered in the IEE, which include:
  - Funding level increase beyond ETD amount,
  - Time period extension beyond ETD dates (even for no cost extension), or
  - A change in the scope of work, such as the use of pesticides or activities subject to Foreign Assistance Act sections 118 and 119 (e.g. procurement of logging equipment), among others.

Victor H. Bullen
Bureau Environmental Officer
Bureau for Latin America and the Caribbean
Copy to: Kevin Kelly, Mission Director, USAID/Guatemala
Nancy Hoffman, DD
Judith Timyan, HEO
Jeffrey Lehrer, PPS
Ligia Maria Alfaro, PPS
Teresa Robles, MEO

Copy to: Paul Schmidtke, Regional Environmental Advisor, USAID/El Salvador

Copy to: Nancy Eslick, Julie Ciccarone
LAC/CAM
Barbara Knox-Seth, LAC/RSD

Copy to: IEE File

Attachment: Initial Environmental Examination

File: LAC.RSD.PUB\RSDDPUB\ENV\Reg216\IEE\IEE12\LAC-IEE-12-70 ETD (GU-DO2 IR2.3 Education Quality and Access Improved).doc
INITIAL ENVIRONMENTAL EXAMINATION

Activity Location: Guatemala

Activity Title: Development Objective Two: Improved Levels of Economic Growth and Social Development in the Western Highlands

IR 2.3: Education Quality and Access Improved

Life-of-Activity Funding: $28.3 million

Life-of-Activity: FY 2012-2016

Reference Threshold Decisions: None

Funding Source: DA

IEE Prepared by: Ligia María Alfaro, USAID/Guatemala

Date Prepared: August 27, 2012

Recommended Threshold Decision: -Categorical Exclusion

-Negative Determination with Conditions
1. Background and IR description

1.1 Purpose and Scope of IEE

USAID/Guatemala Country Development Cooperation Strategy (CDCS) (2012-2016) approved by the Assistant Administrator for the Bureau of Latin America and the Caribbean on March 16, 2012 includes three Development Objectives (DO): DO1: Greater Security and Justice for Citizens, DO2: Improved Levels of Economic Growth and Social Development in the Western Highlands, and DO3 Improved Management of Natural Resources to Mitigate Impacts of Global Climate Change. DO2 includes the following Intermediate Results (IRs): IR 2.1: Broad Based Economic Growth and Food Security Improved, IR 2.2: Access to and Use of Sustainable Quality Health Care and Nutrition Services Expanded, and IR 2.3 Education Quality and Access Improved.

According to the Project Design Guidance issued in December 2011, a project generally focuses on the IR or the DO level if it is associated with relatively small levels of resources and/or incorporates highly integrated IRs. USAID/Guatemala has decided that DO1 and DO3 will each constitute a project, and that for DO2 each IR will constitute a project. Initial Environmental Examinations (IEEs) will also be prepared according to such definition.

This IEE covers activities included under DO2, IR2.3 Education Quality and Access Improved (Education Project).

1.2 Background Education Project Description

In line with Goals 1 and 3 of the USAID Education Strategy, USAID Guatemala will support literacy and access to education for out-of-school youth – two areas of acute need. Support for literacy will focus on enhancing education models and strengthening quality in basic education with the ultimate goal of increasing the level of students’ reading at grade level in early grades. To increase the number of students graduating from primary education who will later enroll in secondary education, USAID Guatemala will support non-traditional primary completion programs for out-of-school children.

1.3 Description of Activities:

Three sub-IRs will support the achievement of improved education quality and access.

Sub-IR 2.3.1: Reading Skills Improved

All interventions included in this sub-IR will seek to improve the reading skills of students in first to sixth grades, with special attention given to targeted disadvantaged population groups. Reading readiness skills will also be developed in pre-primary school children. This sub-IR contributes to Goal 1 of the USAID Education Strategy.

This sub-IR will lead to the sustainability of all proposed interventions through a progressive reform toward a lasting educational structure.
Illustrative Activities:

- Training of teachers, supervisors and school administrators.
- Development of reading-support materials.
- Technical assistance to the MOE for improving reading skills of students in Spanish and in mother tongues.
- Technical assistance to the MOE for the implementation of classroom-based reading models.
- Technical assistance to the MOE for the development and implementation of a tool to assess early grade reading.

Sub-IR 2.3.2: Access to Quality Non-traditional Education Programs Increased

This sub-IR will target out-of-school populations (children and youth). Special attention will be given to girls living in the geographic focus regions of Feed the Future and Global Health Initiative (the five departments in the Western Highlands: Huehuetenango, Quetzaltenango, Quiché, San Marcos, and Totonicapán). This intervention will strengthen existing options for out-of-school populations, will scale up innovative and best practices, and will create new pertinent education alternatives to provide long-term development paths to children and youth.

Under this Sub-IR, USAID could also support interventions directed to improve the facilities where education is provided, including but not limited to installation of roofs and windows, improved water and sanitation, improved bathrooms and kitchens, construction of walls to increase students' safety, installation of light fixtures, etc. In addition to USAID’s resources these activities would also be funded with cash and in-kind leverage from the private sector.

Illustrative Activities:

- Curriculum design.
- Technical assistance to the MOE for strengthening non-traditional education programs.
- Training of teachers, supervisors and school administrators.
- Forging public-private partnerships to help finance school repairs and refurbishment (including installation of roofs and windows, improved water and sanitation, improved bathrooms and kitchens, construction of walls to increase students' safety, installation of light fixtures, etc.).
- Support to the MOE for the development of workforce readiness and life competencies skills in out-of-school youth.

Sub-IR 2.3.3: Government of Guatemala Institutions and Systems Strengthened

To assist the Ministry of Education (MOE) better manage its resources and deliver services in an efficient and transparent manner, USAID will continue supporting the MOE to improve the transparency, efficiency and provision of education services to facilitate compliance with the objectives of previous sub-IRs. Interventions under this sub-IR will strengthen strategic
planning, policy development and reform, information systems, delivery systems and good quality management practices. USAID will also strengthen processes such as primary education certification, as well as non-traditional education models and systems like the USAID-initiated Social Information System (a system that combines all the information for the social sector: education, health, finance and population, establishing all the possible relationships between each one, and providing the necessary tools to respond to queries, prepare reports, and analyze the information).

Illustrative Activities:

- Technical assistance to the MOE to improve the transparency, efficiency and provision of education services.
- Technical assistance to the MOE to strengthen strategic planning, policy development and reform, information systems, delivery systems and good quality management practices.
- Technical assistance to strengthen processes such as primary education certification as well as the use of non-traditional education models and systems like the USAID-initiated Social Information System (SIS).
- Studies for the design and implementation of policies and systems (e.g., a Textbooks and Educational Materials National Policy, the National System for the Professional Development of Ministry of Education Human Resources (SINAFORHE, Spanish acronym)).

1.4 Locations Affected:

Sub-IR 2.3.2 will be focused in five departments of the Western Highlands listed above, whereas interventions under Sub IR 2.3.1 and 2.3.3 will have a national impact.

1.5 Applicable Environmental Policies, Procedures or Regulations:

Section 117 of the Foreign Assistance Act of 1961, as amended, requires that the impact of USAID’s activities on the environment be considered and that USAID include environmental sustainability as a central consideration in designing and carrying out its development programs. This mandate is codified in Federal Regulations (22 CFR 216) and in USAID’s Automated Directives System (ADS) Parts 201.3, 11b and 204 (http://www.usaid.gov/policy/ads/200/), which, in part, requires that the potential environmental impacts of USAID-financed activities are identified prior to a final decision to proceed and that appropriate environmental safeguards are adopted for all activities.

In addition, USAID implementing partners must comply with host country environmental regulations unless otherwise directed in writing by USAID. In case of conflict between host country and USAID regulations, the latter shall govern.

2. Evaluation of potential environmental impact

School repairs and refurbishment will have minor environmental impacts, such as the possibility of generating solid waste, sewage and waste water disposal, creating minor soil erosion and
exposing workers to hazards. Upon identification of site-specific actions, the recipients shall develop an Environmental Mitigation Plan (EMP) as described in the following section. Other activities funded by this IR will not have an impact on the environment.

3. **Recommended Threshold Decisions and mitigation actions**

A **Categorical Exclusion** to activities involving technical assistance, training, analyses, studies, workshops, document transfers, and others that will not have an impact on the environment, including:

(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);

A **Negative Determination with Conditions** is recommended for any activities involving school repairs and refurbishment (including installation of roofs and windows, improved water and sanitation, improved bathrooms and kitchens, construction of walls to increase students' safety, installation of light fixtures, etc.)

- The Mission shall ensure that appropriate environmental guidelines and/or mitigation measures are developed for these building repair-type activities and that adequate monitoring and evaluation protocols are in place to ensure their proper implementation.
- The “Environmental Guidelines for Development Activities in Latin America” shall be used, at a minimum, in identifying mitigation measures.
- Implementing partners shall follow USAID’s "Environmental Guidelines for Development of Activities in Latin America and the Caribbean", especially Chapter 2 on Small-Scale Infrastructure. This document is available at the following website: [http://transition.usaid.gov/locations/latin_america_caribbean/environment/docs/epiq/epiq.htm](http://transition.usaid.gov/locations/latin_america_caribbean/environment/docs/epiq/epiq.htm).
- Upon identification of site-specific actions, the implementing partner shall develop an Environmental Mitigation and Monitoring Plan that outlines possible on-site environmental issues, describes specific actions being taken to mitigate these impacts, and presents the monitoring methods that will be used to determine the effectiveness of the mitigation measures.
- This Environmental Mitigation and Monitoring Plan (EMP) will be submitted to the AOR/COR for approval by the Mission Environmental Officer and Regional Environmental Advisor prior to implementation. In addition, the implementing partner must comply with host country environmental regulations and obtain all required permits from the appropriate host country officials.
- In case of conflict between host country and USAID regulations, the more stringent regulations will apply. Regular reporting by the implementing partner to the AOR/COR will include a section on environmental compliance.
USAID/Guatemala hereby recommends that the LAC Bureau Environmental Officer concurs with the recommendations included in this IEE.

Concurrence: ____________________________
Kevin Kelly
Mission Director

Date: ____________________________
Kevin Kelly
Mission Director

09/10/2012