Request For Categorical Exclusion

PROGRAM/ACTIVITY DATA:

Country/Region: West Bank/Gaza
Project/Activity Title: Antimicrobial Stewardship Initiative
Funding Begin: September 20, 2017  Funding End: September 20, 2019
LOP Amount: $750,000.00
Prepared By: Sawsan Baghdadi, Agreement Officer Representative
IEE/CE Amendment (Y/N): No
Date: July 26, 2017

ENVIRONMENTAL ACTION RECOMMENDED:

Categorical Exclusion: ___ X ___ Negative Determination With Conditions: _________
Positive Determination: _________ Deferral: _________

SUMMARY OF FINDINGS:

The West Bank & Gaza Antimicrobial Stewardship Initiative activity will achieve comprehensive antimicrobial stewardship gains for the Palestinian health system. It is a 2-year activity and will be working on improving the practices in the Palestinian health sector through a learning collaborative approach where staff from 22 hospitals will be brought together under four tracks to support the range of improvements needed:

1. Leadership for Improvement;
2. Infection Prevention and Control;
3. Antimicrobial Stewardship Program for Pharmacists and Physicians, and;
4. Standardizing microbiology processes and protocols used in the laboratories of participating hospitals and developing a national surveillance system within the Palestinian health sector.

Non-environmental impacting technical assistance, training, analyses, studies, workshops, and document and information transfer qualify for Categorical Exclusion per 22 CFR 216.2(c)(2)(i), (iii), and (v), as “education, technical assistance, or training programs”, “analysis, studies, academic or research workshops and meetings,” and “document and information transfer”, respectively.

**Background and Activity Description**

USAID/West Bank and Gaza Mission, and through the Investing in the Next Generation/Health and Humanitarian Assistance (HHA) Office, will achieve comprehensive antimicrobial stewardship gains for the Palestinian health system. The ING/HHA Office will satisfy the aforementioned activity goal through: a) designing an intervention which complements the work previously done with the ASSIST project on healthcare acquired infections (HAI), Infection Prevention and Control (IPC) and Antimicrobial Stewardship (AMS) to ensure optimal prescribing and appropriate use of medicines; b) working with the Palestinian Ministry of Health (MOH) and other healthcare stakeholders to further define the problem and develop a framework for addressing it; c) developing an institutional program, which focuses on the core elements of hospital acquired infections, antibiotic stewardship and infection control programs in hospital setting; and d) developing a standardization and surveillance system within the Palestinian health sector.

A growing concern that hampers quality improvements at the secondary healthcare level in the Palestinian Territories is the increasing antibiotic resistance and the related lack of standardized infection prevention and control measures. This rise in antibiotic resistance is causing an increased rate of morbidity and mortality, with longer and more complicated hospital stays and higher costs of care. Without standardized guidelines for testing to detect and properly treat patients, and no national surveillance system to track what little testing is done, there is little understanding of the scope of the problem and thus few to no resources dedicated to addressing it.

Local hospitals are finding an increasing number of patients arriving with antibiotic resistance and/or hospital acquired infections resistant to first and second line treatments resulting in considerable resources expended on treating the patients’ infections before being able to treat their primary reason for referral. The vast majority of these patients are coming from MOH hospitals where there is no control on antibiotic use, no strict follow-up to guidelines for testing for resistance, and no surveillance of any cases tested.

The Antimicrobial Stewardship Initiative, a 2-year activity, will be working on improving the practices in the Palestinian health sector through a learning collaborative approach...
where staff from 22 hospitals will be brought together under four tracks to support the range of improvements needed:

1. Leadership for Improvement;
2. Infection Prevention and Control;
3. Antimicrobial Stewardship - Program for Pharmacists and Physicians, and;
4. Standardizing microbiology processes and protocols used in the laboratories of participating hospitals and developing a national surveillance system within the Palestinian health sector.

The main activity interventions are:

- Maintain supportive collaborative learning process to work with the quality improvement and collaborative teams across the 22 hospitals.
- Ensure close coordination of activities involving MOH hospitals with the following MOH departments: Quality Department, the Directorate General of Hospitals, the Laboratories Department and with the General Directorate of Pharmacy.
- Provide Expert and peer facilitated collaborative learning and sharing opportunities for hospital staff and leadership. This can be achieved through learning sessions and regular visits by experts and peers to participating hospitals. These evidence-based, adult learning strategies should be adaptive, adjusted and improved to drive improvement across the participating hospitals in line with successful system transformation practices employed in many countries around the world.
- Support quality improvement teams with real-time technical assistance and peer-to-peer connection with the WhatsApp affinity groups on antimicrobial stewardship, microbiology, hand hygiene, environmental cleaning, and screening/patient isolation;
- Build practical skills for participating hospital staff focused on antimicrobial stewardship and microbiology by shadowing physicians, pharmacists and microbiology laboratory technicians in the high-performing hospitals;
- Connect hospital staff through weekly video calls with experts and peers on relevant topics related to infection prevention and control, antimicrobial stewardship and microbiology;
- Collect and analyze weekly quality improvement data with expert coaching and sharing among improvement teams;
- Consult with infection prevention and control, antimicrobial stewardship and quality improvement experts during monthly onsite coaching visits;
- Continue training laboratory technicians on implementation processes and standards for testing methodologics; and,
- Prepare the groundwork for a surveillance system for hospital acquired infections within the Palestinian health sector.
The activity is expected to provide technical assistance, coaching and training to build practical skills for participating hospitals. With regards to the training of the laboratory technicians on implementation processes and standards for testing methodologies, the training is theoretical and not practical, but coaches will visit laboratories during the coaching sessions, visualize how they do the tests and discuss with them results of laboratory tests. The implementing partner will make sure that standard procedures regarding the taking, handling and transportation of samples to be tested are done according to the procedures and guidelines and they will verify that the hospitals are following WHO’s minimal accepted waste management procedures\(^1\).

The activity might need to develop and dissemination of materials, media, and communication tools for health education and patient information.

2. Evaluation of Environmental Impact Potential
This project will include providing certain technical assistance and capacity building for all staff members in the 22 hospitals involved in this initiative. The project will strengthen procedures and practices by providing technical assistance and training, conducting workshops and meetings, and by sharing of information. Activities proposed under this activity will not have adverse impacts on the natural or physical environment. USAID will not fund any procurement of medical equipment, medical supplies, or medical disposables. There are no construction activities under this program.

The implementing partner will be responsible for promoting and monitoring adherence to standard protocols and procedures of the World Health Organization (WHO) and the Center for Disease Control and Prevention (CDC). The reference for them will be, among others, the following documents:

- the World Health Organization guidelines on patients’ safety\(^2\) and medication without harm\(^3\);
- the World Health Organization policies and strategies in relation to the patient’s safety initiative\(^4\) and related publications\(^5\);
- guidelines of the Center Disease Control and Prevention (CDC) in relation to biosafety in microbiological and biomedical laboratories\(^6\);

\(^1\) https://www.healthcare-waste.org/

\(^2\) http://www.who.int/publications/guidelines/patient_safety/en/

\(^3\) http://www.who.int/patientsafety/medication-safety/en/

\(^4\) http://www.who.int/patientsafety/policies/en/

\(^5\) http://www.who.int/patientsafety/education/mp_curriculum_guide/en/
- the laboratories safety guidance\(^7\) of the Occupational Safety and Health Administration (OSHA); and,
- the Laboratory Biosafety Manual of the World Health Organization (WHO).\(^8\)

**Recommended Environmental Determinations**

**Categorical Exclusion:** Activities under this program qualify for Categorical Exclusion as per 22 CFR 216.2 (c)(2)(i),(iii) & (v) ("education, technical assistance, or training programs”, “analysis, studies, academic or research workshops and meetings,” and “document and information transfer”), respectively.

The following points apply to activities under this project:

- No assistance shall be provided for the procurement and use, or both, of pesticides. If for any reason, it is decided to fund procurement and/or use, or both, of pesticides, then the the implementer shall prepare a Pesticides Evaluation Report and Safe Use Action Plan (PERSUAP) prior to any support (including training) for the procurement and/or use of pesticides for approval by the Bureau Environmental Officer. The PERSUAP shall be prepared in accordance with procedures prescribed in 22 CFR 216.3(b)(i) through (v). PERSUAP shall be prepared by a PERSUAP professional- the list of such persons is maintained by the BEO.
- The training materials will be reviewed and cleared by the Agreement Officer’s Representative (AOR) for this project and the Mission Environmental Officer prior to their use.
- All of the above conditions will be fully transposed into the solicitation and the agreement.
- During the post award conference, the implementing partner (IP) will be briefed by the AOR and MEO on all the above conditions. The IP will be mandated to report on their implementation and compliance.

**Climate Change Considerations and Requirements**

1. In 2014 President Obama signed Executive Order 13677 which requires all US agencies to factor climate change into their foreign assistance planning and manage the associated climate risks.
2. This project must be robust in face of potential climate change impacts. Therefore, the Recipient shall identify expected climate change impacts over the life of the

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\(^6\) http://www.cdc.gov/biosafety/publications/bmbl5/

\(^7\) http://www.osha.gov/Publications/laboratory/OSHA3404laboratory-safety-guidance.pdf

\(^8\) http://www.who.int/csr/resources/publications/biosafety/Biosafety7.pdf
activity’s expected benefits and demonstrate how these risks will be reduced in order to ensure sustainability of the activity’s objective and benefits. The Recipient shall identify any opportunities to reduce greenhouse gas (GHG) emissions and propose emissions approaches where possible and applicable. The recipient is encouraged to discuss any opportunities with the AOR.

Compliance

To ensure compliance with USAID environmental procedures, the AOR responsible for managing this program will be responsible for periodic monitoring of the environmental aspects and compliance of this program. Routine site visits by the AOR will be conducted.

Revisions

As with all USAID-funded programs, and pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that any of the proposed actions to be funded by this activity might be “major” and their results “significant”, the threshold decision for those actions listed above will be reviewed and revised by the Mission Environmental Officer, and an environmental assessment prepared as appropriate.
APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

ME Bureau Environmental Officer Approval:   John O. Wilson  8/10/17

Mission Director Approval:                  Monica Stein-Olsen 7/31/17

Mission Environmental Officer:             Anan Masri 7/28/17

Clearances

Deputy Mission Director:                  Courtney Chubb 8/28/17

DO Acting Team Leader:                    Bassam Kort 7/12/2017

AOR:                                      Sawsan Baghdadi 7/23/2017

Regional Environmental Advisor:           Andrei Barannik 8/5/17

cc:  
Anan Masri, Mission Environmental Officer - USAID/West Bank & Gaza  
Ali Ezzatyar, Resident Legal Officer - USAID/West Bank & Gaza  
Jason Gilpin, Agreement Officer - USAID/West Bank & Gaza  
Project Files