MEMORANDUM TO FILE

Date: June 3, 2019
To: Christopher Payne, Bureau Environmental Officer - OAPA
Through: Andrei Barannik, Regional Environmental Advisor - CSA & OAPA
From: Michael H. Hryshchyshyn, Director, USAID Sindh and Balochistan
Subject: Extension in geographical focus of SBEP to entire Sindh Province


1.0 Purpose and Background:

The purpose of this “Memorandum to File” (MTF) is to extend the geographical focus of SBEP from nine districts of Northern Sindh to entire Sindh Province.

USAID signed an Activity Agreement with the Government of Sindh (GoS) to implement the Sindh Basic Education Program (SBEP). The Activity Authorization Document (AAD) of SBEP was approved by the Mission Director on July 27, 2011 and amended on January 12, 2017 and March 29, 2018. USAID is providing $159.2 million to support the Government of Sindh under the SBEP. Amendment #4 approved on September 14, 2018 stated the TEC was increased from $155 to $159.2 million. This includes both Government-to-Government (G2G) and non-G2G activities. Currently, with $ 81 million support under G2G, the Government of Sindh (GoS) is undertaking construction of 106 schools in seven priority districts of Sindh and five towns of Karachi under SBEP. All 106 schools are being built under G2G mechanism. A total of 60 schools have been completed and on the remaining 46 schools construction is in progress at different stages. The Sindh Community Mobilization Program, a non-G2G component of SBEP, continues working to engage communities and private sector in the management of the schools to ensure that children receive quality education.

As per the request of the GoS, the geographic footprint of the program is being extended to the entire Province of Sindh. Therefore, geographical focus of the IEE needs to be extended from nine districts of Northern Sindh to entire Sindh Province.

2.0 Environmental Compliance Lessons Learned:

Environmental compliance is the mandatory requirement of all USAID funded projects. USAID hired A&E firm prepares designs of schools and assess site selection which are approved by USAID engineers.
Memo to File: No Cost Time Extension in the Energy DO Level PAD MEO

As a follow up requirement of approved IEE; site and activity specific Environmental Documentation Form (EDF) and Environmental Mitigation and Monitoring Plan (EMMP) have been approved by USAID for environmental compliance during project implementation. EDFs/EMMPs were prepared for school sites by A&E firm and have been approved by COR and MEO. An environmental manual has been developed and used.

USAID has assigned the task of overseeing environmental compliance efforts of the project to an Architecture & Engineering (A&E) monitoring contractor. The A&E contractor ensures that implementation is carried out in accordance with the approved IEE, respective site specific EDF and corresponding EMMP, provisions of Activity Agreement, and all subsequent Project Implementation Letters (PILs). Site-specific supervision and monitoring are provided by A&E firm for all sites on a regular basis. Another A&E entity works as a third-party monitoring firm to certify the completion of construction milestones. In addition to this, USAID engineers/COR conduct site monitoring on a quarterly basis. The A&E environmental team provided on-the-job training to workers and labor on effective use of PPEs along with demonstrating the best practices to reduce waste and injuries. These trainings have improved the capacity of the construction contractors with regards to implementation of EDF/EMMP. The A&E contractor environment focal persons visit the project sites periodically to check the environment compliance and provide regular reports to USAID COR/PM. The issues of testing potable water and separate staff rooms for male and female teachers identified during site visits have been addressed accordingly.

Non-compliances such as improper use of Personnel Protective Equipment (PPE) and lack of proper housekeeping observed at site are reported by A&E team and followed up regularly for closure. The warranty period for 30 schools is completed. The issues identified during the punch list preparation were rectified at satisfactory level. No other issues were identified. Non-compliance including waste management, water supply and testing etc. was found around 20% and it was followed up to bring to compliance. Non-compliance record is maintained regularly and mitigation measures taken are reported along with the required evidence by A&E firm to USAID. Compliance reports with regard to EMMPs for individual school sites are regularly submitted by stakeholders. Follow up compliance reports are also submitted by A&E service firm to USAID. During the school handing-over process, school drawings and building maintenance manual are given to the GoS and school operator. The GoS has allocated sufficient funds for school maintenance to be done through private sector Education Management Organizations who are outsourced to operate schools.

A success story is attached as annex-1.

3.0 Threshold Determination:

The Threshold Decision for all activities in the original IEE and its subsequent amendment 1 to 4 remains the same. The broad activities and nature of all activities established under the original IEE and its amendment 1 to 4 as well as all conditions, limitations and stipulations for revisions established in the original IEE and amendment 1 to 4, for all activities, remain the same and in force for the extended geographical focus and throughout the Life of Project duration.

4.0 Revisions:

In accordance with 22 CFR 216.3(g)(9) if a project is revised or new information becomes available, including during preparation of an EDF, which indicates that a proposed action might be "major" and its effects "significant," the determination will be reviewed and revised by the originator(s) of the program and projects and submitted through the MEO to the Bureau Environmental Officers, OAPA, for approval.
If warranted, an environmental assessment (EA) will be launched to prepare a scoping statement and EA report. The scoping and EA process, if determined necessary during scoping, will follow and comply with 22 CFR 216.3(a)(4). It is the responsibility of the COR/AOR to inform the MEO and BEO-OAPA, in a timely manner, of any changes in the scope and nature of approved activities. These changes may warrant the revision of the approved threshold decisions.

Engineers constructed Schools Buildings which will produce many Professionals

Engineers, architects and managers collective efforts resulted in the state of the art child-friendly schools.

The overall mission of the Sindh Basic Education Program (SBEP) is to increase and sustain enrolment of students in primary, middle and secondary schools in targeted districts in Sindh by developing schools environment conducive to teaching and learning.

The engineers, architects and managers collective efforts resulted in the state of the art child-friendly schools. The design of schools buildings is timeless, simple and minimal. The design of newly constructed schools buildings is up to international standards.

The key features of schools buildings are spacious classrooms, libraries, science & computer labs, health room, principals' and administration offices, multi-purpose hall, staff rooms, separate toilets for boys & girls, tube well & water filter system, on-site wastewater treatment & disposal, playgrounds, furniture & equipment, gated boundary wall and much more.

The engineers and architects designed the schools buildings considering child friendliness, local cultural and gender sensitivity, access for people with disabilities, durability, energy efficiency, security, low maintenance, disaster resilience, ventilation and insulation.

Earlier, the enrollment of the students in the schools which lacked proper facilities such as chairs and desks in an unhealthy environment contributed to irregular attendance and low enrollment.

The impact that we have on students' lives with a completely new state of the art child-friendly school building is very positive as is evident from the fact that enrollment has increased by manifolds.

The schools buildings constructed by the collective efforts of engineers, architects and managers will produce many engineers, architects, managers, doctors, scientists, professionals and educated citizens with the support of

- warm hearted mobilized community
- trained and qualified teachoro
- updated and upgraded syllabus
- enhanced and developed capacity of educational department and
- extensive administrative support by experts and experienced educational management organization

It could easily be affirmed that the objectives of USAID funded program are successfully met with the state of the art child-friendly schools.
Dear Asim -

while on TDY, reviewed - my Qs & comments are in the attached - with these addressed, I clear by e-mail; pls send clean copy in pdf and Word to Chris Payne, BEO/OAPA for his review and concurrence.

W/r,
Andrei
[Quoted text hidden]

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