U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT  
BUREAU FOR MIDDLE EAST  
WASHINGTON, D.C. 20523

REQUEST FOR THE AMENDMENT OF  
INITIAL ENVIRONMENTAL EXAMINATION (IEE) FOR  
INTEGRATED HEALTH SERVICES AND RESILIENCY (IHSR) Project  
Amendment -2

PROJECT/ACTIVITY DATA:

Country/Region: Jordan  
Development Objective: Social Sector Quality Improved  
Project Objective: Health Status Improved  
Project Name: Integrated Health Services & Resiliency (IHSR)

<table>
<thead>
<tr>
<th>Start Date:</th>
<th>End Date:</th>
<th>Life of Project (LOP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>August 10, 2015</td>
<td>December 31, 2025</td>
<td>Amount: $318.1 Million</td>
</tr>
</tbody>
</table>

IEE Amendment Prepared by: Rawan Qurashi  
Date: May 27, 2019

IEE Amendment (Y/N): Y  
If “Yes,” Number & Date of Original IEE:  
ME 18-76 approved 9/5/2018 (Amendment 1)  
ME 15-68 approved 9/17/2015

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)  
Categorical Exclusion: X  
Deferral:  
Positive Determination:  
Negative Determination: X  
With Conditions: X  
Exemption:

PURPOSE

The purpose of this IEE amendment is to update IEE ME 18-76 in accordance with Amendment No. 5 of the Integrated Health Services and Resiliency (IHSR) Project Appraisal Document (PAD).

AMENDMENTS

The following is a summary of the required amendments:
Amendment 2 for the Integrated Health Services and Resiliency (IHSR) Project IEE

A. Updating names of activities:

1. The Community Health and Nutrition activity is now called the Jordan-Communities Advancing Nutrition (Jordan-CAN).

2. Capacity Building for MOH (Vaccines and Family Planning) is now called Partnership for Health and Family Planning Project (PHFP).

B. Removal of closed/cancelled activities

Closed Activities:

Cancelled Activities:
1. PREDICT Follow-on Activity (Field Support)

C. Addition of new activities:

1. Jordan-Communities Advancing Nutrition (Jordan-CAN) Evaluation Activity. This activity will directly link program learning with program implementation by undergoing qualitative and quantitative assessments of process and performance which can then directly feed into the implementation of the Jordan-CAN activity.

2. Antimicrobial Resistance (AMR) Activity. This activity replaces the previously planned PREDICT Follow-on. USAID will implement the AMR activity to support implementation of components of Jordan’s Antimicrobial Resistance National Action Plan (NAP). The AMR activity will assess gaps in implementation of the NAP, address priority gaps, and support Jordan’s National AMR Steering Committee functions to oversee implementation of the AMR.

3. Human Resources for Health Activity. This Activity will use a field-support mechanism to increase the competency, distribution and number of health workers, and will work to improve public sector leadership in health. The activity will build upon the Human Resources for Health Activity 2030 (HRH2030), and include the development of human resources systems and processes to ensure recruitment, hiring, retention and employee support systems, and that policies and programs are functioning at a consistent and high quality standard to meet continuing workforce demands.

D. Change of Threshold Determination to the Multi-Donor Account (MDA) Activity from Negative Determination with Conditions (NDC) to Categorical Exclusion (CE). In accordance with the Application of the Purpose Accomplished Upon Disbursement Principle (PAUD) to the USAID contribution to the Jordan Health Fund for Refugees (JHFR), USAID/Jordan will have little or no involvement in the management of the funds in Multi-Donor Account (MDA). Therefore, under this amendment, Threshold
Amendment 2 for the Integrated Health Services and Resiliency (IHSR) Project IEE

Determination of the MDA Activity will be amended from Negative Determination with Conditions (NDC) to Categorical Exclusion (CE). Application to the PAUD principle is annexed to this IEE amendment (Annex 1).

E. Increases the funding ceiling of the IHSR Project IEE and extend the IEE deadline. IHSR PAD Amendment No. 5 increases the PAD funding limit from $307.5M to $318.1M and extends the timeline until December 31, 2025.

THRESHOLD DETERMINATION

All new activities under the Integrated Health Services and Resiliency (IHSR) Project qualify for a **Categorical Exclusion** as per 22 CFR 216.2 (c)(2)(i) where “education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)” are not subject to the procedures set forth in §216.3.

The Threshold Determination to the Multi-Donor Account (MDA) Activity is amended from **Negative Determination with Conditions (NDC) to Categorical Exclusion (CE)** as per 22 CFR 216.2 (c)(1)(ii) as USAID “does not have knowledge of or control over, and the objective of A.I.D. in furnishing assistance does not require, either prior to approval of financing or prior to implementation of specific activities, knowledge of or control over, the details of the specific activities that have an effect on the physical and natural environment for which financing is provided by A.I.D.”

SUMMARY OF REQUIRED AMENDMENTS AND THRESHOLD DETERMINATIONS

The following table provides a summary of the above described amendments:

<table>
<thead>
<tr>
<th>No.</th>
<th>Activity</th>
<th>Type of Amendment</th>
<th>Threshold Determination</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Updating names of activities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td>Community Health and Nutrition activity</td>
<td>Change name to Communities Advancing Nutrition (Jordan-CAN)</td>
<td>CE</td>
<td>No action required</td>
</tr>
<tr>
<td>2.</td>
<td>Capacity Building for MOH (Vaccines and Family Planning)</td>
<td>Change name to Partnership for Health and Family Planning Project (PHFP)</td>
<td>CE / NDC</td>
<td>Refer to actions required under IEE: ME 18-76</td>
</tr>
<tr>
<td>B. Removal of closed/cancelled activities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td>Human Resources for Health 2030 (HRH 2030) (Field Support)</td>
<td>Closed Activity</td>
<td>CE</td>
<td>No action required</td>
</tr>
</tbody>
</table>
Amendment 2 for the Integrated Health Services and Resiliency (IHSR) Project IEE

C. Addition of new activities

<table>
<thead>
<tr>
<th>1. Jordan-Communities Advancing Nutrition (Jordan-CAN) Evaluation</th>
<th>New Activity</th>
<th>CE</th>
<th>No action required</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Antimicrobial Resistance Activity (AMR)</td>
<td>New Activity</td>
<td>CE</td>
<td>No action required</td>
</tr>
<tr>
<td>3. Human Resources for Health Activity</td>
<td>New Activity</td>
<td>CE</td>
<td>No action required</td>
</tr>
</tbody>
</table>

D. Change of Threshold Determination

1. Multi-Donor Account (MDA) Change Threshold Determination | CE | No action required |

E. Increase the funding ceiling of the IHSR Project IEE and extend the IEE deadline

CLIMATE RISK MANAGEMENT

All new activities under the IHSR PAD amendment No. 5 as well as this IEE amendment are mainly comprised of Technical Assistance, Training, and Capacity Development interventions. Therefore, these Activities are ranked as LOW for Climate Risks. However, the implementing partner(s) is advised to consider the impact of increasing temperatures as well as the higher frequency and/or intensity of extreme weather events in Jordan such as heat waves, storms, landslides, and floods. These climate stressors can affect the building locations of capacity building and training activities as well as the ability of trainers and participants to access the locations.

LIMITATIONS OF THIS INITIAL ENVIRONMENTAL EXAMINATION

The determinations recommended in this document apply only to projects/activities and sub-activities described herein. Other projects/activities that may arise must be documented in either a separate IEE, an IEE amendment if the activities are within the same project/activity, or other type of environmental compliance document and shall be subject to an environmental analysis within the appropriate documents listed above.

It is confirmed that the projects/activities described herein do not involve actions normally having a significant effect on the environment, including those described in 22CFR216.2(d).
REVISIONS

Per 22CFR216.3(a)(9), when ongoing programs are revised to incorporate a change in scope or nature, a determination will be made as to whether such change may have an environmental impact not previously assessed. If so, this IEE will be amended to cover the changes. Per ADS 204, it is the responsibility of the USAID A/COR to keep the MEO/REA and BEO informed of any new information or changes in the activity that might require revision of this environmental analysis and environmental determination.
Amendment 2 for the Integrated Health Services and resiliency (IHSR) project IEE

USAID APPROVAL OF ENVIRONMENTAL ACTION(S):

Deputy Director, Population and Family Health Office Clearance:

Andrea Halverson

Mission Environmental Officer Clearance:

Haithem Ali

Program Office Clearance:

Jessica Morrison

Resident Legal Officer Clearance:

Jeffrey-Meyers

Acting Regional Environmental Advisor Clearance:

Anan Masri

Acting Deputy Mission Director Approval:

Matthew Sumpter

Acting Mission Director Approval:

Ralph Koehring

CONCURRENCE:

Bureau Environmental Officer, Middle East:

John Wilson

DISTRIBUTION:

Mission Environmental Officer; IEE File
MEMORANDUM TO FILE

TO: Daniel Sinclair, Director, Population and Family Health Office

FROM: Jeffrey Meyers, Resident Legal Officer

SUBJECT: Application of the Purpose Accomplished Upon Disbursement Principle to the USAID Contribution to the Jordan Health Fund for Refugees (JHFR)

DATE: December 11, 2018

Pursuant to longstanding principles of appropriations law, as applied in a variety of situations and recognized by the US Government Accountability Office and federal courts, the requirements applicable to USG grant funds no longer apply after those funds have been expended for an authorized purpose. USAID has applied this concept in a number of contexts, including program contributions to Public International Organizations (PIOs) and grants to Host Country Governments and bilateral donors. Application of the Purpose Accomplished Upon Disbursement (PAUD) principle is particularly well-suited for situations such as the Jordan Health Fund for Refugees (JHFR), in which contributions from multiple donors are commingled in a Host Country Government-managed account. The standard in ADS 308 for using PAUD for PIO grants is instructive in considering its application to USAID’s contribution to the JHFR multi-donor account: “[w]here a significant purpose of a grant ... is accomplished upon disbursement of USAID funds in respect of a general project contribution, such funds may lose their federal character [upon disbursement].... The determination of whether the disbursement of USAID funds accomplishes a significant purpose of a grant is fact-based and situation specific.”

In this case the determination on PAUD applicability is straightforward. The JHFR, and the corresponding Joint Financing Arrangement (JFA) among international donors, was established for the specific purpose of effecting change to the Government of Jordan’s (GOJ’s) policies on the provision of health care services to Syrian refugees. Under the JFA, Donors will make JHFR contributions to a special GOJ account managed by the Ministry of Health (MOH). These funds will be available to offset the costs to the GOJ of returning to a policy under which Syrian refugees receive free-of-charge or highly subsidized primary and secondary health services from MOH facilities. This change in policy is expected to increase significantly the utilization of health care services by Syrian refugees, thereby improving the well-being of the refugee population and the overall health situation in Jordan.

The primary purpose of USAID’s contribution to the JHFR is to effect this change in the GOJ’s policy, while also encouraging and leveraging contributions from other donors. Based on the structure and costing of the JHFR, in which funding is available to offset the costs of free-of-charge or highly subsidized services only and corresponds to the rates of utilization by Syrian
refugees, the primary purpose will necessarily be accomplished upon disbursement to the JHFR account. Application of the PAUD principle in this case allows USAID to take advantage of a multi-donor platform, which is encouraged by Section 102(b)(11) of the Foreign Assistance Act, while facilitating USG leadership for an important multilateral initiative.

USAID will serve on the Steering Committee for the JHFR and will have a significant role in donor coordination, program direction, and oversight, pursuant to the terms of the JFA. The USAID contribution will be made by bilateral agreement(s) (i.e., implementation letter), which may include, as a policy matter, provisions or restrictions on the use of USG funds not covered in the JFA.

For these reasons, application of the PAUD principle is appropriate for the USAID contribution(s) to the JFHR.