INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY DATA

<table>
<thead>
<tr>
<th>Project/Activity Name:</th>
<th>Transforming Education for Students and Teachers in Liberia (TESTS)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Geographic Location(s) (Country/Region):</td>
<td>Liberia, West Africa</td>
</tr>
<tr>
<td>Amendment (Yes/No), if Yes indicate # (1, 2...):</td>
<td>No</td>
</tr>
<tr>
<td>Implementation Start/End Date (FY or M/D/Y):</td>
<td>March 30, 2020 to March 29, 2025</td>
</tr>
<tr>
<td>If Amended, specify New End Date:</td>
<td></td>
</tr>
<tr>
<td>Solicitation/Contract/Award Number:</td>
<td>TBD</td>
</tr>
<tr>
<td>Implementing Partner(s):</td>
<td>TBD</td>
</tr>
</tbody>
</table>

ORGANIZATIONAL/ADMINISTRATIVE DATA

| Implementing Operating Unit(s): (e.g. Mission or Bureau or Office) | Liberia |
| Lead BEO Bureau: | Africa |
| Funding Account(s) (if available): | USAID/Liberia |
| Original Funding Amount: | $21,750,000.00 |
| If Amended, specify funding amount: | NA |
| If Amended, specify new funding total: | NA |
| Prepared by: | Ara Chea |
| Date Prepared: | December 10, 2019 |

ENVIRONMENTAL COMPLIANCE REVIEW DATA

| Analysis Type: | X Environmental Examination |
| Environmental Determination(s): | □ Categorical Exclusion(s) |
| | □ Positive |
| | □ Deferred (per 22CFR216.3(a)(7)(iv)) |
| | X Negative |
| IEE Expiration Date (if different from) | December 2025 |
PROJECT DESCRIPTION AND PURPOSE

The goal of TESTS Activity is to improve the quality of targeted Early Childhood Education (ECE) and primary teachers’ instructional delivery. It promotes a train-the-trainers model that will build local capacity of Liberian universities and community colleges to achieve its purposes: (1) strengthen the capacity of selected public, private, and faith-based institutions to train teachers so that they are capable of delivering quality instruction; (2) improve the content knowledge and pedagogical skills of targeted Liberian ECE and primary school teachers; and (3) improve the enabling environment for teaching practice.

TESTS is a new activity that will be under the USAID/Liberia Education Office. A previous approved umbrella IEE for the Education Office that covers the period September 30, 2017-March 30, 2022 did not include this activity.

THRESHOLD DETERMINATION AND SUMMARY OF FINDINGS

ENVIRONMENTAL DETERMINATIONS

A Negative Determination is recommended for the Liberia TESTS IEE portfolio activities. Sub-activities 1.1-1.7 have no expected environmental impacts and so no associated conditions. For Sub-activity 1.8, a Negative Determination with Conditions is recommended pursuant to 22CFR216.3(c)(2)(iii).

Implementing partners shall develop a comprehensive EMMP for each project, with specific mitigation and monitoring plans for all activities recording a negative determination with conditions. If project implementation takes advantage of sub grants/awards, partners shall adapt USAID’s “Supplemental Environmental Review Forms” for program activities to develop an internal environmental screening form for all project activities to ensure that potentially negative impacts are foreseen, and plans are developed for their mitigation. Based on the screening form, partners would be required to produce an Environmental Review Report for each activity. In addition, the Environmentally Sound Design and Management Capacity-Building for Partners and Programs in Africa (ENCAP) training programs for Mission Staff, implementing partners and GOL counterpart staff will be utilized.

TABLE 1: DEFINED ACTIVITIES

<table>
<thead>
<tr>
<th>Projects/Activities: Transforming the Education System for Teachers and Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sub-activity 1.1: Teacher/Facilitator Training and Faculty Development</td>
</tr>
<tr>
<td>Sub-activity 1.2: General Curricula and Learning/Teaching Materials and Resources Development;</td>
</tr>
<tr>
<td>Sub-activity 1.3: Standards and Testing</td>
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<td>Sub-activity 1.4: Student Services</td>
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<tr>
<td>Sub-activity 1.5: Outreach, Advocacy, and Community Mobilization</td>
</tr>
<tr>
<td>Sub-activity 1.6: Integration of Innovative Technologies</td>
</tr>
<tr>
<td>Sub-activity 1.7: Program Learning Assessment and Evaluation activities (including pilots, special studies, etc.)</td>
</tr>
</tbody>
</table>
Sub-activity 1.8: Small-scale renovation of schools’ bathrooms and construction of handicap ramps

CLIMATE RISK MANAGEMENT

Liberia is vulnerable to the impacts of climate variability and change, such as warmer temperatures, increases in annual rainfall, and increases in the frequency of heavy rainfall events. These climate change impacts present challenges to the country’s socio-economic development. Liberia’s low adaptive capacity to respond to climate change is partially due to the detrimental effects of the 1989-2003 Civil War. Since the war, the government, along with various international and national institutions and organizations, has been taking actions to better understand and address climate change challenges throughout the country. Remaining needs include data on short and long-term climate change impacts and vulnerabilities within the country, as well as the financial, technological, and human resources to identify adaptation priorities and implement appropriate adaptation plans and strategies.

Short-term climate variability is already affecting Liberia, including temperature increases and rainfall variability. As the GoL notes in their new national climate policy, “the impacts of climate change in Liberia not only undermine development gains but also poses serious risk to food security and adaptive capacity,” requiring urgent and concerted national action. As impacts become more pronounced, climate change may erode the progress that Liberia has made and limit gains in the future, including the government’s ability to address its development challenges.

The Climate Risk management results indicated that increased temperatures, changes in amount and duration of rainfall and sea level rise would be addressed through a range of integrated strategies to include preparation and implementation of Teacher Training Institutes emergency plans, involving learners, teachers and communities, practicing Early Warning, Simulation Drills, and Evacuation for expected and recurring disasters and implementing improved ventilation in schools utilizing improved energy technologies.

BEO SPECIFIED CONDITIONS OF APPROVAL

N/A

IMPLEMENTATION

In accordance with 22CFR216 and Agency policy, the conditions and requirements of this document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Sections 1, 2, and 3 of the IEE. 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 AOR/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.
USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY NAME: Transforming the Education System for Teachers and Students


Approval: Sara Walter, Mission Director
Date: 1/6/2020

Clearance: Rebekah Eubanks, Deputy Mission Director
Date: 12/12/19

Clearance: Aliou Tall, Acting Education Office Director
Date: Dec 13, 2019

Clearance: Ara Chea Activity Manager
Date: 12/12/2019

Clearance: Kokulo Yorobor Mission Environmental Officer
Date: 1/13/19

Clearance: Regina Jun, Acting Supervisory Program Officer
Date: 12/17/19

Clearance: Henry Aryestey, Regional Environmental Advisor
Date: Cleared by email 12/17/19

Clearance: Ro-Witecha, Regional Legal Officer
Date: 01/15/2020

Clearance: Cleared by Email
Date: Colin Quinn, AFR Bureau Climate Integration Lead

Concurrence: Brian Hirsch, Bureau Environmental Officer
Date: 01/27/2020
USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY NAME: Transforming the Education System for Students and Teachers in Liberia

Bureau Tracking ID:

Clearance: ____________________________ 12/27/2019

April O’Neill, Acting Deputy Mission Director  Date
Clearance of USAID Liberia Education IEE for Transforming Education for Students and Teachers in Liberia (TESTS) Activity

Ro Wietechea <rwietechea@usaid.gov>
To: Ara Chea <achea@usaid.gov>
Cc: Henry Aryeetey <haryeetey@usaid.gov>, Aliou Tall <atall@usaid.gov>, Solomon Page <spage@usaid.gov>, Miriam White <mwhite@usaid.gov>

Mon, Dec 30, 2019 at 11:50 AM

To the extent you still are waiting for RLO clearance, I clear.

Ronald O. ("Ro") Wietechea
Resident Legal Officer, USAID/West Africa
Office: (+233) 30 274 1564
Mobile: (+233) 54 012 4811
rwietechea@usaid.gov

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[Quoted text hidden]
Clearance of USAID Liberia Education IEE for Transforming Education for Students and Teachers in Liberia (TESTS) Activity

Warren Leishman <wleishman@usaid.gov>  
To: Ara Chea <achea@usaid.gov>  
Cc: Aliou Tall <atall@usaid.gov>, Solomon Page <spage@usaid.gov>, Miriam White <mwhite@usaid.gov>

RLO clears the TESTS IEE.

-Warren
Warren D. Leishman
Resident Legal Officer
USAID/West Africa
Tel: (+233) 30 274-1400
Mob: (+233) 24 431-1280

This message may contain privileged attorney work product / attorney-client communication.

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INITIAL ENVIRONMENTAL EXAMINATION

1.0 PROJECT/ACTIVITY DESCRIPTION

1.1 PURPOSE AND SCOPE OF IEE

The purpose of this initial environmental examination is to include a new activity that was not covered under the original USAID Liberia Education Umbrella IEE.

The purpose of this document, in accordance with Title 22, Code of Federal Regulations, Part 216 (22CFR216), is to provide a preliminary review of the reasonably foreseeable effects on the environment of the USAID intervention described herein and recommend determinations and, as appropriate, conditions, for these activities. Upon approval, these determinations become affirmed, per 22CFR216 and specified conditions become mandatory obligations of implementation. This IEE also documents the results of the project/activity level Climate Risk Management process in accordance with USAID policy (specifically, ADS 201mal).

This IEE is a critical element of USAID’s mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation. Potential environmental impacts should be addressed through formal environmental mitigation and monitoring plans (EMMPs) and/or Environmental Assessments (EAs), if needed.

1.2 PROJECT/ACTIVITY OVERVIEW

The goal of the TESTS Activity is to improve the quality of targeted Early Childhood Education (ECE) and primary teachers’ instructional delivery. It promotes a train-the-trainers model that will build local capacity of Liberian universities and community colleges, to achieve its purpose, which is to (1) strengthen the capacity of selected public, private, and faith-based institutions to train teachers so that they are capable of delivering quality instruction; (2) improve the content knowledge and pedagogical skills of targeted Liberian ECE and primary school teachers; and (3) improve the enabling environment for teaching practice.

1.3 PROJECT/ACTIVITY DESCRIPTION

The TESTS Activity proposes to add value to teacher preparation in Liberia by supporting up to two years of full-time study for participating teacher-aspirants. The comprehensive teacher training program will lead to an Associate’s degree (AA) or Bachelor’s degree (BA) to prepare teachers for the ECE and early primary grade levels. Because the support for each teacher-aspirant will be limited to two years, candidates for the TESTS training program will be required to enter the program intent to pursue a course of study leading to an AA degree or with two years of prior higher education experience (for those opting for a BA degree). TESTS will assist training providers to develop and offer a more rigorous pre-service teacher preparation program, to be described in more detail below. This is in line with the recommendations of evaluations and studies cited above regarding the need for more in-depth and effective training.
TESTS recognizes that there are limited opportunities for those not currently on the payroll to be hired as permanent salaried MOE employees at this time, despite Liberia’s need for more teachers. As a result, TESTS training will be open to teachers in non-state schools and pre-service teachers who may seek employment in non-state schools as a result of limited GOL-salaried opportunities or for other personal or professional reasons. TESTS is also open to current GOL teachers selected by the MOE for participation in the activity.

**TABLE 2: DEFINED OR ILLUSTRATIVE ACTIVITY AND SUB-ACTIVITIES**

<table>
<thead>
<tr>
<th>Project/Activity 1: Transforming the Education System for Teachers and Students</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sub-activity 1.1</strong>: Teacher/Facilitator Training and Faculty Development</td>
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<td><strong>Sub-activity 1.2</strong>: General Curricula, Learning/Teaching Materials and Resource Development;</td>
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<td><strong>Sub-activity 1.7</strong>: Program Learning, Assessment and Evaluation (Including pilot and special studies) including gender (and disability) inclusion assessment of teacher training institutions to determine how to develop strategies for recruiting and retaining female teacher-aspirants</td>
</tr>
<tr>
<td><strong>Sub-activity 1.8</strong>: Small-scale renovation of school infrastructure (e.g. toilets to support the educational environment for teachers and students and construction of handicap ramps for disabled learners)</td>
</tr>
</tbody>
</table>
2.0 BASELINE ENVIRONMENTAL INFORMATION

Liberia has four major ecological zones: coastal plains; upper highland tropical forest; lower tropical forest zone; and a northern savannah zone and lies entirely within the Upper Guinean Forest ecosystem. Liberia contains two of the last three remaining large blocks of Upper Guinean Rainforest in West Africa. These biologically rich forests are home to approximately 240 timber species, 2,000 flowering plants, 600 bird species, 125 mammal species, 74 species of reptile, and more than 1,000 insect species. The Upper Guinean Forest ecosystem and is identified by Conservation International as a “Biodiversity Hotspot.”

The Environmental Threats and Opportunities Assessment (ETOA) completed by USAID/Liberia in late 2018 identified several concerns related to development, natural resource management, the lack of water and waste management infrastructure, and the lack of enforcement of environmental laws. As a result of the destruction of Liberia’s infrastructure during the prolonged conflict, piped water, drainage, wastewater, and solid waste management systems are severely lacking. As the ETOA points out, in spite of the EPA Act and the EPM Law that authorize the creation of regulations, rules, standards and guidelines, as well as the provide for penalties for violation, EPA has not officially promulgated any of these regulations, rules, standards and guidelines, so enforcement is not possible. The absence of a law enforcement division within the FDA also appears to hamper enforcement efforts.

2.1 LOCATIONS AFFECTED AND ENVIRONMENTAL CONTEXT (ENVIRONMENT, PHYSICAL, CLIMATE, SOCIAL)

Programs and resources will focus predominantly on six of Liberia’s 15 counties that have been identified by the Government of Liberia as priority Development Corridors: Bong, Grand Bassa, Lofa, Nimba, Montserratado, and Margibi. By concentrating efforts in these counties, the program will reach 75 percent of Liberians—of whom three quarters live below the poverty line—and exploit synergies across programs to maximize results. The location of the proposed activity and sub-activities will take place on already existing school property and no new ecosystems will be impacted.

2.2 APPLICABLE AND APPROPRIATE PARTNER COUNTRY AND OTHER INTERNATIONAL STANDARDS (E.G. WHO), ENVIRONMENTAL AND SOCIAL LAWS, POLICIES, AND REGULATIONS

THE ENVIRONMENTAL PROTECTION AGENCY ACT OF 2003 (EPA ACT)

The Environmental Protection Agency Act of (EPA Act) authorized the establishment of an overall institutional framework for sustainable management of the environment in Liberia.

NATIONAL ENVIRONMENTAL POLICY COUNCIL

The National Environmental Policy Council is responsible for formulating national environmental policy; setting environmental protection priorities, goals and objectives; and promoting inter-sectoral, private-public cooperation in the achievement of environmental policy.

LINE MINISTRY ENVIRONMENTAL UNITS

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To facilitate the coordination between the EPA and Line Ministries, the EPA Act requires each Line Ministry to establish an environmental unit. The units are charged with ensuring compliance with the requirements of the act, making comments on environmental impact assessments, and liaising with the EPA on environmental management.

ENVIRONMENTAL PROTECTION AND MANAGEMENT LAW
The Environmental Protection and Management Law (EPML) forms the legal framework for the sustainable development, management and protection of the environment by the Environmental Protection Agency in partnership with relevant ministries, autonomous agencies and organizations.

Liberia's Environmental Protection Agency (EPA)²

In keeping with Agency policies for provision of government to government assistance, USAID is committed to designing and implementing programs jointly with the partner government, and to implementing the programs using the partner government policies and procedures to the extent possible. The EPA Act establishes EPA as “the principal authority in Liberia for the management of the environment.” The EPA is an autonomous body under the Executive Branch of Government overseen by a nine-member Board of Directors appointed by the President from specific government agencies and the private sector. Part III of the Environmental Protection and Management Law (EPML) contains detailed procedures for the implementation of an Environmental Impact Assessment (EIA) program for Liberia. The EPA Act (Section 37) and EPML (Sections 6-33) require all public or private projects with a potentially significant impact on the environment to secure an EIA permit prior to commencement of the project.

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² Environmental Protection Agency (EPA) of the Republic of Liberia, November 26, 2002
3.0 ANALYSIS OF POTENTIAL ENVIRONMENTAL RISK

Construction activities have the potential to cause both direct and indirect adverse impacts on the environment. An example of a direct impact is the filling of a wetland to use as a project site. Indirect impacts are induced changes in the environment, population, and use of land and environmental resources. Potential rehabilitation and construction impacts associated with small-scale construction activities are to be mitigated by applying guidance for environmentally sound design and management (ESDM), including guidance found in USAID’s Sector Environmental Guidelines at [https://www.usaid.gov/environmental-procedures/](https://www.usaid.gov/environmental-procedures/) Environmental Protection and Management Law of Liberia.

PROJECT/ACTIVITY 1: TRANSFORMING THE EDUCATION SYSTEM FOR TEACHERS AND STUDENTS

While construction itself has a well-known set of potential adverse impacts, the activity described above involves substantially less activities than construction, as these activities are limited to small-scale renovation and/or refurbishment. Current structures have no historic, cultural, or social importance. No new road construction is envisioned under the education portfolio.

Renovations carried out under the TESTS contract will entail only minor renovations and construction of handicap ramps to provide learners with disabilities access to the school buildings. Works to be performed may also include the purchase and placement of furniture in existing structures. The work will be of short duration and will not necessitate the need for camps to be built to house workers. No heavy equipment (e.g., large tractors or excavation machines) will be employed in the renovations.

<table>
<thead>
<tr>
<th>Project/Activity:</th>
<th>Potential Environmental and Social Impacts for Negative Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activity 1: Transforming the Education System for Teachers and Students</td>
<td></td>
</tr>
<tr>
<td><strong>Sub-activity 1.1:</strong> Teacher/Facilitator Training and Faculty Development</td>
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<td></td>
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<td><strong>Sub-activity 1.6</strong> Integration of Innovative Technologies</td>
<td></td>
</tr>
<tr>
<td><strong>Sub-activity 1.7</strong> Program Learning, Assessment and Evaluation (Including pilot and special studies) including gender (and disability) inclusion assessment of teacher training</td>
<td>These activities are not anticipated to have any adverse impacts on the physical and biological environment.</td>
</tr>
</tbody>
</table>
institutions to determine how to develop strategies for recruiting and retaining female teacher-aspirants

<table>
<thead>
<tr>
<th>Sub-Activity 1.8: Small scale, bathrooms rehabilitation, and construction of handicap ramps.</th>
<th>Noise pollution</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Noise pollution</strong></td>
<td>During construction activities, noise may be caused by the operation of trucks, generators and concrete mixers. The increased noise level can negatively impact construction workers if appropriate worker safety measures are not implemented.</td>
</tr>
</tbody>
</table>

**Worker safety**

- Typical health and safety risks to construction workers include falls, injury from falling objects, crush injuries from collapses and equipment, flying debris, extreme heat stress brought on by high temperatures and humidity, and exposures to toxic materials including solvents, cement dust, lead and asbestos. Occupational injuries can permanently deprive construction workers of the ability to earn and livelihood and are often fatal.

**Latrine Rehabilitation**

- In operation, latrines can contaminate shallow groundwater and wells and, when not well maintained or of an open-pit design, can be the source of multiplication of flies, mosquitoes, spread of diseases, and foul odors. (Properly operated KVIP toilets, which are identified by as an intervention focus, address insect control and odor, though they may still contaminate groundwater.)

More specifically, poorly designed sanitation facilities can lead to insect-borne diseases: There are two groups to consider. Firstly, *culex* mosquitoes, which do not transmit malaria but can transmit filariasis, breed extensively in septic tanks and flooded latrines. Secondly, flies and cockroaches often thrive on excreta and have been implicated in some transmission of fecal-oral disease. Mosquitoes, flies, and cockroaches all constitute a great nuisance, and poor urban households have consistently been shown to spend substantial amounts of their limited household income on using control coils and nets.
### 4.0 ENVIRONMENTAL DETERMINATIONS

#### 4.1 RECOMMENDED CONDITIONS

The following table summarizes the recommended conditions based on the environmental analysis conducted. Upon approval, these determinations become affirmed, per 22 CFR 216. Specified conditions, detailed in Section 5, become mandatory obligations of implementation, per ADS 204.

The conditions noted in Table 4 are minimum set of mandatory conditions or mitigation measures that must be addressed in the EMMP and implemented by the partners. However, partners are expected to conduct their own analysis of impacts and associate mitigations measures in their activity specific EMMP that will elaborate and build upon the minimum set of conditions noted in Table 4. As noted in the BEO Specific Conditions of Approval, the implementing partner will "These EMMPs/EMMRs/ERFs/ERRs will be shared with the BEO in the Google Folder: [https://drive.google.com/drive/u/0/folders/11havlAxH08vgaiUtmpGXpv2xnxRWSNK](https://drive.google.com/drive/u/0/folders/11havlAxH08vgaiUtmpGXpv2xnxRWSNK)

<table>
<thead>
<tr>
<th>Project/Activity:</th>
<th>Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Activity 1: Transforming the Education System for Teachers and Students</strong></td>
<td></td>
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<tr>
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<td></td>
</tr>
<tr>
<td><strong>Sub-activity 1.3</strong> Standards and Testing</td>
<td>No associated conditions.</td>
</tr>
<tr>
<td><strong>Sub-activity 1.4</strong> Student Services</td>
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<td></td>
</tr>
</tbody>
</table>
| **Sub-Activity 1.8:** Small scale, bathrooms rehabilitation, and construction of handicap ramps. | **Associated Conditions:**  
1. **Good-practice design standards** must be implemented for new construction and rehabilitation works, generally consistent with USAID’s [Sector Environmental Guidelines: Water Supply & Sanitation](https://example.com). These standards must be specified in the EMMP. |
2. For **latrines**, they must include provisions to prevent contamination of water supplies, appropriate choice of latrine type given local environmental conditions (e.g. pit latrines are rarely suitable in locations where the water table is high), provision of handwash stations, and development and implementation of a system for ongoing latrine cleaning and maintenance.
4.2 CLIMATE RISK MANAGEMENT

Per guidance provided in ADS 201 Climate Risk Management for USAID Projects and Activities (201mal_101216), the activity design team conducted a CRM screening; technical guidance provided by the Mission Climate Integration Lead (CIL). USAID’s Climate Risk Screening and Management Tool (for activity design) It was made available to the technical team and used to assess the potential climate risks for the proposed activities. The analysis was reviewed as a team and the climate risks to its components were rated as low and moderate according to the CRM risk-rating guidance. Management options and potential adaptation measures were analyzed and refined using the climate matrix.

Using the Liberia’s Climate Risk Profile, we assessed the TESTS activity using the Climate Risk Screening and Management Tool, assigned a risk rating and developed mitigation actions that could be included in our Activity design and implementation. We also identified Opportunities to Strengthen Climate Resilience in our activity. The most significant climate risks to the activity are discussed in the table below. The rationale behind the acceptance of any climate risks is also presented and justified.

**TABLE 4. PROJECT CLIMATE RISK MANAGEMENT SUMMARY TABLE**

<table>
<thead>
<tr>
<th>Defined or Anticipated Project Elements</th>
<th>Climate Risks</th>
<th>Risk Rating</th>
<th>How Risks are Addressed at Project Level</th>
<th>Further Analysis and Actions for Activity Design/ Implementation</th>
<th>Opportunities to Strengthen Climate Resilience</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small-scale renovation</td>
<td>Increased Temperatures</td>
<td>Low</td>
<td>Classrooms designed with increased ventilation</td>
<td>Employ renewable energy technologies in new designs.</td>
<td>Consider building to withstand tropical storms, increased rainfall and flooding. Prepare schools emergency plans.</td>
</tr>
<tr>
<td></td>
<td>Changes in amount and duration of rainfall</td>
<td>Low</td>
<td>Build schools closer to homes.</td>
<td>Consider transportation for students.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sea level rise</td>
<td>Low</td>
<td>Relocate school buildings away from coastlines.</td>
<td>Designate alternative classrooms or school sites.</td>
<td>Involve Students, Teachers, and Communities in Practicing Early Warning, Simulation Drills, and Evacuation for Expected and Recurring Disasters</td>
</tr>
</tbody>
</table>
5.0 CONDITIONS AND MITIGATION MEASURES

5.1 CONDITIONS

The environmental determinations in this IEE are contingent upon full implementation of the following general implementation and monitoring requirements, as well as ADS 204 and other relevant requirements.

5.1.1 During Pre-Award:

5.1.1.1 Pre-Award Briefings: As feasible, the design team and/or the cognizant environmental officer(s) (e.g., MEO, REA, BEO) will provide a pre-award briefing for potential offerors on environmental compliance expectations/responsibilities at bidders’ conferences.

5.1.1.2 Solicitations: The design team, in coordination with the A/CO, will ensure solicitations include environmental compliance requirements and evaluation criteria. A/CO will ensure technical and cost proposal requirements include approach, staffing, and budget sufficient for complying with the terms of this IEE.

5.1.1.3 Awards: The A/COR, in coordination with the A/CO, will ensure all awards and sub-awards, include environmental compliance requirements.

5.1.2 During Post-Award:

5.1.2.1 Post-Award Briefings: The A/COR and/or the cognizant environmental officer(s) (e.g., MEO, REA, BEO) will provide post-award briefings for the IP on environmental compliance responsibilities.

5.1.2.2 Workplans and Budgeting: The A/COR will ensure the IP integrates environmental compliance requirements in work plans and budgets to comply with requirements, including EMMP implementation and monitoring.

5.1.2.4 Staffing: The A/COR, in coordination with the IP, will ensure all awards have staffing capacity to implement environmental compliance requirements.

5.1.2.5 Records Management: The A/COR will maintain environmental compliance documents in the official project/activity file and upload records to the designated USAID environmental compliance database system.

5.1.2.6 Host Country Environmental Compliance: The A/COR will ensure the IP complies with applicable and appropriate host country environmental requirements unless otherwise directed in writing by USAID. However, in the case of a conflict between the host country and USAID requirements, the more stringent shall govern.
5.1.2.7 Work Plan Review: The A/COR will ensure the IP verifies, at least annually or when activities are added or modified, that activities remain within the scope of the IEE. Activities outside of the scope of the IEE cannot be implemented until the IEE is amended.

5.1.2.8 IEE Amendment: If new activities are introduced or other changes to the scope of this IEE occur, an IEE Amendment will be required.

5.1.2.14 USAID Monitoring Oversight: The A/COR or designee, with the support of the cognizant environmental officer(s) (e.g., MEO, REA, BEO), will ensure monitoring of compliance with established requirements (e.g., by desktop reviews, site visits, etc.).

5.1.2.16 Environmental Compliance Mitigation and Monitoring Plan: The A/COR will ensure the IP develops, obtains approval for, and implements Environmental Mitigation and Monitoring Plans (EMMPs) that are responsive to the stipulated environmental compliance requirements.

5.1.2.17 Environmental Compliance Reporting: The A/COR will ensure the IP includes environmental compliance in regular project/activity reports, using indicators as appropriate; develops and submits the Environmental Mitigation and Monitoring Reports (EMMRs); and completes and submits a Record of Compliance (RoC) describing their implementation of EMMP requirements in conjunction with the final EMMR or at the close of sub activities (as applicable). And where required by Bureaus or Missions, ensure the IP prepares a closeout plan consistent with contract documentation for A/COR review and approval that outlines responsibilities for end-of-project operation, the transition of other operational responsibilities, and final EMMR with lessons learned.

5.1.2.18 Corrective Action: When noncompliance or unforeseen impacts are identified, IPs notify the A/COR, place a hold on activities, take corrective action, and report on the effectiveness of corrective actions. The A/COR initiates the corrective action process and ensures the IP completes and documents their activities. Where required by Bureaus or Missions, ensure Record of Compliance is completed.

5.2 AGENCY CONDITIONS

5.2.1 Sub-award Screening: The A/COR will ensure the IP uses an adequate environmental screening tool to screen any sub-award applications and to aid in the development of EMMPs.

5.2.2 Programmatic IEEs (PIEE): PIEEs stipulate requirements for additional environmental examination of new or country specific projects/activities. The A/COR of any project/activity being implemented under a PIEE will ensure appropriate reviews are conducted, typically through a Supplemental IEE, and approved by the cognizant BEO.
5.2.3 Supplemental IEEs (SIEEs): An SIEE will be prepared for any new project/activity being planned which fall under a PIEE. The SIEE will provide more thorough analysis of the planned activities, additional geographic context and baseline conditions as well as specific mitigation and monitoring requirements.

5.2.4 Other Supplemental Analyses: The A/COR will ensure supplemental environmental analyses that are called for in the IEE are completed and documented.

5.2.5 Resolution of Deferrals: If a deferral of the environmental threshold determination was issued, the A/COR will ensure that the appropriate 22CFR216 environmental analysis and documentation is completed and approved by the BEO before the subject activities are implemented.

5.2.6 Positive Determination: If a Positive Determination threshold determination was made, the A/COR will ensure a Scoping Statement, and if required an Environmental Assessment (EA), is completed and approved by the BEO before the subject activities are implemented.

5.2.7 Compliance with human subject research requirements: The AM, A/COR shall assure that the IP and sub-awardees, -grantees, and -contractors demonstrate completion of all requirements for ethics review and adequate medical monitoring of human subjects who participate in research trials carried out through this IEE and ensure appropriate records are maintained. All documentation demonstrating completion of required review and approval of human subject trials must be in place prior to initiating any trials and cover the period of performance of the trial as described in the research protocol.
6.0 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.

Other than projects/activities determined to have a Positive Threshold Determination, 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 22 CFR 216.2(d).

In addition, other than projects/activities determined to have a Positive Threshold Determination and/or a pesticide management plan (PERSUAP), it is confirmed that the projects/activities described herein do not involve any actions listed below. Any of the following actions would require additional environmental analyses and environmental determinations:

- Support project preparation, project feasibility studies, or engineering design for activities listed in §216.2(d)(1);
- Affect endangered and threatened species or their critical habitats per §216.5, FAA 118, FAA 119;
- Provide support to extractive industries (e.g. mining and quarrying) per FAA 117;
- Promote timber harvesting per FAA 117 and 118;
- Lead to new construction, reconstruction, rehabilitation, or renovation work per §216.2(b)(1);
- Support agro-processing or industrial enterprises per §216.1(b)(4);
- Provide support for regulatory permitting per §216.1(b)(2);
- Lead to privatization of industrial facilities or infrastructure with heavily polluted property per §216.1(b)(4);
- Research, testing, or use of genetically engineered organisms per §216.1(b)(1), ADS 211
- Assist the procurement (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, clean-up of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials. Pesticides cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act per §216.2(e) and §216.3(b).

7.0 REVISIONS

Per 22 CFR 216.3(a)(9), when ongoing programs are revised to incorporate a change in scope or nature, an IEE amendment will be prepared to identify and address all environmental impacts. 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 or environmental impacts, requiring revision of this environmental analysis and environmental determination.