PROJECT DATA:

Project Name: Higher Education Program
Country/region: Vietnam
Start Date: 07/22/2011 End Date: 9/30/2024
Life of Project Amount ($): 32,400,000
IEE Amendment Prepared by: Nguyen Phuong Thao Date: 03/20/2020
Original IEE: Asia 11-104

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Categorical Exclusion: [ X ] Negative Determination with Conditions: [ X ]
Positive Determination: [ ] Deferral: [ ]

Purpose and Scope

The purpose of this Amendment No 3 to the original IEE (Database Control Number: Asia 11-104) is to timely and duly reflect on the:

1. expansion of the higher education activities mentioned below, which are recommended for Categorical Exclusion and Negative Determination with Conditions
2. increase of the life-of-project amount from $30,700,000 to $32,400,000.

The scope and nature of all earlier approved activities with Categorical Exclusion Threshold Decision remain unchanged.

Background and Description of Activities

USAID/Vietnam’s Higher Education Project has implemented following activities which were approved with Categorical Exclusion or Negative Determination with Conditions:

1. Fulbright University Vietnam (FUV): This is a three-year FAA with the TEC of 7.2 M. Its scope covers: 1) sustainable revenue generation for the undergraduate school via student enrollment; 2) establishment of an intensive preparatory transition program that uses case-based learning; 3) accreditation support; and 4) strategic communication, public relations, and outreach. This will be done through development of admissions/
recruitment systems and personnel, financial aid programs, and a market-based tuition revenue model. This FAA has delivered 26 out of 31 milestones and it will conclude in May 2020.

2. Improving Access, Curriculum and Teaching in Medical Education and Emerging Diseases Alliance (IMPACT MED Alliance,) which will enhance the health workforce in Vietnam to address current and future health challenges by: 1) improving undergraduate medical education; 2) strengthening infection prevention and control; and 3) improving postgraduate medical education. IMPACT MED’s TEC is $7.8 million with the timeline from May 2016 to May 2022.

3. Building University-Industry Learning and Development through Innovation and Technology (BUILD-IT) which will focus on: 1) developing and strengthening higher education institutional and program innovation policies; 2) strengthening institutional capacity for high quality, high impact, academic programs and improved learning outcomes attainment; and 3) enabling university-private sector collaboration. BUILD IT is a $5.7M grant and it will conclude in September 2020, we anticipate the extension of one year with an additional $1M.

4. Fulbright University Vietnam (FUV) follow-on supporting: 1) improved institutional governance and financing, 2) improved Academic programs, 3) strengthened higher education and private sector partnerships. This activity is designed with the proposed TEC of $10 M and to be implemented from FY2020 to FY2023.

This IEE Amendment No 3 will cover the following additional higher education activities:

1. Extension of Improving Access, Curriculum and Teaching in Medical Education and Emerging Diseases Alliance (IMPACT MED Alliance). The extension will focus on improving infection prevention and control capacity for hospitals and front-line health care workers to fight global pandemic. The cost extension for the activity is up to $700,000. Completion time of the activity is May 2022.

2. Extension of Building University-Industry Learning and Development through Innovation and Technology Alliance (BUILD IT). The scope of the extension will focus on: 1) leadership development, 2) quality assurance, 3) education technology, and 4) university-industry partnerships. Additional funds to the activity is $1 million and the completion date is extended until September 2021.

These activities are in the scope of the IR2: Targeted higher education institutions modernized and contribute to the Mission’s CDCS goal of an open and prosperous Vietnam by increasing Vietnam’s economic competitiveness.

These activities are all education, technical assistance, or training programs which will have no detrimental impact on the environment. However, this project also includes actions that, if managed ineffectively, may cause adverse impacts and can offset or eliminate these intended benefits.
On the other hand, the activities will pursue environment-friendly practices for meetings and workshops and travels as much as possible, such as no use or limited use of single-use plastics, low emission travels whenever possible.

**Recommended Threshold Decision**

**Justification for Categorical Exclusion Request** (about 95% or more of total funding)

The activities described justify Categorical Exclusions, pursuant to 22CFR216.2(c)(1) and (2), for which an Initial Environmental Examination, or an Environmental Assessment are not required because the actions do not have an effect on the natural or physical environment.

Specifically, as currently planned, these activities fall into the following classes of action:

- Education, technical assistance, or training programs (216.2(c)(2)(i))
- Analyses, studies, academic or research workshops and meetings (216.2(c)(2)(iii))
- Document and information transfers (216.2(c)(2)(v)).

**Negative Determination with Conditions** (less than 5% of total funding)

The following actions are recommended for a Negative Determination with Conditions determination. When implemented ineffectively they may cause potential adverse environmental and social impacts that can offset or eliminate the intended benefits. Mitigating environmental and social impacts of these actions requires a participatory approach in activity design and management.

While most IMPACT MED’s activities are training and coaching, and when USAID funds are not used for procurement of equipment as defined in ADS 312 or other activities with potential impacts, practical activities in hospitals and community clinics may involve general medical wastes and environmental and social risks. The implementing partner shall work closely with its university and hospital partners to screen potential negative environmental and social impacts and help develop management plan to mitigate, monitor and report on the identified risks in accordance with the host country laws, regulations and standards, WHO guidelines and following USAID’s Sector Environmental Guidelines below:

Climate risk management

As per the ADS 201mal, USAID must factor climate resilience into international development programs and investments. Therefore, the design team has taken into consideration expected climate change impacts on the success of the activity. See the Climate Risk Assessment table below. Per this assessment, low to moderate risk has been identified. The implementing partner shall help beneficiaries to better integrate climate resilience into planning, design and implementation of relevant activities.

<table>
<thead>
<tr>
<th>Tasks / Defined or Illustrative Interventions</th>
<th>Climate Risks</th>
<th>Risk Rating</th>
<th>How Risks are Addressed</th>
<th>Opportunities to Strengthen Climate Resilience</th>
</tr>
</thead>
</table>
| Activity 1: BUILD IT                          | ● Extreme weather (storm, flooding) may affect participation to activities  
   ● Changing climate may cause spread of communal and other diseases.  
   ● Extreme weather like heavy flooding might cause disruption of teaching activities due to the fall in student attendance, so affecting the teaching quality. | moderate | ● Reschedule the interventions in the event of extreme weather  
   ● Online teaching are considered in such the weather condition | Teaching on WHO best practices and using appropriate guidance |
| Activity 2: IMPACT MED                        | ● Extreme weather (storm, flooding) may affect participation to activities  
   ● Changing climate may cause spread of communal and other diseases.  
   ● Humidity or heavy flooding might reduce the life cycle of some teaching equipment, so affecting the teaching activities. | moderate | ● Reschedule the interventions in the event of extreme weather  
   ● Keep and store these equipment in dry stores and regularly maintain these equipment | Teaching on WHO best practices and using appropriate guidance |
LIMITATIONS OF THE IEE

Any of the below actions before implementation would require an amendment to the IEE duly approved by the Asia BEO:

- Assistance for 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.
- Assistance, procurement or use of genetically modified organisms (GMOs) will require preparation of biosafety assessment (review) in accordance with ADS 211 in an amendment to the IEE approved by Asia BEO.
- Construction activities as defined by ADS 201maw and ADS 303maw.
- GDA and DCA

No procurement or use of asbestos, lead and mercury Containing Materials (ACM) (i.e. piping, roofing, etc.), Polychlorinated Biphenyl’s (PCB) or other toxic/hazardous materials prohibited by US EPA as provided at: http://www.epa.gov/asbestos and/or under international environmental agreements and conventions, e.g. Stockholm Convention on Persistent Organic Pollutants as provided at: http://chm.pops.int.

Revisions

If during implementation, project activities are considered outside of those described in this document, an amendment shall be submitted. Pursuant to 22CFR216.3(a)(9), if new activities are added and/or information becomes available which indicates that activities to be funded by the project might be “major” and the project’s effect “significant,” this determination will be reviewed and revised by the Agreement Officer’s Representative of the project, and submitted to the Mission Environmental Officer and Bureau Environmental Officer for approval and, if appropriate, an environmental assessment will be prepared.
APPROVAL OF REQUEST FOR CATEGORICAL EXCLUSION AMENDMENT

Mission Environmental Officer
Climate Integration Lead cleared via email
Nguyen Ngoc Thang
3/27/2020

Program Development Officer
Clearance CF with PDO edits
Cristina Fentross
3/25/2020

Regional Legal Advisor
Clearance cleared via email
John Niemeyer
3/27/2020

Regional Environmental Adviser
South East Asia & Pacific Islands
cleared via email
Shamenna Gall
3/25/2020

APPROVAL:
Mission Director
approved by email
03/30/2020
Michael Greene
3/30/2020

CONCURRENCE:
Asia Bureau Environmental Officer
William Gibson
3/31/2020

Cced: Project file, MEO tracking, OAA, RLO
Dear Thao,
I clear the amendment.
Best,
Thang

[Quoted text hidden]
IEE/RCE amendment for Higher Education project

Cristina Fentross <cfentross@usaid.gov>  Thu, Mar 26, 2020 at 2:30 PM
To: Thao Nguyen Phuong <thaonguyen@usaid.gov>
Cc: Aaron Brownell <abrownell@usaid.gov>, Lien Le Thi Ngoc <lienle@usaid.gov>

Hi Thao,

Thanks to Lien for reviewing, please see the google doc with PDO edits. I also suggest increasing the ceiling to include the $1M for Build IT so that we won't have to amend the IEE again in a couple weeks. I clear for PDO with edits (also written in the google doc).

Thanks and stay safe,
Cris

On Wed, Mar 25, 2020 at 4:22 PM Lien Le Thi Ngoc <lienle@usaid.gov> wrote:
Hi Cris, I have reviewed and made some edits. When we wrote IEE for Learns, we also commit to environment friendly practices at meetings and workshops and travels, so I have added the same to this IEE.

I am OK with it now. Please have a last look.

Thanks and Best Regards,

Le Thi Ngoc Lien
Project Design Specialist/Gender Advisor
USAID Vietnam
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Mobile +84 962052098
lienle@usaid.gov

On Wed, Mar 25, 2020 at 2:11 PM Cristina Fentross <cfentross@usaid.gov> wrote:
Hi Lien,

Can you help review the IEE for HE? Please confirm the TEC and duration. Aaron is busy with a TEC, so I would appreciate your eyes and I can review tomorrow.

Thanks,
Cris
[Quoted text hidden]
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CRIS FENTROSS (née Drost)
Director, Program Development Office
U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID)
Distance working: 7:00am - 4:00pm (Hanoi) from 2:00pm - 11:00pm (Oahu)
Email: cfentross@usaid.gov; Website: http://www.usaid.gov/vietnam;
John Niemeyer <jnieymer@usaid.gov>  
To: Thao Nguyen Phuong <thaonguyen@usaid.gov>  
Cc: Thang Nguyen <thnguyen@usaid.gov>, "Aaron Brownell (HANOI/PDO)" <abrownell@usaid.gov>, "Stephen Berlinguette (HCMC/PDO)" <sberlinguette@usaid.gov>  

Good work, and please feel free to note my legal clearance via this email, and happy weekend to all  
Best JN  

[Quoted text hidden]
Thao Nguyen Phuong <thaonguyen@usaid.gov>

IEE/RCE amendment for Higher Education project

Shamenna Gall <sgall@usaid.gov>  
To: Thao Nguyen Phuong <thaonguyen@usaid.gov>  
Cc: Thang Nguyen <thnguyen@usaid.gov>  

Wed, Mar 25, 2020 at 11:11 AM

Hello Thao, I clear on the IEE amendment.

Shamenna K. Gall  

United States Agency for International Development (USAID)  
Regional Environmental Advisor  
Southeast Asia and Pacific  
Regional Development Mission for Asia (RDMA)  
Bangkok, Thailand  
sgall@usaid.gov  
Phone:+66 02 257 3000 ext. 3285
Hi Thao. Good to hear from you, and congratulations on all the good work LinkSME is doing on PPE. It is being widely recognized, including at this morning’s embassy senior staff meeting.

I concur with the IEE amendment.

Thanks, mike