Applicant Questions and INL Responses

Enhancing Capacity for Anti-Money Laundering in Nicaragua

Opportunity Number: SFOP0006863

1. Can implementers involve the Government of Nicaragua in activities, for example inviting UAF representatives to participate in roundtables or workshops with DNFBPs or CSOs?

   No. In 2012, Nicaragua did not receive the fiscal transparency waiver required for the central government to receive U.S. foreign assistance, leading to a strategic shift in INL programming to work through civil society grants rather than working directly with the central government. Although direct involvement with the Government of Nicaragua (GON) is not permitted, INL encourages applicants to make extensive use of the UAF resources available on their website.

2. What is the definition of civil society organizations (CSOs) under this NOFO?

   For the purposes of this NOFO, INL provides a broad definition for civil society organizations (CSOs). CSOs are those organizations that are working in the interest of the citizens but operating outside of the governmental and for-profit sectors.

3. The NOFO states under Objective 3, Activity 4 "Create a resource document to provide CSOs and DNFBPs to assist them in self-reporting suspicious financial activity to appropriate NGO national and international AML watchdogs." Could you please clarify what INL means by "NGO national and international AML watchdogs"? Should implementers work with CSOs and DNFBPs to report SARs to UAF?

   For a resource document, applicants should develop a guide on anti-money laundering that will help participants to identify suspicious transactions, local and regional trends on AML, risk factors and prevention measures. The document should also include resources on laws related to AML. NGO national and international AML watchdogs refers to organizations or institutions that might be interested in following up on suspicious reports, in this case other regulators or independent media.

4. Are there any professions or businesses included under DNFBPs that INL would like applicants to prioritize?

   Applicants should include relevant professions or businesses under DNFBP. INL has taken notice of money laundering schemes including real estate companies, car dealerships, gold and cattle commercialization, however the applicant might include other professions or businesses that are relevant according to their knowledge and experience in the region. The DNFBP list of businesses to prioritize on AML training might increase once the baseline is completed.

5. The NOFO states under Objective 1, "Activity 1: Mapping of CSOs, non-financial businesses, and professions in Managua, León, and Chinandega." Could you please clarify what INL would like see in terms of "mapping"?

   INL requests the selected recipient identify the key actors (CSOs, non-financial businesses, and professions) that would benefit the most from participating in project activities. The mapping should cover several industries and businesses across Managua, Leon and Chinandega and should include data such as line of business, registration to

UAF,POC, and other relevant information necessary for the effective implementation of subsequent project activities.

6. NOFO p.17 "Note: Applicants should ensure that all proposed sub-grantees have a valid DUNS number." Are local sub-grantees expected to have a DUNS by the time an application is submitted?

   No, but sub-grantees must obtain a valid DUNS number before the sub-grant agreement is executed (i.e. before they begin working on the project and receiving funding).

7. Are all six of the outcome and output indicators listed on page 10 of the NOFO required?

   Applicants should include the outcome and output indicators from the NOFO. Applicants may propose additional outputs, indicators, and/or targets as appropriate. Please note the NOFO states "The recipient will be required to collect baseline data for all the PMP indicators during the first year of the project." Applicants are encouraged to developed their own Logical Framework Approach to identify outcome and output indicators that might not have been included in this proposal but are relevant to meet the objectives of the AML program.

8. Are applicants allowed to propose different activities than those listed in the NOFO under each Objective?

   Yes. However, activities should stay aligned with the objective they are supporting. Applicants are encouraged to developed their own Logical Framework Approach to identify outcome and output indicators that might not have been included in this proposal but are relevant to meet the objectives of the AML program.

9. NOFO p.9 "Example: Train 20 members of CSOs, 20 non-financial businesses, and 60 accountants, lawyers, and public notaries on anti-money laundering concepts and practices in each selected location." - Are these numbers illustrative of the number of beneficiaries INL would recommend applicants target?

   This is an example and those numbers can be used as a starting point. INL recommends a healthy balance of beneficiaries from different sectors (CSOs, non-financial businesses, lawyers and public notaries) when drafting technical narratives. As stated in the NOFO applicants are "expected to identify targets for these indicators based on what it can reasonably achieve within the performance period of the project and based on the expected overall project results described above". Applicants are encouraged to developed their own Logical Framework Approach to identify outcome and output indicators that might not have been included in this proposal but are relevant to meet the objectives of the AML program.

10. NOFO p.15 requests applicants to "list of previous and/or current U.S. federal assistance awards received, including the awarding agency, point of contact, name of the project, start and end dates, and amount of the award." Our organization has received many U.S. federal assistance awards. Should it list the most relevant in the past 5 years?

    Yes. Applicants are encouraged to list relevant awards that demonstrate the applicant's experience in managing U.S funds. The list must include all **active** projects. Please highlight recent and relevant experience on managing awards related to anti-money laundering or financial training.

11. Could an applicant conduct an expedited registration process with the support of a local law firm upon signature of the award? If not, would a proof of pending business registration make an applicant eligible?

    Due to the socio-political context, an expedited registration process might not be eligible. A pending registration process can make an applicant eligible. However, in the event selected recipient does not obtain legal registration in Nicaragua, the selected recipient should partner with an in-country organization that is legally registered in Nicaragua.

12. Could you please clarify if applicants need to use the M&E template provided, or can we list indicators not per activity but per objective?

    It is encouraged, though not required, for applicants to use the M&E template provided in the templates. If an applicant uses its own template, the M&E plan must match program objectives and activities with indicators.

13. Should the M&E Plan be submitted in Excel format? Should the M&E Narrative be in Excel or Word format?

    INL prefers for M&E plans to be submitted in spreadsheet format (e.g. Microsoft Excel), but applicants may provide the narrative in either spreadsheet or word document format.

14. In the application package on grants.gov, a document entitled "INL Scope of Work Guidance Document" was provided. Could you please clarify what is expected of applicants with regard to this document, as it is not mentioned in the NOFO?

    The selected applicant will work with the Grants Officer Representative to draft a Scope of Work, based on the final proposal narrative, as part of the official grant package. This document is **not** required as part of the application stage. To avoid confusion, we will remove this document from the templates folder.

15. Are applicants required to use the Budget Narrative template provided? Or can we use our own format if it contains the same type of information?

    Applicants can use their own template for the Budget Narrative, as long as it follows the general guidelines outlined in INL's template.

16. Would INL prefer that applicants include several of the required documents (e.g., Timeline, Risk Analysis) in one Word document?

    Applicants may structure their application package in the way they see fit, but all documents should be clearly marked to ensure all required documents are accounted.

17. Is there a total page limit for all the additional documents listed on p.15 and p.16 of the NOFO (M&E Plan, Logic Model, Timeline, Project Risk Analysis, Roles and Responsibilities, List of Awards, Annual Survey)?

    There are no page limits for the documents referenced in the question. However, as stated in the checklist,"15. Other Attachments" should not exceed 5 pages.