ASHA FY21 RFA (72ASHA21RFA00001)
Public Comments and Responses
Posted 02/18/2021

General RFA Comments		
Organization	**Public Comment**	**ASHA Response**
1	Q1: There are two references to a Project Description in the recently released FY21 ASHA RFA. Page 32: **2.** Commodity and Construction/Renovation Approach Criterion (30% weight) **a.** Commodities For commodity requests, identify and sufficiently justify specific durable commodities that directly contribute to the goals and objectives of the Project Description. Page 33: **b.** Construction/Renovation For Construction/Renovation approach, please provide the following information as listed below: **i.** Provide a description in one paragraph of the proposed ASHA-funded construction/renovation project and how it fits with the goals and objectives of the Project Description. If this is a part of a larger project, the approach should provide a description of the larger project and explain how the ASHA funded project fits within the larger project. Which part of the application is considered to be the Project Description?	The Project Description is made up of both the Phase 1 Technical Application and Phase 2 Technical Application as described on pages 17 and 18 of the RFA.

2	Q1: In the Budget Summary template, should the “Total Leveraged funds” column include cost-share to enable the USAID funds column and the Total Leveraged funds column to equal the total cost column?	If Cost share is included in the budget, it should be a separate column from the leveraged funds. The “Total Cost” column should be equal to the sum of all funding, i.e. USAID funds, leveraged funds, cost share. Note that cost share is not required as part of this RFA.
	Q2: In the event of a construction/renovation project, is it permissible to include A&E costs if the contract is tendered before an ASHA award is made, or is it preferable for the tender to be issued after an ASHA award is made/after the start date of the award?	It is recommended but not required to start the tender process after the Award is made. Recipients can start the bidding process at any time; however, they cannot enter into a contract until ASHA concurs on the A&E firm (which can only be done post-award).
	Q3: With regard to the M&E Approach section and AMEP: is the expectation that the Phase 2 Management Approach shall include an AMEP summary with the fuller AMEP being submitted separately within 30 days of award, as outlined in Section H of the RFA? In this case, are there any aspects of the AMEP that should be included in Phase 2 (e.g. the logic model and/or results framework)?	Per SECTION H: ADDITIONAL INFORMATION REQUIRED SUBSEQUENT TO APPLICATION, the Activity Monitoring and Evaluation Plan (AMEP) is required following issuance of an Award but not during the application process. In the Phase 2 Technical Application, when addressing the Management Approach Criterion, please refer to the AMEP template to inform your Monitoring and Evaluation (M&E) Approach. But the full AMEP is not required at this time.
3	Q1: As per Section: 3. Other (pp. 13-14) of the Request for Applications for Fiscal Year 2021 regarding the contingence of the "concurrence of the USAID Mission for the country where the award will be implemented," we would like to inquire if proposals focusing on Armenia would require the concurrence of the USAID Armenia Mission to be eligible for funding, if successful.	Yes, it would require USAID/Armenia’s concurrence.

4	Q1. Page 4 -- Footnote #4 (Improvements, renovations, alteration and refurbishment). Are improvements such as roof replacements considered non-structural and not allowed as part of the renovation component of this program? Or are roof renovations allowed?	Per the footnote on page 8: "'Improvements, renovation, alteration and refurbishment' for purposes of this policy includes any betterment or change to an existing property to allow its continued or more efficient use within its designed purpose (renovation), or for the use of a different purpose or function (alteration). Improvements also include improvements to or upgrading of primary mechanical, electrical, or other building systems. "'Improvements, renovation, alteration and refurbishment' does NOT include non-structural, cosmetic work, including painting, floor covering, wall coverings, window replacement that does not include changing the size of the window opening, replacement of plumbing or conduits that does not affect structural elements, and non-load bearing walls or fixtures (e.g., shelves, signs, lighting, etc.)." Improvements could either be structural (fall under construction/renovation) or non structural (fall under commodities project) both of which are allowable for funding under ASHA. Improvements such as roofs, solar panels, downspouts, rain harvesting systems will be considered a critical part of infrastructure and therefore considered structural based on review by a qualified engineer. If the project contains a simple roof and requires changing a few slats (no changes to structural roof beams or drainage pipes), then the project will be classed as non structural and

		would fall under a commodities project. However if you have a whole roof with solar panels or other environmental saving technology, or if the replacement affects the structural roof beams, then the project would be considered structural and would fall under a construction/renovation project. Most applications to ASHA have some complexity around their roofing systems and would mostly fall under a construction project. Please confer with an engineer to determine where your improvement project will fall.
	Q2. Page 9: Review and Approval of the Recipients' Implementation Plan: It is noted that the implementation plan includes a Construction Schedule (Gantt Chart). Will ASHA be providing a standard Gantt chart format that it wants applicants to use?	No.
	Q3. Page 10/11: Section C/Eligibility Information (3rd bullet) -- This section notes that when the USO/OSI share the same name, the applicant must provide proof that it is a registered legal entity and authorized to operate in the foreign country. Then a list of three acceptable proofs are given. Shouldn't this requirement be listed as a Mandatory Attachment in Annex 6, and not have this instruction/requirement buried in the eligibility section where it is easy to miss?	Noted. The requirement has been added to Annex 6.
	Q4. Page 14: Section 3, General Content and Form of Application: This notes that the application must be submitted in three separate parts, Technical Phase 1, Technical Phase 2, and Business (Cost) application. This is confusing -- later in the document it is clarified that this is actually two steps (1)	Noted. The RFA has been updated to clarify this.

	Tech Phase 1 and (2) Tech Phase 2 AND the Business (Cost) application.	
	Q5. Page 18: Phase 2, #2 Technical Application Format; This section notes that Phase 2 Technical applications are due within 60 days of the written notice by the agreement officer. Is 60 days really a reasonable turnaround time? Perhaps 90 days is more realistic, particularly given the constraints of the pandemic?	In order for ASHA to make awards before it loses its funding, the deadline for Phase 2 applications is 60 days from the date of written notice by the Agreement Officer. Please note this ASHA can allocate more time if needed.
	Q6. Page 30: Phase 1, Merit Review Criterion, Public Diplomacy Section (last sentence on the page). The application should address the relationship between the proposed project and US government foreign policy priorities in that country. Where can one access information about the US government's foreign policies in various countries? Can you provide a hyperlink to that information?	The RFA has been updated to include the following links: State Department Public Affairs: https://www.state.gov/bureaus-offices/under-secretary-for-public-diplomacy-and-public-affairs/bureau-of-global-public-affairs/; US Agency Integrated Country Strategies https://www.state.gov/integrated-country-strategies/;and USAID Mission in-country websites: https://www.usaid.gov/mission-directory.
	Q7. Page 31: Phase 1 Merit Review Criterion: Past Project Impact Statement: The first bullet notes the need to explain the strategic impact of the organization as tracked for the last three calendar years (2017, 2018, and 2019) -- should that be 2018, 2019, 2020?	Yes, regarding the FY 2021 RFA, the last three calendar years are 2018, 2019, and 2020.
	Q8. Business (Cost) application attachments: Can you please include a note on how ASHA would like these required documents to be titled/named? For example, the standard SF424s, etc? That standard document naming requirement is provided for other mandatory attachments, but not for the business application documents.	Please label the files as they are listed in Annex 5.

5	Q1: In regards to Section C: Eligibility Information, the RFA states the following: "One USO applicant may submit an application that requests funds to benefit multiple organizational units within a single OSI". This means that an applicant for example, could request funds for two campuses located in separate countries under one OSI in the same application?	Yes an application can be submitted for an OSI with multiple organizational units that have a legal relationship. However, the work to be performed under any ASHA grant or cooperative agreement must occur in a single country. Accordingly, in this case, the USO would need to request funds for the benefit of a single campus.
	Q2: In regards to page 21 of the RFA section (iv) Detailed budget of durable commodities, the RFA states that applicants must comply with ADS 310 and ADS 312. Can you please confirm that applicants cannot pay for IT software using ASHA funds as it is not listed in ADS 312.	ADS 312 lists items that are restricted (requiring prior approval) or ineligible to be paid for with USAID funding. IT software is not listed as restricted or ineligible. Please also note *NDAA Section 889 prohibition: Covered Telecommunication and Video Surveillance Equipment or Services* Pursuant to John S. McCain National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2019 (Pub. L. 115-232) Section 889 and ADS 303.3.35.2 (Effective August 13, 2020), a recipient may not procure covered telecommunication equipment or services for the implementation of their program using award funds (this includes ASHA awards). Please see page 37 of the RFA for this.
6	Q1: Re SF-424A: As a commodities acquisition project, all the federal funds requested for ASHA 2021 will be expended in Year One. That is not the case with the non-federal share (leveraged costs), which will be expended over two years.	Please fill out Line 14 as accurately as possible for Year One. If only a portion of non-federal funds (leveraged costs) will be expended in Year One, please list that amount. The

	How should we respond to Section D (Forecasted Cash Needs), line 14 (total non-federal share for Year One)? If we respond with leveraged funds for Year One only, the total (line 15) will not correspond to the total budget of the project. Please confirm that the expected response to line 14 is for Year One only.	income/expenditure in Year One is not supposed to match the expenditure for the Total Award.
7	Q1: The fourth bullet on p.15 refers to “Indicator table”. For consistency of terminology, use of “Monitoring and Evaluation Indicator table” could improve reader comprehension.	Noted.This has been updated in the RFA.
	Q2: Suggested to include the following (a) and (b) on p.19: (a) Use the File Name: “[Full name of USO] Phase2-Business Cost” (b) Cover Page (1 page) similar to what the RFA has on p.18. (a) Use the File Name: “[Full name of USO] Phase2-Tech” (b) Cover Page (3 pages)	Noted.This has been updated in the RFA.
	Q3: The paragraph on p.25 “Costs for shipping, installation, training, and warranty of the commodity are allowable if they are embedded in the cost of the item. These are not allowable if they are costs separate from the commodity.” This is problematic when the vendor links do not include costs for shipping, installation, training, especially when the applicant is procuring items from the U.S. for shipment overseas. In such instances, can the applicant show costs related to shipping, installation, and training separately in the Budget, but add an explanation regarding the relevance to the corresponding commodity?	No, shipping costs cannot be shown separately. The costs for shipping, installation, training, and warranty of a commodity must be embedded in the cost of the item in order to be allowable.

	Q4: Under (c) p.32, the requirement clearly states: “From the "F" indicators list, Applicants must identify at least 1 relevant indicator for its proposed project and must include at least 1 Gender indicator for the project's Gender integration efforts.” In the FY 2018 Foreign Assistance Standard Indicators (link provided), most GNDR indicators show the word “Edit” under the status. Should the indicators with “Edit” status not be used by applicants? If so, that would leave only two indicators with “active” status. - Number of local women participating in a substantive role or position in a peacebuilding process supported with USG assistance - Number of training and capacity building activities conducted with USG assistance that are designed to promote the participation of women or the integration of gender perspectives in security sector institutions or activities In the event that none of these two is applicable to the project activity outcome, could the applicant use any of the other GNDR indicators labeled “Edit”?	The FY2020 link can be found here: https://drive.google.com/file/d/1P8F6g7VdI7so98a3EWppsZSk0knYB1wG/view The “edit” status just means it has been edited in the last year. However it is still an indicator that you can report against. .
	Q5: In Annex 4b, there is a dedicated column labeled “Sub (Add)”. An example of what should be included in that column may be useful.	If the USO will have a direct relationship with another entity other than the OSI, e.g. the A&E firm or the construction firm, then that entity will be listed as “Sub (A&E)” or “Sub (Construction)”.
8	Q1: The application instructions on page 15 of the draft RFA specifies the font to use, but the Annex 1 Phase 1 template is fillable. It doesn’t seem like we can change the font or font size on this template to meet these instructions.	Noted. This has been updated in the RFA.
	Q2: Would an indigenous, herbal-based holistic health center	ASHA’s mandate according to Section 214 of the

	be an eligible project, as long as it meets the requirement of providing medical education?	Foreign Assistance Act is to support "hospital centers for medical education and research outside the United States." Hospital centers must be a teaching facility for certified medical staff and utilize and promote American values, ideas and/or practices in health care. Holistic centers are eligible as long as the application meets the requirements set forth in both Section 214 of the Foreign Assistance Act and the RFA at SECTION C: ELIGIBILITY INFORMATION.
	Q3: Would an OSI that is an all-boys school be considered to be discriminating based on gender, and thus ineligible?	While USAID works to reach all people within our partner countries, women and girls are often the most vulnerable, marginalized, and/or excluded from society. For an applicant proposing support to an all-boys school, the applicant organization would have to present a very compelling and well-developed argument articulating how such an organization would advance gender equality and empower women. The USAID Gender Equality and Women's Empowerment Policy principally contemplates engaging men/boys as champions in advocating for gender equality (with the understanding being that it is females who are operating at a disadvantage) and advancing women's/girls' rights.
9	Q1: According to Section A, subsection 1, "ASHA may make awards for projects in any country other than the United States, provided that USAID activities in that country are not otherwise restricted by statute, regulation, or Agency policy." Can you confirm if ASHA is able to consider projects implemented in China for FY21?	The policy towards China to be adopted by the incoming administration is not known at this time. If partners wish to submit a proposal working with a Chinese overseas institution, then ASHA would accept and review subject to future policy guidance and procurement guidance.

11	Q1: If the OSI and USO share the same name/entity and are able to provide proof that they are registered in the US and are authorized to operate in a foreign country, will they have to provide independently audited financial statements? or will one suffice?	Per page 2 of Annex 6, “If the USO and OSI are the same entity there is no need to submit independently audited financial statements for the OSI. If the USO and OSI are the same entity the applicant should make note of that fact in response to number 1 on the eligibility page of their application.”
	Q2: When will the Mission plan to publish the responses to the questions asked?	The Missions do not publish responses to questions submitted regarding ASHA’s FY 2021 RFA.
12	Q1: Is buying used equipment permitted under ASHA award? If yes, are there restrictions/limitations?	Per 6. Business (Cost) Application Format, i) Funding Restrictions, “In accordance with ADS 312.3.3, Restricted Commodities are not allowed in any ASHA award unless explicitly approved by the Agreement Officer (approval cannot be assumed by a reference statement) prior to procurement.” Used equipment is a restricted commodity per ADS 312.
	Q2: What is the clear definition of durable commodities? While a certain amount of hardware is necessary to create and maintain a digital classroom and library, but technology also includes software and programs, and the need to purchase or build an electronic database. We want to make sure that the items we list meet the definition of a durable commodity. As with most universities, there is a move to leverage technology. Online libraries allow greater access to books and journals. Do you have any guidance you are able to share as to what types, if any, software or database meet the definition of durable commodity?	Durable commodities are non-expendable items, like equipment and furnishings, that are eligible per ADS 312. Procurement of commodities may include such items as library materials, specialized medical and research technology, and education equipment and furnishings.

13	Q1: Is the full AMEP required to be presented within the Phase 2 Technical Application? The AMEP does not appear in the ANNEX 5 – REQUIRED PHASE 2 APPLICATION DOCUMENTS LAYOUT. The text in Section E.2.b (page 32) specifies: “The application should clearly describe how the proposed project will be monitored and evaluated using the ASHA AMEP template” as well as the FY 2018 “F” indicators and ASHA custom indicators. (The AMEP template includes the entirety of multi-page sections or annexes on Theory of Change, Logic Model, Monitoring Plan, Evaluation Plan, Learning Plan, Indicator Summary Table, Performance Indicator Reference Sheets, Roles-Responsibilities-Schedule, Data Management, etc.). However, on page 40 of the RFA it is indicated that “successful applicants will be required to finalize and submit” an AMEP 30 days after an award is granted. Is this a refinement of the AMEP that is submitted with the Phase 2 Technical Application?	Per SECTION H: ADDITIONAL INFORMATION REQUIRED SUBSEQUENT TO APPLICATION, the Activity Monitoring and Evaluation Plan (AMEP) is required following issuance of an Award but not during the application process. In the Phase 2 Technical Application, when addressing the Management Approach Criterion, please refer to the AMEP template to inform your Monitoring and Evaluation (M&E) Approach. But the full AMEP is not required to be submitted in Phase 2.
	Q2: If the full AMEP IS required in the Phase 2 Technical Application, how should it be presented as an annex, and titled/presented in the Table of Contents?	The full AMEP is not required to be submitted with the Phase 2 application.
	Q3: Must the indicator table in Annex 2b of the Phase 2 Technical Application be presented within the 6 page “Management Approach” or as an attachment? (The table with multiple “F” and custom indicators could take up half of the 6 page Management Approach section.)	The “table” must be within 6 pages of the Management Approach Section.

14	Q1: Is it possible for a USO's application to benefit more than one OSI-affiliated facility?	Yes, as long as the OSI affiliates are located within the same country and have a formal legal relationship to the OSI (such as a branch, subsidiary, affiliate, etc. of the OSI). For the avoidance of doubt, informal arrangements or relationships between institutions such as academic consortia would not qualify as a formal legal relationship to the OSI for purposes of this provision.
	Q2: If a USO application applied to construct a hospital center where medical education, research and/or medical treatment would occur, could the infrastructure of the hospital center include a residence hall?	Yes, construction of a hospital center residence hall would be acceptable if you can show how it contributes to ASHA's aim of highlighting American ideas and practices, providing concrete illustrations of the generosity of the American people, furthering U.S. Government public diplomacy, and catalyzing collaboration between U.S. citizens and citizens of other countries.
	Q3: During the review and selection process, if a Phase I or Phase II application is denied during the review and selection process, would USAID consider an oral debrief process for FY21 applications?	There will be no oral debriefs ASHA's RFA process.

Comments Specific to an Organization/Application		
Organization	**Public Comment**	**ASHA Response**
10	Q1: [Organization] has two buildings which are considered Lebanese heritage buildings. If we are to apply for rehabilitation support with one of the buildings which entails few administrative offices and two libraries for students, would	If the application fulfills the requirements in SECTION C: ELIGIBILITY INFORMATION, then it is eligible.

	this work? Can we be considered eligible to apply for the grant?	
12	Q1: Please confirm if this section on the form of Phase One is not applicable to our project in [Country]. (Phase 1 Past Project Impact Statement – ONLY for Applicants applying for the 30% Middle East set-aside (not to exceed 3 pages) - Please insert Past Performance Impact Statement below, in accordance with the instructions in Section E.2.a of this NOFO/RFA).	The Past Project Impact Statement is only required from applications who meet both criteria: (1) OSIs located in Algeria, Egypt, Iraq, Israel, Jordan, Lebanon, Libya, Morocco, Syria, Tunisia, West Bank & Gaza, and Yemen; (2) would like to apply for the 30% Middle East set-aside.
	Q2: We submitted a commodity request under RFA: 72-ASHA-19-RFA-00001. While we were accepted under Phase 1, our full application under Phase 2 was declined. ASHA has shared comments on the shortcomings of our application. Assuming that all ASHA recommendations are addressed and cleared this year, and the application strengthened, is it acceptable to submit a request for similar durable commodities proposed in the ASHA19 application for the new application? Many of these commodities will still be needed as we expand our student enrollment.	Yes, please feel free to use your previous RFA application debrief comments to revise your application and submit it under the new RFA along with any updated requirements under the new RFA.
	Q3: Our USO and OSI share the same Board – does this create any eligibility issues? For clarity, no members of the board are appointed by the host government, nor do we receive funding from the host government.	If the USO and OSI are the same legal entity there is no need to submit a board of directors for the OSI as they would be the same. If the USO and OSI are the same legal entity the applicant should make note of that fact in response to number 1 of the eligibility page of their application.