



USAID | WEST BANK/GAZA

FROM THE AMERICAN PEOPLE

December 7, 2012
2013-WBG-02

To: All USAID/West Bank and Gaza Contractors, Grantees and Recipients

Subject: USAID/West Bank and Gaza New Compliance Review Protocols

Dear Implementing Partners,

The purpose of this notice is to notify you that USAID/West Bank and Gaza will commence new rounds of reviews to verify partners' compliance with Mission Order 21. In conducting these reviews we will implement new protocols.

For your reference, USAID has been conducting compliance reviews to verify partners' adherence to Mission Order No. 21. Reviews are conducted to: (a) verify whether partners have obtained the necessary vetting approvals prior to executing any sub-awards which require vetting; (b) verify whether partners included the required special provisions in their written sub-awards and obtained the signed Anti-Terrorism Certificate in accordance with Mission Order No. 21; and (c) verify whether all sub-awards executed under each prime award were reported to USAID on the monthly sub-award report.

Moving forward, in addition to the above listed areas, the scope of the compliance review will be expanded to cover other areas of Mission Order 21 compliance. While the new protocols will still concentrate on the overall compliance status of each partner, through these reviews USAID will also gain a better understanding of the partner's internal control systems and procedures pertaining to your organization's compliance with Executive Order 13224 and Mission Order No. 21.

In conducting the compliance reviews we will be relying on a number of documents; the monthly sub-award reports submitted by our partners to the Program Support Unit; the financial records; and the trainees and beneficiaries lists. For a detailed list of the documents, please see attachment A. Other documents may be requested by the Vetting Compliance Specialist during the course of the compliance review. We ask that you have the award files and records ready at all times for review. Failure to have your files in an orderly fashion will be considered non-compliance.

Upon completion of the field work, a report will be issued for each award that will include each weakness and recommendation identified. Each partner will be granted two weeks to respond to the compliance review report and confirm that the corrective actions were taken. Please note that

in addition to the Office of Contracts Management's internal use, these reports will be also shared with your respective CORs/AORs, USAID/WBG's Mission Management and the Regional Inspector General (RIG).

Should you have any questions or concerns regarding this notice please feel free to contact Mr. Fadi Siam, Vetting Compliance Specialist, at fsiam@usaid.gov or Ms. Reine Joubran, Acquisition Supervisor, at rjoubran@usaid.gov.

Sincerely,



Bruce Gelband
Director, Office of Contracts Management
USAID West Bank and Gaza

Attachment: a/s

CC: USAID West Bank/Gaza CORs/AORs

The following outlines the main documents that the Vetting Compliance Specialist will review:

1. Signed agreement/contract documents including all modifications between USAID, West Bank and Gaza and the prime recipient/contractor.
2. Any documented policies and procedures followed by the prime recipient/contractor for the purpose of complying with Mission Order No. 21 and USAID guidelines and regulations. Also, any documented procedures followed by the prime recipient/contractor for the purpose of ensuring compliance of their sub-grantees (third tier partners).
3. Trial balance as of the end of the month prior to the review.
4. Copy of the last sub-award report submitted to the Mission's Program Support Unit (PSU), in which the date of submission for each sub-award should be noted.
5. Sub-award documents including all modifications between the prime contractor/recipient and their sub-awardees. It is advisable that the order of the sub-award documents mirrors the information that appears on the sub-award report.
6. List of training sessions held within the period of the review, list of attendees and signing in sheets.
7. List of other direct recipients of cash or in kind assistance specifying the amount and type of the assistance.
8. Notice of eligibility sent by PSU (Vetting Approvals) for trainees, beneficiaries, sub-grantees, and sub-contractors that require vetting.