Save the Children

ENHANCING LOCAL VOICE IN USAID POLICY DEVELOPMENT

CONTENTS

ACKNOWLEDGEMENTS

Save the Children Policy Advocacy & Campaign staff accompany youth advocates from Burkina Faso and Nigeria during their visit to Washington DC to participate in advocacy events on climate change and gender equality on Tuesday, Nov. 8, 2023.

EXECUTIVE SUMMARY

This report evaluates USAID's efforts to strengthen the participation of local and national actors in the agency's policy development processes. Conducted by Save the Children in collaboration with partner organizations within the Modernizing Foreign Assistance Network (MFAN), the study puts forth practical recommendations to enhance USAID's consultation with local and national stakeholders in shaping its policies.

USAID has made substantial strides in advancing localization and locally led development, committing to a 25% target on direct local financing and a 50% target for amplifying local leadership in programming. However, enhanced participation of local and national actors in policy development remains a crucial and under-examined component of this agenda.

The incorporation of local expertise not only aligns policies more closely with the needs of the communities they aim to serve, but also contributes to more impactful and sustainable development outcomes. Local leaders have consistently asserted what is required to drive this agenda forward: "Speak directly with us. We are ready - and expect - to collaborate with USAID in order to help make these commitments a reality and better agree strategies for cooperation, by creating channels and structures for consultation and shared decision-making."[1]

To assess the inclusion of local perspectives in USAID policy development, Save the Children conducted semi-structured key informant interviews (KIIs), desk research, and a brief survey. In total, from November 2023 to January 2024, there were 23 KIIs with current and former USAID staff across multiple bureaus and offices, eight KIIs with local and national actors, and one focus group discussion with nine representatives from international non-governmental organizations (NGOs). Additionally, a survey available in English, French, and Spanish garnered 46 responses from local and national stakeholders. See Appendix A for the complete methodology.

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1 Open letter to USAID Administration, in response to new commitments on localization, signed by 1289 local actors. Available at: https://www.near.ngo/s/Public-Letter-to-USAID-Administrator-Power-from-local-actors-December-2021.pdf

KEY FINDINGS

Barriers:

- There is a lack of guidance in the Automated Directives System (ADS) Chapter 200 about how to conduct external consultations on agency policies, resulting in immense variance in consultative processes based on political will and resources.
- There is a lack of consensus at USAID about which policies most benefit from local input, including limited senior leadership pronouncement on the importance of local voice in improving agency policies.
- Other barriers to enhanced consultation and dialogue include resource limitations, regulatory constraints, political pressures, and risk aversion.
- With the exception of the Local Capacity Strengthening Policy, local and national actors were largely unaware of USAID policies released in the past three years.

Opportunities:

- There is consensus among USAID and local and national actors that the Local Capacity Strengthening Policy stands out as the agency's gold standard for local consultation, including the ongoing socialization of the policy and feedback on its implementation. While not an official policy, the Locally Led Programs Indicator also had substantial input from local and national actors.
- Actions like sending out policies widely, facilitating dialogue, allowing sufficient time for feedback, making materials available in local languages, and closing feedback loops encourage local and national actors to provide input.
- There is an opportunity for greater utilization of existing networks and relationships to enhance local and national partners' participation in policy consultation.

RECOMMENDATIONS

Short-Term:

1. Add guidance for local consultation on new USAID policies to ADS Chapter 200.
2. Put in place an ADS Additional Help Document to accompany the newly revised ADS Chapter 200 that provides practical guidance for local consultation.
3. Develop a standardized process for sending new policies out to local and national organizations, including an outreach template to all local implementing partners for feedback, and encourage in-country Mission leadership to disseminate draft policy documents to local partners for review and input.
4. Develop and disseminate a case study on the Local Capacity Strengthening Policy to showcase the factors that facilitated local consultation.
5. Create a USAID Policy Forecast similar to the Business Forecast to enhance transparency, coordination, and engagement with local partners about the policy development process.

Medium-To-Long-Term:

6. Identify pathways for greater investment in dialogue with local and national actors on policy, including appointing additional dedicated localization staff in the Bureau for Planning, Learning and Resource Management, and developing internal incentives for staff to pursue robust external consultation.
7. Enhance the role of the Bureau for Planning, Learning and Resource Management's Office of Policy Implementation and Analytics in providing policy development guidance, oversight, and support for conducting consultation with local and national actors by sector bureaus and eventually across the humanitarian and development nexus.
8. Promote co-design principles and practices beyond programming and embed them into policy generation, starting at the senior leadership level.

USAID'S LOCALIZATION AGENDA

In recent years, the international development field has seen a notable shift towards greater localization and locally led development, emphasizing the involvement and empowerment of local and national actors in decision-making processes. This shift is driven by a recognition of the unique expertise that local communities possess, and that harnessing those insights facilitates more contextually relevant and sustainable development outcomes. Donors, NGOs, and international organizations have increasingly acknowledged the limitations of traditional top-down approaches and are actively seeking ways to enhance the leadership of local communities in shaping policies and interventions.

USAID's efforts to drive localization and locally led development have ramped up over the past decade, becoming a key focus of its policy and programmatic approach. The agency defines locally led development as, "the process in which local actors – encompassing individuals, communities, networks, organizations, private entities, and governments – set their own agendas, develop solutions, and bring the capacity, leadership, and resources to make those solutions a reality."[2]

These principles are reflected in USAID's internal priorities and reforms. The agency defines localization as, "the set of internal reforms, actions, and behavior changes that we are undertaking to ensure our work puts local actors in the lead, strengthens local systems, and is responsive to local communities."[3] These efforts are anchored in two agency-wide targets that Administrator Samantha Power announced in November 2021:

1. USAID will provide at least a quarter of its program funds directly to local partners by the end of Fiscal Year (FY) 2025.
2. By 2030, 50 percent of agency programming will place local communities in the lead to set priorities, co-design projects, drive implementation, and evaluate the impact of its programs.

In 2023, the agency provided the first status update on their progress toward these two targets. On the first target, they reported that in 2022, direct funding to local partners reached nearly $1.6 billion, or 10.2% of obligations, the highest level and percent of direct local funding in at least a decade.[4]

To assess progress toward the second target, USAID developed the Locally Led Programs Indicator, which measures the percentage of USAID-funded activities in which local partners and/or local communities lead development efforts in a given fiscal year.[5] Launched in 2023, the indicator lays out 14 good practices for local leadership and categorizes a given activity as locally led if it demonstrates the use of at least two good practices across at least two categories.[6]

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2 USAID, "What is Locally Led Development?" Fact Sheet, https://www.usaid.gov/sites/default/files/2022-05/What_is_Locally_Led_Development_Fact_Sheet.pdf
3 USAID Localization, https://www.usaid.gov/localization.
4 FY 2022 Localization Progress Report, https://www.usaid.gov/sites/default/files/2023-06/FY%202022%20Localization%20Progress%20Report-June-12-23_vFINAL_1.pdf.
5 USAID defines a local partner as an individual, corporation, nonprofit organization, partner country government entity, or another body of persons that 1) is in a formal partnership with USAID; and 2) is providing assistance in the same country or region as its principal place of business or performance.
6 USAID Locally Led Programs Indicator, https://www.usaid.gov/sites/default/files/2023-10/Locally%20Led%20Programs%20Indicator%20%28EXTERNAL%29_1.pdf.

Another key component of the agency's localization agenda and a focus of this study is a first-of-its-kind Local Capacity Strengthening Policy. The policy "guides USAID decisions about why and how to invest in the capacity of local partners to better achieve inclusive and locally led development."[7] The policy was developed over three years and launched in 2022 after extensive internal and external consultation.

This policy is one of a suite of initiatives that aim to establish greater local ownership of development processes. In March 2023, USAID launched a policy framework that commits to enhancing locally led development, and has undertaken several internal reforms that seek to facilitate this principle. These include a new Acquisition and Assistance (A&A) Strategy that outlines a number of changes in USAID's business practices to better enable locally led development, the WorkwithUSAID.gov platform that is designed to help partners prepare to pursue USAID funding, an updated Risk Appetite Statement that clarifies a higher threshold for taking risks in working with local partners, and a forthcoming Locally Led Humanitarian Assistance Policy, among other efforts.

USAID'S POLICY DEVELOPMENT PROCESS

USAID's policies and strategies, "are intended to convey the thinking of the agency's leadership, guide decisions and actions to achieve evidence-based development and humanitarian outcomes, and improve the effectiveness of USAID's development programs." Additionally, they are intended to reflect good development practice and "illustrate USAID's understanding of the nature of challenges within a certain theme and the best approaches for accomplishing Agency goals in this area."[8]

While USAID leadership has made local engagement a clear priority in programming, engagement with local and national actors is far less formally integrated into the policy development process. The consultation process for USAID development policies governed by ADS Chapter 200 stipulates that in creating a new policy, one internal agency-wide consultation and one external public consultation period must be completed at the end of the drafting process, preceding final clearances.

The chapter indicates that input can be obtained by posting the document on a public forum for written comments or by facilitating meetings with stakeholders. Beyond the requirement of a public comment period, there are no additional metrics or guideposts for consultation of local and national actors in USAID policy development. The result is that each bureau takes a different approach depending on internal political will and established priorities, which in turn govern the extent to which staff time and funding are dedicated to pursuing consultation.

The key informant interviews reflected a general consensus that USAID policies governing internal procedures, such as ADS series 500 or 201, need not include consultations with local and national actors. For ADS Chapter 200, which is "guidance covering the purpose, content, and substance of USAID programs," there is an argument in valuing local perspectives and knowledge, similar to USAID's approach to programs.

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7 USAID Local Capacity Strengthening Policy, https://www.usaid.gov/policy/local-capacity-strengthening
8 USAID Policy and Strategy, https://www.usaid.gov/policy.

Peers with their Child Rights & Governance group in a refugee settlement in Beirut, Lebanon

FINDINGS

In examining USAID's external consultation practices, several findings emerged that shed light on key barriers and opportunities related to the agency's engagement with local and national actors.

Barriers:

It was clear from interviews that there are individual champions within USAID who have consistently advocated for increased consultation with local and national stakeholders in policy development processes. Despite these champions, the organization has faced substantial hurdles in achieving widespread adoption of consultative practices. Part of this stems from a lack of guidance in ADS Chapter 200 about how to conduct consultations on agency policies. Because there are minimal requirements and few resources made available to facilitate consultation, there is significant variance between how different USAID bureaus and offices value and pursue external consultation in policy development.

Local and national actors similarly identified a disconnect between the overall agency approach to external consultation and their experiences with individual staff members at USAID. Positive experiences were often attributed to individual-level commitment and knowledge, rather than an agency-wide orientation towards valuing and recognizing the benefits of local expertise. Historic power imbalances in international development practice have also impeded the meaningful participation of diverse local groups in consultative processes.

There is also no clear consensus within USAID about whether all ADS 200 policies should have local consultation or if only certain ones would benefit from local input. Senior leadership at USAID have largely neglected to identify local consultation as a priority in policy development, perhaps in part because USAID policies are intended to communicate the vision of the agency's leadership and are therefore considered less malleable than programming decisions.

Further, the potential for consultation to be extractive rather than mutually beneficial came up often in interviews with both USAID staff and local actors. There was concern about overburdening local actors with requests for feedback, as well as overpromising when it comes to actually reflecting their feedback in the final policy documents. This lack of clarity results in uncertainty about the strategic prioritization of external consultation efforts, making it challenging to focus resources and efforts effectively.

There are an array of institutional barriers that have hindered agency-wide integration of good consultative practices. Nearly all USAID staff identified budgetary and human resource limitations as a significant challenge to pursuing more robust consultation. Having significant dedicated funds and specialized staff charged with undertaking a meaningful consultative process with local and national groups was consistently noted as a key success factor for the Local Capacity Strengthening Policy.

USAID staff also identified regulatory constraints – or even the specter of regulatory constraints – as an additional barrier to consultation. Regulations like the Paperwork Reduction Act, a federal law designed to minimize the burden of government information collection and dissemination on the public, require agencies to seek Office of Management and Budget approval for most information collection activities,

which can stall consultation processes and limit how USAID staff engage with external groups. Confusion about the boundaries of these regulations and a reluctance to introduce delays to the policy process dissuade staff from pursuing certain consultative activities like surveys.

The agency's burden reduction initiative was also raised as a potential barrier, as USAID is currently in the process of reviewing and retiring multiple policies, which could diminish the influence of the policy development process. Multiple interviewees countered this concern by noting that a decreased number of policies moving forward could actually serve as an opportunity for USAID to do fewer consultative processes more effectively.

Political pressures and a pervasive culture of risk aversion within USAID also play a significant role in limiting external engagement. Multiple USAID staff identified a dynamic in which policy working groups themselves may be eager to gather external input, but pressures from leadership to expedite the process can derail consultation. There is a hesitation at the agency level to invite external feedback too early in any given process, based on the perceived risk of potential backlash if the initiative changes or is not ultimately pursued.

Local actors also identified cultural factors as an impediment to meaningful engagement with USAID, noting the impenetrability of the agency's bureaucracy and the difficulty in establishing sustained working relationships. Beyond logistical and administrative barriers, some local actors also voiced their perception that there may not be a real appetite at USAID for disrupting the status quo to enable local leadership, instead treating local consultation like a "tick the box" exercise. Local actors have underscored that valuing local expertise requires a systems-level approach, and it is important to recognize that a handful of local organizations do not represent all of the diverse experiences and perspectives of the local system.[9]

As a result of these barriers, there is limited awareness among local and national actors about USAID policies. None of the interview participants were aware that any policies besides the Local Capacity Strengthening Policy had been open for public comment released in the past three years. Once made aware, the majority said they would be eager to engage with these policies, as they hold direct relevance for their work and communities. Many survey respondents also said they were not aware that policies were available for feedback and those that were aware had learned through international NGOs or social media. This communication gap suggests a baseline need for improved outreach strategies to ensure that external stakeholders are informed and able to engage in the agency's policy development.

Opportunities:

Despite these barriers, there were several positive developments and promising opportunities identified that could serve as catalysts for more effective external consultation practices at USAID. One significant opportunity was the recognition of the Local Capacity Strengthening Policy as a gold standard for external consultation. Both within USAID and among local and national actors, there was consensus that this policy stood out as a successful model for engaging external stakeholders in policy and strategy formulation.

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9 The Local Capacity Strengthening Policy Learning and Feedback Forum 2023, https://www.usaid.gov/policy/local-capacity-strengthening/forum/local-capacity-strengthening-policy-learning-and-feedback-forum-2023.

Multiple factors contributed to the active participation from local and national actors in the Local Capacity Strengthening Policy, including thoughtful outreach, the facilitation of focus group discussions with significant support from international NGOs, allowing sufficient time for feedback, making materials available in local languages, and closing feedback loops so it was clear to external stakeholders how their feedback was incorporated in the final policy. Local groups, in particular, highlighted the essential need to convey how their input informed the revision process as was done with the Local Capacity Strengthening Policy, while acknowledging that there are limitations to achieving this universally.

While USAID staff stressed that the Local Capacity Strengthening Policy benefited from an atypical combination of resources, capacity, leadership buy-in, and a commitment to quality over deadlines, recognizing these effective strategies nevertheless provides a roadmap for refining and enhancing future consultations.

An additional opportunity for USAID lies in leveraging existing networks and relationships to enhance the participation of local and national partners in policy consultation. Multiple local and national actors and USAID staff identified existing convening spaces that are ripe for dialogue on policy formulation, but remain untapped for these purposes. For example, one local civil society organization noted their participation in monthly meetings convened by USAID with other Democracy, Human Rights, and Governance (DRG) partners, but had not heard of the forthcoming DRG Policy that was opened for public comment.

Additional consultative spaces include established communities of practice and working groups, as well as in-country networks that are invited to provide input on the development of USAID Country Development Cooperation Strategies. The WorkwithUSAID.gov platform is gaining widespread viewership and many local and international organizations are registered in USAID's Partner Directory, and thus contactable via the Office of Acquisition and Assistance Industry Liaison. Leveraging this platform and the registered organizations represents an additional opportunity for outreach. Building upon these established connections can not only streamline the consultation process but also foster a sense of inclusivity and continuity between the agency and local groups.

One area where there was mixed input relates to the role of intermediaries. USAID staff consistently noted the important role of international NGOs in facilitating engagement with local and national actors. This enables USAID to reach the appropriate local players and benefit from established trust between international groups and their local partners. However, international NGOs noted that while they believe this to be a valuable role, there is a significant resource and time commitment involved in serving as intermediaries in this way. Local groups also stress the importance of international NGOs acting as conveners, not gatekeepers.

There was also a diversity of opinions about the role of USAID Missions in facilitating policy consultation, a Washington, D.C.-led process. Many local and national actors expressed a desire for country Missions to convene and solicit input on policies given the existing relationships and their greater knowledge of the local context. USAID staff noted a mismatch in mandate on this point, as well as significant variance across Mission leadership and a lack of capacity at the Mission level to play this role in the policy consultation process.

RECOMMENDATIONS:

In light of these findings, the following recommendations are proposed to enhance the effectiveness of USAID's engagement with local and national actors in policy formulation.

Short-Term:

1. Add Guidance for Local Consultation in ADS Chapter 200:

   Every agency bureau when drafting a new policy, called policy working groups, are mandated to follow the instructions in ADS Chapter 200. We recommend that clear guidance and minimum standards for local consultations during the policy drafting process as well as external comment period be added to ADS Chapter 200.

   These minimum actions by policy working groups should include:

   - Organizing focus group discussions with local and national actors during policy drafting
   - Language translation for draft policy materials into at least Spanish, French and Arabic
   - A public comment period lasting for a minimum of 20 business days and not over major secular or religious holidays
   - Posting the policy across USAID social media platforms and circulating it to all implementing partners, and;
   - Ensuring some form of follow-up communication at the end of the comment period to close the feedback loop with stakeholders and share next steps.

   USAID should prompt a plan for consultation at the policy inception phase. In the required Terms of Reference, policy working groups should outline their plan for consulting local actors in policy development, to encourage early planning and coordination. The Terms of Reference should clearly delineate internal roles and responsibilities for consultation.

   For shorter position papers, we recommend that USAID pursue local consultations while not at the same scale as for USAID policies and strategies.

   Policy working groups should aim to meaningfully and equitably include Foreign Service Nationals (FSNs) throughout the policy development process. However, FSN participation in these groups should not be a proxy for direct engagement with local and national stakeholders outside of the agency.

   Throughout these internal documents, it should be illustrated that there are ways of pursuing local consultation that can avoid regulatory or administrative constraints related to the Paperwork Reduction Act or burden reduction efforts. This includes integrating opportunities for feedback into existing engagement with local and national actors, such

as conducting brief polls during thematic webinars and consistently publicizing a point of contact for feedback in external outreach and newsletters. These incremental investments in local consultation at the policy development stage serve an important role. In valuing local knowledge at the outset, USAID paves the way for more inclusive and effective implementation throughout the policy life cycle.

It is important that USAID, and the Bureau for Planning, Learning, and Resource Management in particular, work to socialize this guidance across the agency so that bureaus and offices are aware of the resources available to conduct consultations and make consistent use of them in policy development.

2. Adopt an ADS Additional Help Document for Chapter 200:

Help Documents can be included in the ADS and provide a practical resource to USAID staff as they carry out the ADS Chapter 200 instructions. USAID should adopt an additional Help Document to provide step-by-step guidance for effectively engaging with local and national actors in the policy consultation process. It should detail best practices for consultation, including longer public comment periods, translation into local languages, robust outreach, and efforts to close feedback loops. This resource should be readily available to all policy owners to implement when initiating new or revised policy development.

3. Routinize Partner Outreach:

Policy owners should coordinate with the Office of Acquisition and Assistance on a routine outreach plan for each new draft policy. This would include the Office of Acquisition and Assistance developing and utilizing a standardized email outreach template for sending new policies to all local implementing partners for feedback through the Industry Liaison email list, partner associations, and encouraging in-country Mission leadership to disseminate draft policy documents to local stakeholders for review and input. Local and national actors can determine whether to provide feedback on the proposed policy, but all policies should be distributed for transparency and optional input. USAID should make local and national actor consultation, including at the local level, the default position for the development and updating of any significant policy.

Additionally, policy owners should seek to advertise the public comment period, including a blog post on WorkwithUSAID.gov and promotion on social media channels.

4. Develop a Case Study on the Local Capacity Strengthening Policy:

There is a wealth of information among USAID staff who spearheaded the Local Capacity Strengthening Policy about how to effectively engage local and national actors in policy consultation, but this knowledge is currently shared internally in an ad hoc fashion. USAID should develop a brief case study detailing the policy development process and lessons learned that can be utilized by other bureaus and offices as a resource for future policy consultations. This case study should be added as an additional help document to the newly

revised ADS Chapter 200, with contact information for the Bureau for Inclusive Growth, Partnerships, and Innovation staff people to enable follow-on discussion.

5. Create a Policy Forecast similar to the Business Forecast:

The agency should consider implementing a Policy Forecast, similar to the Business Forecast, which provides information about potential funding and partnership opportunities at USAID and offers partners the opportunity to engage early in the procurement process. The Policy Forecast would include the name of the policy, the point of contact, the sectors engaged, stage in the process, expected public comment period, and expected publishing date. Similar to the Business Forecast, this would include USAID hosting a quarterly webinar to allow partners the opportunity to pose questions and engage in dialogue about the policy development process.

In coordination with the new Office of Policy, this should include making available to partners an anticipated schedule of policies that will be released as new and revised in any given year to improve transparency about USAID's policy priorities, while recognizing the need for flexibility on publication dates. If a schedule of policies is not feasible, the Bureau should consider publicizing the Policy Agenda to facilitate greater awareness of agency policy priorities.

Medium-To-Long-term:

6. Invest in Enhanced Consultation:

Explore and identify pathways for greater investment in external consultation efforts. This would include the appointment of dedicated localization staff in the Bureau for Planning, Learning and Resource Management to facilitate effective engagement with local and national actors, and the establishment of internal incentives to motivate staff at all levels to pursue more robust external consultation.

Incentives could include explicitly communicating to policy drafters that completing a meaningful and inclusive consultative process is an action that helps facilitate the clearance process at the leadership level. For example, in the Terms of Reference submitted with the draft policy, policy working groups should indicate their plans for local and diverse consultations so these actions are explicitly incorporated in the planning process. Senior leadership should signal to their teams that pursuing consultation with local and national actors is valued as a professional competency. Managers should make consultation a priority by raising the issue at least monthly at staff meetings during policy development processes, asking how the office engaged the stakeholder community. Leadership consistently raising the issue can help create the incentive for consultation and change culture.

Furthermore, the USAID Learning Lab could facilitate additional research and dialogue on the issue of local engagement in policy development processes, including consulting local groups about their preferred approaches and capturing and disseminating good practices through their newsletter and toolkits.

7. Enhance the Role of the Bureau for Planning, Learning and Resource Management's Office of Policy Implementation and Analytics in Improving Consultation:

Enhance the role of the Bureau for Planning, Learning and Resource Management's Office of Policy Implementation and Analytics in providing policy development guidance, oversight, and support in conducting consultation with local and national actors by sector bureaus.

In order to make these changes, more staffing and flexible funding will be necessary. Increased appropriations for USAID's Operating Expenses (OE) are essential to carry out the agency's localization agenda in addition to other necessary reforms requiring more staffing, trainings, evidence gathering, and evaluations.

8. Integrate Co-design Principles:

Incorporate the concept of co-design, traditionally associated with programming, into the realm of policy generation. Rather than limiting local and national actor engagement on policy to the review process, USAID should consider engaging with local leaders in the co-creation of policies at a much earlier stage. This is critical to help ensure alignment of policies with the needs of the communities they impact and improve local ownership of policy implementation, without which USAID will be unable to achieve the intended outcomes. The process of introducing co-design into the policy process should start with convening senior leadership to achieve greater cohesion about how to prioritize and socialize the role of local leadership in policy formulation across the agency.

APPENDIX A - METHODOLOGY

In October 2023, Save the Children commissioned a study to assess USAID's efforts at enhancing consultation with local and national actors in policy development. The study set out to recommend additional ways to strengthen the participation of these stakeholders in USAID's policymaking.

The study sought to answer three key questions:

1. How has USAID engaged in consultation with local and national actors on policy development since the beginning of the current administration?
2. What are the perceived benefits and barriers to improving consultation of local and national actors in USAID policy development?
3. What are recommendations for USAID to enable local and national actor participation in policymaking as the agency seeks to institutionalize its locally led development agenda?

The study consisted of primary data collection via semi-structured one-hour key informant interviews (KIIs), focus group discussions (FGDs), and an online survey (available in English, French, and Spanish); secondary data collection via desk research; and data analysis to inform the content of this report.

Desk Research: Relevant internal USAID documents and multimedia content were identified and read to establish baseline knowledge of USAID's policy development processes (see Appendix C for a complete list of the 9 documents). While additional USAID strategy and programmatic documents were reviewed for broader context, this study focused exclusively on those policies governed by the Automated Directives System (ADS) Chapter 200. The ADS contains the organization and functions of USAID, along with the policies and procedures that guide the agency's programs and operations. It consists of over 200 chapters organized in six functional series. ADS Chapter 200 describes the process of creating USAID development policy.

There was also an informal review of external literature to situate the study within the broader international development ecosystem. The goal of consulting external literature was to identify emerging trends in localization efforts, allowing for a more nuanced and informed assessment of USAID's initiatives in the wider context of global development practices.

Data Collection: Virtual KIIs and FGDs were conducted with USAID staff and civil society stakeholders to explore the factors driving and hindering local and national actor consultation in policy development processes. Interviews were conducted with 23 current and former USAID staff across multiple bureaus and offices, including:

- Bureau for Democracy, Human Rights, and Governance
- Bureau for Humanitarian Assistance
- Bureau for Inclusive Growth, Partnerships, and Innovation
- Bureau for Legislative and Public Affairs
- Bureau for Management
- Bureau for Planning, Learning, and Resource Management
- Bureau for Resilience, Environment, and Food Security
- Office of the Administrator

In-depth interviews were also conducted with civil society organizations. In total, eight KIIs were conducted with local and national actors and one focus group discussion with nine representatives from international NGOs. An invitation to participate in the KIIs was circulated to networks of local and national actors, including the Movement for Community-Led Development, the Network for Empowered Aid Response (NEAR) Network, Peace Direct, and Humentum. See Appendix D for a list of key discussion questions.

Finally, a ten-question survey was developed to gather feedback from local and national actors on their experiences providing input on USAID policies in the past three years. The survey was available in English, French, and Spanish and was circulated to partner networks via email outreach and social media via WorkwithUSAID.gov. In total, the survey generated 46 responses from local and national stakeholders. See Appendix E for the complete survey.

Analysis: The analysis involved compiling and examining notes from the KIIs/FGD to identify trends. The findings section provides a synthesis of these trends and themes, offering illustrative perspectives on policy development processes at USAID. To ensure candid and open dialogue, all interviews for this study were conducted under the understanding of non-attribution, and as such, no quotes or identifying information from individual participants are included in the final report. Additionally, to reinforce key points, this summary incorporates insights from desk research and the online survey.

Limitations of the Study: This section specifically addresses the limitations associated with the online survey on the experiences of local and national actors providing input on USAID policies. While the survey gathered valuable insights, it is important to acknowledge certain limitations in the data collected. Contradictory Responses: Approximately 26% of the responses exhibited inconsistencies in which participants provided conflicting answers to questions, hindering interpretation. This could be attributed to misunderstanding or other factors, such as the open availability of the survey across various social media platforms.

Language Barriers: Because the survey was only available in English, French, and Spanish and was globally distributed, approximately five responses appear to have been affected by language barriers in the open response sections.

APPENDIX B
- SELECTED USAID DOCUMENTS

An informal literature review explored the conceptual foundations, key principles, and practical approaches USAID is taking to promote locally led development. It included a survey of relevant USAID policy and programmatic documents that have been issued since the beginning of the current administration in 2021.

Selected documents include:

- Local Capacity Strengthening Policy Learning & Feedback Forum Summary, January 2024
- Locally Led Programs Indicator, October 2023
- Local Capacity Strengthening Policy: Implementation Updates, August 2023
- Moving Toward a Model of Locally Led Development: FY 2022 Localization Progress Report, June 2023
- Direct Acquisition & Assistance Funding for Localization, April 2023
- USAID Policy Framework 2023, March 2023
- Local Capacity Strengthening Policy Public Feedback, October 2022
- Local Capacity Strengthening Policy, October 2022
- Automated Directives System (ADS) Chapter 200, January 2021 (partial revision date)

A Colombian girl briefing the UN Security Council

"Let's all fight together against child marriage, End violence against children and build prosperous society"

Peers leading a rally in their community to raise awareness about child marriage in Dailekh, Nepal

APPENDIX C
- SAMPLE INTERVIEW QUESTIONS

USAID Interviews:

- What is happening now at USAID in terms of sharing policies out for local and national actor input?
- What do you think is needed to enhance local and national actor participation in policymaking as the agency seeks to institutionalize its locally led development agenda?
- What types of consultation processes have USAID bureaus and offices done with local and national actors on policy development since the beginning of this administration?
- In those consultation processes, what were the enabling factors and/or constraints in effective engagement with local and national actors?
- To what extent are positive examples reproducible for future policies?
- How can barriers to consultation be addressed?
- What types of USAID policies should have enhanced local and national actor consultation?

Local and National Actor Interviews:

- What is your experience providing input on USAID policies?
- Which policies have you provided feedback on in the past three years?
- How did you learn about the opportunity to provide feedback on these policies?
- What was the format of the consultation process?
- What worked well about the consultation process? Not well?
- Overall, how would you characterize the current state of local and national actor engagement in USAID policy development processes?
- What do you think is needed to improve local and national actor consultation in USAID policymaking?

APPENDIX D - SURVEY
- HOW WELL DOES USAID INCORPORATE LOCAL VIEWPOINTS WHEN CREATING THEIR POLICIES?

Save the Children is conducting a study on how local and national actors from the Global South have participated in discussions with USAID in the development of USAID's policies. This study aims to recommend ways to strengthen the participation of local and national stakeholders in USAID's policy development processes.

For this study, we are interested in learning more about local and national actors' experiences engaging with USAID on policy development. This feedback will be used anonymously to inform the development of our project report and recommendations to USAID.

Please provide your feedback by December 22, 2023.

Pour répondre à cette enquête en français, veuillez choisir dans le menu déroulant situé dans le coin supérieur droit de l'enquête.

Para responder a esta encuesta en español, elija en el menú desplegable de la esquina superior derecha de la encuesta.

If you have any questions about this survey, please contact Jenny Russell at jrussell@savechildren.org.

1. Which country are you based in? (Open response)

2. What is your affiliation?
   a. Local civil society organization
   b. Local private sector
   c. Other (please specify)

3. Which USAID policy or policies have you provided feedback on in the past three years?
   a. Local Capacity Strengthening Policy
   b. Gender Equality and Women's Empowerment Policy
   c. LGBTQI+ Inclusive Development Policy
   d. Policy for Localization of Humanitarian Assistance
   e. Rule of Law Policy
   f. Other (please specify)

4. Were you aware that these policies were made available for feedback from the public?
   a. Yes
   b. No
   c. I was aware of some, but not all

5. How did you learn about the opportunity to provide feedback on the policies listed above? (Open response)

6. What was the format of the consultation process?
   a. I submitted written comments on the policy
   b. I participated in a feedback session on the policy
   c Other (please specify)

7. What do you think worked well about the consultation process?
   a. The consultation materials were available in my local language
   b. There was sufficient time to provide feedback
   c. Other (please specify)

8. What do you think did not work well about the consultation process?
   a. The consultation materials were not available in my local language
   b. There was not sufficient time to provide feedback
   c. I was not aware of the opportunity to provide feedback
   d. Other (please specify)

9. What do you think is needed to further improve local/national actor consultation in USAID policymaking? (Open response)

10. What would be your ideal role as a local/national organization be in the USAID policymaking process? (Open response)

A child activist gives a testimonial and speaks about her advocacy at the Ending Child Marriage project closing ceremony in Kailahun, Sierra Leone