Inclusion of Disability in USAID Solicitations for Funding

White Paper

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Acknowledgements

1) Executive Summary

The United States Agency for International Development (USAID) has stated its commitment to the inclusion of persons with disabilities in its programs, yet it remains unclear how this commitment translates into the inclusiveness of funding opportunities.[1] In an effort to answer this question, and at the request of the USAID Disability Team, the InterAction Disability Working Group, led by Perkins School for the Blind, conducted a study to assess how disability language is currently being used in USAID's public solicitations for funding.[2] This study, referred to as "Phase 1," reviewed 85 public solicitations available within a six month period during 2012-2013. In 2015, the "Phase 2" part of the study investigated correlations between level of disability language inclusion in the analyzed solicitations and level of reported disability inclusive programming in the sectors of education, health, and democracy, human rights and governance (DRG).

Phase 1 reviewed all public solicitations and assessed the extent to which language in the solicitations clearly obligates implementing partners to include disability into their project design. The findings of the study show that of the 85 solicitations reviewed, 48 percent did not mention disability within the scopes of work, and only 20 percent of solicitations reviewed required people with disabilities to be included and to participate in any meaningful way throughout the program. Moreover, looking at the data across all of the sectors, the education sector had the best results with 43 percent of its solicitations requiring disability inclusion as a cross-cutting theme, while health represented the sector with the least amount of solicitations requiring inclusion with only six percent.
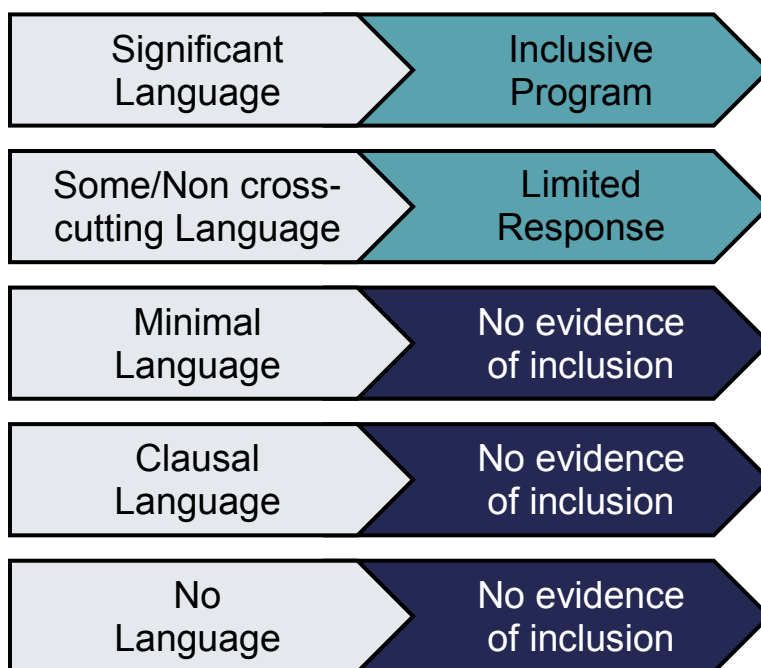
In early 2015, the InterAction Disability Working Group conducted a follow-on phase of the study referred to as Phase 2 which explored the impact of inclusive disability language in a solicitation on the reporting of disability inclusion in funded activities. Perkins collected quarterly and annual reports of organizations that received USAID awards from the previously reviewed solicitations in the sectors of education, health and

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[1] USAID Formal Notice Recognizing the International Day of People with Disabilities by Rajiv Shah. 2011

[2] The InterAction Disability Working Group is comprised of mainstream development organizations as well as disability specific organizations that are interested in promoting disability inclusive development throughout all foreign assistance projects. Current members include: Acción International, American Jewish World Service, Atlas Corps, CBM, Disability Right Education and Defense Fund (DREDF), Handicap International, Help Age, Helen Keller International, Holt International, International Foundation for Election Systems (IFES), International Medical Corps, Mercy Corps, Mobility International USA (MIUSA), Perkins International, Reach Scale, Save the Children, Trickle Up, United States International Council on Disability (USICD), US Fund for UNICEF, United Cerebral Palsy, Women's Refugee Committee, World Learning and World Vision.

DRG. These reports were then reviewed and analyzed by the Expert Review Panel to determine how individuals with disabilities were included or mentioned in activity reports. As detailed in Figure 1 below, review of the project reports indicated that inclusive programming was only reported when solicitations contained specific language requiring the inclusion of people with disabilities throughout all components of the project.[3] This suggests that the exclusion of individuals with disabilities in USAID-funded projects often begins with the omission of disability language in solicitations for funding. In addition, data from Phase 2 indicates that the basic language required by USAID's Disability Policy does not have a substantial impact on inclusion within programs.[4] This lack of influence indicates the need for improved internal policies that require explicit and concrete disability language in solicitations.

Figure 1: Education Findings: Correlation of Disability Language in Solicitation and Inclusiveness of Resulting Awards.

Significant Language	Inclusive Program
Some/Non cross-cutting Language	Limited Response
Minimal Language	No evidence of inclusion
Clausal Language	No evidence of inclusion
No Language	No evidence of inclusion

Based on the study findings, it is clear that the inclusion of people with disabilities in USAID's projects begins with solicitation language that calls for inclusion in a significant

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[3] The study for the Health and DRG sectors is inconclusive due to the lack of available project reports. Efforts to obtain these reports are still ongoing.

[4] USAID AAPD 04-17 requires contracting and agreement officers to include a provision supporting USAID's disability policy in all solicitations and in the resulting awards for contracts, grants and cooperative agreements.

way. Furthermore, only if the solicitation uses significant language around disability will the implemented work be inclusive of people with disabilities. In developing solicitations, donors need to be aware that disability inclusive language must be clearly stated and required within all components of a project in order for people with disabilities to be fully included. With this new data, the Disability Working Group recommends that USAID include a strengthened disability policy in solicitations for funding and that USAID continue to train staff on best practices for including disability language. USAID cannot achieve its mission of "ending poverty and promoting resilient, democratic societies" unless society as a whole, including people with disabilities, are a meaningful part of USAID's global strategy and policy as well as fully included in USAID work.[5]

This White Paper provides the results of both Phase 1 and Phase 2 of the study, discusses the research methodology and provides the recommendations of the Disability Working Group on how USAID can better integrate disability into its future programs.

2) Background

According to the World Health Organization (WHO), more than a billion people, or 15 percent of the world's population, have some sort of disability.[6] Eighty percent of these individuals live in developing countries and often face conditions of extreme poverty, exclusion and discrimination. Due to discrimination and barriers, people with disabilities are at a distinct disadvantage in accessing education, employment and health care, among other areas. For example, the United Nations Educational, Scientific and Cultural Organization (UNESCO) estimates that 90 percent of all children with disabilities in Africa have never received any form of education.[7] Likewise, in terms of employment, the United Nations (UN) states that 80 to 90 percent of persons with disabilities of working age in developing countries are unemployed, whereas in industrialized countries the figure is between 50 and 70 percent.[8] People with disabilities are also discriminated against and have a difficult time accessing adequate health care and/or are often left out of health education, resulting in a higher incidence

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[5] United States Agency for International Development (USAID) website: www.usaid.gov
[6] World Health Organization "World Report on Disability" 2011
http://whqlibdoc.who.int/publications/2011/9789240685215_eng.pdf?ua=1
[7] Balescut, Jill and Eklindh, Kenneth, Literacy and Persons with Developmental Disabilities: Why and How" UNESCO portal.unesco.org/education/en/files/43180/11315369001Balescut_J.doc/Balescut_J.doc –; UNICEF, Regional Information – State of the World's Children Report 2004
[8] United Nations Enable Website "Factsheet on the Employment of People with Disabilities" http://www.un.org/disabilities/default.asp?id=255

of people with disabilities with HIV/AIDS, tuberculosis and malaria.[9] Moreover, people with disabilities are substantially more prone to be adversely affected by natural disasters, conflict or other emergencies and yet are continually excluded from national and international disaster planning, response and recovery efforts.[10]

People with disabilities have historically been marginalized from traditional development cooperation activities due to discrimination, low expectations or inadvertent barriers, which have resulted in further gaps to accessing education, employment, health care services and civil society integration, among others.[11] Furthermore, in the past, the programs that have existed for people with disabilities tended to be separate, often low quality programs, or prevention programs rather than mainstreaming people with disabilities into existing traditional development cooperation activities.[12] Due to this disparity, there is a strong need to ensure that traditional development programs are inclusive of people with disabilities.

USAID has a long-standing commitment to the inclusion of persons with disabilities in its programs. In a formal USAID Notice recognizing the International Day of People with Disabilities, Administrator Rajiv Shah stated, "As an Agency, we are dedicated to supporting inclusive projects across our development initiatives, with a special focus on expanding access to critical services for women and children with disabilities."[13] This commitment has extended over the last few decades and has shown increased traction within the Agency over time. These commitments include the 1997 Disability Policy, several policy directives and developing an e-learning course for staff on disability inclusive development, among others. In addition, USAID manages the USAID Disability Fund which has provided over 100 grants to 79 organizations in 54 countries. Over half of these awards are to local disabled people's organizations.[14]

However, even with these efforts, the extent to which individuals are being mainstreamed into larger development and human rights programs remains unclear. The National Council on Disability's (NCD) Report entitled, "Toward the Full Inclusion of People with Disabilities: Examining the Accessibility of Overseas Facilities and

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[9] Groce, Nora, "HIV/AID and Individuals with Disability" Health and Human Rights, 2005

[10] CBM, "Disability Inclusion and Disaster Management" 2007

[11] Albert, Bill "In or Out of the Mainstream? Lessons from Research on Disability and International Cooperation" 2006

[12] *Ibid.*

[13] USAID Notice on the International Day of Disabilities, December 3, 2011, http://www.usicd.org/index.cfm/news_usaid-notices-december-3-2011-international-day-of-persons-with-disabilities

[14] USAID, http://www.usaid.gov/what-we-do/democracy-human-rights-and-governance/protecting-human-rights/disability

Programs Funded by the United States" shows that the majority of USAID's development and human rights programs are not proactively including individuals with disabilities. It states:

> The majority of USAID-funded projects that include people with disabilities are stand-alone, disability-specific projects with small budgets. USAID uses a "twin track" approach to disability inclusion by funding small disability-specific projects and promoting disability inclusion in general development programs. Through this approach, very few general development programs successfully implement disability components. The main goal of inclusive development is to ensure that all U.S. Government-funded programs are accessible to and inclusive of people with disabilities. USAID's current twin track approach does not effectively foster inclusion in all programs and in some ways promotes segregated disability specific projects with no relationship to general development programs operated out of the same USAID mission. [15]

Even with the information provided in the NCD report, there is a continued need to assess the current situation of how people with disabilities are or are not being included in USAID's general programs. With this need in mind, under the leadership of Perkins School for the Blind, the InterAction Disability Working Group conducted a study of disability language in USAID's public solicitations for funding and its impact on the mentioning of disability in the resulting award reports. The study was conducted in two distinct phases: Phase 1, which reviewed language in solicitation and Phase 2, which reviewed how disability was included or mentioned in the inclusiveness of the resulting awards.

3) Methodology

Several different steps were taken in order to analyze the data for the study. For the public solicitation study in Phase 1, a master's student from Gallaudet University collected public information available for current and past USAID solicitations.[16] The study reviewed a total of 85 public solicitations available in the six month period of December 2012 to May 2013. Information gathered was categorized by sector, geographic area, type of funding mechanism and total amount of funding. Each solicitation was closely reviewed to assess the extent to which disability was included and then each solicitation was classified and placed into categories. Table 1 below

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[15] National Council on Disability (NCD), Toward the Full Inclusion of People with Disabilities: Examining the Accessibility of Overseas Facilities and Programs Funded by the United States. 2013.

[16] Information on Cooperative Agreements, or grants, was collected from www.grants.gov and information on contracts and other mechanisms was collected from www.fbo.gov.

demonstrates the categorization of language used within the solicitations for Phase 1 as developed by the Working Group members. As a secondary step, the 85 solicitations were divided by sector and reviewed by members of the Disability Working Group. Organizations were asked to select sectors in which their organization has considerable expertise. Once all of the organizations conducted a secondary review, Perkins compiled the results and highlighted those solicitations in which there was disagreement of classification between the primary and secondary review. Of the 85 solicitations, a total of 33 had a variation in classification between the primary and secondary review. As a final step, an Expert Review Panel, comprised of senior representatives for Perkins, CBM and the United States International Council on Disability (USICD), was established to conduct a review of the 33 solicitations and to come to consensus for the final categorization of language.[17]

Table 1: Classification Categories used for Solicitation Review in Phase 1

Category	Definition/Description
No Language	Disability was not mentioned at any point throughout the solicitation.
Clausal/Policy Language	Disability was only mentioned as part of the standardized and required clausal language, but was not mentioned at any other point in the solicitation.
Minimal Language	Disability was mentioned in the solicitation but not in a manner that required or encouraged inclusion in the resulting program. For example, language was often only included within the background section.
Some/Non Cross-Cutting Language	Disability was mentioned in the solicitation in a manner that encouraged or recommended inclusion of persons with disabilities in project but was not required.
Significant Language	Disability was significantly mentioned in the solicitations to the extent that inclusion was a required component of the project. For example, disability was included within the selection criteria.

For Phase 2, the same Expert Review Panel analyzed the public quarterly and annual reports of the resulting awards from Phase 1 to determine the possible correlation between disability language in solicitations for funding and the inclusiveness of the resulting projects. This study focused on three sectors: education, health and DRG.

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[17] Expert Review Panel members included: Anne Hayes and Emma Swift for Perkins, Donna Waghorn for CBM and Andrea Shettle for USICD.

Similar to the methodology used in Phase 1, each expert reviewed the information independently and classified the projects into various categories. Table 2 demonstrates the categories for the resulting projects in Phase 2. Again, in the case where there may not have been initial consensus for categorization, the Expert Review Panel met to discuss the classifications and come to a consensus. During Phase 2, the Expert Review Panel did not access the Phase 1 results in order to ensure that the team was not influenced by the previous findings. Information from both phases of the study was compiled and analyzed by Perkins with input by the Expert Review Panel and the broader InterAction Disability Working Group.

Table 2: Classification Categories used for Report Review in Phase 2

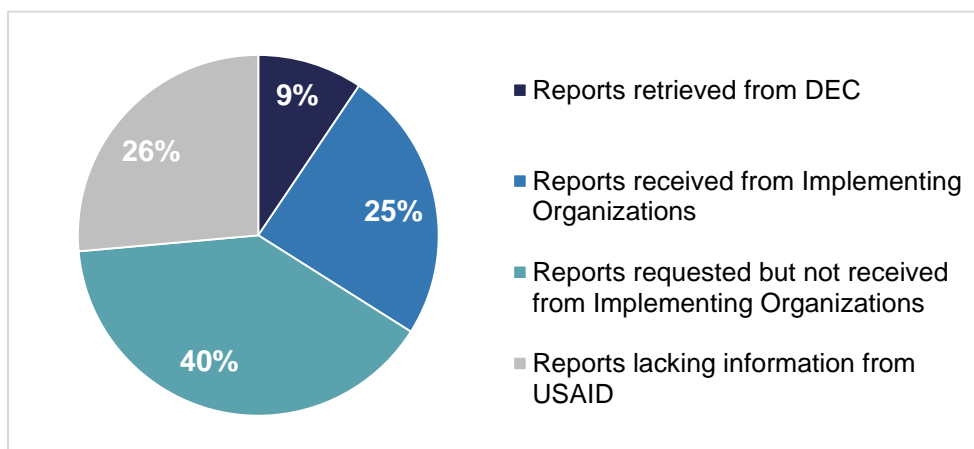| Category	Definition/Description
No Evidence of Inclusion	Disability was not mentioned at any point throughout the report and there was no indication that people with disabilities were participating in the project.
Limited Response/Program	Disability was mentioned in the reports but not in a manner that reflected that proactive strategies were used to ensure that people with disabilities were included throughout the project. For example, disability may have been referenced or a specific type of disability was mentioned but it was clearly not a cross-cutting component of the project.
Inclusive Program	From the review of the reports, it was clear that people with disabilities were proactively included throughout various components of the project.

4) Study Limitations

The group encountered several limitations during both phases of the study. The first limitation for Phase 1 was that the researchers were only able to review public solicitations. Therefore, task orders under existing contractual mechanisms and other internal solicitations were not available for external review and thus not incorporated into the study results. In addition, as Request for Applications (RFAs), or solicitations for grants, typically remain on pubic web domains for a longer period of time; the study was able to view solicitations dating back to November 2009. However, Requests for Proposals (RFPs), or solicitations for contracts, often only remain on public websites for approximately three months limiting the researchers' ability to view solicitations prior to September 2012. Due to the discrepancy of how long solicitations remain public, the study excluded solicitations for funding dated prior to January 2011. As only public

solicitations were reviewed, the study represents a snapshot of solicitations during a period of time versus a fully comprehensive review of all USAID solicitations.

Likewise, it was originally intended that Phase 2 of the study would review annual and quarterly reports collected from the USAID Development Experience Clearinghouse (DEC) website as posting reports is a requirement for all recipients of USAID funding. Initial information, such as award number and award recipient, was provided by USAID. However, even though multiple requests were made by the study team and by other USAID staff, only 74 percent of information from the initial solicitations was provided by USAID. Therefore, 14 of the solicitations were not included in Phase 2 of the study. The health sector had the most amount of missing information of the three sectors reviewed. Additionally, some reports were deemed ineligible for the Phase 2 review for a variety of reasons. For example, in two cases, one project in health and one project in DRG, project implementation had either been delayed or cancelled for a variety of reasons. Furthermore, it was decided that reports from Indefinite Quantity Contracts (IQCs) would not be reviewed given the complexity of the funding mechanisms. As a result of ruling out IQCs, two of the education sector solicitations and one of the health sector solicitations were not reviewed during the Phase 2 study.

Another finding of the study is that the vast majority of reports were not available on the DEC. Only nine percent, or five out of the 53 eligible projects' reports, were available on the DEC. Therefore, substantial efforts were made, in collaboration with USAID, to obtain the remainder of reports directly from the implementing partners. Graph 1 demonstrates the breakdown of the reports including information on how the reports were obtained and the percentage of awards in which initial information was not provided by USAID. Given these challenges, in the end, only 57 percent (eight projects) of projects within the education sector were obtained, 47 percent (four projects) in the DRG sector, and 44 percent (six projects) in the health project sector. As a result of the lack of data from both the DRG and health sectors, only the data from the education sector was fully analyzed.

Graph 1: Overall Results-Availability of Eligible Reports from Resulting Award.

Legend:
- Reports retrieved from DEC
- Reports received from Implementing Organizations
- Reports requested but not received from Implementing Organizations
- Reports lacking information from USAID

Pie chart values: 9%, 25%, 40%, 26%

5) Study Results

The results of the Phase 1 study show that while there is commitment and understanding of the need to include people with disabilities in USAID's programs; this commitment has not yet translated into inclusion of disability language into solicitations. Of the 85 solicitations reviewed, almost half, or 48 percent, of the solicitations do not mention disability within the scopes of work. In fact, 10 percent of the solicitations did not have any language at all concerning disability and are therefore are not even following USAID's minimal requirements for including disability within clausal language. See Graph 2 for the full breakdown of disability language within the solicitations.

The team further analyzed the data by sector.[18] The sector that showed the best results was by far the education sector. This sector had approximately 43 percent of all of its total solicitations classified as "significant" and only seven percent classified as "none" and 14 percent as "clausal/policy." Conversely, the sector with the least amount of "significant" solicitations was health, with only six percent of solicitation classified as "significant" and approximately 20 percent classified as "no language" and 27 percent as "clausal/policy". Graphs 3 and 4 below demonstrate the language breakdown of the education and health sectors, respectively. See Appendix A for the full breakdown of the classification of disability language by sector.[19]
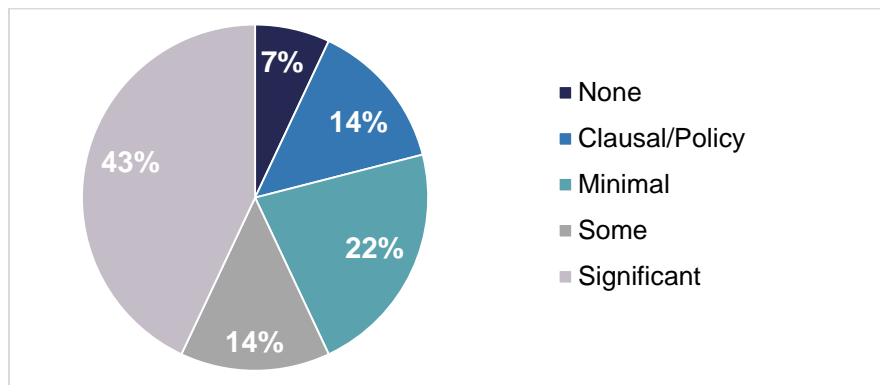
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[18] Due to the differences in which RFA and RFPs are collected, conclusive comparison by mechanism could not be established.

[19] Additional data which demonstrates the breakdown by geographic distribution, funding amount and funding mechanism is also available upon request.
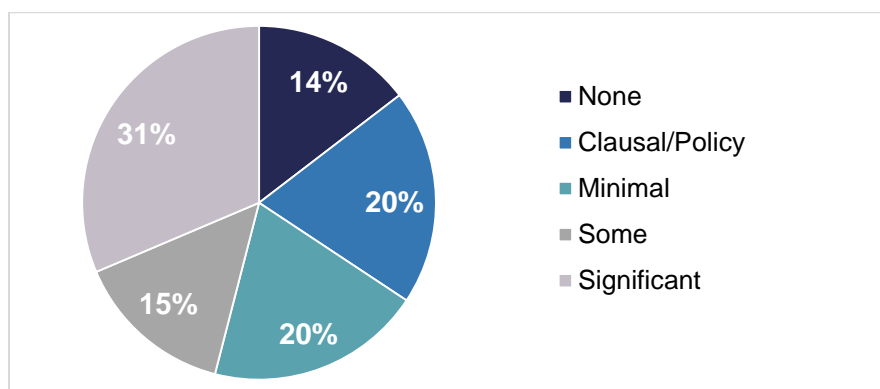
Graph 2: Overall Results-Disability Language in All Solicitations.

None	14%
Clausal/Policy	35%
Minimal	17%
Some	14%
Significant	20%
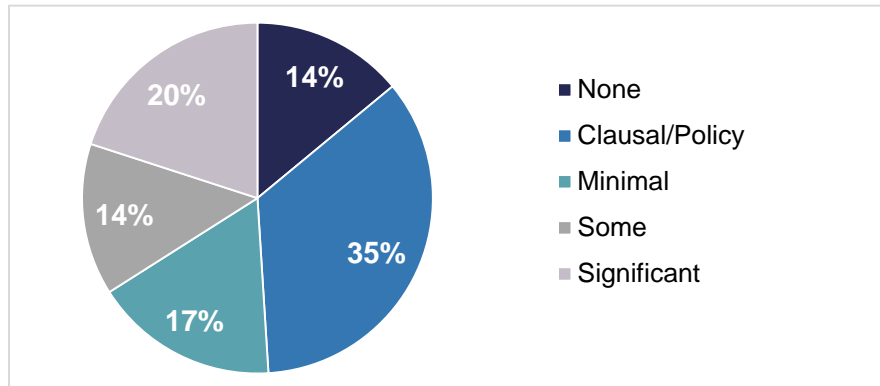
Graph 3: Disability Language in Education Sector Solicitations.

None	7%
Clausal/Policy	14%
Minimal	22%
Some	14%
Significant	43%

Graph 4: Disability Language in Health Sector Solicitations.

None	14%
Clausal/Policy	20%
Minimal	20%
Some	15%
Significant	31%

Phase 2 of the study reviewed public quarterly and annual reports of the resulting awards from Phase 1 to determine the possible correlation between disability language in solicitations for funding and the inclusiveness of the resulting projects. This study focused on three sectors: education, health and DRG. The Expert Review Panel was only able to obtain 47 percent of reports from the awards despite efforts to obtain the information through various sources.[20] [21] In fact, although it is a requirement for USAID implementing partners to publish their reports on the USAID DEC, only 13 percent of all of the projects were in accordance with this regulation. Due to this lack of compliance, only the reports from the education sector, which obtained 33 reports from approximately 60 percent of the projects, showed conclusive results. Figure 1 shows the results of the education sector.

This initial study demonstrates that the inclusion of people with disabilities takes place only when disability is mandated as a cross-cutting theme by the donor. In cases where the donor only asks for a portion of the project to be inclusive or to include only one type of disability, only that portion is inclusive and only that one group is considered. Conversely, when disability is classified as minimal or is mentioned only as clausal language, which follows the USAID policy, there is no indication that people with disabilities are involved in any way within the projects. Not surprisingly, as seen in Figure 1 on page 3, the absence of disability in solicitations results in non-inclusive projects. All projects within the education sector followed the above results without exception. In addition, though the data was limited, results from the other two sectors also followed the above trends.

6) Study Analysis

The study results show that disability inclusion is donor-led and that inclusive programs only occur when required by the donor. The study also shows that the USAID policy that requires standard clausal language within funding solicitations does not result in inclusive programs, thereby indicating a need for improved USAID internal policies. USAID already has a model for strong, cross-cutting requirements for inclusion in its internal policies requiring the inclusion of gender in solicitations.[22] Though many may argue that continued measures need to take place to promote gender equity, there is no dispute that these internal policies have already improved the lives of women and girls

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[20] Multiple reports were reviewed from 18 of 38 organizations. As of June 2015, the team has reviewed approximately 57% of the education sector, 46% of the health sector and 44% of the democracy and governance center.

[21] Perkins worked with the USAID Education and disability teams in attempts to collect information in the three sectors. Multiple written requests and phone calls were then sent to each of the awardees in an attempt to obtain the reports. The Perkins team also elicited the help of the office responsible for the DEC who also reached out to the various groups asking for reports.

[22] USAID Gender Equality and Female Empowerment Policy, March 2012

worldwide. It is clear that a similar policy is required for disability. USAID has stated that it is in the process of reviewing and updating its 1997 Disability Policy. At this time, however, the details of the policy review or how a new policy might address disability inclusion within solicitations for funding has not been shared publically with civil society.

One possible reason that disability inclusion is not taking place organically may be a result of the USAID solicitation process and the perception of implementing partners that there is a disincentive to add programming that is not requested by the donor. This perception is supported by discussions that took place throughout the research process with some of the USAID implementers.[23] The same organizations, however, have stated that they support the concept of disability inclusion and will happily modify and design inclusive programs when requested by USAID.

In order for USAID to ensure that disability inclusion takes places in all programs, stronger policies that mandate disability language as a required cross-cutting theme within the solicitation's Scopes of Work are necessary. Moreover, additional training to USAID staff about the importance of including disability within projects remains paramount. Though USAID already has developed an e-learning training available for all staff and has trained new entry staff, these trainings are elective versus required.

7) Recommendations

The Working Group developed several recommendations for USAID in order to strengthen disability inclusive programs in the future. The recommendations are as follows:

- ***Include civil society in the USAID Disability Policy review discussions***. Civil society input is essential in order to ensure that the new policy reflects the interests and priorities of the various organizations implementing USAID's programs globally. This group could include diverse stakeholders such as disabled persons organizations (DPOs), other disability service organizations and mainstream development organizations. It is important that there are individuals with disabilities as part of this group. The Working Group would like to see the robust inclusion of civil society organizations moving forward, receive a briefing on the status of the policy review to date and be a part of the detailed plans on how civil society will be engaged moving forward.

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[23] Though USAID implementers were happy to share their views with the researchers, all of the organizations preferred to remain anonymous due to concerns of their reputations to USAID.

- ***Provide models and examples of best practices for inclusive language in solicitations***. As a result of Phase 1, the Working Group identified two solicitations that could serve as models for inclusion of disability language. These solicitations include: the Malawi Early Grade Reading Activity (EGRA), which integrated disability as a requirement throughout the solicitation, and the South Sudan Safer Schools Support (5S) Project, which had specific language requiring that five to ten percent of the beneficiaries be individuals with disabilities and that five to ten percent of the budget reflect this requirement as well. In both cases, the projects resulted in inclusive programs and thus are examples of model language for solicitations within the Agency.

- ***Require inclusive development training to USAID staff on how to solicit quality programs that are fully inclusive of people with disabilities.*** There is a continued need to train USAID staff on how to effectively ensure the integration people with disabilities into implementing partners' programs. Additional USAID staff training could include elements such as how to develop model language promoting inclusion solicitations, how to review and evaluate proposals with an eye on quality inclusive program design, and how to monitor ongoing inclusive programs. Training on disability inclusive development should be a requirement of new staff and/or contract officers in order to ensure stronger awareness on disability within the Agency. As USAID further commits to disability inclusion and takes proactive measures to ensure inclusive programming, the need for training on how to procure quality programs versus programs that promote "tokenism" will become even more prevalent.

- ***Continue to promote inclusive development and provide training opportunities for implementing partners on inclusive disability design, implementation, monitoring and evaluation.*** It is important that USAID continues to communicate its commitment to inclusive programs to all of its current and potential partners. However, additional training and skill set development is needed in order for implementing partners to develop, implement and monitor quality programs. Conducted together with disability organizations, USAID should provide training for USAID implementers on how to develop projects that empower individuals with disabilities versus reinforce harmful stigmas, how to disaggregate data by disability, effective approaches for engaging local DPOs and other practical, hands-on applications.

8) Conclusions

USAID cannot achieve its mission of "partnering to end extreme poverty and to promote resilient, democratic societies while advancing our security and prosperity"[24] unless it thoughtfully and proactively takes concrete measures to include the 800,000 individuals with disabilities living in developing countries.[25] Likewise, as the international development community moves towards implementing the Sustainable Development Goals (SDGs) that include people with disabilities, it is important that donors adopt strategies to ensure this population is effectively included in their programs. This study provides data that the inclusion or exclusion of people with disabilities begins at the solicitation phase. The Agency as a whole must make stronger efforts in order to fully realize its commitment to including people with disabilities into all program sectors. To work toward this goal, USAID can develop policies with civil society input that require disability as a cross-cutting component within all solicitations for funding. The InterAction Disability Working Group would like to see USAID take similar actions and policies developed for gender applied to disability. The study outlined provides data on the vital elements needed to make programs inclusive of people with disabilities: when donors require disability inclusion within solicitations, the resulting projects are fully inclusive. This groundbreaking study affords USAID the opportunity to provide a transformative, global example to ensure that all people, with and without disabilities, are included in USAID programs in the future.

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[24] United States Agency for International Development (USAID) website: www.usaid.gov

[25] World Health Organization "World Report on Disability" 2011. WHO estimates there are 1 billion people with disabilities with 80%, or 800,000 individuals, living in the developing world.