



USAID | PAKISTAN

FROM THE AMERICAN PEOPLE

**U.S. Agency for International Development (USAID)/Pakistan
 Request for Categorical Exclusion (RCE)
 Education Resilience Activity (ERA)**

Project/Activity Data:

Activity/Project Title: Education Resilience Activity		Solicitation #: N.A.
Contract/Award Number (if known): TBD		
Geographic Location: Pakistan; 391		
Originating Bureau/Office: USAID Pakistan, Office of Education		
Supplemental IEE: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DCN and date of original document: N/A	
Amendment: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	DCN and ECD link(s) of Amendment(s): N/A	
Programmatic IEE: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Amendment No.: N.A.	
Funding Amount: ██████████	Life of Activity Amount: ██████████	
Implementation Start/End: January 2024 - December 2028		
Prepared By: Hafeez Samo	Date Prepared: June 1, 2023	
Expiration Date (if any): December 2028 ¹	Reporting due dates (if any): N.A.	
Environmental Media and/or Human Health Potentially Impacted (check all that apply): None <input checked="" type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Land <input type="checkbox"/> Biodiversity <input type="checkbox"/> Human Health <input type="checkbox"/> Other <input type="checkbox"/>		
Recommended Threshold Determination:		
<input type="checkbox"/> Negative Determination <input type="checkbox"/> with conditions	<input type="checkbox"/> Deferral	
<input checked="" type="checkbox"/> Categorical Exclusion	<input type="checkbox"/> Exemption	
<input type="checkbox"/> Positive Determination	<input type="checkbox"/> USG Domestic NEPA action	

Climate Change:
<input checked="" type="checkbox"/> GCC/Adaption <input type="checkbox"/> GCC/Mitigation <input checked="" type="checkbox"/> Climate Change Vulnerability Analysis (included)
Adaptation/Mitigation Measures: Listed in Section 4.0

¹ The Activity is aligned with the new draft Country Development Cooperation Strategy (CDCS 2023-2028), expected to be approved by July 2023. The ERA RCE may be amended, if required, when the new CDCS is formally approved.

**U.S. Agency for International Development (USAID)/Pakistan
Request for Categorical Exclusion (RCE)
Education Resilience Activity (ERA)**

SUMMARY OF FINDINGS:

1. BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Purpose and Scope of RCE

The purpose of this Request for Categorical Exclusion (RCE) in accordance with 22 CFR 216 is to provide the first review of the reasonably foreseeable effects on the environment, as well as recommend Threshold Decisions for the USAID/Pakistan, “**Education Resilience Activity,**” or the “**Activity.**” All the sub-activities and interventions planned under this activity are considered to have no negative effect on the natural or physical environment. This RCE has been prepared in accordance with 22 CFR 216.2 (c) (1) (i); and 22 CFR 216.2 (c) (2) (i), (iii), (v); (xiv) and (xv).

1.2 Activity Background

In Pakistan, over 20 million (40 percent) of children are out of school. Of all the 60 percent already enrolled in school, only 25 percent can read with proficiency at grade level, especially in primary grades (1-5). Rural poor, girls and children with disabilities remain the most disadvantaged in accessing quality basic education.² The COVID-19 pandemic and 2022 floods have further worsened the situation and decreased chances of their inclusion and retention in and completion of at least the primary cycle of the school system. Furthermore, the current public education scenario does not reflect a strong link of community engagement which is critical to reach out to the disadvantaged children, making public schools more inclusive and increasing accountability for delivering quality education.^{3,4,5}

The basic education systems and policies should be adaptable and strengthened enough to build resilience for shocks and provide inclusive education for better learning outcomes with a deliberate focus on disadvantaged areas and vulnerable children. Similarly, the potential of strong community involvement needs to be channelized to solve complex problems at school level for a better learning environment.

Multiple donors have been supporting the provincial and federal education development initiatives in Pakistan. The Global Partnership for Education (GPE), World Bank (WB), United Kingdom Foreign Commonwealth and Development Office (FCDO) and European Union (EU) are among the key development partners in the basic education sector.

² [UNICEF Pakistan \(n.d.\). Education: Giving Every Child the Right to Education. UNICEF.](#)

³ [Building Resilience in the Return to Learning during COVID-19: Pakistan Final Study Report](#)

⁴ [USAID - Pakistan Basic Education Sector Assessment 2023](#)

⁵ [Pakistan Ministry of Planning, Development and Special Initiatives \(n.d.\). Pakistan Floods 2022 Post Disaster Needs Assessment. World Bank.](#)

FCDO is primarily focusing on education sector in Khyber Pakhtunkhwa and Punjab. The GPE with a cumulative grant of [REDACTED] (2021-2026) has partnered with the four provincial governments to support their education sector plans' priorities focusing on equitable access and quality of basic education.

The WB is supporting multiple federal and provincial education projects. The Bank's [REDACTED] [REDACTED] Actions to Strengthen Performance for Inclusive and Responsive Education (ASPIRE) program is a federal initiative to mitigate COVID-19 school disruptions and to improve education access and quality with a focus on disadvantaged areas and vulnerable populations. Similarly, the WB's [REDACTED] Sindh Early Learning Enhancement through Classroom Transformation (SELECT) project aims to increase early grade literacy and student retention rates in disadvantaged and remote communities of the province.

UNICEF has been a major contributor to emergency response in education. It also coordinates and supervises GPE grant implementation across the provinces. The Japanese International Cooperation Agency (JICA) on the other hand is providing assistance to strengthen Non-Formal Education (NFE) across four provinces.

1.3 Description of Activity

The purpose of this Activity is to improve Pakistan's education ecosystem to enhance inclusive, sustained access to quality education for marginalized children including children with disabilities, girls, and children in rural areas of Pakistan. The ERA's Theory of Change is grounded in USAID/Pakistan's Development Objective 3: "Healthier, more educated population" outlined under the new Country Development Cooperation Strategy (CDCS). To achieve reach the development objective and achieves its two Intermediate Results (IRs), the following three areas will be addressed: 1) Enabling Policies for equitable access and resilience, 2) Community Mobilization for improved social inclusion and climate awareness, and 3) Improved Classroom Enabling Environment.

To achieve inclusive, sustained access to quality basic education for marginalized children, the Education Resilience Activity seeks change in three domains: policy implementation, community mobilization, and classroom implementation. Each domain will have to coordinate seamlessly to ensure that students from diverse backgrounds- particularly girls and children with disabilities- are able to learn in a safe, supportive environment that employs pedagogical techniques suitable to children's diverse learning needs.

The activity implementation will comprise the following three components:

1.3.1. Component 1 - Strengthen local education capacities to implement inclusive education

Pakistan has policies in place to support inclusive education and ensure school resilience during disasters and conflict⁶. For example, Pakistan School Safety Framework 2017 clearly outlines three pillars of school safety plans: safe learning facilities, risk reduction and resilience

⁶ Ibid.

education, and school disaster management. The framework also identifies roles and responsibilities of a host of stakeholders including federal, provincial and district education departments, parents, communities and civil society.⁷

To realize the benefits of these policies such as the Pakistan School Safety Framework, implementation plans must be institutionalized, and the district-level education department officials' technical and managerial capacities must be enhanced to roll out policies at the district level. Policy implementation must also be paired with monitoring mechanism at districts and school-level to assess and understand how policies are being implemented and whether educational outcomes are being achieved for girls, children with disabilities, and other marginalized populations.

Illustrative activities include:

- Develop implementation frameworks and guidelines for provincial and district-level education officials to roll out inclusive education policies.
- Review, revise and update existing disaster risk reduction plans for schools so children's education is not compromised during disasters and conflict.
- Strengthen provincial and district education officials' capacities to implement education service improvement policies and programs at local level.
- Strengthen Education Management Information Systems at district and provincial levels to collect, analyze and report on varied education indicators.
- Strengthen capacities to utilize data to inform policy decisions, governance, and management of education service delivery.

1.3.2. Component 2 - Mobilize communities to support inclusive education for girls and children with disabilities

For girls, children with disabilities, and other marginalized populations to feel safe and supported in school, the wider community must be mobilized to advocate for greater classroom inclusion. Through campaigns, activism, and local leadership, the Education Resilience Activity aims to increase community awareness around the importance of inclusive education. Community members and local organizations will become champions for inclusive education, demonstrating support for children from diverse backgrounds. These community networks will also play an important role in developing local disaster risk reduction plans for schools and ensuring that all children's learning and psycho-social support needs are adequately met during disasters and conflict.

Given the realities of climate change in Pakistan, ties between schools and communities become even more important as communities ensure children continue prioritizing education amidst shocks. Symbiotically, schools also have an important role to play in raising awareness within communities about the realities of climate change including rising heatwaves and floods and how these impact daily lives, labor productivity and livelihoods. The community-school nexus also offers significant opportunity for development of joint disaster risk reduction plans

⁷ [Government of Pakistan National Disaster Management Authority: Pakistan School Safety Framework](#)

and shared approach for education continuity if a natural disaster strikes. Well-thought-out community-based advocacy programs can also help bring about an attitudinal change and help individuals and communities cultivate more environmentally sustainable habits to reduce the effects of climate change at local level.

Illustrative activities include the following:

- Identify and leverage existing community organizations or create new networks to improve collaboration between schools and the community.
- Build capacity of School Management Committees (SMCs) /Parent Teachers Associations and local community networks to play their role to promote gender equality and social inclusion in schools.
- Develop and implement advocacy campaigns to promote sustained education for girls and children with disabilities.

1.3.3. Component 3: Improve school learning environment particularly for girls and children with disabilities

To ensure sustained classroom participation and improved learning outcomes for girls and children with disabilities, the Education Resilience Activity will work at the classroom and school administration level to strengthen teachers' pedagogical capacity to teach learners with diverse learning needs. The activity will introduce innovative approaches to set up an inclusive learning environment in schools and classroom so that the schools are safe and responsive to the needs of girls and children with disabilities. This component is anticipated as a pilot model which can be expanded by the Government of Pakistan in the future once the concept has been proven.

Illustrative activities include the following:

- Strengthen teachers' capacity to teach diverse learners through the Universal Design for Learning⁸.
- Review and strengthen formative and summative assessment systems and practices to align with UDL pedagogies for better learning outcomes⁹
- Advocate for adoption and implementation of national learning standards aligned with the Global Proficiency Framework¹⁰ supported by the GoP.

1.4 Period of Assignment/Services

The planned period of performance for the activity is five years, starting in January 2024 subject to the availability of USG funds. The proposed activity is aligned with new Country Development Cooperation Strategy (CDCS), 2023 to 2028. This RCE shall be amended as and when required to realign with the USG priorities for Pakistan and the global climate change efforts. The amended RCE shall cover the remaining period of performance for this activity.

⁸ [Universal Design for Learning to Help All Children Read: Promoting Literacy for Children with Disabilities](#)

⁹ Ibid.

¹⁰ [Global Proficiency Framework: Reading and Mathematics](#)

1.5 Activity Budget and Deliverables

The total maximum estimated cost over the life of the activity is [REDACTED]

2. LEGISLATIVE AND REGULATORY FRAMEWORK

Pakistan has several policies and pieces of legislation in place to guarantee inclusive education. The Article 25 (A) of the Constitution of Pakistan guarantees that the State shall provide free and compulsory education to all children from the age of five to sixteen years. Reinforcing that, the country is a signatory of the United Nations (UN) Convention on the Rights of the Child, which makes education compulsory and free for all children.¹¹ The Ministry of Federal Education and Professional Training (MoFEPT) has a goal for inclusive education that integrates girls and children with disabilities in general education settings; and provinces like Punjab and Sindh have identified inclusive education in contrast to special education as top priorities in their sector plans.

The 2017 - 2025 National Education Policy endorses UNESCO's definition of inclusive education as: '... a process of addressing and responding to the diversity of needs of all learners through increasing participation in learning, cultures and communities, and reducing exclusion within and from education. It involves changes and modifications in content, approaches, structures and strategies, with a common vision which covers all children of the appropriate age range and a conviction that it is the responsibility of the regular system to educate all children.'¹² However, stakeholders acknowledge that while the policies and plans promote exceptional ideals, the implementation of these plans are lacking. Schools are not adequately equipped to serve students with diverse learning needs and, generally, teachers do not have the skills required to integrate new learning techniques in the classroom.

2.1 International Environmental Treaties Ratified by Pakistan

Pakistan is a signatory to several international environmental agreements, International Labor Organization (ILO), and World Health Organization (WHO) conventions, Codex Alimentarius International Food Standards and International Organization for Standardization (ISO) etc. These agreements cover very broad areas from biodiversity and genetic resources, protected areas, climate change, and international trade, to a range of labor and health conventions. Multilateral Environment Agreements (MEAs) impose requirements and restrictions of varying degrees upon the member countries in order to meet the objectives of the agreements. However, the implementation mechanism for most of these MEAs is weak in Pakistan, and the institutional framework needs strengthening. The following are the relevant international treaties and conventions that have been ratified by Pakistan:

- Vienna Convention on protection of ozone layer; and Montreal Protocol on ozone layer depleting substances. Pakistan Ratified: 1992

¹¹ [United Nations Human Rights Office of the Commissioner \(n.d.\). *Convention on the Rights of the Child*. United Nations.](#)

¹² [Ministry of Federal Education and Professional Training Government of Pakistan \(n.d.\). *National Education Policy 2017*. UNESCO.](#)

- UN Convention to Combat Desertification (UNCCD). Pakistan Ratified: 1997
- Kyoto Protocol to the United Nation Framework Convention on Climate Change (UNFCCC). Pakistan Ratified: 2005
- Rotterdam Convention on the Prior Informed Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade. Pakistan Ratified: 2005
- Stockholm Convention on Persistent Organic Pollutants (POPs). Pakistan Ratified: 2008
- United Nations Framework Convention on Climate Change, Paris Agreement – April 22, 2016
- Declaration on Control and Prevention of Air Pollution and its Likely Trans-boundary Effects for South Asia. Pakistan Endorsed - April 1998
- Forced Labor Convention, 1930 (No. 29), Ratified on 23 December 1957
- Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87), Ratified on 14 February 1951
- Right to Organize and Collective Bargaining Convention, 1949 (No. 98), Ratified on 26 May 1952
- Equal Remuneration Convention, 1951 (No. 100), Ratified on 11 October 2001
- Abolition of Forced Labor Convention, 1957 (No. 105), Ratified on 15 February 1960
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111), Ratified on 24 January 1961
- Minimum Age Convention, 1973 (No. 138), Minimum age specified: 14 years, Ratified on 6 July 2006
- Worst Forms of Child Labor Convention, 1999 (No. 182), Ratified on 11 October 2001
- Labor Inspection Convention, 1947 (No. 81), Ratified on 10 October 1953
- Tripartite Consultation (International Labor Standards) Convention, 1976 (No. 144), Ratified on 25 October 1994
- Convention prohibiting environmental modification techniques (ENMOD), 1976, Ratified on 27 February 1986

3. JUSTIFICATION FOR CATEGORICAL EXCLUSION REQUEST

The activity components and sub-activities described justify Categorical Exclusions, pursuant to 22 CFR §216.2(c)(1) and §216.2(c)(2), for which an Initial Environmental Examination (IEE) or an Environmental Assessment are not required because the actions do not have an effect on the natural or physical environment.

Specifically, ERA, as currently planned, falls into the following classes of action:

- a) The action does not have an effect on the natural or physical environment [216.2(c)(1)(i)],
- b) education, technical assistance, and training [216.2(c)(2)(i)],
- c) analyses, studies, and workshops [22CFR216.2(c)(2)(iii)],
- d) document and information transfer [216.2(c)(2)(v)],
- e) activities that will develop the capability of recipient countries to engage in development planning [216.2(c)(2)(xiv)], and

- f) activities that involve the application of design criteria or standards developed and approved by A.I.D [216.2(c)(2)(xv)].

As currently planned, no interventions will directly affect the environment. This RCE shall be read and implemented together with the Government of Pakistan and the international best practices related to the COVID-19 and climate risk mitigation approaches.

At the post-award conference, the Contracting Officer's Representative (COR) and MEO/CIL shall explain the scope and nature of the Categorical Exclusion Threshold in this RCE.

4. CLIMATE CHANGE INTEGRATION

4.1 Country Climate Change Information (Baseline Information)^{13,14,15,16}

According to USAID/Pakistan FAA 118/119, Climate Change and Ecosystem Services Assessment, and the Global Climate Risk Index (2021), Pakistan is one of the ten countries most affected by climate change, and it is highly vulnerable to future impacts.

The UNICEF Study (2022) highlights Pakistan as highly vulnerable to adverse effects of climate change and climate-induced hazards including flash flooding, landslides, riverine flooding, saline intrusion, coastal flooding, desertification, drought and heat waves. According to the report Pakistan ranks 14 out of 163 countries in UNICEF's children's climate risk index of 2021.¹⁷

The World Bank's Climate Country Profile of Pakistan terms the country highly vulnerable to global warming with a potential rise in temperature by 1.3 to 4.9 Celsius, which is considerably higher than the global average rise in temperature. It increases the country's disaster risk, impacting particularly vulnerable poor. The Country Profile estimates an increase in the number of people affected by flooding to around 5 million people exposed to extreme river floods.¹⁸ Similarly, the Bank's Pakistan Country Climate and Development Report reiterates the country's increased vulnerability to climate induced disasters and resulting human, economic and social impacts. The report maintains that climate change is a risk multiplier with adverse ripple effects on country's development. The report posits that heatwaves will intensify in future; labor productivity will likely decline across the board because of extreme heat; and precipitation changes and declining water availability could damage riverine ecology, impair water security, and affect hydropower production.¹⁹

¹³ [Global Climate Risk Index 2021](#)

¹⁴ [USAID/Pakistan FAA 118/119, Climate Change, and Ecosystem Services Assessment](#)

¹⁵ [Pakistan Climate Vulnerability Profile](#)

¹⁶ [Pakistan Climate Vulnerability Profile](#)

¹⁷ [Kagawa, F. \(2022\). The Heat is On! Towards a Climate Resilient Education System in Pakistan. Kathmandu: UNICEF Regional Office for South Asia](#)

¹⁸ [Climate Risk Country Profile: Pakistan \(2021\): The World Bank Group and the Asian Development Bank](#)

¹⁹ [World Bank Group Country Climate Development Report](#)

Pakistan's National Climate Change Policy 2021 also identifies the country as among the most vulnerable to climate change with a significantly low technical and financial capacities to adapt to the adverse climate impacts. Among a host of climate focused actions, the Policy advocates for introducing curriculum on climate change and environmental planning with particular emphasis on Disaster Risk Reduction (DRR) in formal education system.²⁰

4.2 USAID Climate Risk Management Requirements

In the revised ADS 201 dated January 23, 2017, Climate Risk Management is a required analysis for new projects (ADS 201.3.3.13) and activities (201.3.4.5). The Mandatory Reference for ADS Chapter 201, Climate Risk Management for USAID Projects and Activities, dated October 12, 2016, outlines the process and provides tools for doing so.

4.3 Project Activities and Recommended Climate Risk Management Actions

The activity design team used USAID's "Climate Risk Screening Tool" to assess the potential climate risks for the activity. Activity components will take place in different parts of Pakistan and are largely focused on technical assistance and capacity building. The assessment considered the potential impacts of climate (temperature, drought, precipitation and flooding, sea level rise, storm surges, and other storms) across all of Pakistan over a ten-year time frame.

The climate risk analysis concluded that this activity poses low risk; however, the implementing partner(s) will be encouraged to raise awareness among local governments, schools and communities on the impact of climate change. The assessment also considered the potential impacts of climate (temperature, drought, precipitation and flooding, and winds and storms), across the geographical scope.

A summary of the conclusions from the analysis is presented in the Table-1 below.

²⁰ [Government of Pakistan Ministry of Climate Change: National Climate Change Policy 2021](#)

Table-1: Activity-Level Climate Risk Management Summary

1.1: Tasks / Defined or Anticipated Tasks or Interventions	1.2: Time-frame	1.3: Geography	2: Climate Risks*	3: Adaptive Capacity	4: Climate Risk Rating*	5: Opportunities	6.1: Climate Risk Management Options	6.2: How Climate Risks are Addressed in the Activity	7: Next Steps for Activity Implementation*	8: Accepted Risks
<i>Strengthen local education capacities to implement inclusive education</i>	0-10 years	Selected districts nationwide	Flooding and extreme temperatures	Existing institutional and human capacities of provincial governments are weak. However, private sector entities, partners and the provincial governments are open to capacity building support and assistance.	Low	In the wake of 2022 floods, the host government is eager to build local capacities in climate smart approaches and technologies. Private sector and implementing partners are also ready to adopt climate smart practices to ensure continuity of education and learning during any climate induced emergencies.	The activity will: <ul style="list-style-type: none"> Identify and integrate climate risks in site selection criteria. Integrate climate risks and preparedness in all training and capacity building activities. Prepare and practice emergency response at school levels to ensure planned activities continue during climatic risks. 	Climate risks like heavy rains, extreme temperatures, and flooding will be integrated in activity planning and execution in the focused areas.	Climate smart approaches will be included in all technical training to government counterparts, beneficiaries, and partners.	Nil
<i>Mobilize communities to support inclusive education for girls and children with disabilities</i>	0-10 years	Selected districts nationwide	Flooding and extreme temperatures	Existing knowledge and capacities of the communities to support the education are weak, which may impact activity implementation and management under climatic risks. However, the community representative groups such as School Management Committees are open to capacity building support and assistance.	Low	School Management Committees, as representatives of larger local communities settled near schools, have traditionally been open and willing to develop their capacities to continue supporting education in all circumstances. Further, potential local and international partner organizations have strong capacity building and technical capabilities to assist the education sector, local communities and government counterparts in the region.	The activity will: <ul style="list-style-type: none"> Identify and integrate climate risks in site selection criteria. Consider adopting a local climate risk analysis before engaging with local communities. Incorporate contingency planning for climatic risks to reduce impact on focused education institutes. Integrate climate risks and preparedness in all training and capacity building activities for School Management Committees 	Climate risks like heavy rains, extreme temperatures, and flooding will be integrated in activity planning and execution in the focused areas	Opportunities and challenges will be incorporated into annual and LOP work plan and development plans for working with local communities. The mobilization and advocacy packages will integrate messages on climate and risks to education of children, especially children with disabilities.	Nil
<i>Improve school learning environment particularly for girls and children with disabilities</i>	0-10 years	Selected districts nationwide	Flooding and extreme temperatures	Existing capacities of schools to support the education for girls and children with disabilities are weak. Climate induced events exacerbate the situation. Schools and local governments are open to capacity building support and assistance.	Low	Learning from the 2022 Floods, schools are poised to invest in developing preparedness and education continuity plans during climate related events such as heavy rains and floods. Teacher training and other capacity building activities also offer an opportunity to integrate climate risks in the training curriculum. Options will also be explored to make physical learning environments conform to the local climate risk challenges.	The activity will: <ul style="list-style-type: none"> Identify and integrate climate risks in site selection criteria. Use USAID Advancing Climate Action in and through Education guidelines to design and implement climate risk management approaches in building schools and managers capacities. Incorporate contingency planning for climatic risks to reduce impact on focused education institutes. 	Climate risks like heavy rains, extreme temperatures, and flooding will be integrated in activity planning and execution in the focused areas	Climate risk management strategies will be integrated in school-based activities and reflected in the activity implementation plans. Schools and local communities will also be encouraged to develop localized plans to continue education services if a disaster strikes.	Nil

5. REVISIONS

In accordance with 22 CFR 216.3(a)(9,) if an activity is revised or new information becomes available, which indicates that a proposed action might be "major" and its effects "significant", the originator(s) of the project/activity will review and revise the determination and submit through the MEO or to the Bureau Environmental Officers (BEO), Asia, for approval. If warranted, an environmental assessment will be launched, and a scoping statement and environmental assessment report prepared. The scoping and environmental assessment process, if determined necessary during scoping, will follow, and comply with 22 CFR 216.3(a)(4). It is the responsibility of the A/COR to inform the MEO/MCIL and BEO/Asia of any changes in the scope and nature of approved activities that may warrant the revision of the approved threshold decisions in a timely manner.