



TRACKING FUNDS TO LOCAL ORGANIZATIONS

Localization Research Methodology

June 2024

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ACKNOWLEDGEMENTS

This methodology document was written by Henry Lewis, Gary Forster and Sally Paxton with research support provided by Alex Tilley and Elma Jenkins.

We would like to thank the following organizations that funded and supported this research:

CARE Catholic Relief Services FHI360 Global Communities Modernizing Foreign Assistance Network (MFAN) Oxfam America Save the Children US

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Introduction

On November 4, 2021 United States Agency for International Development's (USAID) Administrator Samantha Power set out her new vision to make aid more accessible, equitable and responsive. A key part of this vision is the commitment to the "localization" agenda: by 2025 a quarter of USAID's funding will go directly to local partners and by 2030, 50% of programming will be led by local communities.

US aid implementation has been dominated by large US consultancy firms, intergovernmental organizations, and international NGOs for the past few decades. Implementation by local organizations is mainly as minority partners of these much larger organizations or as direct recipients of very small proportions of overall spend.

Greater local ownership of aid projects has been an important element of the aid effectiveness agenda for several decades. It runs through the principles set out in the 2005 Paris Declaration on Aid Effectiveness and the 2008 Accra Agenda for Action, which include local ownership, inclusive partnerships and capacity development. In the United States, efforts to decentralize decision-making and increase local agency have been made by recent administrations from both political parties.

The purpose of this methodology is to help us review current USAID spending patterns and establish an independent, replicable approach against which to measure progress towards the ambitious 25% target for channeling funds to local organizations. This methodology was used to undertake the research and analysis underpinning the <u>Metrics Matter II</u> report.

USAID has indicated that the 25% target applies to primary recipients of its funds and not sub-grants made by larger organizations or other intermediaries, and we have made our assessment on this basis. As well as presenting results of the current levels of funding received by local organizations, this exercise provides detailed information about USAID's country programs, which can help inform efforts to move forward with the localization agenda.

This research provides insights into the elements of the target and illustrates the implications of choices made about how to define and measure it. In Metrics Matter II we illustrate the significant differences that can be made to results by adjusting the definitions of what counts as a "local" organization and by adjusting what is counted or excluded from overall spending totals.

Research approach

We used spending data published by USAID in the International Aid Transparency Initiative (IATI) Standard for the analysis. This data includes the names of the organizations receiving funding from USAID, and we carried out secondary research on these to identify key characteristics. Using this data, we were able to identify local and non-local partner organizations and quantify financial flows to these. We looked at spending data for five years, from 2019 to 2023 (US fiscal years).

To calculate the amount of funding going to local organizations as a percentage of total funding requires an approach to determining what to include as local (the numerator) and what that funding is a proportion of (the denominator). Adjusting either of these will affect the values and proportions of what you are trying to measure. If one is trying to achieve a goal, such as a 25% funding target, then changing either of these can make it easier or more difficult to achieve that goal. We developed an approach to each of these elements that differs from USAID's current approach.

Firstly, for the numerator, while USAID has a detailed definition of local organizations, the approach they use to measure local partner funding is different (see the definitions section below). To track progress towards the 25% goal, USAID identifies local organizations as those that are incorporated in the country of performance. USAID has argued that a desire to reduce costs and administrative burdens has been central in determining this approach.

There is currently no universally agreed definition of what "local" means in this context, or what constitutes a "local organization". While at first glance it may seem intuitive, the large variety of organization types in the aid and development ecosystem means some organizations could be excluded from the count because they have features that don't fit the definition (for example, a diaspora-run organization based overseas would not meet most definitions because it is not headquartered locally). Additionally, there are strong opinions among stakeholders about whether to include or exclude particular organization types. Variables include location of the organization's main office, where the organization is legally registered, whether the organization is staffed and governed by citizens of the aid recipient country (or a specific beneficiary group of non-citizens) and whether the organization is a subsidiary of an international organization or brand. As well as changing static measurement results these questions are also important for the dynamic incentives created by inclusion or exclusion of organization types. For this research we have chosen to compare USAID's definition of local to the Inter-Agency Standing Committees (IASC) definition developed through consultation as part of the Grand Bargain (see IASC definition section below). This is because it best reflects USAID's vision to diversify its partner base, it has been independently developed by the Grand Bargain community, and it has been adopted by USAID for Grand Bargain purposes.

Secondly, for the denominator in the percentage calculation, there are many ways this could be interpreted. It could be a proportion of USAID's total aid and development budget; a proportion of project spend that is suitable for local partnership; or a proportion of a narrower subset of these flows. We followed a principle that the 25% should be a proportion of those funding flows that could be delivered by local partners: the total project funding to the countries we reviewed. USAID use a subset of these flows for its denominator, calculating the percentage as a proportion of project funds channeled to NGOs, the private sector or academic institutions only. This excludes flows for projects implemented by UN agencies and other multilaterals.

A note on government-togovernment (G2G) aid

An important part of the localization debate is whether to include government-to-government aid as local funding. USAID partners with government entities to implement projects in some countries and in others it makes direct payments into national budgets (budget support). Some voices in the localization debate argue for the inclusion of funding to governments as local. Others see the movement to greater local aid delivery as a means to increase the participation of local non-governmental organizations. They see this as the quickest, most efficient route to reach low-income or marginalized communities, while also strengthening civil society capacity. USAID is not currently planning to count government-to-government funding towards the 25% local partner target but will be tracking it separately. Given this, we also excluded it from our approach.

The Definition

DEFINING "LOCAL" – THE IASC APPROACH

USAID's localization agenda is partly based on a recognition that more resources need to be channeled to support organizations which lack resources and voice within the international system. In January 2018 the Localization Marker Working Group of the IASC Humanitarian Financing Task Team produced a Definitions Paper.¹ In this paper there are two main definitions:

- 1. Local and national non-state actors are "Organizations engaged in relief that are headquartered and operating in their own aid recipient country and which are not affiliated to an international NGO". A local actor is not considered to be affiliated merely because it is part of a network, confederation or alliance, wherein, it maintains independent fundraising and governance systems.
- 2. National and sub-national state actors are "State authorities of the affected aid recipient country engaged in relief, whether at local or national level"

It is notable that the definition of local and national non-state actors allows "affiliated organizations" under circumstances whereby said organization maintains "independent fundraising and governance systems". This means, among other things, that national organizations, originally established by INGOs, can be considered local under some circumstances. It is notable that the IASC definition maintains a specific definition of local and national private sector organizations which excludes this caveat relating to independent fundraising and governance systems.

It is noteworthy that both of these definitions were endorsed, at the time, by Grand Bargain signatories including the United States. While these definitions provided significant clarity, there remains one important challenge, chiefly that the term "fundraising and governance systems" has not been defined. This could be defined in a number of ways:

1. A technical definition – local organizations must operate policies, practices and systems relating to fundraising and governance which are not linked to, directed by or accountable to the policies, practices and systems of an international NGO.

¹ The full document on the IASC definition of local can be read <u>here</u>.

- 2. A principled definition local organizations must undertake their fundraising and governance activities without reliance upon an international NGO.
- 3. A pragmatic definition local organizations must not receive funding nor any oversight/direction from the international NGO which established them.

In truth, all of these definitions are challenging to apply although those under point 3 can at least be evidenced using financial accounts.

For the purposes of our analysis we have excluded organizations where we feel that there is a high likelihood that they fail to meet at least one of the definitions above.

DEFINING "LOCAL" – USAID'S APPROACH

In its progress report released in 2023, USAID defines a "local partner" as an individual, corporation, non-profit organization, or another body of persons that:

- 1. Is a USAID prime contractor or recipient;
- 2. Is legally organized under the laws of, and has as its principal place of business or operations in, a country classified as developing; and
- 3. Is providing assistance in the same country as its principal place of business.

To minimize reporting burdens on staff and partners, USAID is using data for this indicator from its Global Acquisition and Assistance System (GLAAS) and the Federal System for Award Management (SAM). This data is not publicly accessible, although USAID did provide the underlying data set along with the <u>2023 report</u>.

USAID has informed stakeholders that its definition and analysis process is complemented by a "spot check" which is undertaken by missions in order to ensure that organizations which don't meet the spirit of the definition are not classified as local. It is not clear from the resulting figures in the progress report, nor the accompanying dataset, what effect this has on the underlying data set nor the scale of organizations which need to be manually redefined.

In other areas of its work USAID uses the criteria outlined in the <u>ADS 303</u> directive to define what constitutes a "local" organization. According to this directive, a local entity is an individual, a corporation, a non-profit organization or other group of people that is:

- Legally organized under the country's laws.
- The country is its principal place of business or operations.
- It is majority owned by individuals who are citizens or lawful permanent residents of the country.
- It is managed by a governing body the majority of whom are citizens or lawful permanent residents of the country.

ADS 303 includes a separate definition for Locally Established Partners (LEPs) of US or international organizations. Local offices of US organizations must meet the following criteria to qualify as an LEP:

- Continuous operations in the country for at least five years.
- Local staff comprise at least 50% of office personnel.
- A local office registered with the local authorities and with a local bank account.
- A portfolio of locally implemented programs.
- Demonstrated links to the local community, including a majority of local citizens on any governing body or board and evidence of local support or roots.

Whether LEPs are counted as local implementers is controversial. Many civil society advocates see this as a way for US and other international actors to perpetuate their dominant role as USAID contractors. LEPs are not currently included in the ADS 303 local entity definition. The data USAID plans to use to measure progress towards the 25% goal does not include several of the criteria in the ADS 303 definition (including information about who organizations are governed and staffed by). This means LEPs may be included in measurements of progress towards the 25% goal. USAID has argued that a desire to reduce costs and administrative burdens has been central in determining the planned measurement approach.

In practice, USAID's use of its varying definitions can be inconsistent and, in some cases, appear contrary to the agency's stated goals. For example, guidance for the New Partnerships Initiative/Conflict Prevention and Recovery Program² explicitly states that LEPs are eligible to apply for funding. Meanwhile USAID's Colombia mission, has provided recent "locals only" solicitation guidance clarifying what type of organizations should apply for opportunities. USAID's Colombia mission has used this language, which seems apt for adoption by other USAID missions: "Local non-governmental entities do not include subsidiaries, affiliates, or member entities of organizations organized or headquartered outside of the country."

DEFINING "LOCAL" - THE APPROACH WE USED IN THE FIRST METRICS MATTER REPORT

In our previous <u>Metrics Matter</u> report, we used a series of characteristics to define "local". In our analysis organizations were identified as "local" when:

- 1. Headquartered and incorporated in the recipient country.
- 2. Excluding subsidiaries/brands of international organizations.
- 3. Managed and governed by nationals of the recipient countries or by non-nationals from a specific beneficiary group (e.g. refugees).
- 4. Only working sub-nationally or nationally.

While our team and other stakeholders felt strongly (and still do) that the third and fourth characteristics are important indicators of the extent to which an organization is local (and indeed the third indicator speaks to USAID's ADS 303 guidance for LEPs), we decided to revert to the IASC definition for this report. We have done this in part because the IASC definition is a widely recognized definition which was built through a multi-stakeholder approach and which, importantly, has been endorsed by USAID along with other Grand Bargain signatories. Before making this change we undertook analysis to understand the extent to which these changes would affect the data and ultimately the results. The difference was marginal.

² Annual Program Statement Number 7200AA24APS00005 Program Title: New Partnerships Initiative (NPI)/Conflict Prevention and Recovery Program (CPRP) Catalog of Federal Domestic Assistance: 98.001

The denominator

USAID'S DENOMINATOR

As well as the definition of which organizations count as "local" and, therefore, contribute to the 25%, the other side of the equation is the spending this target is a proportion of (the denominator in the percentage calculation). It could, for example, apply to the totality of the USAID budget, or just spending that is allocated to recipient countries (bilateral expenditure, excluding global spend such as core contributions to multilaterals and global administrative and personnel costs). Within bilateral aid it could apply to a sub-set of expenditure, excluding particular funding streams and channels.

In its FY22 progress report, USAID stated that its Direct Local Funding indicator is calculated as follows:

"The Direct Local Funding indicator can be expressed in terms of (1) obligations made in a given fiscal year, or (2) a percentage for a given fiscal year. When expressed as a percentage, the denominator is the total development and humanitarian A&A funds obligated in GLAAS in that given fiscal year. The denominator excludes personal services contracts (PSCs), interagency agreements, G2G assistance, and agreements with Public International Organizations (PIOs). With the exception of PSCs, these implementing mechanisms are not (or not fully) recorded in GLAAS. Since G2G is an important type of direct local partnership, it is reported separately."

USAID FUNDING STREAMS THE TARGET IS APPLIED TO (THE DENOMINATOR)

As well as modelling two different approaches to identifying which organizations we count as local, we have also modelled two different sets of funding streams included as the denominator in the calculation. To help illustrate this, Table 1 below shows all of the USAID funding streams to our 10 focus countries for US fiscal year 2023 and the two denominators we are working with:

Aid type		Receiver type	Total	Included in PWYF denominator	Included in USAID denominator
A02	Sector budget support	Public Sector	\$897,138,663		
A02	Sector budget support	Unknown	\$14,600,000		
B021	Core contributions to multilateral institutions	UN agency	\$2,659,130		
C01	Project-type interventions	Academia	\$77,186,698	v	v
C01	Project-type interventions	Global program	\$76,588,316	~	
C01	Project-type interventions	Multilateral	\$113,661,913	v	
C01	Project-type interventions	NGO	\$1,603,045,759	v	v
C01	Project-type interventions	Private	\$729,708,368	v	v
C01	Project-type interventions	Public Sector	\$21,986,748		
C01	Project-type interventions	Redacted	\$121,541,775	v	
C01	Project-type interventions	UN agency	\$1,506,718,051	~	
C01	Project-type interventions	Unknown	\$6,832,144	~	
D01	Donor country personnel		\$16,885,624		
D02	Other technical assistance		\$27,118,823		
G01	Administrative costs not included elsewhere		\$252,638,784		
ΤΟΤΑ	L		\$5,468,310,796	\$4,235,283,024	\$2,409,940,825

Table 1. Funding streams included in the Publish What You Fund and USAID denominators for US FY2023

The Publish What You Fund denominator includes all the aid flows marked in column four of the above table. This includes all project-type interventions, including all implementer types, except public sector implementers which are counted separately. It excludes non-project spending: direct government-to-government contributions, administrative costs, USAID personnel and technical assistance. For clarity, we call this the "Publish What You Fund denominator".

The rationale behind this model is to exclude costs which are not eligible to be delivered by local partners (administration and personnel), costs that are generally delivered by individuals not organizations (technical assistance), and government-to-government funding. We have included all other aid that could, in theory, be delivered by local organizations.

The second denominator we have modelled follows the approach that USAID is using – we refer to this as the "USAID denominator" (see table 1, column five). This focuses only on direct awards to non-government and private sector organizations as USAID indicates that they exclude project type interventions delivered by the public sector (government-to-government), by UN agencies and multilaterals, and will include only funding channeled through NGOs, private sector organizations and academic institutions. The two approaches we present are calculated as follows (G2G is government-to-government aid):

Publish What You Fund approach:

Local criteria based on IASC

All project funding (excl. G2G)

USAID approach:

Simple local criteria

Project funding to NGOs, academia and private sector only

The data

WHAT DATA DOES USAID USE TO MEASURE PROGRESS?

In its 2023 progress report, USAID explains that "to minimize reporting burden on staff and partners, USAID is using data for this indicator from its Global Acquisition and Assistance System (GLAAS) and the Federal System for Award Management (SAM)." Some of these systems allow public access to a subset of the data they hold. However, it is not currently possible to review the full set of information that would be required to carry out the research presented here. This limits the possibility to carry out independent verification of USAID's data and results. However, USAID has committed to sharing, retrospectively, the data sets on which its progress reports are based. This was the case in 2023 when USAID shared this <u>data set</u> which details funding recipients, amounts, sectors and then determinations on whether USAID considers the organization as local, regional and/or south to south.

It should be noted that this data set contains a large number of disbursements which are tagged as "miscellaneous foreign awardees", "recipient not reported" or "undisclosed", thus limiting the utility of the data.

WHAT DATA DID WE USE FOR THIS RESEARCH?

USAID makes detailed information about its spending available in the International Aid Transparency Initiative (IATI) Standard. This data is standardized, machine readable, timely and provides detailed information about project activities, including the names, and often alphanumeric references, of implementing organizations. USAID publishes this data on a monthly basis with an approximately threemonth (quarter) time lag for full data to come through into its systems. USAID consistently scores in the "good" category of the <u>Aid Transparency Index</u>, meaning its data is detailed, timely and relatively complete.

Access and usability of IATI data has improved significantly in the last few years and, with a base level of technical knowledge, it can be used for detailed research into aid spending. Publish What You Fund has developed an approach to using this data to assess the quantities of funding channeled to "local" organizations as defined by the IASC.

The approach uses USAID's granular spending data, downloaded on a country-by-country basis. The data includes details of the organizations that receive USAID funding and implement projects. There is a code-list in the IATI Standard to identify organization-types. However, USAID does not currently use this consistently or comprehensively and it does not provide the detailed information about organizations that would be required to operationalize more nuanced definitions of "local".

ORGANIZATION CHARACTERISTICS AND DEFINITIONS OF "LOCAL" (NUMERATOR)

To produce accurate, detailed analysis of the recipient organizations, we carried out secondary research to identify the relevant characteristics, derived from the IASC definition, for each organization. These include the organization type, headquarters location, project location, and whether the organization maintains independent fundraising and/or governance. See Annex 1 for a full list of the characteristics and the coding protocol used to identify these. Using the characteristics, we are then able to filter expenditure data according to whether it is channeled through local organizations.

We have worked with two possible approaches to identifying local organizations. USAID has said that it will identify local partners as those that are both incorporated and located in the country where the project is taking place. We have used this looser approach to illustrate the results it will produce. However, several of the details contained in the ADS 303 definition, as well as those identified by advocates as essential characteristics of local organizations, are missed. We have therefore compared the USAID definition to the IASC definition. Both of these approaches exclude public sector implementers and only apply to non-state actors (NGOs, private companies and academic institutions).

COUNTRY SELECTION

The secondary research required for this approach was carried out manually by Publish What You Fund staff and is labor intensive. For this reason, we limited our analysis to the same 10 USAID recipient countries which we had selected for the first Metrics Matter report. These were selected countries from across USAID's focus regions and included countries from a mix of country-income classifications. We prioritized countries that receive larger amounts of USAID funding and purposely included several countries where USAID's Local Works programs are operative. Given that our selection process was purposive rather than random, our selection is somewhat biased towards countries that have a higher than average proportion of local implementers and we expect this to show in our overall results. For this reason, we do not expect our totals to be directly representative of local implementer totals across USAID's portfolio. Given the heterogeneity of USAID operations in different countries and regions, it would not be possible to create a representative sample. We have, therefore, prioritized a diverse set of countries that will surface challenges in quantifying and measuring local implementation targets.

The 10 countries we selected are:



Q	Q	Q	Q	Q	Q	Q
East Africa	Southern Africa	West Africa	Middle East and North Africa	South and Central Asia	Western Hemisphere	Europe and Eurasia
Kenya*	Zambia	Liberia	Jordan	Bangladesh	Haiti	Moldova
Ethiopia				Nepal	Guatemala**	

* Prioritized for Local Works programs

** Prioritized for Local Works programs, including Centroamérica Local

TIME PERIODS

For each of these countries we looked at disbursement³ data covering the last five US fiscal years for which full data was available: 2019, 2020, 2021, 2022 and 2023. Researchers can also replicate our analysis for different time periods and using commitments rather than disbursements using the <u>public dataset</u> we have released alongside this report.

MARGINS OF ERROR

There are some margins of error in our results that should be noted when interpreting the findings. These are:

- Redacted or unknown implementers. As explained, in some cases USAID redacts implementer names, identifies an implementer as "unknown" or leaves the implementer name blank. We have assumed that all redacted or unknown implementers are not local (based on a principle of only identifying an organization as local when we have the evidence). However, some or all of these organizations could be local so we must assume our estimates could be slightly low. The amount of funding⁴ channeled to "unknown" or "redacted" organizations for US fical year 2023 ranges from 7.6% (Nepal) to 0.6% (Guatemala). The average across the 10 countries is 3%. There is no basis for assigning a probability to this margin of error.
- Human error in coding. In total we reviewed 977 organizations across the 10 case study countries. In some cases, full information was not available so we had to make best guesses. Some of these guesses could be incorrect, so there could be inaccuracies that effect the results. The margin of error in this situation is likely to be small and could lead to under- or over-estimates of funding to local organizations.
- Errors in USAID's transparency data. Publication of aid information in the IATI Standard is voluntary and carried out in real time as data becomes available. It is not independently verified, although the publication process includes automated validation checks. For this reason, there could be some errors or inaccuracies in USAID's data. It should be noted that data published in the IATI Standard is an official public record of the publisher's aid spending.

³ We chose to use disbursement transactions rather than commitments since they represent actual transfers of money from USAID to an implementer, and so are a more accurate reflection of money flowing to recipient countries.

⁴ Using the Publish What You Fund denominator.

Annex 1

CODING PROTOCOL FOR CATEGORIZING IMPLEMENTING ORGANIZATIONS

Publish What You Fund's localization research followed the Inter-Agency Standing Committees (IASC) definition of local.⁵ Using the IASC definition as our foundation, we used a standardized approach to categorize implementing organizations. The approach identified 12 organization characteristics which can be used to categorize implementers as "local". The series of questions was replicated across our 10 countries. This protocol will set out how to research each question in a standardized way to support future research.

Question	Method	Source 1: Organization's website / online search	Source 2: Open Corporates ⁶ <u>https:// opencorporates. com/</u>	Source 3: NGO Registry <u>https://</u> iatiregistry. org/ https://www. wango.org/	Source 4: IATI data <u>https://</u> iatiregistry. org/	Source 5: LinkedIn	Notes
1. Entity's principal place of business (donor country, recipient country, third country)	Review of headquarters address	Organization's website. HQ location may be found on the 'Contact us' page/ locations page or in footnotes	Search for entity name	Search for entity name	Search for entity name	Organization LinkedIn page office address	The receiver organization is the only entity being assessed. For example, 'Oxfam GB' is listed as the recipient for activities in Ethiopia, Haiti, Kenya & Nepal but the recipient name is 'Oxfam GB.' Therefore, we assessed only the UK office location and not any in-country offices
							Unless the 'receiver org' column explicitly states that the funding reported was received by the country-based office the presence of other country-based offices is not relevant for this assessment
2. Type of entity (private, academia, NGO, Public Sector, multilateral)	Self-assessment of organization type	Organization's website. Review the 'about us' section			IATI data (if available)		Note that USAID currently uses "national NGO" to mean US-based NGO and "regional NGO" to mean recipient country-based NGO. We will use "National NGO" to refer to a recipient country NGO and "International NGO" to refer to US or other home-country based NGOs

⁵ The IASC definition of "Local and national non-state actors" are "Organizations engaged in relief that are headquartered and operating in their own aid recipient country and which are not affiliated to an international NGO". Note: "A local actor is not considered to be affiliated merely because it is part of a network, confederation or alliance wherein it maintains independent fundraising and governance systems".

⁶ The Open Corporates website is a single repository for all publicly accessible corporate data so this will be a secondary source should the entity not have much information on their own website. It could also be used to triangulate the findings from the organization's website.

Question	Method	Source I: Organization's website / online search	Source 2: Open Corporates <u>https://</u> opencorporates. <u>com/</u>	Source 3: NGO Registry https:// iatiregistry. org/ https://www. wango.org/	Source 4: IATI data https:// iatiregistry. org/	Source 5: LinkedIn	Notes
3. Organization's focus (sub- national, national, regional,	Review of locations of work	Review the 'work we do' section			IATI data (if available)		International: crossing two or more boarders across regions
international)							National: within one country only
							<i>Regional:</i> across two or more country borders within a region
							(Consider how a local stakeholder would define this)
4. Is the organization a CBO? (i.e. does it only work sub- nationally within the area local to the organization's HQ)	Self-assessment of CBO claims	Review the 'work we do'/ 'About sections. Many CBOs do not have a large online presence					Yes: ONLY if it exclusively works sub-national in the area where it is based. Sub-national in this case means the organization only works for a single community and not across multiple regions <u>Note:</u> Some Orgs. have local representation
							but are international, this would not be a CBO
5. Is the organization legally	registered section. Company	gistered section. Company/ ddress NGO reg. number	Company listed addresses	NGO listed			Yes/No
organized under national laws in the recipient country? (Yes/No)				addresses			If an organization has its address in the recipient country this is a 'Yes' (Q1)
6. Is the organization a subsidiary/brand of an international organization? (Yes/No)	Review of organization structure & name(s)	Organization's website 'About us' section/ Report/Executive Summaries, etc.	Check company ownership structure on OC				<i>Private entity</i> : Check if the organization is owned by an INTERNATIONAL company. The parent company might have a different name from the entity being assessed therefore check Open Corporates
		<u>Plus</u> , check through an online key word search for: 'organization name' + 'subsidiary/owned'					<i>NGO:</i> check if the organization uses the brand of an INTERNATIONAL NGO (e.g. Oxfam)

Question	Method	Source 1: Organization's website / online search	Source 2: Open Corporates <u>https:// opencorporates. com/</u>	Source 3: NGO Registry <u>https://www.</u> wango.org/	Source 4: IATI data https:// iatiregistry. org/	Source 5: LinkedIn	Notes
7. Is the organization a subsidiary/brand of a regional organization? (Yes/ No)	Review of organization structure & name	Organization's website 'About us' section/ Report/Executive Summaries, etc. <u>Plus</u> , check through an online key word search for: 'organization name' + 'subsidiary/owned'	Check company ownership structure on Open Corporates				<i>Private entity:</i> Check if the organization is owned by a REGIONAL company. The parent company might have a different name from the entity being assessed therefore check Open Corporates. <i>NGO</i> : check if the organization uses the brand of a REGIONAL NGO.
8. How long has the organization been operating in the country? (founding date)	Review of organization history	Organization's website 'About us' section	Check Corporate registry for dates as well. Be aware if the organization has changed their name				Record the start year of the organization
9. Was the organization originally established by an international organization?	Review of organization structure & name(s), incl. previous names	Organization's website 'About us' section. <u>Plus</u> , check through an online key word search for: 'organization name'	Check company ownership structure on OC				Private entity: Check if the organization was originally established by an INTERNATIONAL company. The parent company might have a different name from the entity being assessed therefore check Open Corporates. NGO: check if the has previously used the branding of an INTERNATIONAL NGO (e.g. Oxfam)
10. Does the organization maintain independent fundraising? (Yes/No)	Review of organization structure, annual accounts (where available), and annual reports	'About us' or sections outlining funders Also look for references to local organization in the annual reports/ websites of linked INTERNATIONAL organizations					Yes: organization has a diverse number of funders and receives only a small proportion of funding from a linked INTERNATIONAL entity. <i>No:</i> organization receives large proportions of its funding (e.g. restricted/project funding and/or unrestricted/general funding) from a linked INTERNATIONAL entity

Question	Method	Source 1: Organization's website / online search	Source 2: Open Corporates <u>https:// opencorporates.</u> com/	Source 3: NGO Registry <u>https://www.</u> wango.org/	Source 4: IATI data <u>https://</u> iatiregistry. org/	Source 5: LinkedIn	Notes
11. Does the organization maintain independent governance? (Yes/No)	Assessments of organization board members in HQ office and also website text regarding governance processes	'About us' or 'governance' sections Also look for references to local organization in the annual reports/ websites of linked INTERNATIONAL organizations				LinkedIn board members search	Yes: If the entities have their own independent policies, practices, and board members/board chair No: If the entity has policies, practices or board members from a linked organization
12. Does the organization have a bank account in the recipient country? (Yes/No)	Self-assessment of organization addresses/ registrations	Search for address in recipient country. Can be found on the 'Contact us' page or org. address on site footnote	Check addresses on Open Corporates	Check NGO registration location			If organization has its address in the recipient country (question 1) it is safe to assume 'Yes,' unless there is strong evidence against

There are three receiver organization types which required special treatment:

- Unspecified Vendor/Enterprise: unspecified vendors/Enterprises are marked as 'unknown'
- USAID redacted: this category seems to include large global projects: These are marked as 'redacted'
- Unknown USAID as receiving organization: These are marked as 'unknown'