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December 10, 2022

Adam Nicholas Phillips
Executive Director
Local, Faith and Transformative Partnerships Hub
US Agency for International Development
Washington, DC

RE: CCIH Comments on USAID Policy on Engaging Faith-Based and Community Partners

Dear Mr. Phillips,

Christian Connections for International Health would like to thank USAID and especially the Office of Faith and Community Initiatives within your Hub for creating an excellent draft *Policy on Engaging Faith-Based and Community Partners*.

We circulated your request for comments among our over 100 organizations and several hundred individual members. We reviewed the draft policy and convened a forum of members on December 9.

This policy will help advance our shared interest, unite disparate groups, and focus on this critical work of a complex agency. We appreciate that this policy:

- Recognizes faith communities as both *legitimate* and *vital* partners in development,
- Remains committed to pluralism and to bringing diverse voices together globally and locally, and
- References, without conflating, religious freedom with strategic religious engagement.

Overall, two areas could be amplified.

1. Recognize that faith actors are part of the community and have a legacy of development, and want to be included in thinking and planning, not just left to the end for consideration as an implementing partner. The language we often hear is that faith actors do not want to be a “check box” on an implementation agenda. This is stated but should be amplified in the policy.
2. Implementation and accountability need to be more directly brought out. There needs to be an optimistic view about funding and support for this, as well as indications of how this will be monitored and progress measured.

We recommend some adjustments below. Some, highlighted, seem especially important while others are for clarification. All suggestions below were also uploaded on the comments page

1. VISION AND PURPOSE

- a. **Page 1 - Vision and Purpose - We recommend you include available statistics on religious identification.** For example, say According to [Pew Research Center](#), 84% of the world's population identifies with a religion; this is higher in LMICs and is growing there. Pew has other helpful data.
- b. **Page 1 - Faith partners are part of the local community, not separate.** The sentence "they understand the needs of local communities" could be revised, saying *they are part of and integral to local communities, which means they understand the needs of local communities. Also, add, They often predate governments and have a historical legacy of humanitarian response.*

2. OPPORTUNITIES, BARRIERS, AND EVIDENCE

- a. Page 4 - Barriers - **the discussion of misperceptions, myths, and mistrust is confusing.** Misperceptions lead to myths and foster mistrust. We recommend renaming the categories and clarifying as follows:
 - i. Replace Misconceptions with *Inconsistent understanding of legal permission to engage faith actors and FBOs*. Poor understanding of the legal framework - keep the content about understanding.
 - ii. Replace Myths with *Prejudices that arise from stereotypes and myths*. Include three items: 1) faith actors only want to proselytize, 2) they are not seen as professional, and 3) they are not science-driven. All stereotypes and myths have some rooting in experience, but they prejudice staff and other USAID partners.
 - iii. Replace Mistrust with *Risks to effective partnerships*. Include the following perceived risks about working with faith actors: 1) they don't track resources and provide necessary data, 2) they contribute to misinformation or stigma, and 3) they do not work beyond their faith or sect within their faith. Each of these can be mitigated with well-developed partnerships.
- b. Page 3 - Strategic Religious Engagement is most effective when built upon partnerships cultivated over time: It is confusing to read "one-time engagements" followed by "when recurrent." Replace the wording "when recurring" with *Serial, one-time engagements cannot build lasting relationships and trust.*
- c. Page 3- last paragraph, replace "emerging" field with "growing" field of religion and development. There is nothing "emerging" other than some academic circles now paying more attention to it.
- d. Page 5 - "Similarly, USAID staff may be uncertain about the legality or appropriateness of these types of engagements." This is true of USAID advisors, consultants, and stakeholders too. We suggest revising this to say USAID staff, *their contractors, and partners* may be uncertain...

3. BRIDGES: PRINCIPLES FOR ENGAGEMENT

- a. Page 9 - **Respect: refer to legacy and community trust, not just autonomy and unique identity.** When faith actors say they are not respected, they often feel their presence, trust, and legacy in the community are overlooked. We suggest adding *history* to the first sentence and acknowledging in the paragraph that *Faith actors have for centuries been at the heart of relief and development and are known, trusted, and integral parts of the community.*

4. BUILDING BRIDGES

- a. **Page 11 - Consider a new section, Convening Diverse Voices.** We suggest that USAID/Washington (through the Partnership Hub) convene faith partners and invite them into planning at the global level. This would set a model for the country/CDCS level as well.
- b. **Page 12 - Set the Foundation - expand training courses to others and include consultations for HQ and missions.** We recommend clarifying that the *Training available to USAID staff should be made available to consultants and partners and that trusted faith partners be engaged for consultations and advisory sessions to ensure the promising practices in SRE are understood and advanced.*
- c. **Page 13 - Build together:**
 - i. **Include faith actors in planning.** The point that faith actors should be included in consultations needs to be amplified much more, potentially earlier in the policy. Many faith organizations want to influence how development decisions shape ideas of how resources are allocated. We recommend adding *faith actors ought to be included in planning development initiatives, regardless of whether they are funded to implement programs.* Consider adding this on page 1.
 - ii. **Articulate a role for USAID in advocacy for faith engagement.** USAID has invested time and effort in building some strong faith-based partnerships. We recommend a statement in this section that makes clear that *USAID will seek to share learning and influence multi-lateral and other bilateral funders as well as other USG agencies working in International Development, outlining the processes and impact of SRE.*
 - iii. **Address a major concern that missions are overstretched.** It would help if missions receive support to create a “desk” to expand faith engagement and meet and develop relationships with faith partners. Related to this would be a faith desk in each bureau as well. However, the paragraph that states, **“independent funding for SRE will likely not be available,”** will be used against this policy. What support can be provided? We recommend replacing that with *It is in everybody’s interest to seek and attract resources to support this function. We expect to develop clear cases where the inclusion of faith voices improves quality programming and implementation.*

d. **Page 14 - Maintain and Repair**

- i. **There should be more clarity about how the successful implementation of the policy should be measured.** Perhaps “success” should be defined much earlier in the policy. We recommend adding, *Success of the policy needs to be monitored and measured, for example, to be sure that faith actors are involved in planning and dialogue with USAID and its operating units and missions, as well as considering how much funding is going to faith-based groups.*
- ii. We also suggest clarifying a **period to monitor the ramp-up** of the policy and a “mid-course assessment” after perhaps three years in a 6-year plan.
- iii. **Address how problems with faith actors will be addressed.** Religion and religious groups sometimes harm populations, either unintended or intended. Painful examples of stigma and misinformation, and sometimes with religious-motivated violence, come to mind. The opportunity in this section is to clarify what to do when things go wrong rather than draconian responses to shut out faith partners. We recommend adding a sentence, *Efforts need to be made to listen for emerging problems or issues that arise where faith actors are directly linked as the source of the problem, then convene stakeholders and develop effective strategies to safeguard continued religious engagement.*

Thank you again for the opportunity to provide comments. Please contact us if anything here is unclear or if you would like more information.

Sincerely,

A handwritten signature in blue ink that reads "Douglas Fountain". The signature is fluid and cursive, with a long horizontal flourish at the end.

Doug Fountain
Executive Director