Activity Location Data

A Mandatory Reference for ADS Chapters 201 and 579

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1. OVERVIEW

This policy establishes the requirement that USAID Operating Units (OUs) must collect Activity Location Data. Collecting, analyzing, and sharing Activity Location Data strengthens the Agency's ability to accomplish two priority objectives:

a. **Maximize Development Impact Effectively and Efficiently**

   Routine data collection and analysis are essential to applying analytic rigor to support evidence-based decision-making and managing adaptively through continuous learning (**ADS 201.3.1.2**). Integrating Activity Location Data collection and analysis into planning, delivering, assessing, and adapting USAID programming will help achieve greater development impact by increasing operational efficiency and improving decision-making based on rigorous data analysis and continuous learning.

b. **Promote Transparency, Participation, Collaboration**

   The value of USAID's development data is enhanced when the data is managed as an asset and made available throughout the Agency and to all other interested stakeholders in accordance with proper protection and redaction allowable by law. Collecting, managing, and sharing Activity Location Data supports existing USAID efforts to:

   ● Promote cooperation and collaboration with partner country/regional government(s), civil society, the private sector, the interagency, and other donors, implementing partners, and stakeholders;

   ● Further the U.S. Government's commitment under the **International Aid Transparency Initiative** (IATI) to increase aid effectiveness and promote international accountability through enhanced aid transparency (see **ADS 579maa, Foreign Assistance Reporting and the Foreign Assistance Redaction System**); and

   ● Implement **ADS 579, USAID Development Data**.

As a result, this mandatory reference supports the requirements and procedures outlined in both **ADS 201** and **ADS 579**.

2. PURPOSE

The purpose of this mandatory reference is to:

1. Establish that USAID OUs must collect Activity Location Data for applicable activities and clarify the Level of Geographic Detail at which Activity Location Data must be collected.

2. Establish primary responsibilities, procedures, and standards regarding Activity Location Data that are complemented by but not already covered in the responsibilities and procedures governing USAID's development data lifecycle established in **ADS Chapter 579**.

3. Institute procedures for collecting, managing, and reporting Activity Location Data to address the challenges that currently either limit Activity Location Data collection or result in low-quality data that does not adequately serve the Agency's needs.

4. Strengthen the Agency's ability to fulfill the existing requirements established by the **Geospatial Data Act of 2018**, the **Open, Public, Electronic, and Necessary Government Data Act**, and the **Foundations for Evidence-Based Policymaking Act of 2018**.

3. BACKGROUND

Activity Location Data depict an activity's location of implementation and intended beneficiaries to support operational awareness and programmatic decision making. Therefore, the requirement to collect Activity Location Data is inherently programmatic rather than administrative. Activity Location Data allows USAID to ask and answer questions, such as: "Where do we work and what do we do there?," "Where are the people and places that benefit from USAID programming?," "Where are opportunities to strategically coordinate USAID investments to maximize impact?"

Activity Location Data excludes other types of geographic data that may be collected during the implementation of an activity and used for other purposes. Examples include but are not limited to geographic microdata for scientific research, impact evaluations, population-based surveys, and geographically disaggregated performance or context indicators.

Once collected and submitted to USAID, Activity Location Data will be governed by the same privacy, security, and other considerations that apply to other types of USAID development data (see **ADS 579.3.3.3**). Additional procedures and considerations specific to Activity Location Data are outlined in **Section 8. Key Concepts for Implementation, Managing Data**.

4. APPLICABILITY, EXEMPTIONS, AND WAIVERS

Applicability

The requirements of this policy apply to field-based activities that directly generate development results.

Exemptions

There are several exemptions to the requirements of this policy, including:

1. Activities in which implementation began prior to issuance of this policy.

2. Worldwide or regional partnerships with Public International Organizations (PIOs) that qualify as Project Contributions or General Contributions pursuant to **ADS 308.3.9, Types of PIO Agreements**.

3. Inter-Agency Agreements (IAAs) that support broad development objectives that are not tied to specific countries.

4. Activities funded by multiple donors in which USAID does not have direct control over the countries of implementation.

Waivers

Under extenuating circumstances that restrict the ability to collect Activity Location Data at the required level of geographic detail (see **Section 5. Mandatory Requirements**), Activity Planners or Design Teams may request a waiver from the requirements of this policy. The relevant head of the Mission, Bureau, or Independent Office (or their designee) must approve the Action Memorandum that provides a justification for requesting the waiver and the duration of the waiver, not to exceed two years. The relevant head of the Mission, Bureau, or Independent Office (or their designee) may extend a waiver based on a review of a follow-on justification. Planners or Design Teams (or COR/AORs) must save all approved waivers in the Agency Secure Image and Storage Tracking System (ASIST).

5. MANDATORY REQUIREMENTS

USAID Operating Units (OUs) must collect Activity Location Data for each applicable activity they implement, including the 1) Location of Implementation; and 2) Location of Intended Beneficiaries (see **Section 8. Key Concepts for Implementation**), according to the following:

1. Location of Implementation

   Collect the Location of Implementation at the Exact Site Location level (see **Section 7. Determining the Appropriate Level of Geographic Detail** for information on how "Exact Site Location" is defined for an activity).

2. Location of Intended Beneficiaries

   At a minimum, collect the Location of Intended Beneficiaries at the Administrative Unit 1 Level, e.g., region, province, etc. (see Section 9. Frequently Asked Questions for the definition of "administrative unit").

Exception: When the Location of Intended Beneficiaries is considered nationwide, collect the Location of Intended Beneficiaries at the Administrative Unit 0 level (*i.e.,* country).

3. Ensure that Activity Location Data is collected and submitted according to **ADS 579saa, Geographic Data Collection and Submission Standards**, in accordance with the roles, responsibilities, and required procedures defined in **ADS 579** that govern the collection, management, and submission of all USAID development data. This must include verifying Activity Location Data quality (see **ADS 578, Information Quality Guidelines**).

4. Collect Activity Location Data that excludes location information that could directly identify individuals or households or other personally identifiable information (PII) (see **ADS 508.3.1** for definition of PII). For example, data such as an individual's name and address that could be used to re-identify the individual.

5. When applicable, collect Activity Location Data using existing Agency-approved data collection and management systems that fulfill the above requirements.

6. PRIMARY RESPONSIBILITIES

The responsibilities below apply to Activity Location Data and must be completed in accordance with the other primary responsibilities described in **ADS 579** that govern the collection and management of all USAID development data assets. Internal Agency resources, such as the USAID GeoCenter, are available to provide guidance on completing these responsibilities.

a. Activity Planners or Design Teams

During Activity Design (see **ADS 201.3.4**), Activity Design Teams, in close coordination with USAID OU Geographic Information Systems (GIS) Specialists or other subject matter experts:

1. Must determine the appropriate Level of Geographic Detail to collect the Location of Implementation and the Location of Intended Beneficiaries (see **Section 7. Determining the Appropriate Level of Geographic Detail**).

2. Must assess data risk and identify whether methods to mitigate risk are required (see **Section 8.d Managing Data Risk**).

3. Must include the estimated cost of collecting Activity Location Data by contractors and recipients in the Activity's cost estimate. It is recommended that activity locations are derived from existing lists, such as a master health facility list, to increase efficiency and interoperability with existing datasets in-country. When it is necessary, Activity Location Data collection that involves manually creating activity locations with GPS-enabled devices rather than

selecting locations from an existing list will require greater technical capacity and technology from contractors and recipients and therefore increases the associated cost if these requirements are not already required to implement the activity.

4. Must coordinate with the relevant Technical Office(s), Program Office, Contracting Officer (CO), Agreement Officer (AO), General Counsel (GC) or Resident Legal Officer (RLO), as appropriate based on the type of implementing mechanism, to ensure that the solicitation indicates:

   a. Any Activity Location Data required under the award provides standards that comply with **ADS 579saa, Geographic Data Collection and Submission Standards**;

   b. Any Activity Location Data submitted to USAID is in a format that fulfills the **ADS 579saa, Geographic Data Collection and Submission Standards**;

   c. The Level of Geographic Detail at which the Location of Implementation and Location of Intended Beneficiaries will be collected (see **Section 7. Determining the Appropriate Level of Geographic Detail**);

   d. The award number of the primary activity will be included in Activity Location Data; and

   e. Any additional OU requirements to standardize Activity Location Data, such as the use of standard administrative unit or populated place names.

5. Should plan to use Activity Location Data for improved activity monitoring, evaluation, and learning (see **ADS 201.3.4.10**).

b. **Contract Officer's Representatives (CORs), Agreement Officer's Representatives (AORs), Government Agreement Technical Representatives (GATRs)**

In accordance with the responsibilities outlined in **ADS 579.2.i** and in close coordination with Activity Managers, implementing partners, the USAID OU GIS Specialist, or other subject matter experts, the COR/AOR/GATR:

1. Must consult with the implementing partner to ensure that they understand the Activity Location Data collection and submission requirements included in the award.

2. Must verify that the implementing partner collects and submits Activity Location Data in accordance with the terms of the award (see **ADS 579.2.i**).

3. Must assess data risk and identify whether methods to mitigate risk are required (see **Section 8.d Managing Data Risk**), in accordance with the other responsibilities outlined in **ADS 579.2.i**.

4. Should analyze Activity Location Data with other monitoring data to inform efforts to manage adaptively and promote accountability (see **ADS 201.3.5.2**).

c. **USAID OU GIS Specialist or Other Subject Matter Expert**

To facilitate Activity Location Data collection, management, and analysis, the OU GIS Specialist or other subject matter expert:

1. Must provide support to Activity Planners or Design Teams, AORs/CORs/GATRs, and their OU as they conduct their primary responsibilities regarding Activity Location Data.

2. Must work with their OU to establish methods to standardize Activity Location Data collection across activities, such as defining standard names and locations for administrative units, populated places, facility locations, and other geographic units that will be used to collect Activity Location Data.

If a USAID OU does not have a GIS specialist or other subject matter expert, technical assistance is available upon request from Agency resources, such as the USAID GeoCenter (email **GeoCenter@usaid.gov**) or teams within the OU's bureau that include data analysis and visualization capacity.

d. **USAID Operating Units**

To facilitate Activity Location Data collection and analysis for improved development programming, the USAID OU:

1. Must verify that the "Mandatory Requirements" (see **Section 5. Mandatory Requirements**) are fulfilled.

2. Must plan for Activity Location Data collection and analysis during strategic planning and project design. This will help to ensure that Activity Location Data can be used to support decisions across the results framework hierarchy.

3. Should ensure that Activity Planners or Design Teams, CORs/AORs/GATRs, and/or subject matter experts receive training on geographic data collection and analysis practices.

4. Should analyze Activity Location Data with other performance and context monitoring information to inform management and adapt interventions, when appropriate (see **ADS 201.3.4.10 B**).

5. Should use Activity Location Data as part of their Collaborating, Learning, and Adapting approach to engage and coordinate with the OU and USAID, with implementing partners, and among key stakeholders to increase synergies and information sharing (see **ADS 201.3.7**).

7. DETERMINING THE APPROPRIATE LEVEL OF GEOGRAPHIC DETAIL

The purpose of collecting Activity Location Data is to support operational awareness and programmatic decision making (see **Section 3. Background**). Therefore, determining the Level of Geographic Detail at which Activity Location Data is collected must be based on programmatic rather than administrative reporting requirements and reflective of a robust activity-design process. This process will inform the statement of work or program description and associated performance reporting requirements.

There are four Levels of Geographic Detail outlined in Section 8.c Level of Geographic Detail that a USAID OU will refer to while determining which level is appropriate for an activity:

○ Administrative Unit Area

○ Populated Place Location

○ Exact Line or Area Feature

○ Exact Site Location

*Note: As indicated in **Section 5. Mandatory Requirements**, Activity Location Data must exclude personally identifiable information (PII) (see **ADS 508.3.1** for definition of PII).

a. Location of Implementation

The Mandatory Requirements establish that the Location of Implementation must be collected at the "Exact Site Location" level. The Level of Geographic Detail used to represent the Exact Site Location will be based on the type of activity:

1. *If* the activity is implemented in Exact Site Locations that are directly related to the development results generated by the activity, *then* collect the Location of Implementation at the Exact Site Location or Exact Area or Line Feature Level of Geographic Detail.

2. ***If*** the activity is implemented in Exact Site Locations that are not directly related to the development results generated by the activity, ***then*** collect the Location of Implementation at the Populated Place Level of Geographic Detail.

> **For Example:** Consider an activity that is implemented in health facilities to improve the quality of health services delivered in those health facilities. In this case, the site locations where the activity is implemented are directly related to the development results generated by the activity and therefore the facility location (Exact Site Location) is collected to represent the Location of Implementation.
>
> Alternatively, consider an activity that is implemented in a country's capital city and focused on policy reform to achieve inclusive economic growth in the agriculture sector. The activity is not implemented in site locations directly related to the development results generated by the activity and therefore the capital city (Populated Place) is collected to represent the Location of Implementation.
>
> Finally, consider an activity that is implemented in a set of streams and forested areas within one part of a large protected area, such as the Amazon. The entire protected area would be too broad to accurately represent the activity's location so the streams (Exact Line Feature) and the forested area boundaries (Exact Area Feature) are collected to represent the Location of Implementation.

b. Location of Intended Beneficiaries

The Mandatory Requirements establish that:

1. If the activity's impact is considered nationwide, then the Location of Intended Beneficiaries must be collected at the Administrative Unit 0 Level (*i.e.,* country).

2. If the activity's impact is not nationwide, then the Location of Intended Beneficiaries must be collected, at a minimum, at the Administrative Unit 1 Level (*i.e.,* region, province, etc.).

For these activities, USAID OUs should consider collecting more granular geographic location information about the activity's Location of Intended Beneficiaries when it is necessary to support operational awareness and programmatic decision-making. A key question to consider while determining the appropriate Level of Geographic Detail is "where is the development impact generated by this activity located and which geographic units best represent these locations?"

> **For example:** Consider an activity that will conduct capacity building with a province-level Ministry of Health to strengthen the health system across the entire province. The activity is implemented in the province's capital city but the activity will benefit the entire province through a strengthened health system. In this case, the province (Administrative Unit 1 Level of Geographic Detail) will best represent the activity's Location of Intended Beneficiaries.
>
> Alternatively, consider an activity that seeks to increase regional health integration in West Africa by supporting a West African regional health organization. The activity is implemented in Bobo-Dioulasso but it will benefit all 15 member states of the health organization. In this case, the impact of the activity is considered nationwide and the Location of Intended Beneficiaries will be collected at the Administrative Unit 0 Level (i.e., country).

c. **Other Key Considerations**

While determining the appropriate Level of Geographic Detail for the Location of Intended Beneficiaries, USAID OUs should also consider the following:

- The Level of Geographic Detail that is necessary to provide a meaningful unit of analysis for routine activity management tasks, such as establishing basic operational awareness, facilitating collaboration, learning, and adapting, and communicating with external stakeholders;

- The type of programming and the cost and capacity requirements for implementing partners to collect data at a certain Level of Geographic Detail;

- Whether collecting data at a certain Level of Geographic Detail will present data risk that exceeds its benefit (see **Section 8.d Managing Data Risk**); and

- Whether collecting data at a certain Level of Geographic Detail will not be permissible due to insecure environments.

8. KEY CONCEPTS FOR IMPLEMENTATION

Understanding the Activity Location Data collection and management process and several key concepts is necessary.

a. Activity Location Data Collection and Management Process

Collecting, managing, and using Activity Location Data occurs throughout all phases of an activity. Table 1 provides an overview of the considerations for each phase. The specific roles and responsibilities within a USAID OU are outlined in **Section 6. Primary Responsibilities**.

Table 1 - Activity Location Data Collection and Management Process Overview

Activity Phase	Activity Location Data Considerations
Design and Procurement	○ Determine the Activity Location Data collection requirements. ○ Include Activity Location Data collection and submission requirements in solicitation and award language. ○ Review offeror/applicant's proposed methodology for collecting Activity Location Data.
Implementation and Post-Award	○ Verify that the Activity Location Data collection and submission requirements in the award are fulfilled. ○ Use Activity Location Data for improved programming, coordination, and communication. ○ Engage in periodic data review and publishing processes to ensure Activity Location Data are shared at the appropriate access level.

b. Types of Activity Location Data: Location of Implementation and Location of Intended Beneficiaries

Activity Location Data help answer two important questions: 1) where is our programming implemented? and 2) where are the people and places benefitting from our development programming? Frequently, the location where an activity is implemented is different from the location of the intended beneficiaries. Therefore, it is important to collect data that will represent both the Location of Implementation and the Location of Intended Beneficiaries to fully understand an activity's geographic presence.

For example, consider an activity that conducts training events in a country's capital city. Training participants travel from various parts of the country and then travel home to apply what they have learned in their own communities. In this scenario, collecting both the location of the capital city (Location of Implementation) and the location of the communities that the participants came from (Location of Intended Beneficiaries) will best represent the activity's geographic location and better support programmatic decision-making and transparency and accountability.

c. Level of Geographic Detail

The levels of geographic detail outlined in Table 2 are defined in **ADS 579saa, Geographic Data Collection and Submission Standards**.

Table 2 - The Four Levels of Geographic Detail

Level of Geographic Detail	Description	Example
Administrative Unit Area ***Only valid for Location of Beneficiaries (see Section 5. Mandatory Requirements).**	The activity's location is collected by administrative unit areas, such as districts.	A health activity builds the capacity of a district-level ministry of health and will impact the health system of the entire district. The location of the district is selected as the appropriate Level of Geographic Detail.
Populated Place Location	The activity's location is collected by populated place, such as a city, town, or settlement, and represented by latitude/longitude coordinates of the populated places.	A governance activity promotes government accountability in 15 cities. The location of each city is selected as the appropriate Level of Geographic Detail.
Exact Line or Area Feature	The activity's location is collected by an area or linear feature and represented by the area or line.	An economic growth activity increases agriculture yield in areas within 10 districts. The exact agriculture areas boundaries are selected as the appropriate Level of Geographic Detail.
Exact Site Location	The activity's location is collected by the exact site location and represented by latitude/longitude coordinates of the site locations.	A health activity expands the services available at 30 health facilities in 4 districts. The exact location of each health facility building is selected as the appropriate Level of Geographic Detail.

d. Managing Data Risk

Activity Location Data are collected, managed, and shared for an intended benefit: to improve operational awareness and development decision-making while remaining accountable and transparent. However, in certain scenarios, Activity Location Data may

present some level of data risk in addition to benefit. Data risk is the potential harm caused by the inability to adequately acquire, store, transform, transport, and use data assets. Therefore, balancing benefit and risk is a key component of responsible Activity Location Data collection and management.

There is a common misconception that Activity Location Data will be publicly released once it is submitted to USAID. This misconception may lead to limiting data collection due to the potential data risk rather than its benefit or result in overly redacting or aggregating data before it is submitted to USAID thereby reducing its benefit. In response, it is important to clarify the following:

1. When Activity Location Data that present risk is submitted to USAID data repositories, USAID can limit data access to: Public, Restricted Public, Non-Public, as defined in **ADS 579.3.3.4**.

2. To maintain the spirit of openness and transparency while also mitigating data risk, Activity Location Data that present risk can be, redacted or aggregated before it is shared.

For example, if releasing Activity Location Data publicly poses substantial risk of - identifying individuals and that risk falls within one of the Principled Exceptions to public release, the original Activity Location Data can be partially or fully redacted, or it can be aggregated to a level that anonymizes the sensitive information before it is shared more widely (see **ADS 579.3.3.3**).

The steps a USAID OU should take to assess and mitigate data risk are outlined in **ADS 579saa, Geographic Data Collection and Submission Standards**. The Activity Location Data requirements exclude the collection of PII and therefore privacy will not generally be a factor in Activity Location Data risk management (see **Section 5. Mandatory Requirements**).

Data Risk

Three interrelated parts define data risk:

1. A negative outcome that could result from unauthorized access to the data,

2. The likelihood that the negative outcome will actually occur, and

3. The level of impact that would result from the negative outcome.

Types of negative outcomes include the Principled Exceptions outlined in **ADS 579.3.3.3**. In addition, certain country contexts may present insecure environments that result in concerns regarding the safety of individuals while collecting geographic data. When applicable, these data collection constraints should also be considered when planning for data collection.

e. ADS 579 Geographic Data Collection and Submission Standards

[ADS 579saa, Geographic Data Collection and Submission Standards](#) provides the guidance for a USAID OU to manage data risk and define and communicate Activity Location Data collection and submission requirements in solicitation and post-award guidance documents, in accordance with the other responsibilities and procedures established by [ADS 579](#).

9. FREQUENTLY ASKED QUESTIONS

a. Managing Implementation

1. **When will USAID OUs be required to fulfill the requirements of this mandatory reference?**

   USAID OUs are responsible for fulfilling the requirements in new awards starting on the date this mandatory reference is effective.

2. **How should this requirement be implemented in awards that include field support?**

   In the case of awards that include field support, an Activity Manager may assist the COR/AOR in performing certain technical oversight duties, but the Activity Manager is not authorized to provide technical direction to contractors or recipients or any other action that binds the government based on the COR/AOR designation letter. In these cases, the Activity Manager is often located in the Mission, while the COR/AOR is located in USAID/Washington. As a best practice, Missions should identify Activity Managers for field support activities implemented in their respective country of responsibility (for more information see [ADS 201.3.4.9](#)).

3. **USAID's management oversight is limited for certain types of awards. In these cases, how will a USAID OU fulfill this requirement?**

   For awards in which a USAID OU's management oversight is limited, the USAID OU may generate Activity Location Data internally. The Level of Geographic Detail at which Activity Location Data is collected will be determined by the information available to the USAID OU. For example, if a USAID OU transfers funds to a Public International Organization that ultimately supports a host-country government ministry, the activity's Location of Implementation and Location of Intended Beneficiaries could be represented by the latitude/longitude coordinate location of the capital city.

b. Capacity Requirements

1. **What if a USAID OU does not have access to a GIS specialist or GIS tools?**

   Defining and communicating Activity Location Data collection and submission requirements does not require GIS expertise. Once the data has been collected, the OU should not require additional expertise or access to special tools to verify that the data collection and submission requirements have been met and to conduct basic analysis of the data. However, the efficiency and effectiveness of collecting, managing, and analyzing Activity Location Data will be improved if USAID OUs ensure that Activity Planners or Design Teams, CORs/AORs/GATRs, and/or other subject matter experts receive appropriate training on basic geographic data collection and analysis practices.

2. **What level of technical support is available to OUs that need assistance fulfilling these responsibilities?**

   Further technical assistance is available upon request from Agency resources, such as the USAID GeoCenter (email **GeoCenter@usaid.gov**).

c. **Data Collection and Management**

1. **What is the appropriate level of geographic detail for national-level activities?**

   At a minimum, national level activities will be represented at the Administrative Unit 0 level (*i.e.,* country) (see **Section 5. Mandatory Requirements**).

2. **What are administrative units?**

   Administrative Units define the hierarchy of administrative divisions within a country. The units are delineated by geographic boundaries, starting with the country boundary that is referred to as Administrative Unit 0. The first level of subdivision within a country is referred to as the Administrative Unit 1. Administrative 1 units are subdivided into administrative 2 units and this logic continues until the lowest level of subdivision is reached. Terms such as "Admin 1" or "Adm1" are commonly used to refer to administrative units and frequently appear in column headings or filenames for datasets. Each country will refer to the administrative units with different terms for each level, such as region, province, and district.

   As an illustrative example, Table 3 displays the names and number of units for each administrative level in Peru in 2018.

Table 3 – Administrative Unit Hierarchy Example

Administrative Level	Unit Name	Number of Units
0	Country	1
1	Region	26
2	Province	196
3	District	1,869

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