



Senior Obligation Alignment Review: Frequently Asked Questions

An Additional Help for ADS 300

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FREQUENTLY ASKED QUESTIONS

SOAR Background and Applicability

- 1. Why were the thresholds and review process for Senior Obligation Alignment Review (SOAR) revised?**

After almost three years of utilizing the SOAR, the Agency has taken steps to streamline the SOAR process. The SOAR process is designed to engage senior leadership in the review of certain proposed, high-dollar-value awards to ensure they are aligned with the Agency's Mission and the Administrator's priorities. The increased thresholds accomplish this objective while empowering Assistant Administrators and Mission Directors with increased responsibility of ensuring that procurements within their threshold align with Mission and Agency strategies and the Administrator's priorities. Overall, these changes will reduce the time it takes to move an award from design to procurement.

- 2. Is a proposed activity that is in furtherance of a Congressional mandate exempt from the SOAR process?**

Many USAID activities are based on statutory mandates or commitments. The purpose of the SOAR process is to make sure the Agency is applying the principles of Effective Partnership and Procurement Reform (EPPR) and the Journey to Self-Reliance in all awards, whether mandated or not. The only exemptions are those outlined in [Automated Directives System \(ADS\) Chapter 300.3.4.1\(b\)](#).

- 3. We plan to issue a Notice of Funding Opportunity (NOFO) that we expect will result in between 20 and 35 grants, each of which is limited to a total estimated amount of \$2,000,000. Are the NOFO and the awards subject to the SOAR review?**

Yes, SOAR approval is required for the NOFO, regardless of whether it is an Annual Program Statement (APS) or a Request for Application (RFA). The SOAR requirement applies to the solicitation, whether for single or multiple awards, rather than the individual award(s) under it. As stated in [ADS 300.3.4.1\(a\)\(1\)](#), the review level is determined by the cumulative estimated value of the awards you expect to issue. If a Bureau/Mission is uncertain at the solicitation stage on whether the potential awards will reach the SOAR thresholds, then a SOAR review can be undertaken at a later time once more certainty on funding-level availability is known. If the total amount of all the awards is envisioned to be below the SOAR threshold, then no SOAR review is required.

- 4. Is a SOAR required if a Justification to Restrict Eligibility (JRE) or a Justification and Approval for Other than Full and Open Competition (J&A) is signed by the Assistant Administrator or Administrator for procurement**

contracts or assistance awards? Note: This Q&A applies to procurement contracts and acquisition awards.

For new awards: The SOAR is not required in instances where an exception to competition, signed by the Assistant Administrator or Administrator, documents in the Action Memo how the proposed award addresses areas covered by the SOAR, including self-reliance, leveraging new resources, collaborating with our partners, and broadening our partner base (see [ADS 300.3.4.1\(b\)](#) for exceptions to the SOAR policy).

For modifications of existing awards: The SOAR is required for new awards only and does not apply to contract modifications, regardless of whether a J&A is required.

5. Can we publicly post the draft Statement of Works/Statement of Objectives (SOW/SOO) in a Request for Information (RFI) without an approved SOAR?

Yes. It is allowable to post the draft SOW/SOO for industry comment without a pre-approved SOAR. You should mention in the SOAR that the draft was posted for comment and use any data you receive in the SOAR document.

6. For activities that meet the SOAR threshold, what comes first: 1) SOAR approval by the Administrator or responsible Assistant Administrator; or 2) approval of the Activity Approval Memorandum (AAM) by the head of Mission/Bureau (or their designee)?

We encourage Missions and Bureaus and Independent Offices (B/IOs) to submit their SOARs as early in the design process as possible, as the process does sometimes result in changes to the design of the activity. For this reason, the SOAR process should occur prior to finalization of the "Activity Description," which is often incorporated into a solicitation (e.g., a Statement of Work, Program Description, Statement of Objectives, etc).

Once the Activity Description is finalized, the Mission or B/IO must clear the final version through an AAM. The Mission Director, Assistant Administrator, or Independent Office Director (or their designee) is responsible for approving the AAM. AAM approval authorizes the Mission or B/IO to proceed with releasing a solicitation or, in some cases, finalizing an agreement.

For further guidance, see [ADS 201mba](#), which describes the typical step-by-step process of designing an A&A instrument. The if-applicable SOAR process is described under Milestone C, and the AAM is described under milestone D.

7. Do we need to specifically address Youth Engagement/Integration for all projects?

The USAID Youth in Development Policy asks that any activity that affects young people between ages 10–29, apply an intentional, age-appropriate, [Positive Youth](#)

Development (PYD) approach and interventions. While not all USAID activities focus or affect this age group, many programs do and can improve development outcomes by integrating key language and interventions into their designs. Additional examples and language can be found on the [USAID Youth Intranet Resource Site](#) or from the USAID Youth Coordinator, mimccabe@usaid.gov.

8. What is the definition of “Information Technology (IT),” “IT resources,” and “for use by Agency staff” as referenced in ADS 300man?

USAID uses the definition for “IT Resources” directly from the Office of Management and Budget ([OMB Circular M-15-14: Management and Oversight of Federal Information Technology](#), pages 3-4):

B. Such services or equipment are “used by an Agency” if used by the Agency directly or if used by a contractor under a contract with the Agency that requires either use of the services or equipment or requires use of the services or equipment to a significant extent in the performance of a service or the furnishing of a product.

Whether IT is procured by the Agency directly or by a contractor, it is covered if it meets the criteria for “used by Agency,” as defined by OMB above. This could mean such services or equipment used by the Agency directly or used by a contractor under a contract with the Agency that requires either use of the services or equipment, or requires use of the services or equipment to a significant extent in the performance of a service or the furnishing of a product.

USAID has identified several factors that affect whether IT is “used by an Agency.” The Office of the Chief Information Officer (M/CIO) will consider these criteria when determining whether IT falls within its scope, and include: (1) whether the Agency owns the IT; (2) how Agency personnel use the IT ; (3) whether Federal information is collected, maintained, or processed; (4) what the Agency’s rights to, and restrictions with, the data are; (5) whether the IT is interconnected to an Agency system; (6) what the purpose of the contract is; and, (7) what role the IT plays in the delivery of product and/or services under the contract.

9. How do I obtain M/CIO approval in relation to the SOAR process?

B/IO/MS can submit a review or approval request to M/CIO at ITAuthorization@usaid.gov to initiate a review of the proposed acquisition that includes a requirement for IT for the Agency’s use. Upon approval, M/CIO will provide a document to attach to the SOAR.

10. Under an already SOAR-approved IDIQ or LWA, do Task Orders and associate awards respectively require a SOAR?

No SOAR is required for Task Orders or associate awards under an already SOAR-approved IDIQ or LWA.

11. If a new award is based on exceptions to competition authorized in an Expedited Procedures Package (EPP), is a SOAR required?

No SOAR is required for a new award based on exceptions to competition authorized in an EPP.

Thresholds

12. Does the review process only apply to appropriated funds? In other words, would cost-sharing provided through public-private partnerships be included for the purpose of determining the total estimated ceiling?

All funding sources that are legally required conditions of the USAID award (e.g., cost-sharing) should be considered in determining the total estimated ceiling of the activity. For example, if \$90 million is provided from appropriated funds and another \$20 million is partner cost-sharing, the SOAR must be approved by the Administrator. On the other hand, if the \$20 million is anticipated leveraging and does not constitute legally required cost-share under an agreement between an implementing partner and USAID (as could be the case with public-private partnerships), the potential funding would not be included for purposes of determining SOAR requirement applicability because the proposed leverage amount is not legally binding.

Process

13. Are the Contracting/Agreement Officer (CO/AO) and the cognizant attorney in the Office of the General Counsel in Washington (GC/W) or the Resident Legal Officer (RLO) required to clear on the SOAR prior to submission?

The policy outlined in [ADS 300, Agency Acquisition and Assistance \(A&A\) Planning](#), particularly **ADS section 300.3.4.3**, does not require that the cognizant CO/AO and GC/W attorney or RLO clear SOARs prior to submission. The policy allows for the head of the Operating Unit (OU) to determine what internal clearances will be required. However, planners may wish to consult with their CO/AO and lawyer in advance of submitting the package to address any legal questions presented in preparing a SOAR package. Bureau for Management (M), GC/W Front Office, and Office of Small and Disadvantaged Business Utilization (OSDBU) clearance are required for SOARs approved by the Administrator, *i.e.*, A&A solicitations with an estimated cost of \$100 million and above.

14. Can a B/IO include more than one award in one SOAR document?

No, a B/IO must only include one activity requiring SOAR approval per SOAR Document, which includes Part 1—Standard Descriptive Data and Part 2—Justification. However, a B/IO may package and route several SOAR documents under one action

memo. The key will be to keep the memo short (two pages) and to summarize the urgency and main points in the action memo.

15. How many days is the Secretariat compliance review? Should the SOAR Liaison not continue the routing process until she/he hears back from the Secretariat that the SOAR has passed the compliance check?

The SOAR Secretariat review in the second block of the flowchart (found [here](#)) is a quick scan and can be accomplished with the copy to the SOAR mailbox. The Secretariat will not reply unless there are blatant errors that are apparent at this stage. The SOAR Liaison should continue to route the document through the process without waiting for a response from the Secretariat regarding the compliance check at the first stage of the process.

16. Should the questions in the SOAR template be incorporated into the evaluation criteria for the solicitations?

The areas covered by the SOAR should be incorporated into the statement of work/program description and/or the evaluation criteria at the corresponding SOAR thresholds to the extent that specific SOAR recommendations are relevant to these particular areas.

17. What topics will be discussed in a potential meeting with the Agency Front Office if required?

SOARs may result in a meeting with the Agency Front Office where additional questions may be asked. The focus of the meetings has been on “how” the program/project will be done, how this particular procurement broadens the partner base, how it enhances “self-reliance,” how local organizations are involved, *etc.*

18. Do I need to submit any additional documentation with the SOAR?

No additional documentation should be provided unless specifically requested. However, we encourage presenters to include **any additional material they feel is relevant to** the activity to the Administrator-level review meeting.

Broad Agency Announcements (BAAs) and Interagency Agreements (IAAs)

19. How can a B/IO complete the SOAR Document for a BAA when the use of innovation, evidence, and some other questions in the template cannot be answered prior to solicitation?

While the B/IO will not know the outcome of the BAA process, the SOAR Document can provide information from the technical background/perspective to highlight why the BAA

approach offers significant potential to harness a number of approaches/innovation/evidence, etc. The B/IO should do its best to share the technical foundation for the problem and where the state of evidence currently appears to be— basically, any technical knowledge that supports why the BAA process would likely be the most effective approach to tackle the particular problem area. As a best practice, the B/IO could also look at existing innovations, including intellectual property in the same area of programming that USAID might also own and manage via past awards, and make that a key part of the analysis.

**20. Why does the SOAR process apply to interagency agreements (IAAs)?
Are the SOAR thresholds applicable to IAAs?**

Any new IAA meeting the SOAR threshold must be approved by the AA or Administrator, determined by the threshold applicability. If the IAA is operational in nature (e.g., personnel contracts, leases, etc.), SOAR approval is required, but should follow the expedited process outlined in ADS 300.

21. Does the SOAR process apply to 632(a) IAAs (which do not obligate funds)?

No, the SOAR process does not apply in this situation. 632(a) is a non-expenditure transaction that occurs at the appropriation level; therefore, there is no agreement to approve.

22. The questions in the template do not seem to apply to IAAs. What should Planners include in SOAR submissions re: proposed IAA awards?

For IAAs, Planners should consider all applicable questions in the template to the best of their knowledge. For Operational IAAs Only: Explain how the goods and services requested by USAID from the Servicing Agency cannot be provided by contract as conveniently or cheaply by a commercial enterprise.

SOAR Roles

23. Who are the SOAR Liaisons and how do they provide feedback?

The SOAR Liaisons provide comments and/or share the SOAR document with reviewers to provide comment in the google doc provided by the initiating B/IO Responsible SOAR Liaison. For more information on the roles and responsibilities of SOAR personnel or for the SOAR Liaison POC list, please contact the SOAR Secretariat at soar@usaid.gov or visit the [SOAR USAID intranet site](#).

General Information

24. Are non-disclosure agreements (NDAs) required for individuals who will be working with the SOAR?

The requirements to protect internal procurement-sensitive and proprietary information and documents apply to United States Government employees regardless of whether they sign NDAs. Therefore, any USAID employee receiving SOAR documents does not need to sign an NDA.

Contractor employees and fellows, who generally are also contractor employees, should sign NDAs when they start their work in USAID space and on USAID systems. Under IAAs, the sending agency can send either U.S. Direct-Hires or employees of a contractor firm. If the RASA/PASA person is a U.S. Direct-Hire, no NDA is needed. If they are a contractor employee, then confirm if they have signed an NDA with the sending agency. If they have not, ask them to sign an NDA.

In addition, the SOAR template includes the footer below for procurements to ensure that individuals in the process are aware that the information is procurement sensitive.

SENSITIVE BUT UNCLASSIFIED
For Acquisition-Procurement Sensitive Information under FAR 3.104

25. Is there a help desk or some way to request assistance?

You may request assistance by sending an email to soar@usaid.gov or by contacting the designated SOAR Liaison for your Bureau or Independent Office.

26. Where can I find definitions and more information on Effective Partnering and Procurement Reform (EPPR)?

Basic information on the EPPR initiative can be found at this link .

27. Is there a place to find SOAR templates and guidance?

Yes, publicly available SOAR templates and guidance can be found in [ADS 300](#). Additionally, the SOAR google drive found on the [SOAR USAID intranet site](#) contains further guidance on the SOAR process.

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