

**Ask the USAID Procurement Executive  
Partner Conference Call  
Tuesday, July 18th, 2017  
9:00-10:00 AM**

**Background**

The purpose of this call is to provide a forum for partners to ask questions and have a discussion on pressing matters with USAID's acquisition and assistance leadership. In advance of the call, USAID contacted five associations and asked them to submit questions. The associations were: InsideNGO, InterAction, Small Business Association for International Companies, Society for International Development -- Washington, and Council of International Development Companies.

**USAID Participants**

- Mark Walther, Acting Director, M/OAA
- Luis Rivera, Deputy Director, M/OAA Foreign Operations
- Crista Wise, Ombudsman, M/OAA
- Marcelle Wijesinghe, Division Chief, M/OAA Policy
- Stephanie Fugate, Branch Chief, M/OAA/SIDP
- Kimberly Ball, Deputy Director, Office of Small & Disadvantaged Business Utilization (OSDBU)
- Teneshia Alston, Senior Program Manager, Office of Small & Disadvantaged Business Utilization (OSDBU)
- Rachel Chilton, Communications Specialist, M/OAA

## Conference Call Transcript

### **Ms. Chilton**

Good morning, good afternoon, or good evening to you all. Thank you very much for joining us for another USAID Ask the Procurement Executive conference call.

My name is Rachel Chilton and I am a Communications Specialist for the Management Bureau's Office of Acquisition and Assistance.

I just want to note a few housekeeping reminders before we get started.

- You are all muted so you will not be able to speak during the call -- this is a listening session.
- We will be recording the call today. A transcript of the call as well as the recording itself will be posted on our external USAID Ask the Procurement Executive page either later today or tomorrow.
- Once everything is posted, we will notify you on our Twitter handle @USAIDBizOpps and our email distribution list.

I have a number of people in the room with me today who I will let introduce themselves quickly --

- Mark Walther, Acting Director, M/OAA
- Luis Rivera, Deputy Director, M/OAA Foreign Operations
- Crista Wise, Ombudsman, M/OAA
- Marcelle Wijesinghe, Division Chief, M/OAA Policy
- Stephanie Fugate, Branch Chief, M/OAA/SIDP
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Thanks to all of our staff for joining today as well. I will now turn the call over to Mark Walther, our Acting Director, to provide a few introductory remarks before we discuss the Q&A portion of today's event.

## **Mr. Walther Remarks**

Good morning everyone. I want to thank you all for joining us today and thank you for submitting your questions to our office.

I also want to thank you all for your partnership and your work to help us move towards achieving our common development mission and goals around the world. Our implementing partner community is what makes our efforts possible.

I know we have not hosted an Ask the Procurement Executive call in about a year now, so I would like to highlight a few of our priorities in case you have not heard me speak at a partner association engagement session or one of our business forecast review calls.

Many of our previous priorities remain the same. As you will hear during one of our questions, Procurement Action Lead Time (also known as PALT), is still at the top of our list. We are continuing efforts to find ways to streamline our procurement processes and promote best practices among our A&A staff.

Selection of Instrument, also known as ADS 304, is another important issue for the Agency. I want to reiterate that USAID has no preference between acquisition and assistance instruments. We appreciate the comments and feedback provided to us by each partner association last fall. We welcome any specific examples and experiences you can provide concerning Selection of Instrument this fiscal year. We will be reaching out to the partner associations to schedule follow-up meetings for October.

If you are not familiar with our Business Forecast, at the beginning of this calendar year, we moved the Forecast from a quarterly excel sheet post to a live feed tool embedded on USAID's external website. You can now view USAID solicitation opportunities in real-time that reflects updates every 24 hours as our acquisition and assistance staff make changes to our internal tracking system. We will be sending out a note soon to our partner distribution list asking for your questions about the Agency's current Business Forecast opportunities. While we will not be hosting an FY17 Quarter 4 phone call, our office will still task out your questions and post a full Q&A in the coming weeks. We hope to have responses ready for posting in early August.

Naturally at this time of year we are focused on FY end. Obligations and transactions to date in FY17 compared to FY16 still out pace slightly at this same time last year.

- As of today (FY 2017), USAID has obligated \$10.412 Billion under 13,821 transactions.
- Compared to last year (FY 2016) at this time: USAID had obligated \$9.928 Billion under 12,992 transactions.

That's all I have as far as updates at the moment. Once again, I want to thank you all for taking the time to join us today. We appreciate your continued interest and partnership efforts. And with that, I will turn it over to the question and answer session of our call.

### **Questions and Answers**

- 1. ACES Project:** For the anticipated "Active Communities – Effective States (ACES)" project, the USAID forecast indicates an expected Small Business Reserve. Will USAID allow a small business to be a subcontractor to a large business on the full-and-open procurement, and then have that same large business be a subcontractor to the small business for a proposal responding to the Small Business Reserve?

**USAID Response:** There is no prohibition from a small business to be a subcontractor to a large business on the full-and-open procurement, and then allow that large business be a subcontractor to the small business for a proposal that is responding to the Small Business Reserve. To the extent that both are ultimately evaluated as competitive proposals under multiple awards, the cognizant CO will clarify within the specific procurement.

- 2. RFP for Subcontracting:** USAID/OAA noted at the USAID Small Business Conference plans to give guidance to contract officers on draft language for RFPs to better incentivize large prime contractors to subcontract to small businesses through awarding points in the technical or cost sections. We understand that this guidance is planned for a Procurement Executive Bulletin. Any update on this would be appreciated.

**USAID Response:** A Procurement Executive Bulletin (PEB 17-01), titled "Subcontracting Plan Requirements, Evaluation, and Reporting/Monitoring", was released internally to staff last month. You can access the PEB on USAID.gov if you search for our "Resources for Partners", and then navigate to PEBs: <https://www.usaid.gov/work-usaid/resources-for-partners/procurement-executive-bulletins-pebs>.

The main area of update in the PEB relates to evaluation of subcontracting plans, and that there are different options to approach such evaluations--either the traditional responsibility like method, or as weighted technical/business criteria. As a reminder, Procurement Executive Bulletins are not formal policy. These documents act as guidance for USAID colleagues.

- 3. Partner Vetting:** At the end of May, USAID (along with DOS) held an open meeting on completion of the congressionally mandated Partner Vetting System (PVS) pilot program, and at that time indicated the transcript from that meeting as well as USAID's status report to Congress (due July 5) would be available publicly. Is there a time frame for posting these to the USAID website, if that is how they will be made public (if they are not already public by the time of the call)?

**USAID Response:** USAID had meetings with partner representatives. USAID is now working on scheduling having consultations with Hill colleagues prior to the report being finalized. It is my understanding that it is the Agency's intent is to make the report available to the public once we receive feedback from the Hill and it is finalized.

- 4. ADS 304 Selection of Instrument:** In the Consolidated Appropriations Act of 2016, Congress included language requiring the development of guidelines for the use of contracts versus grants and cooperative agreements for the unique objectives of democracy programs. In the Consolidated Appropriations Act of 2017, Congress requires reports detailing the use of contracts, grants, and cooperative agreements in the conduct of democracy programs with funds made available by the Department of State, Foreign Operations, and Related Programs Act, 2016 (division K of Public Law 114-113), which shall include funding level, account, program sector and subsector, and a brief summary of purpose.

Can USAID provide a timeframe in which it anticipates to meet these two requirements? Regarding the 2016 language, USAID developed draft amplifying guidelines for DRG. The various associations were asked in November 2016 for comments on USAID's draft Amplifying Guidance for ADS 304, Selection of Instrument. Can you provide an update on the status of the Amplifying Guidance? Will there be further consultations with implementing partners? Will USAID consult with partners in its efforts to meet the 2017 reporting requirements?

**USAID Response:** On the Congressional report, we are working with the State Department on a timetable which will likely be sometime from FY end and within the first quarter to capture FY17 data.

Second, on the DRG amplifying guidance, it has been further refined based on prior internal and external inputs. We await a further update from DCHA/DRG on their next steps.

Third, as mentioned earlier during my opening remarks, for the ADS 304 amplifying guidance, we are in the process of setting up meetings with leaders in the major associations for sometime in October) to discuss main elements, and to also obtain specific examples of any concerns experienced during FY17.

5. **PALT:** Is shortening the time to award contracts, grants and cooperative agreements still an objective of OAA? What steps are being taken to make significant progress?

**USAID Response:** We continue to focus on reducing the amount of time it takes to make an award -- also known as Procurement Action Lead Time, or PALT. Last year we launched a PALT management working group and developed a detailed PALT Best practices guide and 1-pager summary tool. In late May, we conducted a community of practice call with our acquisition and assistance staff worldwide to showcase areas of success with some mission and Washington examples that include the COs and TEC chairs. We also continue to work on an easier tracking tool as a component within our A&A Planning system. We will continue to promote best practices in reducing PALT.

6. **a) Treatment of Consultants:** Some USAID contracts staff are requiring that consultants be treated the same as institutional subcontractors for the purposes of FAR 44.2, "Consent to Subcontract" requirements. It is extremely time consuming for both the contractor and the CO to prepare and review consent requests for every needed STTA. This is also concerning as Implementing Partners (IPs) are required to follow cost accounting standards on a consistent basis and not all IPs treat short-term consultants as subcontractors. Furthermore, when IPs hire individual consultants, IPs are responsible for emergency evacuation support, DBA, etc. However, this is not the case with an individual receiving a subcontract. Can you please clarify that the use of consultants does not require that they be characterized by USAID as subcontractors?

**b) Consultants vs. Subcontractors:** We would appreciate to hear any updates on OAA guidance with respect to the status of independent consultants and whether or not they need to be considered as regular subcontractors. This relates not only to the SBA rules on limitations on subcontracting (where possibly USAID will defer to SBA or wait for FAR Council language), but it also relates to whether consent to subcontract needs to be granted for consultants, whether FAR contract clauses relevant for subcontractors need to be flowed down to individual consultant contracts (even for TCNs and CCNs), and other issues

that apply to regular subcontractors unrelated to SBA calculations. Given that different contract officers are taking different positions on this, central OAA guidance would be helpful. We believe the best policy and the correct FAR interpretation are that consultants do not need to be categorized as subcontractors.

**USAID Response:** Thank you for your question. This is an ongoing matter and we are currently working with our policy division and Agency general counsel office to ensure we have better clarification before providing guidance. Additionally, I will note we have received a number of specific examples relating to the question and we are still consulting on appropriate parameters for next steps.

- 7. a) Contract Closeout:** In some countries where bilateral agreements are in place to exempt projects from tax, contractors are required to submit and seek reimbursement from the host country government. This presents a problem after contracts close out since the host country reimbursements often come well after the contract period of performance has ended. What should contractors do at the end of a contract's period of performance to ensure a smooth handover from the project to USAID so that those owed funds reach USAID?

**b) Value Added Tax (VAT):** Relatedly, some country-to-country tax/VAT reimbursement or exoneration schemes supported by various Missions do not meet the intent of the cost provisions of 2 CFR 200.470 and FAR 52.229-8, in that they are NOT true exemptions. The only true exemption as anticipated by the regulations would be a host government-issued general point of sale exoneration letter that by law/decreed a vendor would be required to accept. Schemes that require contractors to submit evidence of executed agreements with vendors to USAID or to the host government, and suspend transactions waiting for a response, neither satisfy the meaning of an exemption nor support best buyer-vendor business practices. Including a requirement to budget local procurements without taxes in contracts is tantamount to requesting defective pricing unless a point of sale exoneration process is already negotiated between the USG and the host government and in place when the award is to be implemented. Notwithstanding the direction on pricing issue, the understanding should be taxes, including VAT (value added tax) and customs duty, are an allowable costs that shall be billed as incurred and any reimbursements shall be credited against costs billed, with the understanding that contractors will make a good faith effort to secure any exemption or reimbursement that may be available within normal business practices (timing) and credit any reimbursement back to the project. What guidance does USAID offer on this?

**USAID Response:** We are actively researching this topic at the moment. Our office is reaching out to the Agency's general counsel and the controllers to ensure we have a comprehensive understanding before providing guidance.

8. **Agir PF Project:** Does USAID plan to release a RFA as a follow-on to the Agir PF project? If so, what is the anticipated release date?

**USAID Response:** The current projected release date for the RFA (or NOFO) is October 20th, 2017.

9. **IDIQs & Sub-Awardees:** There are several IDIQ being forecasted. When USAID determines to use a contract mechanism to implement projects, it effectively precludes participation as a prime implementer a large number of experienced non-profit organizations whose relationship with USAID is governed by grants and cooperative agreements. Combined with the standard rule governing contracts that, absent special circumstances, no organization may receive more than \$100,000 as a grant during the life of a contract, the choice of instrument effectively precludes non-profits from participating as sub-awardees. This distortion is magnified when the contract is a large IDIQ that covers a wide array of program activities.

Has USAID considered including provisions in the proposed announcements and eventual IDIQ solicitations that permit the participation of non-profit organizations as sub-awardees (through sub-grants or cooperative agreements) without limitation, by removing the \$100,000 restriction?

**USAID Response:** Non-profit organizations are not precluded from getting a contract with USAID, either as a prime or subawardee. Also, Non-profit organizations are not limited to receiving GUCS; they can also participate as subawardees. The determination of the type of instrument appropriate to implement the activities is based on the relevant laws and regulations on selection of instrument. Contracts are used to buy a wide variety of services and supplies delivered either directly to USAID or for its direct-use or benefit. Grants and cooperative agreements are used when the principal purpose of the relationship is to benefit the recipient through a transfer of a thing of value, not to procure property or services. So, in addition to opportunities for obtaining grants under contracts, non-profit organizations may also perform as either prime contractors or subcontractors under USAID awards.



For contracts with a grants-under-contract component, the overall size and purpose of a proposed GUCs program under an USAID contract is determined by the technical office based on the nature of the program, especially when it is anticipated that there will be a need to award multiple grants to achieve the overall goals and objectives of the program. The number, size, and selection of GUCs are determined based on programmatic needs when awarding a number of small grant activities is particularly difficult for the responsible USAID Mission or office; or when the grant program is incidental and relatively small in comparison to the other technical assistance activities of the contractor.

The \$100,000 limitation applies only to GUCs and not to subcontracts. Also, this limit is for individual grants to a U.S. NGO and does not preclude the possibility of multiple grants, under potentially multiple Task Orders and there is no limit on GUCs to a non-U.S. NGO.

GUCs are not considered "subawards" under contracts; therefore the term subawardee is not used to describe a grant recipient. GUCs allow the contractor to award grants (not cooperative agreements) with non-governmental organizations (non-profits or for-profits) and partner government entities.

As GUCS are generally meant to implement a number of small grant activities or is incidental and relatively small in comparison to the other technical activities, USAID is not considering an increase to the this threshold at this time.

**10. Salary history under acquisition:** In August 2016 a [New York Times article](#) noted that Massachusetts had become the first state to bar employers from asking about applicants' salaries before offering them a job, part of an effort to strengthen equal pay laws. Does this type of action at the state level have any bearing on the collection of salary history on the Biodata Form 1420 in use under acquisition at USAID?

**USAID Response:** This state-level ban has no bearing on the collection of salary history on the Biodata Form 1420 required for contractor proposals under USAID solicitations. USAID is not requiring the salary history for purposes of making a job offer, but for negotiation of a fair and reasonable rate. The salary history is one of several factors considered by the contracting officer in negotiations, such as the current market rate or salary range for a given labor category.

**11. Broad Agency Announcements (BAAs):** We understood that USAID might be doing an internal stocktaking of the experience to date with the Broad Agency Announcement co-creation mechanism, and wonder if that has happened, and if so, if any changes to the BAA process are contemplated?

**USAID Response:** To date, there have been over 41 BAAs posted, with approximately 150 awards. (Note: Approximately 5% have been acquisition instruments.) Yes, the Agency conducted a detailed analysis of the use of BAAs and its use of co-creation over the last year . The study found that overall BAAs have allowed for improved project design through the use of open co-creation, the concept of intentional partner engagement has been a benefit, and the use of the BAA has re-emphasized the need for teams to plan strategically at the design/pre-solicitation phase. While planning is important to all procurements, it has been found that scenario planning is a critical part of the BAA process.

As the BAA method of procurement has evolved since 2014 and there are lessons learned and best practices that have come out of the experience, educating staff worldwide on this technique has been an important part of ensuring understand the process. Since July 2016, in conjunction with the Acquisition & Assistance Lab, Operationalizing the BAA: Scenario Planning to Award workshops have been conducted in the field and in DC, as well as, Mock Co-creation and Q&A workshops that complement the BAA process. While the BAA technique may not be appropriate for every action, it is another tool in our toolbox. It is also important to us that our partners have some understanding of the BAA process, as well. Information on the BAA is available on the USAID website at <https://www.usaid.gov/partnership-opportunities/respond-solicitation/broad-agency-announcements>. We have also seen how important the co-creation stage is used in the BAA process so attached is a co-creation discussion note on how particular processes enable this collaborative approach including the BAA.

**12. NICRA Guidance:** Certain Missions and many solicitations specify that either (a) subcontractors that do not have NICRAs, or (b) local subcontractors for a fixed price subcontract, are required to charge all costs as direct. This poses many issues:

- a. It is the FAR which specifies that indirect costs are not direct costs, not Missions.
- b. From an accounting perspective, this is unduly burdensome as each cost that the organization incurs (rent, utilities, accounting and other support staff, general management, supplies, HR, business development, etc.) must be allocated to its different projects based on the relative expenditures by project that month. This is particularly burdensome on those organizations too small to have their own accounting structures.

- c. When “indirect costs” charged directly are limited, and do not include items such as business development, general management and staff development, it severely impairs the ability of the organization to develop its capacity and seek other funding, which is contrary to USAID’s goals.
- d. Would M/OAA revise the “indirect costs as direct” guidance to allow organizations to propose indirect costs and contract types that are appropriate for the work being performed and the accounting practice adopted by the organization?

**USAID Response:** We appreciate the issue being raised and I can tell you that Indirect Cost Rates are both complex and of interest to our missions and to both, our prime partners and their subawardees, particularly local organizations in the field. At missions, we are very excited about the 2 CFR 200 language that promotes fairness and equity, particularly through the 10% de minimus rate for recovering the cost of doing business. To briefly go into what is the 10% de minimus as defined under 2C CFR 200 -- it’s a rate that may be elected by an organization that has never received a NICRA. It specifies that any non-federal entity that has never received a NICRA may also elect to charge a de minimus rate of 10% which may be used indefinitely. Finally, under 2 CFR 200, factors affecting the allowability of costs, costs must be consistently charged as either indirect or direct costs but may not be double charged or inconsistently charged as both. If a methodology is chosen, once selected, it must be used consistently for all of the awards.

So what we are finding, particularly with local organizations is that they do not have the financial systems that allow them to track and justify their proposed indirect rates. There is the challenge that we are all facing-- so what we have partnered with our prime partners to educate local organizations on how they can fairly recover the cost of doing business and therefore establish an indirect cost rate. This is a work in progress, but ultimately our goal is to ensure a fair and equitable system on all parts.

**13. Cancelled Procurements:** Implementing Partners (IPs) spend tens of thousands of dollars and in some case hundreds of thousands of dollars in research and capture costs only to have projects cancelled from the USAID Forecast, and post-submission, for reasons which include "change in mission priorities." While it is at the government's discretion to cancel procurements at any time, the sheer number in recent months is disconcerting. If priorities are changing, IPs would like to know so they can plan accordingly. When and how, aside from the Forecast, can they learn in a timely manner what Missions' new priorities are? Will USAID engage in dialogue with industry to seek input and feedback about those priorities?

**USAID Response:** We recognize that firms put a great deal of time and resources into proposals while preparing for opportunities with USAID. Our staff work to make the Agency's Business Forecast as accurate as possible. Please keep in mind that the Forecast is a forecast, which means opportunities listed are subject to change at any time.

**14. ADS 303:** It is our understanding that prime recipients of cooperative agreements follow the cooperative agreement and 2 CFR 200 when awarding sub-awards. It is also our understanding that ADS 303 provides guidance to USAID when USAID issues awards directly. What should Implementing Partners do when ADS 303 requirements for issuing subawards are applied to the IP by the AO and AOR team resulting in excessive substantial involvement?

**USAID Response:** It is correct that recipients must follow 2 CFR part 200, the OMB Uniform Requirements for Federal Awards, and USAID's regulations in 2 CFR part 700 when awarding subawards.

However, ADS chapter 303, on Grants and Cooperative Agreements to Non-Governmental Organizations, contains USAID's internal policy and guidance and is used by Agreement Officers, Agreement Officer Representatives and other Agency officials to determine what should be incorporated into Assistance awards and how the Agreements should be administered and monitored. It is not intended to provide direct policy guidance to recipients of Federal awards.

The substantial involvement section of ADS 303 under collaboration or joint participation allows the AO to include concurrence on the substantive provisions of subawards when providing the subaward approval required in 2 CFR 200. Recipients should consult the cognizant Agreement Officer if they believe that the AO and AOR are exceeding their substantial involvement.

In the event the recipient is unable to resolve a question with the AO, they may contact the A&A Ombudsman and provide specific examples to help resolve the matter.

**15. Budget & USAID Small Business Goals:** Given current USAID budget constraints and uncertainties, and given the workload on the OAA workforce which might lead to fewer but larger awards, what is the Agency doing to ensure that goals of increasing small business utilization stay on track?

**USAID Response:** USAID remains committed to working with our existing and new small business partners. The Agency will continue to educate its acquisition staff and work closely with the OSDBU to identify capable small businesses through the use of market research, outreach events, and other activities which provide acquisition officials with an opportunity to network with the small business community.

The OSDBU continues to review requirements in excess of \$25K to ensure that U.S. small business is given adequate consideration; including following the Rule of Two in Washington. We continue to stress the importance of meeting small business goals with our A&A staff.

**16. USAID Small Business Engagement Efforts:** While USAID has made significant progress generally with small business contracting, small business contracting has fallen short of expectations in some categories, particularly HUBZones, Women-Owned Small Businesses, and Economically Disadvantaged Women-Owned Small Businesses. What steps does USAID plan to increase contracting in these areas?

**USAID Response:** While USAID has not recently met the goals in the Historically Underutilized Business Zones (HUBZone), Woman-Owned, and Service-Disabled small business categories, the total acquisition dollars have steadily increased over the past three years. To continue this upward trajectory, the Agency conducts outreach activities to develop a cadre of small business firms to meet the Agency's needs, its overall small business goal, and the goals of each socio-economic program. So far this fiscal year the Agency has hosted and supported various activities for each small business program area. For example, in On October 27, 2016, the Agency hosted its third annual Veterans International Small Business Opportunities Conference (VISBOC) to identify capable service-disabled veteran owned businesses. In December 2016 we partnered with the U.S. Women's Chamber of Commerce to host an outreach event geared towards woman-owned small businesses. The Agency supported the National HUBZone Council Summit, on April 26th in Philadelphia. As of today, the OSDBU has training more than 900 USAID staff on the small business program which includes procedures for awarding set asides in each category.

**17. FY16 Small Business Data:** Is USAID able to provide any reporting on 2016 small business utilization that is disaggregated by mission, region, bureau, and/or socio-economic category?

**USAID Response:** Currently, the OSDBU tracks Mission, Bureau and Independent Office small business accomplishments. The following charts represent USAID’s total prime contract dollars awarded domestically and regionally to U.S. small businesses:

	<b>Domestic – Bureau &amp; Independent Offices Fiscal Year 2016</b>		
	<b>Total Dollars</b>	<b>SB Dollars</b>	<b>SB%</b>
Africa	8,178,313	3,946,033	48.25%
Asia	3,156,096	1,870,405	59.26%
BFS	32,440,869	20,491,359	63.17%
DCHA	445,242,338	56,349,209	12.66%
E3	107,842,495	33,820,588	31.36%
Europe & Eurasia	7,896,288	5,323,556	67.42%
Global Health	955,215,229	153,406,948	16.06%
HCTM	28,517,701	7,104,447	24.91%
LAC	11,270,386	1,446,372	12.83%
Management	160,685,336	81,567,215	50.76%
Middle East	14,417,534	9,174,138	63.63%
OAPA	3,186,594	264,102	8.29%
OIG	10,876,578	5,150,185	47.35%
PPL	26,414,181	25,385,725	96.11%
Security	12,605,653	11,600,156	92.02%

	<b>Regional Missions – Fiscal Year 2016</b>		
	<b>Total Dollars</b>	<b>SB Dollars</b>	<b>SB%</b>
Afghanistan & Pakistan	332,033,260	2,041,119	0.61%
Africa	1,007,578,350	47,467,599	4.71%
Asia	369,336,431	24,383,328	6.60%
Europe & Eurasia	97,956,615	11,662,394	11.91%
Latin America and The Caribbean	338,964,894	34,131,363	10.07%
Middle East	317,253,417	3,937,068	1.24%

Please visit SBA’s website to review USAID’s overall small business accomplishment for fiscal year 2016 (<https://www.sba.gov/contracting/contracting-officials/goaling>).