



## ENVIRONMENTAL COMPLIANCE FACESHEET FOR THE INITIAL ENVIRONMENTAL EXAMINATION (IEE)

**Objective:** Objective 3/ Investing in People

**Program Areas:** 3.1 Health

**Program Elements:** 3.1.1 HIV, 3.1.2 Tuberculosis, 3.1.5 Other Public Health Threats, 3.1.6 Maternal and Child Health, 3.1.7 Family Planning and Reproductive Health

**Country/Region:** Bangladesh/AME

**Country Code:** 388

**Funding Period:** FY2013 – FY2017

**Resource Levels/Amount(s):** Estimated \$208.51 million

**Statement Prepared by:** Etienne LeBailly, Deputy Director, OPHNE, USAID/Bangladesh

**Date:** April 30, 2013

IEE Amendment? Yes  No

**Environmental Media and/or Human Health Potentially Impacted** (check all that apply):

None  Air  Water  Land  Biodiversity  Human health  Other

**Environmental Action(s) Recommended** (check all that apply):

**Categorical Exclusion(s)**

**Initial Environmental Examination:**

**Negative Determination:** no significant adverse effects expected regarding the proposed activities, which are well defined over life of activity. IEE prepared:

With conditions: no special mitigation measures needed; normal good practices will be used. For the possible limited procurement of equipment, the proposed action is that the implementer is required to ensure that equipment, commodities (also see ADS 312) and materials are procured from certified retailers; environmental safety and quality certificates conforming with national and/or international standards are available; equipment and materials are used in an environmentally sound and safe manner, properly disposed of when applicable at the end of their useful life in a

manner consistent with best management practices according to USG, European Union or equivalent standards acceptable to USAID (see Facesheet Table 2 and IEE Section 4).

- With conditions (special mitigation measures specified to prevent unintended impact for activities listed in Facesheet Table 2 and IEE Section 4).

**Summary of Findings:**

The purpose of this document is to review current and planned activities covered under Objective 3: Investing in People (program elements 3.1.1 HIV, 3.1.2 Tuberculosis, 3.1.5 Other Public Health Threats, 3.1.6 Maternal and Child Health, 3.1.7 Family Planning and Reproductive Health) in the period 2013-2017 by the Office of Population Health Nutrition and Education, USAID/Bangladesh, as well as any future programming under Objective 3 (such as 3.1.5 Other Public Health Threats) which remain consistent with current known programming from an environmental perspective. Until now, on-going programs have been covered by the Initial Environmental Examination (IEE) Request for Categorical Exclusion with Conditions, approved on August 2, 2011, valid through September 2017, and signed by the BEO on October 19, 2011. This IEE Amendment fully supersedes the existing IEE (Asia 12-01, approved by BEO Rob Macleod on 10/19/2011) for all health activities from 2013 to 2017, and reflects changes in budget, activities, and length of projects.

This IEE covers all known and not fully defined activities under the USAID/Bangladesh Health Program (SO 3.1) so long as the nature of the activities remains as described from an environmental perspective.

The following current projects will be implemented with health funding during FY2013 - FY2017, under the USAID/Bangladesh Program Area 3.1, Health (see Table 1).

**Facesheet Table 1.** Activities in the Health Portfolio

**Objective 3:** Investing in People

**Program Area:** 3.1 Health

Program Element	On-going and planned projects under the Program Element.	Types of Activities with Environmental Implications	Determination
3.1.9	USAID Shikha/Alive & Thrive Implementer: FHI 360 LOP: June 2013 – May 2016 LOP Budget: \$9 million Agreement # TBD	This program trains frontline health workers and government health workers on nutrition and hygiene. Equipment purchases will include electronics, mobile phones, and vehicles (motorcycles and a car).	CE, NDC
3.1.9	Food Security and Nutrition Surveillance Project (FSNSP) Hellen Keller Intl (HKI) LOP: March 2013 – February 2014 LOP Budget: \$150,000. AID-388-0-13-00022	This is a surveillance study. Equipment purchases may include electronics.	CE
3.1.7	Mayer Hashi Project EngenderHealth LOP: 20 May 2009 – 30 September 2013 LOP Budget: \$12 Million 388-09-CA-388A000900078	This program addresses the need for family planning through expanding contraceptive choices with an emphasis on LA/PMs and program services, and preventing post-partum hemorrhage (PPH). Equipment purchases include electronics and vehicles.	CE, NDC
3.1.7	Marketing Innovation for Health (MIH) Program Social Marketing Company (SMC) LOP: July, 2012 – July, 2016 LOP Budget: \$15 million AID-388-A-12-00003	SMC is distributing short term and long acting family planning products (pill, condom, injectable, implant and IUD), oral rehydration salts (ORS), a micro-nutrition powder, dispersible zinc tablets and safe delivery kits throughout the country. Equipment purchases include electronics and vehicles. Special medical waste may be produced.	CE, NDC
3.1.1	Modhumita FHI360 LOP: October 1, 2009 – September 30, 2013 LOP Budget: \$12 million 388-A-00-09-0123-00	The objective of the Modhumita Program is to support an effective HIV/AIDS prevention strategy through improved prevention, care and treatment services for most-at-risk populations (MARPS) (sex workers, injecting drug users, clients of sex workers, migrants, people living with HIV). The program produces some special medical waste.	CE, NDC
3.1.6	Developing the Next Generation of Public Health Experts in Bangladesh James P. Grant School of Public Health (JPGSPH), BRAC University LOP: September 2012 – June 2015 LOP Budget: \$3 million AID-388-F-12-00001	This program provides scholarships, internships, and training for public health degree candidates and participants. The fourth and last component aims to strengthen the capacity of public health teachers by improving their training and delivery skills. All four components address sustainability in their descriptions. Equipment purchases may include electronics.	CE
3.1.6 3.1.7	Integrated Safe Motherhood, Newborn Care and Family Planning Project (MaMoni) Jhpiego Corporation and Save the Children, USA LOP: August 2009 – January 2014 LOP Budget: \$ 13.5 million 388-A-00-09-0104-00	MaMoni project aims to improve maternal and newborn health (MNH), and increase access to family planning (FP) services, and strengthen GOB service delivery systems. Equipment purchases may include electronics and vehicles. Special medical waste may be produced.	CE, NDC
3.1.6 3.1.7	NGO HEALTH SERVICE DELIVERY PROJECT (NHSDP) Pathfinder LOP: December 10, 2012 to December 9, 2016 LOP Budget: \$ 53.86 million AID-388-C-13-00002	USAID NGO Health Service Delivery Project provides integrated family planning and health service coverage through a clinical network. This project will purchase electronics and vehicles. Special medical waste may be produced.	CE, NDC
3.1.5 3.1.6 3.1.7	Bangladesh Health Sector Development Program (PIO Grant) World Bank LOP: 2012 to 2016 LOP Budget: \$ 40 million AID-388-IO-12-00001	This grant pools funds from USAID, Center for Disease Control, Department of Defense, and the Embassy to support the Government of Bangladesh in implementing the new Bangladesh Health, Population & Nutrition Sector Development Program.	CE
3.1.6 3.1.7 3.1.9	Health Systems Strengthening (HSS) Implementer: TBD LOP: 2013-2017 LOP Budget: \$50 million Agreement # TBD	This program proposes to provide health systems strengthening, but will also provide FP/RH products, equipment, and logistical support for Government of Bangladesh (GOB) health facilities. Some renovation may occur. Special medical waste will be produced, but by GOB facilities.	CE, NDC

It is anticipated that in various projects the following activities may take place: procurement of electric and electronic equipment including computers, electronic devices; small-scale construction or minor renovation activities related to sanitation and hygiene and drinking water supply; and disposal of special medical waste. All of these activities will require monitoring and screening and application of various mitigation measures as described in IEE Table 2 (IEE Section 4).

Facesheet Table 2 presents results of environmental screening and recommends threshold determinations for the main types of activities under all program elements.

**Facesheet Table 2.** Proposed Health Activities, Recommended Threshold Decisions and required Reg.216 actions

<b>Sec.</b>	<b>Activities</b>	<b>Effect on Natural or Physical Environment</b>	<b>Threshold Decisions and required Reg. 216 actions</b>
I	<p><b>All Program activities expected to have no effect on the natural or physical environment</b></p> <p>This includes: education, technical assistance, training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.); consultations, participant training, document transfers and information dissemination, analysis, studies, conferences workshops, study tours, curriculum development, working with training programs, developing information networks</p>	No effect	<p><b>Categorical Exclusion (CE)</b> no actions required.</p> <p>While these activities are considered to have no impact on the environment, environmental health and quality considerations should be incorporated into all relevant steps along the healthcare continuum, as part of quality assurance and infection prevention approaches.</p> <p>See IEE Tables 1 and 2 for more details.</p>
II	<p><b>All activities regarding which no significant adverse effects are expected</b></p> <p>No special mitigation measures are needed; activities are implemented with conditions that normal good practices, engineering methods and standard instructions are followed. This includes procurement of office furniture, electric and electronic equipment and materials (no bio-hazardous or low-radiological materials will be used for testing in this equipment).</p>	no significant adverse effect	<p><b>Negative Determination with Conditions (NDC)</b></p> <p>The implementer is required to ensure that equipment, commodities (also see ADS 312) and materials are procured from certified retailers; environmental safety and quality certificates conforming with national and/or international standards are available; equipment and materials are used in an environmentally sound and safe manner, properly disposed of when applicable at the end of their useful life in a manner consistent with best management practices according to USG, European Union or equivalent standards acceptable to USAID.</p> <p>See IEE Tables 1 and 2 for more details.</p>

III	<p><b>Activities that normally do not have a significant effect on the environment if special mitigation measures are specified to prevent unintended impact</b></p> <p>Examples include:</p> <ul style="list-style-type: none"> <li>- Medical laboratories and centers upgrade; equipment procurement and installation; HIV and TB testing;</li> <li>- Procurement and use of medical kits, supplies, and chemical reagents;</li> <li>- Procurement and use of pharmaceutical drugs;</li> <li>- Immunization campaigns including TA and vaccination;</li> <li>- Small-scale construction/renovation of sanitation and health facilities;</li> <li>- Small-scale water supply, water testing, and water quality improvement activities (may include application of disinfectants that are registered as pesticides);</li> <li>- Improved nutrition and feeding; and</li> <li>- Generation, storage and disposal of special medical wastes as part of various activities;</li> </ul>	Potential for a significant adverse effect of one or more activities	<p><b>Negative Determination with Conditions (NDC);</b></p> <p>EDD in form of Environmental Review and Assessment Checklist (IEE Annex 1) is required to identify environmental effects, develop Environmental Manual and Mitigation and Monitoring Plans when applicable, confirm /neglect and mitigate a potentially significant adverse effect. If significant adverse effects are expected, a Scoping Statement (SS) and Environmental Assessment (EA) shall be conducted by the implementer prior to start of activities. SOW/Terms of Reference (TOR) for Scoping Statement and EA Report must be reviewed by Mission Environmental Officer (MEO) and approved by Asia BEO. For details, please see Section “Implementer Procedures” and IEE Section 4.</p>
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**Note: EDD - Environmental Due Diligence Review**

Under the Global Health Initiative (GHI), USAID helps Bangladesh adopt and scale-up proven interventions to increase the use of long-term family planning methods; reduce maternal, neonatal and child mortality; and improve nutrition. We are also working to reduce the burden of tuberculosis (TB), keep HIV/AIDS prevalence below 1%, and strengthen health systems. Likewise, GHI is helping to foster a country-led process to help Bangladesh achieve its MDGs, thereby contributing to the host government’s Health, Population and Nutrition Sector Development Program for 2011-2016.

The overall environmental determination for 90% of USAID/Bangladesh health programming is **Categorical Exclusion** for activities that were found to present no risk according to 22 CFR 216 guidelines, and is **Negative Determination with Conditions** for the remaining 10%.

**a) Recommended Action: Categorical Exclusion** (90% of funding, or \$187.7 million) Pursuant to 22 CFR 216.2(c)(2)(i), the originator of the activities has determined that all of the activities consist of types of interventions entirely within the categories listed in paragraph (c)(2), “Categorical Exclusions,” of Section 216.2, “Applicability of Procedures,” of Title 22 CFR Part 216, “AID Environmental Procedures”, and therefore are categorically excluded from further environmental review requirements (see

Facesheet Table 2). The proposed activities are fully within the following classes of actions:

- a. Education, technical assistance, or training programs except to the extent such program includes activities directly affecting the environment (such as construction of facilities, etc.) [22 CFR 216.2(c)(2)(i)];
- b. Analyses, studies, academic or research workshops and meetings. [22 CFR 216.2(c)(2)(iii)];
- c. Document and information transfers. [22 CFR 216.2(c)(2)(v)]; and
- d. Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.) [22 CFR 216.2(c)(2)(xiv)].

**b) Recommended Action:** Pursuant to 22 CFR 216.3(a)(2)(iii), a *Negative Determination with Conditions* (10% of funding, or \$20.85 million) is recommended for any Health Care activities that have potential for adverse impact on the environment in the following categories, as presented in Section III of Facesheet Table 2 of this document:

- a. Procurement, storage, management and/or disposal of public health commodities, including pharmaceutical drugs, medical kits, supplies and/or chemical reagents;
- b. Generation, storage and disposal of Special Medical Wastes , e.g. HIV testing, TB testing and laboratory-related activities;
- c. Small-scale construction/rehabilitation of health facilities;
- d. Small-scale water and water quality assurance activities;
- e. Immunization campaigns (might include procurement of vaccine and its administration thereof, storage, distribution, and waste disposal); and
- f. Improved nutrition and feeding

For each type of these activities an implementer will conduct Environmental Due Diligence (EDD) as part of the Environmental Review and Assessment Checklist (Annex 1) to document existing environmental concerns and foreseeable environmental effects resulting from the activity and develop an Environmental Manual (EM) and Framework Environmental Mitigation and Monitoring Plan (FEMMP) when applicable. This EM and FEMMP will then be approved by the MEO, in consultation with the Asia, Middle East, and OAPA Regional Environmental Advisor (REA), adapted to a specific site before the activity implementation (site specific EMMP), and incorporated into the project design. The Standard Conditions List in Annex 3 and IEE Table 2 may be used as a guide in developing an EM, FEMMP, and EMMP along with other references listed in Implementer Procedures section below.

#### **Implementer Procedures:**

The implementing partner will employ the following process for all relevant activities:

- All program activities will seek to raise environmental awareness, promote regional and national environmentally and socially sustainable development, promote biodiversity conservation, adaptation to climate change, and foster the culture of environmental compliance and governance in accordance with Bangladesh's National Environmental Policy of 1992, the National Environmental Management Action Plan of 1995 (and its 2000 and 2002 amendments), and the National Conservation Strategy of 1992.
- The implementer will include environment compliance considerations into all aspects of the program implementation and will promote and train local counterparts on environmental requirements and standards across all of the program's activities. Such proposed activities will be included into annual work plans, and results will be reported in annual reports.
- Each activity should be conducted in a manner consistent with good design and implementation practices described in USAID Environmental Guidelines for Small-Scale Activities in Africa, 2nd edition as provided at: <http://www.encapafrika.org/egssaa.htm> or at <http://www.usaidgems.org>; IFC Environmental, Health and Safety Guidelines as provided at: <http://www.ifc.org/ifcext/sustainability.nsf/Content/EnvironmentalGuidelines>; World Health Organization guidelines as provided at [http://www.who.int/publications/guidelines/environmental\\_health/en/index.html](http://www.who.int/publications/guidelines/environmental_health/en/index.html); and Standard Conditions for Small-Scale Construction, Small-Scale Road Rehabilitation, Small-Scale Water and Wastewater Activities, attached to this IEE (Annex 3).
- Based on EDD results and mitigation measures from Environmental Guidelines for small-scale Activities, IFC EHS Guidelines, and other documents as referenced above, implementer will develop a Program Environmental Manual (EM) and Framework Environmental Mitigation and Monitoring Plan (FEMMP) for activities that may have negative environmental impact. The EM will establish criteria for eligibility, selection and screening against potential environmental risk (low, moderate, and high). An EM and FEMMP might be done per implementing partner or the whole program and then adapted as needed for different implementing partners. This documentation will then be approved by the A/COR and MEO, in consultation with the Regional Environmental Advisor for Asia (REA/Asia), incorporated in project design and the FEMMP will be adapted to a specific site prior to the activity implementation (EMMP) (see IEE Annex 4).
- The implementer will use the Environmental Review and Assessment Checklist (ER Checklist) (IEE Annex 1) and Leopold Matrix (IEE Annex 2) as the main reporting documents for each activity having an adverse environmental impact.
- Prior to the launch of each activity, including small grants and subcontracts, the implementer will conduct an Environmental Due Diligence (EDD) review as an inherent part of the ER Checklist for each activity that may have a potential for moderate and high adverse environmental impact (e.g. small-scale construction; rehabilitation of potable water and sanitation facilities; etc.) to document existing environmental concerns and foreseeable environmental effects resulting from such types of activities. The EM should establish a simplified EA process for

sub-grants/sub-projects. If the EDD results in a finding of potential significant environmental impact, a Scoping Statement (SS) and Environmental Assessment (EA) will be done by the implementer prior to start of activities. TOR for Scoping Statement, Scoping Statement and EA Report must be reviewed by MEO and approved by Asia BEO.

- As part of its initial Work Plan, and all Annual Work Plans thereafter, the implementer, in collaboration with the USAID Agreement/Contracting Officer's Representative (A/COR) and MEO shall review all ongoing and planned activities under this award to determine if they are within the scope of the approved IEE; and classify them in accordance with Facesheet Table 2 and IEE Section 3.
- When appropriate, the implementer will have a qualified, MEO-approved environmental impact professional(s) (EIP) who will assess and recommend environmental actions to be taken by the program and will coordinate implementation of mitigation measures, monitoring, and reporting. Specifically, the EIP will conduct environmental reviews and will identify: 1) activity category in consultation with the MEO; 2) potential environmental impacts (based on ER Checklist, EDD, Leopold Matrix, and his/her technical knowledge of the local, U.S., and international environmental standards, guidelines, requirements, and practices; and 3) mitigation and monitoring measures needed. Should the EIP lack special technical knowledge to identify any special environmental impact, the implementer will consult with a specialist in the relevant area.
- Documenting environmental baseline conditions prior to activity implementation is an integral part of the site specific EMMP.
- Host country laws and regulations for environmental protection and management will be followed in implementing the activities. For activities categorized as "potential risks" or "definite risks" of adverse environmental impact, the implementing partner will be required to obtain a letter from the local or regional office for environmental protection stating that the office: a) has been contacted by the implementing partner concerning the project activities; b) will maintain contact with the project; and c) will be aware of the potential environmental impacts of the project to help ensure that no detrimental impact will result from this project.
- For such activities prior to their implementation the implementer will conduct public consultations and will seek concurrence from the national duly authorized environmental agency on FEMMPs and EMMPs.
- In all cases, implementation will adhere to corresponding host country environmental laws and policies, generally outlined in national the National Environmental Policy of 1992, the National Environmental Management Action Plan of 1995 (and its 2000 and 2002 amendments), and the National Conservation Strategy of 1992. National environmental policies are available at the following link:  
<http://www.moef.gov.bd/html/policy/policy.html>
- Monitoring will be conducted during the project (beginning with a baseline) to determine the environmental impact (positive and/or negative) of all project activities. The implementer shall use only qualified staff for overseeing the mitigation and monitoring work. Monitoring shall occur on an as-needed basis.

The implementer will ensure that the environmental procedures are implemented, potential impacts mitigated, and indirect and cumulative effects are considered for each activity. If negative environmental impacts are discovered through regular monitoring and evaluation of project activities, immediate actions will be taken to rectify the situation.

- The implementer shall have sufficient resources and permanent staff with expertise in an environmental field and compliance with Reg. 216.

**Resource Allocation, Training and Reporting requirements:**

- The agreement/contract with the implementing partner will include environmental compliance and reporting language into agreements/contracts, and ensure that appropriate resources, staff, equipment and reporting procedures are dedicated to this portion of the project; the language will have a requirement to follow all recommendations of this IEE, including completed Environmental Review and Assessment Checklist, and EM and FEMMP, site specific mitigation and monitoring plans, and mitigation and monitoring reports. Reports will be submitted to the Agreement/Contracting Officer's Representative (A/COR) and MEO prior to and at the completion of each relevant activity at every affected project site, and not at the end of the project or not on a semi-annual or annual basis.
- Sub-contracts or grants from the implementing partner to other organizations must incorporate provisions stipulating compliance with 22 CFR 216 and ADS 204.
- The A/COR of each project, in consultation with the MEO or REA and corresponding implementing partner(s), will actively monitor and evaluate whether environmental consequences not foreseen by this IEE arise during implementation, and will modify or halt activities as appropriate. If additional activities are added to a project but are not described in this IEE, an amended IEE must be prepared.
- When deemed necessary by the A/COR and MEO, reporting will include photographic documentation and site visit reports which fully document that all proposed mitigation procedures were followed throughout implementation of the subject work including quantification of mitigation.
- The implementer's quarterly reports to USAID shall contain a section specific to Environmental Compliance will include project summaries along with environmental impacts, success or failure of mitigation measures being implemented, results of environmental monitoring, and any major modifications/revisions to the project, mitigation measures or monitoring procedures. If the activities implemented do not have any negative impact on the environment, this should be documented as well. The implementer's annual report will include an annex containing a table indicating the title, date of award, and category of each grant activity.

- A/CORs together with MEO/Deputy MEO will explain all environmental conditions to the implementers at the post-award conference. The Mission will also arrange for Environmental Compliance Training for the implementer(s) by the MEO prior to the start of the project implementation.

**Limitations of the IEE:**

1. All reagents, disinfectants and other chemicals, registered by the U.S. EPA, as pesticides shall be procured, used or recommended for use only in accordance with BEO-approved Programmatic Pesticide Evaluation Report and Safe use Action Plans (PERSUAPs) for Bangladesh. If any additional chemicals are proposed, relevant Programmatic PERSUAPs shall be amended and approved by the BEO/Asia. The IEE shall be amended to reflect on the recommendations of the Programmatic PERSUAP, and approved by the BEO/Asia. For Bangladesh, the implementer will request the BEO/Asia approval to extend validity of relevant Programmatic PERSUAP sections to stipulate compliance with relevant legislation.
2. No procurement, use, or recommendation for use of ammonium nitrate (AN) and calcium nitrate (CAN) fertilizers.
3. No procurement or use of Asbestos, Lead and Mercury Containing Materials (ALMCM) (i.e. piping, roofing, batteries, etc.), Polychlorinated Biphenyl's (PCB's) or other toxic/hazardous materials prohibited by US EPA as provided at: <http://www.epa.gov/asbestos> and/or under international environmental agreements and conventions, e.g. Stockholm Convention on Persistent Organic Pollutants as provided at: <http://chm.pops.int>.
4. This IEE does not cover activities involving:
  - a. support to wood processing, agro-processing, industrial enterprises, and/or regulatory permitting;
  - b. assistance, procurement and/or use of genetically modified organisms (GMOs), which would require preparation of biosafety assessment (review) in accordance with ADS 201.3.12.2(b) in an amendment to the IEE approved by Asia BEO; or

Any of these actions would require an amendment to the IEE duly approved by Asia BEO.

**Revisions:**

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the project might be “major” and the project’s effect “significant,” any Negative Determination with Conditions will be reviewed and revised by the originator of the project and submitted to the BEO for approval and, if appropriate,

an environmental assessment or other relevant documentation will be prepared. It is the responsibility of the USAID COR/AOR to keep the Mission Environmental Officer (MEO) USAID/Bangladesh, and the BEO/Asia informed of any new information or changes in the scope and/or nature of the activity that might require revision of the IEE.

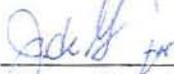
**USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:**

**Clearance:**

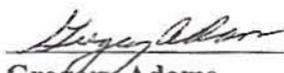
Mission Director:  Date: 5/14/2017  
**Richard Greene**

Deputy Mission Director: \_\_\_\_\_ Date: 5/14/2013  
**Paul Sabatine**

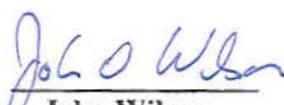
Regional Environmental Adviser: Concurred by Email Date: 05/08/13  
(Asia, Mid-East, & OAPA) **Andrei Barannik**

Mission Environmental Officer  Date: 05/7/13  
**Tamar Barabadze**

Director /Program Office:  Date: 05/13/13  
**Thomas Kress**

Director (A)/PHNE Office:  Date: 5-8-13  
**Gregory Adams**

**Concurrence:**

ANE Bureau Environmental Officer  Date: 5/23/13  
**John Wilson**

Approved: 

Disapproved: \_\_\_\_\_