



USAID's Ecosystem Conservation through Livelihood Improvement and Forest Enhancement (ECO LIFE) Activity

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Report on NACOM Capacity Needs Assessment

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Abbreviations

CBSG	= Capacity Building Service Group
CAN	= Capacity Needs Assessment
ECA	= Ecological Critical Areas
ECO LIFE	= Ecosystem Conservation through Livelihood Improvement and Forest Enhancement
HRM	= Human Resource Management
ICT	= Information and Communication Technology
IGA	= Income Generation Activity
MIS	= Management Information Systems
M&E	= Monitoring and Evaluation
NACOM	= Nature Conservation Management
NGO	= Non-Governmental Organization
PA	= Protected Areas
PCM	= Project Cycle Management
PF	= Provident Fund
PRI	= Policy Research Institute
USAID	= United State Agency for International Development

1 Background:

Nature Conservation Management (NACOM) is the pioneer, non-government, pro-environment organization in Bangladesh. Established in 1987, NACOM's mission is to work for ensuring protection of nature while empowering the local communities. Over the years, NACOM earned huge recognition for its contribution to Sustainable Development and Poverty Reduction. In 2017, NACOM received prestigious Green Award from Southeast Bank Ltd, Financial Express & Policy Research Institute (PRI) Green Award Trust.

NACOM has received a grant from USAID under its Local Work Program to implement Ecosystem Conservation through Livelihood Improvement and Forest Enhancement (ECO LIFE) project to improve the forest PAs and ECAs in the Cox's Bazar District. One of the ECO LIFE activities relates to the capacity enhancement of NACOM in the areas of its weaknesses, particularly on areas of organization functioning and delivering mandates.

NACOM, through a competitive selection process, engaged Capacity Building Service Group (CBSG) to conduct a rigorous capacity need assessment and support NACOM in developing and updating appropriate policies, processes and organizational systems, and improve human resource capacities through competency-based training.

1.1 Objective and Scope of Capacity Needs Assessment (CNA)

Overall objectives of the Capacity Need Assessment (CNA) are to identify organizational capacity enhancement areas and improve key policies to comply with current national legal framework and donors' requirements. The assessment results would contribute to strengthen NACOM's organizational capabilities to deliver its mandates and services effectively to its constituencies.

The scope of capacity needs assessment mainly includes three major dimensions that include but not limited to the following:

- Assessing capacity needs to improve NACOM's capacity in governance and management control system, particularly those related to organizational functionality & operational system, and whether or not organizational policies are implemented across the organization properly; legal compliances, human resource management including staff performance management system.
- Assessing capacity needs of NACOM's financial control system that ensure good financial practices including banking and accounting system, chart of accounts and financial statement, financial planning, direct and indirect cost system, account's cycle, budget forecasting, financial record management, funding sources and financial control, financial documentation, and audit and financial reporting system are consistent and maintained in a transparent manner.
- Assessing capacity needs for improving program/project control systems (programming and planning, technical reporting, project development, MIS, supervision & monitoring, quality assurance) and suggest areas for the improvement (planning, record keeping).

Review and Verification – Systems & practices required for capacity needs assessment included-

- Legal documents including bylaws, registration papers, mission statement and board documents
- Documented and approved policies and procedures including organization chart, delegation of authority, Banking relations, Internal and external audit reports
- Project management documents including plan, budget, monitoring & progress reports
- HR procedures, personnel files, salary documentations etc.
- Fiduciary management including accounting cycle, banking relations, procurement etc.
- Organization management procedure including decision making and supervisory practices etc.
- Progress of action plan prepared by NACOM in Eco-life project and capacity building training

This assessment is expected to provide roadmap towards its sustainability, particularly attaining financial sustainability, while reducing its dependence on donor funds.

1.2 Implementation and Methodology:

1.2.1 Inception meeting

The assignment kicked off with an inception meeting on 12 March 2021 at the NACOM Office. The meeting was attended by top management of NACOM and the consultants. The meeting discussed and finalized CNA methodology and detail implementation plan. As such the inception meeting made all concerned on board to agree on scope of work, assessment methodologies and an implementation plan (annex-2). CBSG formed a small team comprising key staffs of NACOM, led by the Project Director who mobilized internal support for organizing assessment events and policy changes.

During inception meeting, NACOM team suggested to apply organizational capacity assessment tools (OCAT) and areas in a limited scale. This will enable the critical mass of NACOM staff members to participate in the assessment process and reflect on strength and weaknesses areas of NACOM from organizational perspective. CBSG and NCAOM agreed the following assessment areas to be included in the CNA processes.

- Governance
- Administration
- Human Resource Management
- Financial Management
- Procurement and Accounting
- Program Management
- Monitoring and Evaluation
- Gender Inclusion

The assessment team organized formal day-long sessions in two occasions, one in Head Office level in Dhaka and the other one at field office level in Cox's Bazar. CBSG also administered OCAT during these sessions. The assessment tools were designed in a five

points scale (1-5); 1=Very Poor; 2= Poor; 3=Average; 4=Good; 5=Excellent. The participants lists are attached in annex-1.

1.2.2 Organizational Policy Review

On the outset of the assessment process, CBSG team thoroughly reviewed the existing policy manuals and identified areas for update in order to ensure compliance with international development agencies and law of the land. Main issues of the review included but not limited to:

- Assessed adequacy and appropriateness of the policy to current operating context
- Reviewed staff perception on the existing policies
- Assessed organizational capacity to implement the existing policies
- Assessed compliance with national and relevant international (donor) standards

The assessment process looked at the organizational governance, accountability and transparency issues. During the process, CBSG team members were not only limited to document review but also held consultations with relevant members of NACOM. Later on, review notes were shared with the NACOM leadership to get their perspective during the finalization of the Capacity Needs Assessment Report.

1.2.3 Participatory Policy Review Sessions

The documents review was complemented and supplemented by participatory and consultative review sessions with central and field office level staffs and relevant stakeholders for collection and validation of information. The capacity needs assessment process was centered around the following framework but not limited to:

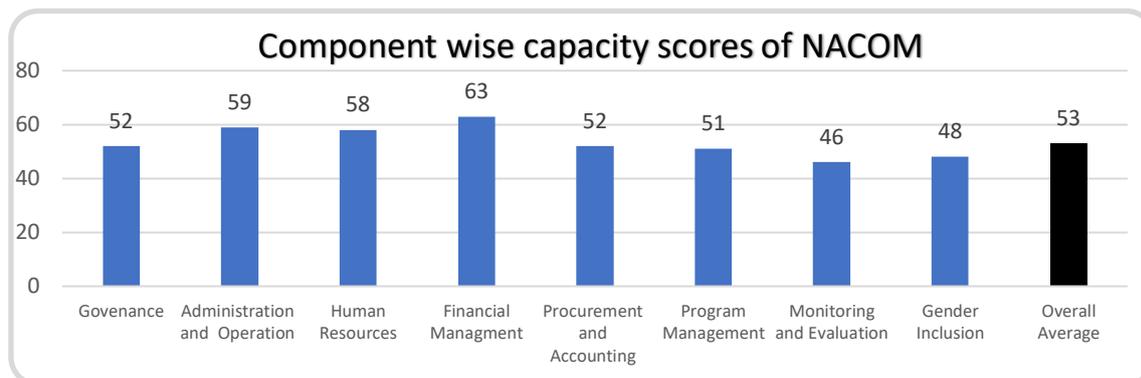
Capacity Needs Assessment Framework

Organizational Areas	Sub-Areas	Compliance & Gaps	Improvements Need
Governance, Human Resource and Operations Management	<ul style="list-style-type: none"> • Governance • Administration and Operation • Human Resource 	Existing policies, practices and gaps	Future directions and policy needs
Financial Management	<ul style="list-style-type: none"> • Financial Management • Procurement and Accounting 	Government and Donor Legal compliances and sectoral best practices will be used as standards to review NACOM exiting policy	Policy updating; Staff capacity building
Program Management, M&E and Gender	<ul style="list-style-type: none"> • Program Management • Monitoring and Evaluation • Gender Inclusion 	Current level of policy compliance vs. inconsistency policy application Staff capacity to proper policy implementation	

1.2.4 Synthesis, Debriefing and Validation

CBSG team collated the entire findings/outputs from documentary review and consultative discussion sessions. The assessment findings were presented to the NACOM leadership and governance team in a debriefing and validation session.

CBSG transformed the raw scores (1- 5) into scaled scores (1-100) for easy understanding. A **capacity score** indicates how an organization perceives its strengths and weaknesses with respect to the capacity area. It informs the identification of interventions needed to increase capacity.



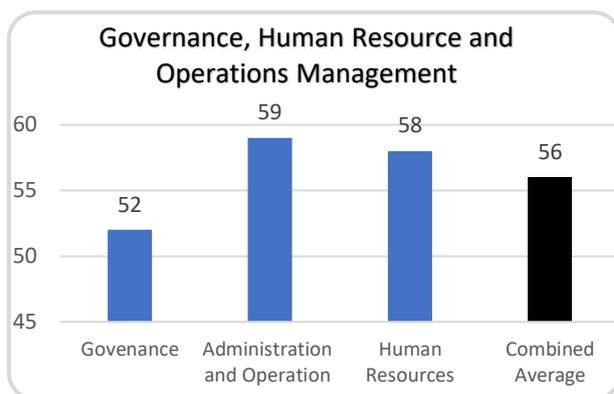
Overall self-assessment results revealed that NACOM scored 53 at a 100-point scale. NACOM's capacities approximate acceptable performance standards in this area. It needs significant level of capacity building input to attain organizational excellence. Generally, an organization requires to attain 70 out 100 score level to function efficiently. The assessment suggests that organizational systems and processes **that just meet acceptable performance standard**. There are issues on consistency, accuracy and sustainability of capacity at this stage, that NACOM management needs to address the issues described in the findings and analysis section.

2 Findings and Analysis

CNA findings are presented in this section with detail analysis within the context of NACOM's development priorities. The assessment is carried out broadly on NACOM's performance in Human Resource Management, Financial Management, and Management of Program including M&E systems require for successful execution of the project. Following provides the detail.

2.1 Governance, Human Resource and Operations Management

Assessing needs to improve NACOM's capacity in management control system, particularly those related to organizational functionality & operational system, legal compliances, human resource management including staff performance management system.



meaning NACOM needs to strengthen its capacities in these areas to a large extent. In particular, NACOM requires immediate attention to strengthen governance functions. The strategic planning process needs to be revisited, while staff needs to be oriented on mission, vision and operations management.

This capacity needs assessment put a special attention to NACOM's Governance,

Mission and Vision, Human Resource Management (HRM) deals with personnel and their management. The assessment tried to figure out current operational and management policies and practices especially with regard to gaps in policy compliances with applicable national and donor requirements. Specifically, the assessment covers the following issues:

2.1.1 Findings and Observations: Governance, Human Resource and Operations Management

- NACOM has 7 members Executive Committee of which 3 are female. AGMs are not held at a regular interval. EC meetings are held irregularly, often on need based. It has an ETIN certificate (5888115141728), VATs and Taxes are regularly deposited through Treasury Challan as per government rules.
- NACOM has not taken any initiative to review its mission statement because the mission statement is still relevant to the current context, however, they time to time update scope of work and objectives in response to the changing scenarios in country's environment. Field level staff have never received orientation on mission and vision; therefore, they need guidance organizational strategic management.
- There are issues and concerns around information flow, understanding level and satisfaction on governance issues mainly on NACOM's board functions, organizational structure and second-generation leadership role.
- The strategic planning process has not been internalized by staff members, and therefore lack of understanding about organizational governance functions is evident across the different category of staff.
- HR policy does not cover all applicable legal and regulatory compliance requirements as laid out in the Bangladesh Labor Law, most notably drug, child abuse, anti-trafficking. Moreover, the HR policy do not specifically categorize staff by their employment type like project staff, regular staff and consultant. Therefore, there exist no delineation of benefits for various types of staff.
- Service benefits are seemingly below par and not quite competitive with similar NGOs. This affects staff morale and work motivation. There is no standard salary structure for the organization. Staff salary is determined through individual negotiation; Budget provision is the key determinant for donor supported project staff salary. Currently, most of the staff are employed in donor supported project. Besides salary and some other benefits (cash and non-cash), there is a provision for participatory provident fund (PF) which lacks clarity to the staff. Hence, there is a need for clear definitions and clauses to administer Provident Fund (PF).

- Existing organogram does not fully represent organizational strategy and actions. All current positions are not covered in the organogram. Staff role, reporting relationships and performance standards do not provide necessary clarity and thus lack adequate comprehension of job responsibilities to the staff especially at the mid and lower level.
- There is a brief gender policy attached to the HR management. However, this only provides the general direction of the organization towards gender equity and women development. It lacks necessary policy directions and action plans in compliance with the national standards and international donor compliances. A detail gender and women empowerment policy are needed for NACOM.
- Existing travel policy is inadequate to ensure specific and contextual needs for staff travel. Generally, staff seems to be unhappy with the existing travel policy. Therefore, a thorough review of the travel policy is a need of the time.
- There lacks any planned staff development strategy, plan and budget. Most staff training is tied to specific project implementation. This causes staff from taking higher responsibilities for lack of skills.
- Presently, assets are managed manually and verified once in a year as part of annual audit. There is a lack of internal asset management procedure. A complete policy is needed as part of compliances to manage organizational assets timely and effectively.

ICT needs for NACOM program management is paramount but there is no guidelines and compliance requirements. Nevertheless, there is no dedicated person to trouble-shoot to keep existing automation system functional and improvise ICT infrastructure (both hardware and software) for organizational efficiency.

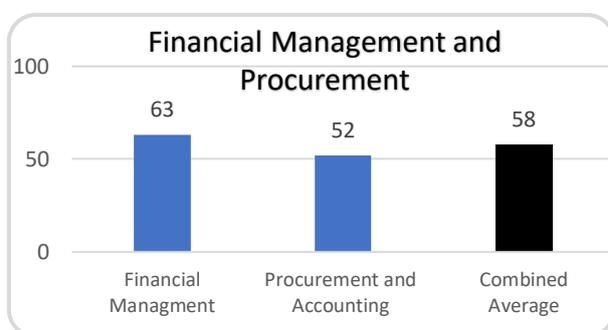
2.1.2 Recommendations

- Strategic plan needs to be shared and revisited on a regular interval and updated with the current reality; this may be part of the strategic planning practices which will contribute to increased understanding staff about NACOM's governance functions.
- Proper induction is required for new recruits. NACOM should orient the new staffs to its organizational and functional principles, activities and strategies, particularly emphasizing on mission and vision. The new recruits should have clear understanding on NACOM's management principles, performance appraisal process and on internal governance processes.
- There is a need for wholesale review and update of the existing human resource policy including salary and service benefit structure, leave policy, recruitment procedure, organizational structure, management and regulatory compliance etc.
- The gender and women development policy needs to be reviewed. This policy should address the gender assessment recommendations, and the critical issues need to be delineated across all levels of staff.
- Staff job description needs to be more pragmatic and should also include roles and responsibilities, authority with accountability and reporting relationship.

- NACOM requires a full-length ICT Policy to ensure staff comply with contemporary national ICT laws and applicable international security practices. NACOM should consider a dedicated staff with required ICT skill in its organizational structure and staff functions for improved and uninterrupted automated functioning of the organization.
- Human Resource management is a major administrative function of the organization. These functions need to be integrated within the updated organogram with specific role(s), detail responsibilities, reporting relationship. Therefore, NACOM should place a dedicated staff for human resource and administrative management.
- Prepare a detail human resource development plan within the framework of NACOM mission, strategies, current and prospective plans and programs. This policy should include anti-drug, child abuse, human trafficking, anti-terrorism, and international conventions of human rights and Labour Laws.
- The organizational structure of NACOM needs to be updated based on the current reality and job descriptions of all staff needs to be aligned accordingly.

2.2 Financial Management

CBSG assessment team, among others focused on assessing NACOM’s financial control system that ensure good financial practices including Banking and accounting system, Chart of accounts and financial statement, financial planning, Direct and indirect cost system, Account’s cycle, Budget forecasting, financial record management, Funding sources and financial control, financial documentation, and Audit and financial reporting etc.



The combined self-assessment score of financial management was found at 58, while with financial management components, staff members are happier than procurement practices. NACOM should pay immediate attention to strengthen its procurement procedures more transparently.

With regard to financial policy, it covers all policies, procedures and systems of the organization that relate to the management of funds and resources. Primarily, there are two purposes for framing a financial policy which include:

- Laid out detail mechanisms for financial transactions that are taking place in the organization so that staff can abide by the set procedures; and
- Fulfill statutory requirements of local bodies and establish strong management practices, as adopted by NACOM.

2.2.1 Findings and Observations: Financial Management

- NACOM has a chart of accounts in the financial policy manual. However, the chart of account does not cover all types of transactions to provide clear and specific accounting keeping, recording and report analysis.

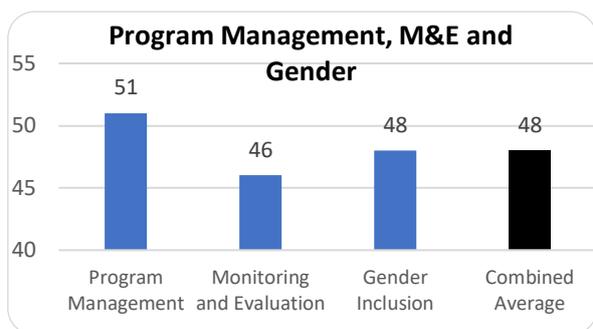
- Financial policy is prepared in 2001 and last updated in 2015. It does not cover all standard compliance and accounting procedures. There are many office orders and supplementary notes that drive policy issues. These need to be reviewed and incorporated into the financial policy.
- All staff are not adequately aware of financial policy and procedures; more specifically, some non-finance staff found to lack basic understanding and skills to maintain financial transaction within their responsibility areas.
- NACOM follows accrual basis accounting for financial transactions. It uses single user tally software for financial recording. Therefore, it lacks the scope and opportunity of recording financial transactions in head office and branch office in real time. A multi user integrated software program would provide those scope and help in better financial management.
- Fixed asset management policy exists but it is not practiced adequately and in a timely manner.
- NACOM financial authority level is not adequately laid out throughout the organization. It needs logical revision to ensure proper management of finance.
- Internal control systems lack adequate check and balance; there is no internal audit function for periodic examination of financial and regulatory compliance at the operational level.
- NACOM has cost sharing policy in its financial manual which needs further review to fit with donor compliance framework.

2.2.2 Recommendations on Financial Management

- Update financial manual and procedural requirements to comply with accepted accounting principles, regulatory and compliance needs and national/international standards. Key staff members of NACOM from both program and finance departments require training on financial and procurement processes.
- Use multi-user accounting software program with proper budget management and control practices. In fact, an web-based multi-user version of TALLY, could reduce manual vouching efforts and would allow Dhaka based staff to over-see and track expenses in a real-time situation.
- Capacity building training should be provided to finance staff for brining efficiency at work. All non-finance people should have access to financial policies and provide orientations to develop basic operating skills. Internal control system needs further attention of the management.
- Procurement policy requires to be reviewed and updated specially to define authority level with details on methods of goods and services procurement. There is not provision for emergency procurement. Therefore, emergency procurement clauses need to be added in the existing procurement policy

2.3 Program Management, M&E and Gender

This section encompasses capacity areas concerning program/project control systems (programming and planning, technical reporting, project development, MIS, supervision & monitoring, quality assurance), and gender inclusion in management and program.



The combined in three areas – program management, M&E and gender was found below 50, meaning NACOM should bring these issues in priority needs of its capacity development program. In particular, monitoring, evaluation and gender are grey areas for NACOM. While NACOM has over six thousand direct beneficiaries in Cox’s Bazar and Barisal divisions - 70% of them are

female, its needs more female staff at management and program implementation level.

Effective project management ensures that projects have appropriate guidelines so that they are completed in a timely and efficient manner. Similarly, Monitoring and evaluation (M&E) works to track and assess the results of interventions throughout the life of a program while MIS uses project information for decision-making, coordination and control through data analysis and data visualization. This CNA process assessed program management, M&E and MIS within the project cycle management framework and delve into the workings of the current system vis-à-vis their utility to deliver results to the community. Hence, following elements and sub-elements were examined during the CNA processes:

2.3.1 Findings and Observations: Program Management, M&E and MIS

- NACOM has a professional team to prepare project proposal to seek donor support. The team seeks external assistance to prepare quality proposal. So far, fund raising success is good but not exceptional. Funding diversity remains limited to few sources. While NACOM is striving to attain organizational and financial sustainability, therefore further consolidation is needed in this particular area.
- NACOM works with community development model and support IGAs to improve livelihoods. Its information system lacks adequate data gathering and analysis capability to track individual IGA effectiveness and sustainability.
- Currently, NACOM is implementing two major projects and funded by USAID and SUMMIT Group. Each project has small M&E team who collects project information periodically and prepares monitoring reports. These reports mostly focus on implementation status rather than intervention effectiveness. Thus, learning opportunities are often compromised mainly due to lack of staff time and skills.
- Lack of female staff at management and program implementation level, while it works with more female beneficiaries than male.
- NACOM has designated staff for project monitoring who conduct surveys with the beneficiaries and stakeholders to assess project effectiveness and results. However, these efforts are quite limited.
- There is a lack of comprehensive MIS at NACOM. Therefore, beneficiary level data remains limited to track and assess results at the beneficiary level.

2.3.2 Recommendations for Program Management, M&E and MIS

- Project design and proposal writing needs further attention of NACOM management. Therefore, relevant staff can attend standardized training program either home or abroad.

- Training on Project Cycle Management (PCM) for program staff and ensure regular follow-up input from competent consultant.
- Consider hiring more female staff at management and program level. It should also consider a gender committee with a clear ToR in NACOM to oversee gender sensitive issues.
- NACOM may consider an ICT based automated project management system that can itself take care of project monitoring, MIS and quality assurance protocol. In particular, NACOM may use Microsoft Project or AGILE software for project management purpose and form a small unit within NACOM headed by the Director Program for overseeing project implementation and performances. This unit will be responsible for project progress monitoring and project performance evaluation.
- NACOM should develop GIS facilities to support its program management and implementation, reporting and documentation supported by GIS software and other ICT facilities.
- Strengthen project monitoring system, so that managers can make informed decisions. It is suggested that NACOM should develop a web-based database system (as developed for ECO LIFE Activity) for use in its all programs to inform NACOM management and its donors time to time about the progress and impacts by engaging a competent expert.
- NACOM should establish a system for its data quality assurance (DQA) and clearly set out its processes and functions. The Monitoring Officer should be trained in this area of work.
- Integrate sustainability and exit plan wherever possible in the existing or future projects so that planned efforts are made for the sustainability of project impact.

3 Capacity Building Plan for NACOM

Capacity needs assessment clearly identifies strengths and weaknesses of its internal systems and processes to fulfill regulatory and acceptable compliance obligations and deliver results to the communities. A result orientated capacity building will aim to amend weaknesses and further consolidate strengths.

A set of potential strategies have also been suggested as recommendations for capacity-building. Accordingly, capacity building plan will devise from these recommendations focusing on NACOM's key institutional processes, staff skills and local and donor regulatory requirements. National and international best practices may provide additional input to prepare a result-oriented capacity building plan.

Based on the assessment results, capacity building plan will have three focus areas. They are

- A. Institutional Policies and Procedures to address issues related to regulatory and compliances;
- B. Improve Staff Competency to address capacity issues related to staff skills and effective application of policies & procedures; and
- C. Institutional sustainability and financial health to address issues related long term viability of the organization and growth.

3.1 Putting robust policies and procedure

Improve management and operational capacities through up gradation and adaptation of adequate and compliant policies and guidelines.

A. Update Existing Policies

- I. Human Resource Management (HRM) policy
- II. Financial Management policy (Including internal control mechanism, chart of accounts, budgetary control)
- III. Procurement policy (Covering emergency procurement, assets management, store management and vehicle management)
- IV. Travel policy (Per-diem rate for domestic and international travel, travel insurance and travel safety security)
- V. Monitoring and Evaluation Policy
- VI. Environmental compliance policy (Ref. USAID rules and regulations)

B. Prepare and Install new policies and guidelines

- I. Contract management policy
- II. Risk management policy
- III. Gender and women empowerment policy
- IV. Conflict resolution policy
- V. ICT security policy
- VI. Project development checklist
- VII. Record management policy

3.2 Conduct Capacity development training

Staff are the key in social and environmental development organization like NACOM. Therefore, well trained staff contributes to enhance technical capacity to implement services efficiently need deliver results. While staff training should be a regular process within a growth orientated organization, NACOM should undertake following trainings/courses to address staff skills gap.

- a) Project cycle management (PCM) training for program staffs – including project monitoring and evaluation practices (Advance training – at home and abroad only for selected staff)
- b) Orientation on Human Resource Management and administrative processes for selected program management and relevant head and field office staff.
- c) Financial Management including for non-finance and program people
- d) Advance training on financial management for key finance staff (at home and abroad)
- e) Project performance monitoring, data quality assurance and web-based reporting
- f) Training of project proposal development, documentation and reporting
- g) Inclusive Gender in organization and program management.

- h) Technical training on bio-diversity conservation
- i) Orientation on USAID rules and regulations including financial and procurement process
- j) Communication and emailing skill development training
- k) Supportive Supervision and monitoring techniques for field managers/Supervisors of development interventions

These training will be specialized and tailor-made training package to address capacity needs of NACOM. all network NGOs. Following the training NACOM is expected to prepare action plans to improve organizational policies, processes, system and management practices. NACOM will receive high quality templates, guidelines and tools to support implementation of Capacity Building program as part of follow-up supported discussed in the next section.

The matrix below provides course duration of selected training courses and target participants of NACOM.

Name/area of training/ courses	Duration/Type/	Target Audience
Project cycle management (PCM) training for program staffs – including project monitoring and evaluation practices	Week-long (dedicated to NACOM staff only)	Program staffs, 2 management personnel
Orientation on Human Resource Management and administrative processes for selected program management and relevant head and field office staff.	5 days – dedicated to NACOM staff and	Selected program management and HR and finance staff
Financial Management for Non finance and program management staff	2-days	Selected program and management staff
Biodiversity conservation	Participation in Month-long/ or certificate/ diploma course (home and abroad)	Program officials and staff
Protected area management	Participation in Month-long/ or certificate/ diploma course (home and abroad)	Program staff/ management personnel

Name/area of training/ courses	Duration/Type/	Target Audience
Climate change adaptation and mitigation planning	Participation in Month-long/ or certificate/ diploma course (home and abroad)	Program staff/ management personnel
Project performance monitoring, data quality assurance and web-based reporting	Week-long (dedicated to NACOM staff or participate in training organized by any competent organization	MEL Manager/program staff
Supportive Supervision and monitoring techniques for field managers/Supervisors of development interventions	3 days long	Field managers and Supervisors
Inclusive Gender in organization and program management.	Two days and two batches	Selected Program and Management staff
Communication skill development training	3-5 days duration (dedicated for NACOM staff only)	Communication Officer/Program, staff
Orientation on USAID rules and regulations including financial and procurement process	2-3 days dedicated to NACOM staff	Selected finance and management staff

3.3 Plan for ICT Facilities Development for Program Management, Monitoring and NACOM's Financial Management

3.4 Capacity Strengthening Follow-up Support

The capacity building will be a continues process for NACOM to align it updated with contemporary management practices, in particular with the changing rules and regulations of international donors and law of the land. The assessment team suggests that NACOM should have provision of follow-up support from the competent management expert on a limited scale for a period of at least six months to get the input of training and capacity building interventions cemented.

As per agreement of this assignment, CBSG will provide backstopping support to NACOM in their operational and administrative activities initially for six months period. CBSG will also help NACOM staff in their problem areas of work or clarifying and interpreting various issues relating to financial, administrative and management procedures during the backstopping support period.

During this period CBSG relevant staff will work in NACOM Office at Dhaka along with NACOM staff 2 days every week to help guide them in their weak areas of works. In addition, CBSG will provide help desk support on phone calls and emails. We also intend to use on-line platforms such as Google meet, Zoom for online meeting and orientation sessions. In particular, CBSG will provide backstopping support in the following areas:

- Implement and institutionalize improved/renewed organizational policies, procedures and practices
- Implement action plan prepared in central as well as organization wise training, workshop and internal learning processes
- Help Desk experts will make periodic visits to the NACOM Dhaka and field offices to support institutionalization of capacity building efforts. That will include - Establishing internal financial control procedures, Compliance to PPR relating to procurement of good and services.
- Project cycle management (PCM) and development of data quality assurance system. And support to make a functional internal project performance monitoring system.
- Ensuring financial and accounting (software program) system are maintained with proper budget management and control practices.

4 Institutional financial sustainability

Since its inception in 1987, NACOM has been playing an important role in nature conservation and had contributed significantly to the country's biodiversity and natural resource management, protected area management, green energy promotion, climate change adaptation and livelihood development of poor resource users and has earned huge reputation in these areas of works. NACOM received a prestigious Green Award for its outstanding contribution to the national development.

NACOM has a strong commitment to continue with their work in mandated areas in the backdrop of an uncertainty in their program financing. NACOM generates just a small amount of fund as subscription from its 35 general members, which is very meagre to support any NACOM's program. So far, NACOM's programmatic activities are almost reliant on donor supported projects, while NACOM sometimes undertake contracted projects of government and other clients. Also, sometimes, NACOM seeks financial supports for implementing its programs from donors, however, opportunities for such funding is very limited. Therefore, often face financial crisis in supporting its program. In the absence of any long-term secured funding, there are uncertainties in operational and program implementation in its mandated areas.

Many pro-environment NGOs in Bangladesh operate micro-credit programs to generate funds and support its environmental programs. NACOM is not willing to exercise such option, rather it emphasizes on generating funds from green and social business. This

assessment explores such potential funding opportunities and generating own funds to support its programs. During the CNA processes, a number of alternative sources of resource mobilization were identified but due to limited time and resources, these ideas could not be fully explored. Therefore, each of these sources need to be adequately researched to assess operational suitability, financial viability and business sense. The following sources appear potential for NACOM:

- A. **Establishment of a plant nursery:** NACOM under its various projects established and supported more than 50 private and community level plant nurseries and thus has gained huge experiences in developing and operationalizing plant nurseries. Presently, under USAID's ECO LIFE Activity NACOM has been strengthening 10 local plant nurseries in Cox's Bazar areas to produce increased quantity of indigenous species. NACOM has interest to develop a nursery at a commercial scale as they have experiences in sapling production. NACOM has some lands, about 100 decimals, beside a highway in Mymensingh area. Considering the local demand and NACOM's technical capacity NACOM may establish and operate a plant nursery on its land in Mymensingh. However, this requires to develop a business plan considering its financial sustainability.
- B. NACOM's presence in Cox's Bazar area also provides it with opportunities to look for alternative funding sources. Over the years, NACOM has formed, capacitated about 125 Alternate Income Generation (AIG) groups in the Cox's Bazar area under different donor supported projects. These groups are engaged in income generating activities, including small holder agriculture, horticulture, fish culture, handicrafts making, fish drying and other production at local levels. NACOM may take the lead in marketing the products in Dhaka with formation of a supplier network with its beneficiaries. This will not only help to generate some funds for NACOM, but also add value to products benefiting the groups. This will also help to sustain the AIG activities undertaken by the AIG groups. Few of the of the potential commodities having potential for business are dry fish, handicrafts, etc. The other opportunities in Cox's Bazar are:
 - Involve and integrate NACOM's community groups to cultivate and market organic food and vegetables
 - Branding and market locally made quality handicraft and clothing
 - Business with renewable energy sources i.e., installation and maintenance of bio-gas plant and solar panel
 - Construct residential facility at Cox's Bazar beach area to get involved in tourism
 - Work on Eco-tourism with govt. and other international donors
 - Develop a pool of tour guide from the beneficiaries and provide tour guide services
- C. Accessing CSR funds: As per government rules, every business corporate in Bangladesh requires to allocate and expend some money for social development activities, known as Corporate Social Responsibility fund. This fund is accessed by many institutions, including, academic institutions, NGOs, Civil Societies, etc. Bangladesh Bank also deals with the CSR funds. NACOM may hold dialogues with few business corporates to explore and access such fund to finance its programs.
- D. Providing specialized training and TA support to other organizations on climate change, biodiversity, plant and animal conservation: NACOM has in-house experts with strong background in Biodiversity Survey and Assessment, Environmental Impact Assessment,

NRM, climate change adaptation and mitigation planning. Therefore, NACOM, if require, in association other institutions, may offer few training courses in these areas of knowledge.

- E. Providing (Analytical) Community Service: NACOM has in-house expertise for water quality, zooplankton and benthic fauna analysis. These services are often required by projects dealing with EIA studies. NACOM may establish an analytical laboratory at Dhaka to provide these analytical services to different clients.

It is suggested that NACOM, on a priority basis, may develop detail business plan on the above-mentioned identified areas.

5 Annexes

5.1 Annex-1: CNA Participants list

CNA Participants list Head Office

SL#	Name	Designation
1	Professor Dr. Md. Abdur Rob Mollah	Chairman, NACOM
2	Dr. S. M. Munjurul Hannan Khan	Executive Director
3	Mr. Rashiduzzaman Ahmed	Director
4	Md. Abdul Mannan	Program Coordinator
5	Gazi Rezaul Karim	Accounts and Finance Manager
6	Touhidul Islam	Communication Officer
7	Rupita Tahsin	Assistant Program Officer
8	Mohammad Mokbul Hossain	Office Manager

CNA Participants list Regional Office

SL#	Name	Designation
1	Dr. Md. Shafiqur Rahman	Senior Program Officer
2	Md. Sharif	MEL Manager
3	Afroza Khatun	CB, HID & Governance Manger
4	Md. Abdul Kaiyum	NRM Manager
5	Farhad-Al-Mahmud	Livelihood Manager
6	Md. Mozaharul Alam (Mukut)	Site Officer
7	Md. Nasir Uddin	Admin & Accounts Officer
8	Tanvir Ahmed	Field Manager
9	Puspak Barua	NRM Facilitator
10	Md. Saiful Islam	Livelihood Facilitator
11	Ruma Mozumder	Livelihood Facilitator

13	Md. Saiful Islam	NRM Facilitator
14	Umme Awara Begum	NRM Facilitator
15	Md. Parvez	Field Facilitator
16	Md. Yusuf	Field Organizer
17	Md. Abdul Kader	Field Organizer
18	Nasrin Akter	Field Organizer
19	Omar Faruk	Field Organizer
20	Nurul Absar	Field Organizer

5.2 Annex-2 : CAN Implementation Plan

Sl	Activity/Even/Particulars	Time Period	Remarks
1	Desk review / existing policy manuals and relevant documents	March 1-8	
2	Inception Meeting	2 nd week of March	As per convenience of NACOM
3	Need assessment sessions	Week -3 to 4, March	
4	Draft CAN reporting	March 31	End of March
5	Policy Manual Update	April 1-20, 2021	Existing ones
6	Session for New policy development	April 22-April 30	
7	Debriefing on CAN report and Policy updates	April 30, 2021	New and existing