

OFFICE OF INSPECTOR GENERAL

AUDIT OF USAID/IRAQ'S MONITORING AND EVALUATION PERFORMANCE PROGRAM

AUDIT REPORT NO. E-267-08-004-P July 3, 2008

BAGHDAD, IRAQ



Office of Inspector General

July 3, 2008

MEMORANDUM

- **TO:** USAID/Iraq Mission Director, Christopher D. Crowley
- **FROM:** Director, Office of Inspector General/Iraq, Jay R. Rollins /s/
- **SUBJECT:** Audit of USAID/Iraq's Monitoring and Evaluation Performance Program (Report No. E-267-08-004-P)

This memorandum transmits our final report on the subject audit. The report contains six recommendations for your action. We have considered management's comments on the draft report and have incorporated them into the final report, as appropriate. They have been included in their entirety in appendix II.

Based on management's comments, we consider that a management decision has been reached on all six recommendations. Please provide evidence of final action on each recommendation to the Audit Performance and Compliance Division upon completion.

I want to express my sincere appreciation for the cooperation and courtesies extended to my staff during this audit.

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SUMMARY OF RESULTS

The presence of a USAID mission in an active war zone has imposed unique constraints on USAID's normal mode of operations. Chief among these constraints has been the inability of USAID officials to adequately monitor program activities as they are occurring in the field. To address this constraint, USAID/Iraq employs a contractor to carry out its monitoring and evaluation program (page 2).

The Office of Inspector General/Iraq conducted this audit to determine: 1) if USAID/Iraq's monitoring and evaluation program is producing reports that are timely, relevant, and useful for performance management, and 2) if USAID/Iraq is using those results to manage its portfolio (page 3). The audit covers the second phase of this program which began in May 2005 to provide three years of monitoring and evaluation coverage for mission programs via a \$13.4 million contract with International Business and Technical Consultants, Inc. (IBTCI) (page 2).

The audit concluded that IBTCI's monitoring and evaluation reports were generally timely, relevant to the programs being reviewed, and useful for performance management. However, the audit found that the reliability of its monitoring reports could be enhanced if IBTCI coordinated with the U.S. military to spot check the performance of its field monitors. In addition, the frequency of monitoring high risk activities, such as trash collection campaigns in Baghdad, should be increased (page 6).

The audit also determined that while USAID/Iraq was generally using the results of its monitoring and evaluation program to manage its portfolio, the mission could use those results more effectively by systematically documenting its responses to findings and recommendations (page 10), and by granting the USAID/Iraq Program Office authority to initiate monitoring and evaluation activities (page 13). In addition, ensuring that evaluation reports are shared with implementing partners (page 12) and that awards specifically require monitoring and evaluation plans would also enhance the effectiveness of this program (page 14).

Recommendations include: discussing with Provincial Reconstruction Team representatives the feasibility of obtaining information from using military units to help verify the accuracy of monitoring reports (page 9); increasing the frequency of monitoring high risk activities (page 9); documenting compliance with Automated Directives System 203.3.6.7 for evaluations and responding to findings and recommendations contained in monitoring reports of mission programs (page 11); establishing procedures to help ensure that evaluation reports are shared with implementing partners (page 13); permitting the USAID/Iraq Program Office to initiate monitoring and evaluation activities (page 14); and helping ensure that acquisition and assistance awards require implementing partners to submit appropriate monitoring and evaluation plans (page 15).

In its response to the draft report, USAID/Iraq agreed with all six recommendations and proposed completion of corrective actions by September 30, 2008. Based on management's comments, management decision has been reached on all six recommendations (page 16).

BACKGROUND

The presence of a USAID mission in an active war zone has imposed unique constraints on USAID's normal mode of operations. Chief among these constraints has been the inability of USAID officials to adequately monitor program activities as they are occurring in the field. USAID/Iraq has repeatedly identified this impediment to effective management controls in annual reports required under the Federal Managers' Financial Integrity Act of 1982.

To mitigate this weakness in program oversight, USAID/Iraq instituted the Monitoring and Evaluation Performance Program (MEPP). Phase I of this program (MEPP I) ran from June 2003 to May 2005. MEPP II, the subject of this audit, was implemented in May 2005 via a three-year, \$13.4 million contract with International Business and Technical Consultants, Inc. (IBTCI), a strategic consulting firm headquartered in Vienna, Virginia. The contract contains two one-year options worth an additional \$11.4 million.

As its name indicates, MEPP II focuses on monitoring and evaluating USAID/Iraq's programs. Monitoring is an ongoing activity intended to provide USAID/Iraq with regular feedback on program performance. An important facet of monitoring in Iraq is known as "ground-truthing", or verifying the actual existence and status of USAID programs and projects, including those outside the International Zone, as reported by USAID's implementing partners. For example, in early 2007 MEPP II produced monthly monitoring reports on projects implemented under the Community Action Program, which were intended to provide newly established Provincial Reconstruction Teams with information on activities in local communities. Evaluations, conversely, are selectively undertaken analytical efforts intended to determine specific information about USAID activities, such as program impact or effectiveness. Evaluations typically generate findings, lessons learned, and recommendations, and can provide crosscutting lessons applicable to other USAID operating units. MEPP II has produced five evaluations and eighteen monitoring reports, not including smaller and more limited monitoring engagements, through October 19, 2007.

At USAID/Iraq, the Program Office provides technical oversight of the MEPP II contract and acts as a liaison between the mission's functional offices and IBTCI. As a supporting office, the Program Office serves chiefly in an advisory role, acting as the mission's monitoring and evaluation expert and suggesting MEPP II services to the functional offices. Initiation of MEPP II monitoring and evaluation activities, however, is at the discretion of those USAID officials with direct responsibility for management of specific programs, such as contracting and cognizant technical officers.¹

As of March 2008, the total amounts obligated and disbursed under this contract were \$19,670,237 and \$11,297,290, respectively.

¹ A cognizant technical officer is an individual designated by the contracting or agreement officer to perform delegated functions as part of overall contract or assistance administration. It is synonymous with the term contracting officer's technical representative used elsewhere within the U.S. Government.

AUDIT OBJECTIVES

As part of its fiscal year 2008 annual audit plan, the Office of Inspector General/Iraq conducted this audit to answer the following questions:

- Is USAID/Iraq's monitoring and evaluation program producing reports that are timely, relevant, and useful for performance management?
- Is USAID/Iraq using results from its monitoring and evaluation program to manage its portfolio?

Appendix I contains a description of the audit's scope and methodology.

AUDIT FINDINGS

Is USAID/Iraq's monitoring and evaluation program producing reports that are timely, relevant, and useful for performance management?

We found that USAID/Iraq's monitoring and evaluation program – the Monitoring and Evaluation Performance Program, Phase II (MEPP II) – is generally producing evaluation reports that are timely, relevant, and useful for performance management. In general, we found that these reports were both timely and punctual, addressed the inquiries posed by USAID officials, and contained recommendations that provided meaningful opportunities for enhancing program effectiveness. We found that this also applied to monitoring reports. However, we found several weaknesses in the monitoring of one USAID/Iraq program that diminished confidence in the reliability of some monitoring reports. These are described in more detail on page six.

To answer this audit objective, we first established criteria for assessing the timeliness, relevance, and usefulness of monitoring and evaluation program reports. These criteria were based on discussions with USAID officials, review of Agency guidance, and auditor judgment. We then assessed twenty-three monitoring and evaluation reports against a uniform checklist containing these criteria. Detailed results of this analysis are shown in appendix III.

Furthermore, we surveyed report users and solicited their comments on the reports' utility. These comments, like our assessments, were generally positive. For example, a USAID official previously assigned to a Provincial Reconstruction Team (PRT) indicated that the monthly PRT monitoring reports published in early 2007 were extremely useful. According to this official, the reports provided PRT members with valuable insight into ongoing activities in their respective areas, which assisted those members in prioritizing their efforts. Furthermore, as evidence of their timeliness, these reports were released at approximately the same time that the PRTs were deployed. Finally, this official stated that these reports were both thorough and relevant, addressing a myriad of issues of interest to PRT members.

Another USAID official reiterated these basic themes of the monitoring and evaluation reports' high quality and usefulness. For example, this official stated that an evaluation of the Iraq Civil Society Program indicated that while the contractor fulfilled its obligations, the program itself had no lasting impact. As a result, the program was not renewed, allowing USAID's resources to be more effectively utilized for other programs.

This official also gave other concrete examples of how the monitoring and evaluation program was aiding other ongoing programs. For instance, in one program jointly conducted by four implementing partners, this official requested that the MEPP II contractor identify the strengths and weaknesses of those partners in order to enhance overall program performance. Similarly, the mission also utilized the contractor's capability to expeditiously perform spot checks on issues of immediate concern, which might have gone unmonitored due to the difficulty and expense of travel outside the International Zone for U.S. Government employees. For example, the contractor verified

the existence and usage of items provided pursuant to a USAID program, such as trash collection vehicles in southern Iraq and hospital equipment in Baghdad. The cognizant technical officer for this program remarked that the monitoring and evaluation contractor did a "good, quick job" on these types of requests, displaying a "good reach."



Ground-truthing in action: photograph taken by the monitoring and evaluation contractor of a vehicle identification number pursuant to a monitoring request by a USAID/Iraq official. The vehicle was used in USAID/Iraq's Community Action Program. Source: USAID/Iraq.

Lastly, we interviewed USAID/Iraq Program Office officials for their perspective of the monitoring and evaluation program reports' timeliness, relevance, and usefulness for performance management. As both the mission's performance management experts and the technical overseer of the monitoring and evaluation contract, the Program Office is in a unique position to judge the adequacy of monitoring and evaluation program reports. Program officials uniformly praised these reports, noting, among other things, the contractor's professionalism, enthusiasm, and commitment.

However, as noted above, we found several weaknesses in the MEPP II monitoring program. In summary, the monitoring of high risk activities needed strengthening and that USAID/Iraq could make better use of the results of its monitoring and evaluation program to manage its portfolio. Specifically, USAID/Iraq should document its responses to evaluation report recommendations so as to enhance program management, systematically share evaluation reports with implementing partners, grant the USAID/Iraq Program Office the authority to initiate monitoring and evaluation activities, and ensure that acquisition and assistance awards require awardees to submit monitoring and evaluation plans.

Frequency and Accuracy of Monitoring High Risk Activities Should Be Strengthened

Summary: In order to be timely and useful for performance management, monitoring of high risk activities must be frequent and accurate. In one area of Baghdad where evidence of potentially fraudulent trash campaigns has surfaced, monitoring activities under the monitoring and evaluation contract had not been conducted since July 2007; moreover, statements by U.S. Army officials raised doubts about the accuracy of previous monitoring reports. For this particular USAID/Iraq program, monitoring efforts shifted to other program elements, while, in general, the monitoring and evaluation contractor did not verify the accuracy of monitoring reports with local U.S. military officials. Without frequent and accurate independent monitoring of high risk activities, vulnerability to fraud is heightened and effective performance management is hindered.

Monitoring of high risk activities has not always been frequent, nor in some cases accurate. Notably, in USAID/Iraq's high risk Community Stabilization Program (CSP), a \$544 million program, which had a large employment generation component, monitoring was not frequent enough to ensure that Iragis hired to carry out clean-up campaign activities actually carried out these tasks. For example, in March 2008, OIG personnel traveled to a Forward Operating Base in southern Baghdad to meet with U.S. Army and Iragi government officials regarding allegations of fraud in a trash cleaning contract funded by USAID/Irag's Community Stabilization Program (CSP).² This three-month contract had a value of \$125,850. Specifically, the allegations brought by U.S. Army officials concerned a CSP-funded contractor paid for work already performed by a different contractor funded by the U.S. military. OIG personnel questioned a local Iragi official whose signed name appeared on a timesheet certifying work performed by the CSP-funded contractor. This official stated that he had never seen this document, nor did he sign it, and furthermore believed that his name had been forged. In addition, another high ranking local Iragi official stated that other personnel who signed the document as approving officials were not authorized to do so. It is believed that the contractor submitted these timesheets to the CSP implementing partner as proof of completed work.

These timesheets indicated that 170 workers were employed on this cleaning campaign daily. Regarding these 170 workers, OIG personnel interviewed U.S. Army officials at both the Forward Operating Base and in the neighborhoods where the CSP-funded contractor purportedly worked. These officials not only stated that they had been unaware of the CSP-funded contractor, but that a workforce of 170 persons could not possibly be deployed in their area of operation without their knowledge. According to military personnel, this was because their counterinsurgency mission required them to know their area of operation in such minute detail that even as few as two unknown persons appearing in the area would be noticed and investigated. For example, after a U.S. Army official questioned a CSP representative about the suspect contract, a military

² See Audit of USAID/Iraq's Community Stabilization Program, Report No. E-267-08-001-P, March 18, 2008. The areas of Baghdad mentioned in this section are different from the area in the previous audit where USAID/Iraq suspended CSP activities.

unit observed eight trash workers in yellow jumpsuits entering the neighborhood and taking photographs. Based on our personal observation of both the specific neighborhoods and the conduct of a U.S. Army foot patrol, we agree with the officials' assertions. Subsequently, U.S. Army officials informed OIG personnel directly of other dubious contracts that warranted further inquiry.



Photograph taken by OIG personnel while walking with a U.S. Army unit during patrol of a Baghdad neighborhood. Source: OIG/Iraq.

Frequency of Monitoring - Given these statements regarding phantom workers and unperformed work, we sought to determine if there had been any monitoring of CSP trash campaigns in this particular area. According to our review of monitoring reports, the monitoring and evaluation contractor has not monitored any CSP trash campaigns in the area patrolled by units from this Forward Operating Base since May 2007. Furthermore, a monitoring and evaluation contractor official told us that there had been no overall monitoring of CSP trash campaigns by the monitoring and evaluation contractor in Baghdad since mid-2007. A Program Office official also stated that there is no monitoring of these Baghdad trash campaigns scheduled to take place under the monitoring and evaluation contract in the near future.

According to the monitoring and evaluation program contract, the program's objective is to provide continued and regular performance monitoring of USAID/Iraq's portfolio. In order for the program to be truly effective as a ground-truthing instrument, high risk activities, such as Baghdad trash campaigns, require a higher frequency of monitoring. While monitoring reports covering Baghdad trash campaigns were completed in December 2006 and July 2007, no further monitoring of this type in Baghdad has been conducted or scheduled since then. In addition, according to the Government Accountability Office's *Standards for Internal Control in the Federal Government*, the scope and frequency of separate evaluations depends primarily on the assessment of risks and the effectiveness of ongoing monitoring procedures. This occurred even as

mission officials, by their actions, acknowledged that Baghdad trash campaigns were highly vulnerable to fraud and abuse. As an additional example, after our trip to southern Baghdad, OIG personnel received another allegation of the same type of fraud – CSP trash contracts duplicating work that military contractors were already performing – emanating from an embedded Provincial Reconstruction Team leader located in a different part of Baghdad. After mid-2007, however, monitoring and evaluation program efforts regarding the Community Stabilization Program shifted to other program elements and locations.

Accuracy of Monitoring – In addition, we expanded our procedures to determine if the monitoring and evaluation contractor had monitored any CSP trash campaigns in the area patrolled by units from this Forward Operating Base prior to July 2007 and, if possible, to assess the accuracy of that monitoring. Consequently, we determined that a number of visits had been made by the monitoring and evaluation contractor to CSP trash campaigns in this area, based on specific field monitors' reports which indicated that the projects were financed by the CSP implementing partner. These reports indicated that active work had been performed at those sites, with hundreds of workers employed.

Although the current U.S. Army unit did not assume responsibilities at this Forward Operating Base until December 2007, based on reports from predecessor units, a U.S. Army official stated that "trash was such a problem" for one unit "that they hired their own contractors." This official indicated that if this predecessor unit had to resort to hiring its own contractors it was because this work was not being performed. Another unit referred to an isolated instance in this area where a small group of CSP workers was seen, but these were subsequently "kicked out" due to allegations of planting improvised explosive devices. In addition, a U.S. Army civil affairs officer who had been in this operating area for nearly a year told OIG officials that approximately one week earlier he saw a CSP trash worker for the first time. Moreover, the significant numbers of workers indicated on the monitoring reports – much higher than 170 - could not have gone unnoticed by military patrols. For these reasons, a U.S. Army official stated that, in his opinion, the particular contracts that were the subject of these monitoring reports were "phony."

The indications of past and present issues with trash collection create a strong impression that these problems have been well-entrenched and ongoing in this particular area. As a result, the information received from U.S. Army officials raises questions about the accuracy of monitoring reports which indicated that active work was ongoing at the sites visited, with as many as 800 workers reportedly employed. Based on personal observation of U.S. Army units, in our opinion U.S. military officials are well qualified and positioned to assess localized conditions.

Senior monitoring and evaluation contractor officials stated that their field monitors do not perform unannounced site visits, for security reasons. Moreover, these officials stated that they relied on the review of field reports by a highly experienced monitoring and evaluation expert to satisfy themselves that the site visits were actually performed. Furthermore, contractor officials indicated that they did not coordinate with military officials to verify the accuracy of those reports. We confirmed this lack of coordination with military officials through inquiry of a Program Office official.

Conclusion - The fact that uncertainty exists about various features of these trash

contracts, notwithstanding positive monitoring reports, diminishes the credibility of these particular ground-truthing activities. Consequently, steps that improve confidence in the accuracy of field monitoring should make those reports more useful for decision-making. Additionally, even if the emergence of potentially fraudulent CSP contracts in this particular area is a relatively new phenomenon, the lack of recent, independent monitoring contributes to an environment where those activities can flourish and is itself a weakness of the monitoring and evaluation program. Finally, one of the emergent lessons of OIG audit and investigative work in Iraq is that activities funded by U.S. taxpayers require more thorough and frequent oversight, in the field, by U.S. personnel. The U.S. military is uniquely capable of providing this oversight, and USAID representatives on Provincial Reconstruction Teams have developed effective relationships with U.S. military personnel. Consequently, we are making the following recommendations:

Recommendation 1: We recommend that USAID/Iraq establish policies and procedures to utilize its Provincial Reconstruction Team representatives to obtain information from U.S. military officials to assist in verifying the accuracy of field monitoring reports.

Recommendation 2: We recommend that USAID/Iraq take steps to increase the frequency of monitoring those activities demonstrated to be highly vulnerable to fraud and abuse.

Is USAID/Iraq using results from its monitoring and evaluation program to manage its portfolio?

We found that, in general, USAID/Iraq was using the results of its monitoring and evaluation program to manage its portfolio. However, we also found that the mission could use those results more effectively by systematically documenting its responses to findings and recommendations, granting the USAID/Iraq Program Office authority to initiate monitoring and evaluation activities, and ensuring that evaluation reports are shared with implementing partners.

Interviews with current and former Program Office officials indicated that the extent to which the monitoring and evaluation program was utilized was highly dependent upon the attitudes of incumbent office directors and cognizant technical officers (CTOs). Program Office officials noted that while the current personnel rotation was typically receptive to the program's services, this had not always been the case. For example, the monitoring and evaluation program's CTO stated that one of his first duties upon arrival in November 2006 was to help prepare a justification for the continuance of the program. This was after a portion of the monitoring and evaluation contract, regarding the development of a web-based monitoring reporting system, was terminated, which may have negatively affected perceptions of the program. However, a monitoring and evaluation contractor official stated that the mission had made "huge strides" in utilizing reports over the past year.

Following are areas in which USAID/Iraq could improve the use of its monitoring and evaluation program.

Documentation of Monitoring and Evaluation Reviews Can Be Improved

Summary: Agency guidance and sound management practice require that USAID operating units respond to findings and recommendations in monitoring and evaluation reports. While some review of these reports took place, it was insufficiently documented. This occurred in several cases because a documented response was deemed unnecessary and inefficient. Inadequate documentation of responses to monitoring and evaluation reports degrades institutional memory and hinders program management.

Monitoring and evaluation activities are key components of both management control and performance management. While monitoring provides management with early indications of a program's progress, evaluations provide deeper insights that can help the Agency's operating units achieve their intended results. To maximize the usefulness of evaluations, Automated Directives System 203.3.6.7 prescribes the responsibilities of operating units, such as USAID field missions, in responding to evaluation findings. These responsibilities include systematically reviewing the evaluation results and determining whether the team accepts each finding or recommendation. Additionally, operating units should identify any management or program actions needed and assign clear responsibility and timelines for completion of each set of actions.

Since ADS 203.3.6.7 does not specify exactly how evaluation findings and recommendations should be addressed, we asked the Program Office director, whose office advises the mission on the Agency's monitoring and evaluation policies, if a verbal response was sufficient. The director stated that a verbal response was not sufficient. In our opinion, a written response would also be consistent with ADS 596.3.1, which requires adequate documentation of management control activities, in addition to being a prudent management practice given the level of personnel turnover at USAID/Iraq. Consequently, a written response to findings and recommendations in monitoring reports would be required as well.

We found that while there was some review of evaluation findings and recommendations, this review was not sufficiently documented to fully comply with Agency policies and sound management practice. This review consisted primarily of an exit briefing held between representatives of the monitoring and evaluation contractor, the Program Office, and the office directly responsible for management of the specific program. Next, a Program Office official would review the draft evaluation report and make any appropriate comments. Comments would also be solicited from other USAID officials prior to issuance of the final report.

We asked an official from one USAID/Iraq office that had the most evaluations performed on its programs if there was any documentation detailing its responses to the exit briefings. This official stated that there was none because the briefings were perceived to be merely informational and too much time and effort would be expended in responding to each recommendation. Furthermore, this official also distinguished between recommendations made by the monitoring and evaluation contractor and those made by the OIG in audit reports, indicating that the latter required a response. While OIG recommendations do in fact require a response from USAID, ADS 203.3.6.7 explicitly requires a decision on each evaluation recommendation as well.

Another office also displayed no documentation of evaluation responses. We interviewed an official from that office, which had had one evaluation performed in 2006 for a program that was still ongoing. This official was unaware of the existence of the evaluation report. Moreover, given the age of the report, there was no one in the office who could discuss the report or the contribution it made to the evaluated program. After discussing the report with the implementing partner, this official told us that the partner disagreed with the findings and recommendations. However, there was no contemporaneous documentation to indicate what action, if any, was taken by former mission officials.

During the Community Stabilization Program audit at USAID/Iraq, released March 2008, we learned that a third office did not maintain any documentation of responses to recommendations contained in monitoring reports, contrary to ADS 596.3.1 and sound management practice. In response to our audit finding, this office has begun to inventory all recommendations for prioritization with the implementing partner. As part of this process, a table was developed for each report to track (1) all recommendations that were made; (2) the office's response to each recommendation; (3) the implementing partner's response to each recommendation; (4) the followup action, if any, required for each recommendation; and (5) the timeline for completing proposed followup actions. These tables are now attached to program monitoring reports as an annex to help ensure that appropriate responses are undertaken. This effort will provide a number of benefits, including more effective use of recommendations and greater historical information for successor personnel.

Given the short tours and high turnover at USAID/Iraq, inadequate documentation of monitoring and evaluation reports degrades institutional memory and can lead to inefficiencies in program management. For example, one USAID official posed a series of questions for the monitoring and evaluation contractor to investigate regarding a particular program. This official, however, was not only unaware that a previous evaluation had already addressed those questions, but also that the evaluation even existed. Furthermore, progress in monitoring program improvements is hindered without documented rejection or acceptance of evaluation findings and recommendations. Consequently, we are making the following recommendation:

Recommendation 3: We recommend that USAID/Iraq establish policies and procedures to document compliance with Automated Directives System 203.3.6.7 for evaluations and to also document responses to findings and recommendations contained in monitoring reports of mission programs conducted under the Monitoring and Evaluation Performance Program, Phase II.

Evaluation Report Was Not Shared With Implementing Partner

Summary: USAID policy states that evaluation reports should be shared and discussed with relevant stakeholders, including implementing partners. However, one implementer of a major USAID/Iraq program was unaware of a previous program evaluation. This occurred because the report was not delivered to and reviewed with the partner. Not sharing evaluation reports diminishes program effectiveness by foregoing opportunities for improvement.

USAID programs are almost always implemented through partner organizations. Consequently, communication of performance information with these implementing partners is an important component of the Agency's continual efforts to improve results. To help ensure that this communication occurs, ADS 203.3.6.7 states that USAID operating units should share and openly discuss evaluation findings, conclusions, and recommendations with relevant stakeholders, including partners, unless there are compelling reasons for not doing so.

Notwithstanding this requirement, the implementing partner of a major USAID/Iraq program was unaware of the existence of a previous evaluation conducted in May 2006. The evaluation consisted of a review of a number of USAID/Iraq programs that contained a capacity building element, including this specific major program. The monitoring and evaluation contractor discovered this condition during a March 2008 evaluation of the program. According to the monitoring and evaluation contractor, the May 2006 report was not formally delivered to and reviewed with the implementing partner, even though it was available through USAID's online evaluations database.

We asked a USAID/Iraq Program Office official if the Program Office was responsible for delivering evaluation reports to implementing partners. According to this official, the various technical offices have this responsibility. In addition, the official did not know why the partner was unaware of the report. We then asked the technical office director if she was aware why the report was not shared with the partner. The director, who did not arrive in Iraq until more than one year after the May 2006 evaluation, also did not know why the partner was unaware of the report. Finally, our review of the evaluation indicated no compelling reasons for not sharing this report with the partner.

A common part of evaluations is referring to past evaluations of the same program and determining if relevant recommendations led to improved performance. However, since the implementing partner was unaware of the evaluation report, any consideration of the implementation of recommendations was, according to the monitoring and evaluation contractor, "relatively pointless." We noted, for example, that a recommendation from the previous evaluation regarding the desirability of results-oriented indicators was essentially repeated in the March 2008 evaluation, signifying that the underlying weakness had not been corrected. By not sharing evaluation reports with its implementing partners, USAID/Iraq misses opportunities for program improvement. Furthermore, adequately documenting the results of evaluation reviews with implementing partners enhances institutional memory. Finally, not utilizing evaluation reports to their fullest extent is an inefficient use of monitoring and evaluation funds. Consequently, we are making the following recommendation:

Recommendation 4: We recommend that USAID/Iraq establish policies and procedures requiring that evaluation findings, conclusions, and recommendations be formally reviewed with the relevant implementing partner, and that the results of that review be documented.

Program Office Cannot Initiate Monitoring and Evaluation Activities

Summary: USAID/Iraq's monitoring and evaluation program was established to improve oversight of USAID programs operating in Iraq's challenging security environment. The USAID/Iraq Program Office, however, cannot initiate monitoring and evaluation activities for those programs. This is because the Program Office acts only as an advisor to those with direct responsibility for program management. Consequently, services provided by the monitoring and evaluation contractor have been inconsistently utilized across USAID/Iraq's portfolio.

Since fiscal year 2003, USAID/Iraq has noted in annual reports required under the Federal Managers' Financial Integrity Act of 1982 that program implementation and monitoring are highly vulnerable activities given the prevailing security environment. Among other things, this situation has impaired the mission's ability to obtain, maintain, report, and use reliable and timely information for decision making. The monitoring and evaluation program was established to increase oversight of USAID/Iraq's activities and ameliorate this material weakness.

Notwithstanding this corrective action, the USAID/Iraq Program Office, as the mission's performance management experts, cannot initiate monitoring and evaluation activities. According to Program Office officials, the office serves in an advisory capacity to the mission's contracting and cognizant technical officers (CTOs), who have direct responsibility for program management. Even though the Program Office can theoretically elevate recommendations for proposed monitoring and evaluation activities to the mission director for ultimate decision, Program Office officials feared that repeated use of this tactic could jeopardize that office's relationship with other offices, thereby diminishing its overall effectiveness.

While two of USAID/Iraq's four main functional offices have made regular use of the monitoring and evaluation program, two others have not. One of these latter offices, for example, cancelled a scheduled evaluation for one of its major programs. According to a Program Office official, the same office rejected a proposed evaluation of another program because it had already been subject to inquiries from other bodies such as the Special Inspector General for Iraq Reconstruction and the U.S. Congress, and the office was planning to prepare a self-evaluation based on this work. The Program Office confirmed that this self-evaluation had not been done.

However, the various services provided by the monitoring and evaluation contractor do not duplicate the work of other entities such as the Special Inspector General for Iraq Reconstruction. Instead, monitoring and evaluation activities form an integral part of the

mission's performance management system. The USAID/Iraq Program Office, by virtue of both its technical expertise and organizational independence from direct program management, is uniquely qualified to initiate monitoring and evaluation activities. Consequently, we are making the following recommendation:

Recommendation 5: We recommend that USAID/Iraq establish policies and procedures permitting the USAID/Iraq Program Office to initiate monitoring and evaluation activities conducted under the Monitoring and Evaluation Performance Program, Phase II.

Some Awards Do Not Require Monitoring and Evaluation Plans

Summary: Sound management practice dictates that acquisition and assistance awards specify partners' responsibilities regarding monitoring and evaluation plans. However, two contracts did not contain any such specification. Due to the age of these contracts, it is unclear why this condition existed. Without clear language specifying partners' obligations, USAID depends upon their voluntary cooperation to develop monitoring and evaluation plans.

As an integral part of the performance management process, ADS 203.3.3 requires USAID operating units to prepare a performance management plan for each strategic objective. USAID implementing partners' monitoring and evaluation plans are a vital component of the overall performance management plan by assuring that comparable data will be collected on a regular and timely basis. The legal relationship between the Agency and an implementing partner, however, is defined in the particular acquisition or assistance award establishing a USAID program. Given the importance of USAID's implementing partners in performance management, a sound and prudent management practice is for acquisition and assistance awards to specify partners' responsibilities regarding the development of monitoring and evaluation plans.

Contrary to this sound management practice, contracts for two USAID/Iraq programs worth a total of \$379 million did not originally contain any language specifying the implementing partners' responsibilities regarding monitoring and evaluation plans. A later modification to one of these contracts did contain language regarding a monitoring and evaluation plan, but this was geared toward the additional element enacted by the modification and did not encompass a program-wide plan. A Program Office official did not know why these two contracts, which were signed in September 2004, did not originally contain such language when contracts enacted later did. This official believed such omissions were an oversight, and noted that performance monitoring in the initial phases of the USAID mission in Iraq did not receive the same emphasis as now.

We did not become aware of any actual adverse effects as a result of the omission of this language, since the implementing partners have voluntarily established comprehensive monitoring and evaluation plans for their respective programs. However, potentially adverse effects exist if future contracts omit this language, since voluntary cooperation is not assured. To minimize this possibility, we are making the following recommendation:

Recommendation 6: We recommend that USAID/Iraq establish policies and procedures to help ensure that acquisition and assistance awards require implementing partners to submit appropriate monitoring and evaluation plans.

EVALUATION OF MANAGEMENT COMMENTS

In its response to the draft report, USAID/Iraq agreed with all six recommendations and outlined proposed actions for their implementation, to be completed by September 30, 2008. We have considered management's comments on the draft report and have incorporated them into the final report, as appropriate. Based on management's comments, we consider that a management decision has been reached on all six recommendations.

Regarding Recommendation 1, the mission intends to issue a policy encouraging its Provincial Reconstruction Team representatives to obtain information from U.S. military sources to assist in the verification of field monitoring reports. Accordingly, a management decision has been reached on Recommendation 1.

Regarding Recommendation 2, the mission detailed a number of steps taken to increase monitoring of Community Stabilization Program projects. In addition, the mission is developing a risk analysis framework for its entire portfolio to aid in the development of effective monitoring strategies as a tool for reducing the potential for fraud and abuse. Accordingly, a management decision has been reached on Recommendation 2.

Regarding Recommendation 3, the mission intends to issue a policy stipulating that its responses to findings and recommendations in all monitoring and evaluation reports must be adequately documented and included as part of the final report. These responses will also include input from implementing partners. Accordingly, a management decision has been reached on Recommendation 3.

Regarding Recommendation 4, the mission intends to issue a policy that requires implementing partners to acknowledge receipt of monitoring or evaluation reports within two weeks of transmittal. This policy will also codify the current practice of reviewing evaluation reports orally with the implementing partner. These procedures, in conjunction with the additional input to be solicited from implementing partners as part of the mission's response to evaluation findings and recommendations, meet the intent of the recommendation. Accordingly, a management decision has been reached on Recommendation 4.

Regarding Recommendation 5, the mission concurred with the recommendation that the mission establish policies and procedures permitting the USAID/Iraq Program Office to initiate monitoring and evaluation activities conducted under its monitoring contract. The mission intends to codify this concurrence in a new mission order to be issued by September 30, 2008. Accordingly, a management decision has been reached on Recommendation 5.

Regarding Recommendation 6, the mission stated that it has developed language to be included in acquisition and assistance awards requiring implementing partners to submit appropriate monitoring and evaluation plans. Accordingly, a management decision has been reached on Recommendation 6.

Determination for final action on all six recommendations will be made by the Audit Performance and Compliance Division (M/CFO/APC) upon submission of documentation evidencing completion of the actions proposed by the mission.

SCOPE AND METHODOLOGY

Scope

The Office of Inspector General/Irag conducted this audit in accordance with generally accepted government auditing standards. The purpose of the audit was to determine (1) if USAID/Irag's monitoring and evaluation program was producing reports that were timely. relevant, and useful for performance management, and (2) if USAID/Iraq was using results from its monitoring and evaluation program to manage its portfolio. The audit reviewed monitoring and evaluation reports completed from the inception of the Monitoring and Evaluation Performance Program, Phase II (MEPP II) contract in May 2005 until October 19, 2007. We confirmed the completeness of this list with a MEPP II contractor official. We also reviewed any evidence of ongoing monitoring projects as it became available during the course of fieldwork. We did not review any other products undertaken pursuant to the MEPP II contract, such as data quality assessments, nor did we verify any data contained in the monitoring and evaluation reports we reviewed. Fieldwork was performed from December 27, 2007 to April 30, 2008 in the International Zone; at a Forward Operating Base and in nearby neighborhoods in Baghdad, Irag; and in Washington, DC. At the end of fieldwork, the MEPP II contract had obligated approximately \$19.7 million and disbursed about \$14 million.

Methodology

To answer the first audit objective, we established criteria for assessing the timeliness, relevance, and usefulness of monitoring and evaluation reports. These criteria were based on discussions with USAID officials, review of Agency guidance, and auditor judgment. For example, we incorporated guidance from ADS 203.3.6.6 regarding the required elements of an evaluation into our review of program reports. We also relied on the scopes of work for various reports as an additional evaluative tool. In addition, we utilized monitoring work plans to evaluate the monthly Provincial Reconstruction Team monitoring reports. These criteria formed a checklist which we used to assess the monitoring and evaluation reports completed during the time period specified above.

In addition, we communicated with a U.S. Army battalion effects coordinator and an embedded U.S. Army civil affairs officer during and after our visit to the Forward Operating Base. We also spoke with the battalion's commanding officer, several platoon lieutenants, other U.S. Army soldiers, Iraqi civilians, and local Iraqi officials during our visit.

To answer the second audit objective, as well as to assist in answering the first, we interviewed officials from the following USAID/Iraq offices: Program, Democracy & Governance, Focused Stabilization Program, Capacity Building, Economic Growth & Agriculture, and Provincial Reconstruction Team, both in person and via e-mail. We also interviewed USAID officials based in Washington on issues pertaining to the monitoring and evaluation program. In order to gain an understanding of the MEPP II contractor's qualifications, independence, and procedures, we relied on an interview we conducted with MEPP II officials pursuant to the Community Stabilization Program audit. In addition, we made other inquiries of MEPP II contractor officials as needed.

MANAGEMENT COMMENTS



June 24, 2008

MEMORANDUM UNCLASSIFIED

- TO: Director, Office of Inspector General/Iraq, Jay R. Rollins
- FROM: USAID/Iraq Mission Director, Christopher D. Crowley /s/

SUBJECT: USAID/Iraq Management Comments on Audit of USAID/Iraq's Monitoring and Evaluation Performance Program (Report No. E-267-08-00X-P)

USAID/Iraq acknowledges delivery of the subject draft audit report dated May 13, 2008, and provides the following comments on the report and responses to the recommendations.

General Comments

The Mission agrees with the conclusion in the subject report that the Mission's monitoring and evaluation (M&E) program is "generally producing reports that are timely, relevant, and useful for performance management" and that USAID/Iraq is "generally using the results of its [M&E] program to manage its portfolio."

The work under the Monitoring and Evaluation Performance Program II (MEPP II), performed by International Business & Technical Consultants, Inc. (IBTCI), provides independent third party monitoring and is just one facet of the M&E functions the Mission supports in its overall management of the portfolio. The front line of M&E occurs at the project level, where all implementing partners have M&E contacts to support effective project implementation. The USAID Provincial Reconstruction Team (PRT) representatives provide another layer of field-level monitoring. The Cognizant Technical Officer (CTO) provides yet another layer of monitoring and frequently requests that additional steps be taken to strengthen or verify project implementation outputs and outcomes. In addition to having an M&E specialist in the Mission who advises staff on performance management policy and practices, the Mission conducts periodic program performance reviews.

Recommendation 1: We recommend that USAID/Iraq establish policies and procedures to utilize its Provincial Reconstruction Team representatives to obtain information from U.S. military officials to assist in verifying the accuracy of field monitoring reports.

The Mission generally concurs with this recommendation. A critical component of the Mission's overall strategy has been to deploy USAID representatives to the PRTs and embedded PRTs (ePRTs). In December 2006, USAID/Iraq initiated a formal decentralization of field project management and oversight to (i) place the PRT/ePRT representatives at the center of program implementation; (ii) integrate USAID field programs more effectively with those of other USG agencies, including the military; (iii) improve information flows between Baghdad and the field to enhance USAID's ability to resolve implementation problems with its partners; and (iv) report on progress in a more timely and effective manner. USAID PRT representatives are tasked to utilize the assets around them to gather information. This includes discussions with implementing partner representatives, site visits, and requesting military colleagues to verify progress or deficiencies in project implementation.

The Mission cautions against a formal policy that *requires* PRT representatives to verify IBTCI field monitoring reports with the U.S. military. Intimate knowledge of project objectives and the project implementation plan is required to provide accurate and useful feedback. In addition to project-level monitoring, IBTCI conducts random spot checks to verify work. IBTCI uses a monitoring protocol comprising tested sampling and survey methods accompanied by five-tier triangulation to verify findings. Adherence to recognized monitoring methodologies requires specific training to produce reliable, relevant results. Military personnel typically do not have such training and therefore the military does not have a comparative advantage in the verification of field monitoring reports.

Nevertheless, Management believes that PRT representatives should maintain established work relationships with the military to share information, as needed and where opportunities arise. USAID/Iraq will encourage PRT representatives to obtain information from U.S. military officials to *assist* in verifying field monitoring reports. Such information is one important source of field verification information, but not the only source. This procedure will be formalized as policy in the "Managing for Results" Mission Order that will be issued by September 30, 2008. Mission Management therefore requests OIG/I concurrence that a management decision is reached on this recommendation.

Recommendation 2: We recommend that USAID/Iraq take steps to increase the frequency of monitoring those activities demonstrated to be highly vulnerable to fraud and abuse.

The Mission concurs with this recommendation. The Mission has taken steps to increase the frequency of monitoring for activities that have been demonstrated to be highly vulnerable to fraud and abuse. In the case of Community Stabilization Program (CSP), the CTO and the implementing partner recognized the potential for fraud and abuse. The Mission's M&E contractor therefore conducted more monitoring of CSP activities than of any other project. Of the 18 monitoring reports IBTCI has produced for the Mission to date, ten were on CSP.

In addition, USAID's CSP implementing partner, International Relief & Development (IRD), engages in extensive internal monitoring. CSP has an M&E unit that operates independently from the technical staff charged with developing and supervising projects. The USAID-approved M&E Plan for CSP includes standard monitoring forms and tracking sheets, a clear segregation of duties between technical staff and M&E staff, and benchmarks for the number of random site visits M&E staff must conduct on each type of CSP activity. In its monitoring reports, IBTCI confirmed that IRD's systems have been well executed. IBTCI confirmed that this is a statistically valid finding based on the percentage of activities that were randomly sampled given the universe of CSP-funded projects.

A third source of monitoring information is through USAID field staff based on the PRTs and ePRTs. Their role in CSP has been codified in a written communication protocol issued on February 24, 2008. Since its issuance, the Mission has noticed a marked improvement in the field-level coordination and oversight of CSP activities.

The fourth source of information on CSP is from local Government of Iraq officials and community leaders. For security reasons and in order to build capacity, CSP works very closely with these individuals to identify, approve, tender, and execute projects.

A fifth source of CSP monitoring information is the relatively new Quality Assurance / Quality Control (QA/QC) unit created by IRD. The QA/QC unit performs an internal audit function. The unit checks project documentation for compliance with standard procedures and conducts unannounced field visits to project sites. This enhances the monitoring capacity of IBTCI, which is not authorized to conduct unannounced site visits. The QA/QC unit is organizationally separate from both the technical units and the M&E unit and its findings are reported directly to the IRD Chief of Party.

More generally, the Mission is developing a framework for risk analysis that assesses each project's potential for fraud, waste, or abuse. The framework will be formalized and used in collaboration with the CTO, the Mission's M&E specialist, and the implementing partner during Performance Management Plan (PMP) development. This will allow the Mission and the implementing partners to design appropriate monitoring protocols to mitigate potential for fraud. This process will be formalized as policy in the "Managing for Results" Mission Order that will be issued by September 30, 2008. Mission Management therefore requests OIG/I concurrence that a management decision is reached on this recommendation.

Recommendation 3: We recommend that USAID/Iraq establish policies and procedures to document compliance with Automated Directives System 203.3.6.7 for evaluations and to also document responses to findings and recommendations contained in monitoring reports of mission programs conducted under the Monitoring and Evaluation Performance Program, Phase II.

The Mission concurs with this recommendation. On March 11, 2008 (beginning with the Baghdad and Mosul Business Development Project Monitoring Reports), the Mission introduced procedures to document findings and recommendations in all monitoring and evaluation reports completed for USAID/Iraq-funded projects. Mission responses to findings and recommendations (with input from the implementing partner) and final management decisions on each issue are now outlined in a matrix. The matrix is included in the final version of each monitoring or evaluation report and is maintained in

the Mission's project files. This process will be formalized as policy in the "Managing for Results" Mission Order that will be issued by September 30, 2008. Mission Management therefore requests OIG/I concurrence that a management decision is reached on this recommendation.

Recommendation 4: We recommend that USAID/Iraq establish policies and procedures requiring that evaluation findings, conclusions, and recommendations be formally reviewed with the relevant implementing partner, and that the results of the review be documented.

The Mission concurs with this recommendation. Current practice at USAID/Iraq requires evaluation findings, conclusions, and recommendations related to project performance to be provided to the implementing partner at a formal oral briefing. In most cases, the written evaluation report is also shared with the partner. However, if an evaluation is procurement sensitive or has other sensitive material in it, the Mission reserves the right to share *select* findings with the implementing partner through a formal oral briefing to avoid compromising any sensitive information.

To generate necessary documentation to comply with ADS 203.3.6.7, the Mission has instituted a procedure that requires the implementing partner to acknowledge receipt of the monitoring or evaluation report within two weeks of transmittal. The record of receipt will be maintained electronically in the Mission's project files. The project files will also document the outcomes of the formal oral briefing with the implementing partner.

These procedures will be formalized as policy in the "Managing for Results" Mission Order that will be issued by September 30, 2008. Mission Management therefore requests OIG/I concurrence that a management decision is reached on this recommendation.

Recommendation 5: We recommend that USAID/Iraq establish policies and procedures permitting the USAID/Iraq Program Office to initiate monitoring and evaluation activities conducted under the Monitoring and Evaluation Performance Program, Phase II.

The Mission concurs with this recommendation. One of the key roles of the Program Office (PRO) is to provide expert advice and quality assurance by advising technical teams and Mission offices on Agency and Mission policies, procedures, and guidelines related to performance management. PRO staff serve as extended members of the technical teams and routinely review incoming project reports and attend relevant meetings. In cases where unexpected issues or questions in project implementation arise from reports or discussions, the CTO and PRO, working together in the team context, initiate the process to develop a scope of work for more rigorous monitoring and verification to be performed. If deeper underlying implementation issues are flagged, the CTO and PRO work together to develop a scope of work detailing appropriate methodologies for an evaluation.

PRO also guides technical teams and implementing partners in conducting periodic reviews of the PMPs (and in some cases requests a data quality assessment) to ensure that indicators and targets are appropriate, relevant, and offer timely and productive feedback to staff on implementation progress. The Mission uses the services of IBTCI under MEPP II as needed throughout the process. These are now standard operating

procedures that will be codified in the "Managing for Results" Mission Order that will be issued by September 30, 2008. Mission Management therefore requests OIG/I concurrence that a management decision is reached on this recommendation.

Recommendation 6: We recommend that USAID/Iraq establish policies and procedures to help ensure that acquisition and assistance awards require implementing partners to submit appropriate monitoring and evaluation plans.

The Mission concurs with this recommendation. A PMP is a key component of resultsbased management at the project level. The Mission agrees that acquisition and assistance awards must require implementing partners to submit appropriate M&E plans in a timely fashion. PRO has already developed relevant language, in partnership with the Office of Acquisition and Assistance (OAA), to be included in the awards. New awards now include this language. PRO and OAA have been working together to ensure that the remaining existing awards are updated to include performance language by September 30, 2008. Mission Management therefore requests OIG/I concurrence that a management decision is reached on this recommendation.

Specific Comments on Draft Report

The Mission offers the following comments for consideration in the preparation of the final report:

Frequency of Monitoring

<u>Page 7, paragraph 1</u>: USAID/Iraq implementing partners conduct continuous field monitoring at the project level, and IBTCI, as an independent third party, conducts additional monitoring during discrete periods throughout the project cycle. IBTCI's work thus constitutes but one level of field monitoring. We suggest adding the bolded text below to the two statements at the end of this paragraph to be more factually accurate:

"Furthermore, a monitoring and evaluation contractor official told us that there had been no overall monitoring of CSP trash campaigns **by the MEPP II Contractor** since mid-2007. A Program Office official also stated that there is no monitoring of these Baghdad trash campaigns scheduled to take place **under the MEPP II contract** in the near future."

<u>Page 7, paragraph 2</u>: There was no IBTCI monitoring of CSP trash removal activities after mid-2007 because the Mission believed it was also necessary for IBTCI to look at the other three components of CSP and other CSP locations. In addition, in mid-2007, CSP began transitioning trash removal responsibilities in Baghdad to the Government of Iraq, a process that will be completed on June 18, 2008. The transition took longer than anticipated because of an outcry from ePRTs and military units in Baghdad, who cited security concerns if CSP did not keep the streets clean. Roadside bombs are frequently hidden under trash.

Accuracy of Monitoring

<u>Page 8</u>: While fraud may or may not have occurred under the CSP project under its trash collection campaign, the draft report makes strong statements based on military hearsay. It is not clear whether these statements were triangulated through contacts

with IRD, the implementing partner. This is important because the large-scale, highprofile CSP trash collection activities in Baghdad never covered more than about 50-60% of the city; and the targeting of those activities was highly localized. Therefore, it would be difficult to ascertain if the area in question was under CSP contract for trash removal without verification from IRD.

<u>Page 8, paragraph 4</u>: This paragraph states that "Furthermore, contractor officials indicated that they did not coordinate with military officials to verify the accuracy of those reports. We confirmed this lack of coordination with military officials through inquiry of a Program Office official." IBTCI's contract scope of work does not require verification of its reports with the military. IBTCI has its own scientifically-sound triangulation process to verify work, designed to be independent from USG influence.

Documentation of Monitoring and Evaluation Reviews Can Be Improved

<u>Page 11, paragraph 2</u>: The report states that "In response to our audit finding, this office has begun to inventory all recommendations for prioritization with the implementing partner." The technical office that manages CSP has documented its responses and follow-up plans to IBTCI monitoring reports since September 2007, before OIG/I released the CSP audit. The technical office started responding to the IBTCI monitoring reports because the staff believed that this added value to CSP.

Drafted: PRO: K. Spainhower

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Cleared:		
PRO: M. Musisi-Nkambwe	Date:	
FMO: G. Zegarac	Date:	
RLA: M. Driver	Date:	
OAA: J. Kryschtal	Date:	
A/DMD: J. Seong	Date:	

ASSESSMENT OF REPORTS

#	Report	Type of Report	Α	В	С	D	Е	F	G	н	<u> </u>
1	ICAP I Evaluation Report	Evaluation	Y	Y	Υ	Y	Y	Y	Y	Y	Y
2	Community Action Group Survey ³	Evaluation	Y	Y	n/a	n/a	N⁴	n/a	Y	n/a	Ν
3	ICSP Evaluation Report	Evaluation	Y	Y	Y	Y	Υ	Y	Y	Y	Y
4	Political Process Assistance	Evaluation	Y	Y	Y	Y	Y	Y	Y	Y	Y
5	Public Sector Capacity Building	Evaluation	Y	Y	N ⁵	Y	Y	Y	Y	Ν	Y
6	CSP Rapid Assessment	Monitoring	n/a	Y	Y	Y	Υ	n/a	n/a	Y	n/a
7	Baghdad CIES Report	Monitoring	n/a	Y	Y	Y	Y	n/a	n/a	Y	n/a
8	Kirkuk/Mosul CIES Report	Monitoring	n/a	Y	Y	Y	Υ	n/a	n/a	Y	n/a
9	Kirkuk EGY Report	Monitoring	n/a	Y	Y	Y	Y	n/a	n/a	Y	n/a
10	Consolidated PRT Report	Monitoring	n/a	n/a	n/a	n/a	Y	n/a	n/a	Y	n/a
11	Baghdad, February Report	Monitoring	Y	Y	Y	Y	Υ	n/a	n/a	Y	n/a
12	Baghdad, March Report	Monitoring	Y	Y	Y	Y	Υ	n/a	n/a	Y	n/a
13	Baghdad, April Report	Monitoring	Y	Y	Y	Y	Y	n/a	n/a	Y	n/a
14	Salah Ad Din, March Report	Monitoring	Y	Y	Y	Y	Y	n/a	n/a	Y	n/a
15	Salah Ad Din, April Report	Monitoring	Υ	Υ	n/a	n/a	Υ	n/a	n/a	Y	n/a
16	NW Region, Feb Report	Monitoring	Y	Y	Υ	Y	Υ	n/a	n/a	Y	n/a
17	NW Region, April Report	Monitoring	Y	Υ	Υ	Y	Υ	n/a	n/a	Y	n/a
18	South Central, Feb Report	Monitoring	Y	Υ	Υ	Y	Υ	n/a	n/a	Y	n/a
19	South Central, March Report	Monitoring	Y	Y	Y	Y	Y	n/a	n/a	Y	n/a
20	South Central, April Report	Monitoring	Y	Y	Y	Y	Y	n/a	n/a	Y	n/a
21	South Region, Feb Report	Monitoring	Y	Y	Y	Y	Y	n/a	n/a	Y	n/a
22	South Region March Report	Monitoring	Y	Y	Y	Y	Y	n/a	n/a	Y	n/a
23	South Region April Report	Monitoring	Y	Y	Y	Y	Y	n/a	n/a	Y	n/a

- A) Were the draft and final reports provided within the specified due dates established by USAID/Iraq?
- B) Do the report's findings and conclusions address the inquiries posed by USAID/Iraq?
- C) Are the report's recommendations connected to the findings?
- D) Are the recommendations actionable and consist of meaningful opportunities for program improvement?
- E) Is the scope and methodology documented (required for evaluations pursuant to ADS 203.3.6.6)?
- F) Are lessons learned documented (required for evaluations pursuant to ADS 203.3.6.6)?
- G) Is an executive summary included for longer reports (required for evaluations pursuant to ADS 203.3.6.6)?
- H) Does the report identify key points clearly, distinctly and succinctly?
- I) Was the report submitted to the Development Experience Clearinghouse (for evaluations)?

³ The CAG Survey was a survey that supported the efforts of the ICAP Evaluation.

⁴ The specific scope was not recorded, though through the report, it is discussed.

⁵ It was very difficult in this evaluation to trace the questions in the SOW to their answers in the report.

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