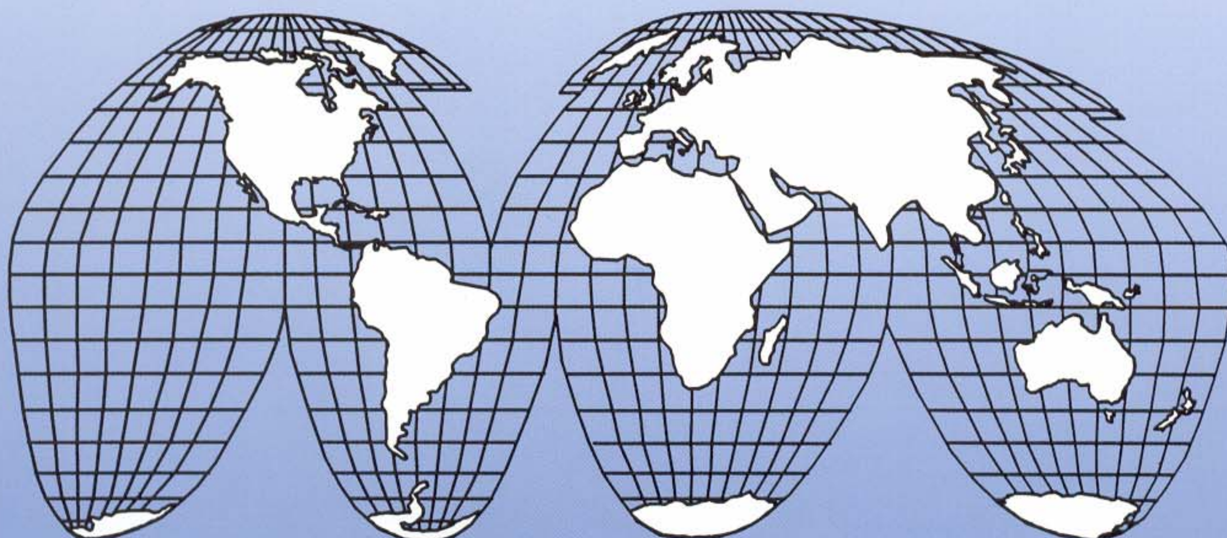
USAID

OFFICE OF INSPECTOR GENERAL

Audit of the Management of USAID/Haiti's P.L. 480 Title II Food Program

Audit Report No. 1-521-04-001-P

October 20, 2003



San Salvador, El Salvador

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October 20, 2003

MEMORANDUM

FOR: USAID/Haiti Director, David Adams

FROM: RIG/San Salvador, Steven H. Bernstein

SUBJECT: Audit of the Management of USAID/Haiti's P.L. 480 Title II Food Program (Report No. 1-521-04-001-P)

This memorandum transmits our final report on the subject audit.

Your comments on the draft report were considered in preparing this report and are included for your reference in Appendix II.

This report contains four recommendations for your action. A management decision has been reached for all four recommendations. The Office of Management Planning and Innovation will make a determination of final action after the recommendations have been implemented.

Once again, thank you for the cooperation and courtesy extended to my staff during the audit.

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Summary of Results

At the request of USAID/Haiti, the Regional Inspector General/San Salvador added this audit to its fiscal year 2003 audit plan to determine whether USAID/Haiti's P.L. 480 Title II food programs were managed in an efficient manner in accordance with Regulation 11 of the U.S. Code of Federal Regulations and best practices for managing food distribution programs. The audit covered the costs associated with managing and implementing the program (page 7).

USAID/Haiti's P.L. 480 Title II food programs were generally being managed in an efficient manner in accordance with Regulation 11 of the U.S. Code of Federal Regulations and best practices for managing food distribution programs. The audit showed that the four cooperating sponsors did comply with the basic guidance outlined in Regulation 11 and, in addition, utilized two joint and three individual practices that have made the program more efficient as well as reduced costs. However, the audit identified four areas where improvements in management should be implemented to reduce cost inefficiencies.

- A management survey is needed to determine proper levels of staffing (page 9).
- A cost analysis of commodity transport needs to be performed (page 10).
- Food storage and distribution costs need to be reviewed (page 11).
- Increased cooperation and coordination is needed among the four cooperating sponsors (page 13).

We are making four recommendations that will help USAID/Haiti improve the management costs of the P.L. 480 Title II food program (pages 10-13).

USAID/Haiti concurred with four of the report's findings and recommendations identified in the draft audit report and management decisions were made on the four recommendations. RIG/San Salvador deleted Recommendation No. 2 as discussed in the draft audit report and renumbered findings three, four and five accordingly.

Background

P.L. 480 Title II food assistance has been provided to Haiti since the late 1950s. Due to inadequate access to, availability of, and utilization of food for more than half of the Haitian population, Haiti remains the most food-insecure nation in the Western Hemisphere. This situation, coupled with over 16 years of political instability and consequent economic deterioration, has translated into chronic food insecurity characterized by poverty and resulting in poor health, diminished agricultural productivity, and poor educational support.

In fiscal year 2002, the Mission underwent an intensive evaluation process with its partners and stakeholders to identify the best uses for Title II food aid as a development tool. As a result, the "Reduced Food Insecurity in Target Population Activity" was authorized in September 2002 for a period of four years. The desired goal of the Title II food program is to reduce food insecurity in target populations. Over this four-year period, these programs are funded with direct Mission grants of $17 million, $62 million in proceeds from monetized Title II commodities,[1] and approximately $19 million in food aid commodities provided directly to eligible beneficiaries.

Utilizing this food and funding, four USAID partners referred to as "cooperating sponsors"–Catholic Relief Services (CRS), Cooperative for Assistance and Relief Everywhere (CARE), World Vision International (WVI), and Save the Children Federation (SCF)–implement their individual programs, which include the following types of activities:

- Mother/Child Health activities include distributing dry rations to pregnant women, breastfeeding mothers, children, and/or caretakers of moderately and severely malnourished children.

- Agriculture activities include teaching new farming techniques such as grafting trees and land erosion measures.

- Food for Work activities include drainage/sanitation projects in urban slum areas and road construction projects in rural areas.

- Education activities include ensuring student attendance and improved scholastic achievement and school feeding.

- Income-generating activities include extending credit to women.

[1] Some development food aid is monetized, or sold, on private markets, with the proceeds used by the cooperating sponsors to fund development activities.

Figure 1 summarizes the unaudited direct Mission grant funding, monetization, and food aid budgeted for fiscal year 2003.

Figure 1

Cooperating Sponsor	Direct Mission Funding	Monetization Proceeds	Directly Provided Food Aid	Total
CRS	$1,450,000	$2,567,001	$1,582,000	$5,599,001
CARE	1,000,000	3,912,271	985,000	5,897,271
WVI	500,000	3,847,901	1,397,300	5,745,201
SCF	650,000	1,549,401	1,218,100	3,417,501
Total	**$3,600,000**	**$11,876,574**	**$5,182,400**	**$20,658,974**

In the request for this audit, USAID/Haiti noted that Haiti's poor transportation infrastructure, high salary levels, and unavailability of trained local workers are some of the factors contributing to what appears to be a very costly Title II program. Of concern was the apparently high administrative and management costs and the use of direct Mission funding. Specifically, the monetized funding is used to implement program activities, absorb administrative costs, and pay for logistics and staff salaries.

Audit Objective

In March 2003, USAID/Haiti requested an audit of its P.L. 480 Title II food program. As a result, the Regional Inspector General/San Salvador added this audit to its fiscal year 2003 audit plan to answer the following question:

- Are USAID/Haiti's P.L. 480 Title II programs managed in an efficient manner in accordance with Regulation 11 of the U.S. Code of Federal Regulations and best practices for managing food distribution programs?

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

Audit Findings

Are USAID/Haiti's P.L. 480 Title II programs managed in an efficient manner in accordance with Regulation 11 of the U.S. Code of Federal Regulations and best practices for managing food distribution programs?

USAID/Haiti's P.L. 480 Title II food programs were generally managed in an efficient manner in accordance with Regulation 11 of the U.S. Code of Federal Regulations and best practices for managing food distribution programs. Although we identified some inefficiencies in management, the audit showed that the four cooperating sponsors (Catholic Relief Services (CRS), Cooperative for Assistance and Relief Everywhere (CARE), World Vision International (WVI), and Save the Children Federation (SCF)) did comply with the basic guidance outlined in Regulation 11 of the U.S. Code of Federal Regulations and that there were practices used by the four cooperating sponsors to increase management efficiencies and to reduce costs.

The audit confirmed the following:

- The cooperating sponsors had properly executed authorization agreements and operational plans with USAID to implement a food program.

- A bilateral agreement with the Government of Haiti had been signed.

- All four cooperating sponsors were subject to the Mission's annual review of transactions as well as their own annual OMB Circular A-133 audit for programs expending more than $300,000 in a program year.

- Commodity shipments were verified through the Government of Haiti's office responsible for receipt and distribution of monetization proceeds.

- The four cooperating sponsors had established procurement procedures both locally and in concert with their headquarter offices.

In addition, the cooperating sponsors utilized two joint and three individual practices, which have made the program more efficient as well as reduced costs.

- The warehouse in Port-au-Prince shared by CRS, WVI, and SCF was well managed, clean, and secure.

- The cooperating sponsors had mechanisms in place to "borrow" commodities from one another to avoid food aid shortages in a cooperating sponsor's area.

- As a result of hard bargaining by its staff, CRS negotiated a transport contract for shipping commodities from Port-au-Prince to Les Cayes for $21 per metric ton, which, according to the commodity manager, was substantially lower than even its own fleet of trucks could match.

- CRS developed a schematic to depict Haitian common commodity measurements, such as Coca-Cola bottles, for distributing vegetable oil. This schematic minimized confusion on the part of both the client and the distributor regarding exact food allocations.

- CARE sent two of its personnel for training in clearing goods through Haitian customs. CARE management stated that this training had been a great help in expediting commodities through customs.

In the following four areas, however, improvements in management should be implemented to reduce cost inefficiencies.

A Management Survey is Needed to Determine Proper Levels of Staffing

Figure 2 reflects the current personnel the four cooperating sponsors have charged against their activities under the P.L. 480 Title II food program.

Figure 2

Cooperating Sponsor	Local Personnel*	Expatriates*	Total
CRS	170	7	177
CARE	299	7	306
WVI	179	6	185
SCF [2]	200	4	204
Total	**848**	**24**	**872**

* Includes full-time and part-time equivalent positions of the cooperating sponsors and their local partners.

All the cooperating sponsors maintained that their programs were labor intensive, and two of the four stated that due to budget reductions their staffing levels had been reduced from the levels of the 1990s. Mission and cooperating sponsor personnel maintained that their current program's increased emphasis on health, agriculture, and education required large numbers of personnel to implement. However, variances existed in the staffing of several offices. For example, three of the cooperating sponsors had between three to five personnel in the controller's office, while one cooperating sponsor had 17 people. Human resource offices varied between three and five personnel, but the number of people directly managed by these offices varied between 177 and 306 personnel. As shown in figure 3, personnel costs comprised from 48 to 73 percent of the unaudited fiscal year 2003 local operating budgets.

[2] SCF had no previous P.L. 480 Title II Food Program experience in Haiti. As a result, SCF executed an implementation agreement with two local partners.

Figure 3

Cooperating Sponsor	FY 2003 Local Operating Budget	FY 2003 Local Personnel Budget	Percentage of Personnel Budget to Operating Budget
CRS	$4,017,001	$1,916,117	48%
CARE	4,912,271	3,609,494	73%
WVI	4,347,901	2,561,580	59%
SCF*	2,199,401	1,220,323	56%

* Includes local partners' personnel costs.

Such large personnel costs reduce the amount of available resources that can be used for other operational costs incurred in the implementation of the program. Regulation 11 of the U.S. Code of Federal Regulations states that "cooperating sponsors shall provide adequate supervisory personnel for the efficient operation of the program." OMB Circular A-122, Attachment A, states that "a cost is reasonable if, in its nature or amount, it does not exceed that which would have been incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur costs."

Since none of the cooperating sponsors had performed reviews to determine the number of personnel required to effectively complete the operational or administrative support tasks, it seems prudent that a personnel management survey be performed to determine the proper levels of staffing required by each cooperating sponsor. Significant cost savings could result from this survey. Consequently, we are making the following recommendation.

> **Recommendation No. 1: We recommend that USAID/Haiti conduct a personnel management survey of the four cooperating sponsors to determine the most efficient level of staffing.**

A Cost Analysis of Commodity Transport Needs to be Performed

Two cooperating sponsors maintain in-house overland transportation capability for transporting commodities to their areas of operation, including trucks, dispatchers, mechanics, drivers, and a garage. The other two cooperating sponsors rely solely on transport contracts. The two which maintained in-house transport capability also had supplementary transport contracts, which both commodity managers agreed were cheaper than using their in-house transport. One commodity manager cited an informal analysis which showed in-house transport costs of $70 per metric ton of food versus the contract carrier price of $47 per metric ton. The other commodity manager was not able to give specific figures for in-house transport, but had contracted transport for $21 per metric ton to their area of operations. In addition, for all four cooperating sponsors, the contract carrier price ranged from $14 to $74 per metric ton of food, depending on the contract carrier and location. The commodity managers who maintained in-house transport capability cited reliability and security as the reasons for not contracting out all transportation requirements, even though they stated they had experienced no problems with the contract transport.

OMB Circular A-122, Attachment A, states that "a cost is reasonable if, in its nature or amount, it does not exceed that which would have been incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur costs." Nevertheless, no formal review had been undertaken by the two cooperating sponsors with in-house transport capability to determine which method was most cost effective. Further, the cooperating sponsors had not addressed the possibility of a joint transport contract or contracts to take advantage of the economies of scale. A review to determine the most economical method of commodity transport could result in cost savings to the program. Consequently, we are making the following recommendation.

Recommendation No. 2: We recommend that USAID/Haiti (a) coordinate a cost analysis to determine the most cost-effective method of transporting commodities, and (b) coordinate the negotiation of a joint transport contract or contracts by the four cooperating sponsors.

Food Storage and Distribution Costs Need to be Reviewed

Food storage and distribution in Haiti is extremely expensive given the number of personnel required to staff even a small warehouse, plus rental and maintenance costs. In one instance, a subrecipient maintained 11 separate commodity warehouses whose personnel costs alone ranged from $17,000 to $34,000 per warehouse per year. To illustrate costs of commodities requiring warehousing and distributing, Figure 4 summarizes the unaudited budgeted food aid for fiscal year 2003 through fiscal year 2006.

Figure 4

Cooperating Sponsor	FY 2003	FY 2004	FY 2005	FY 2006
CRS	$1,582,000	$1,598,400	$1,659,800	$1,648,600
CARE	985,000	1,129,000	1,049,300	1,217,300
WVI	1,397,300	1,507,300	1,451,500	1,250,100
SCF	1,218,100	630,800	683,800	656,200

The cooperating sponsors stated that each of their programs focused on different areas such as education, agriculture, and health. In some instances, the cost of personnel involved in food storage and distribution were partially imbedded in these areas. Figure 5, provided by the cooperating sponsors, compares the unaudited budgeted food storage and local distribution costs with the estimated food aid commodity costs for FY 2003.

Figure 5

Cooperating Sponsor	Food Aid	Cost of Storage & Distribution*	Cost of Storage and Distribution per $1.00 of Food Aid
CRS	$1,582,000	$407,950	$0.26
CARE **	985,000	231,860	$0.24
WVI	1,397,300	925,308	$0.66
SCF***	1,218,100	790,795	$0.66

* Does not include ocean freight or transport costs to distribution centers.
** Unable to distinguish distribution personnel from overall program personnel.
*** Includes subgrantees.

The costs to store and distribute food illustrate the disparity among the cooperating sponsors. As stated previously, OMB Circular A-122, Attachment A, states, "a cost is reasonable if, in its nature or amount, it does not exceed that which would have been incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur costs." Since no overall review of the food distribution system for Haiti has been undertaken, costs to store and distribute food could be substantially higher than necessary. While the four cooperating sponsors operate in different areas of the country, it is not clear why the cost of distribution and storage of food varies so greatly among them. The Mission needs to coordinate a countrywide review of the management, storage, and distribution systems to determine whether a duplication of effort exists and whether storage and distribution operations could be consolidated.

Recommendation No. 3: We recommend that USAID/Haiti coordinate a review of the four cooperating sponsors' commodity management systems to determine whether duplicate activities exist and whether storage and distribution operations could be consolidated.

Increased Cooperation and Coordination is Needed Among the Four Cooperating Sponsors

The four cooperating sponsors did cooperate among themselves on a limited basis. Some good examples include WVI, CRS, and SCF sharing a joint warehouse in Port-au-Prince and the cooperating sponsors sharing food aid to avoid shortages. Each cooperating sponsor maintains a fully staffed headquarters in Port-au-Prince with the commonality of functions that such an operation entails. The Mission and four cooperating sponsors conducted regular meetings to discuss programmatic issues. However, while there was general discussion of joint coordination of program activities to avoid duplication of effort, no specific agenda or plan was set for formal coordination, especially as related to administrative issues, such as transport, food storage, personnel, and administrative maintenance that were previously discussed throughout the report. As a result, costs in these areas could be substantially higher than necessary. As stated in USAID Automated Directives System (ADS) 200, the declining development assistance resources worldwide increase the need for effective donor coordination. A review of commonality of functions for potential consolidation in the various areas of the program to avoid duplication of effort and take advantage of economies and efficiencies of scale could net further cost savings. Consequently, we are making the following recommendation.

Recommendation No. 4: We recommend that USAID/Haiti develop a plan with the cooperating sponsors to coordinate program activities to avoid duplication of effort and take advantage of economies and efficiencies of scale.

Management Comments and Our Evaluation

In response to the draft report, USAID/Haiti presented steps being taken to address the four recommendations. Consequently, management decisions were made on all four recommendations. RIG/San Salvador deleted Recommendation No. 2 as discussed in the draft audit report and renumbered findings three, four and five accordingly. The Mission provided additional information on the budgeted value of food aid and their costs of food distribution and storage. After verification, these figures have been updated to reflect the Mission's input. Mission comments are included in their entirety in Appendix II.

Scope and Methodology

Scope

The Regional Inspector General/San Salvador conducted an audit of the management of USAID/Haiti's P.L. 480 Title II food program. The audit was performed in accordance with generally accepted government auditing standards to determine if USAID/Haiti's P.L. 480 Title II programs were managed in an efficient manner in accordance with Regulation 11 of the U.S. Code of Federal Regulations and best practices for managing food distribution programs. The audit covered the period from September 16, 2002 through May 31, 2003.

We conducted the audit in Haiti from May 27, 2003 to June 18, 2003 at the offices of USAID/Haiti, Catholic Relief Services (CRS), Cooperative for Assistance and Relief Everywhere (CARE), World Vision International (WVI), and Save the Children Federation (SCF). We also visited the P.L. 480 Title III Office of the Government of Haiti and the joint commodities warehouse in Port-au-Prince, Haiti.

In planning and performing the audit, we obtained an understanding of management controls related to the program. We assessed the Mission's risk exposure and control effectiveness over the P.L. 480 Title II food program management and administrative costs. We conducted interviews with key USAID/Haiti personnel and reviewed the Mission's fiscal year 2002 annual self-assessment of its compliance with the Federal Manager's Financial Integrity Act of 1982. In addition, we reviewed the Mission Controller Office's internal assessments of the four cooperating sponsors operating procedures and costs.

We assessed the cooperating sponsors' control procedures and processes for personnel management, procurement, and commodity management, including transportation procedures for commodities and monetization procedures as they related to program expenditures.

We reviewed 100 percent of program operating expenses, monetization and direct income, all capital equipment procurements, payrolls against employee rosters and locations, and all transportation contracts (except CRS), warehouse contracts, and other rental contracts for the period October 1, 2002 through March 31, 2003. However, we did not audit the budgeted figures. In addition, we considered prior audit findings that could affect Haiti's P.L. Title II food program.

Methodology

To answer the audit objective, we conducted interviews with the responsible officials and reviewed relevant documentation maintained by

USAID/Haiti, the P.L. 480 Title III Office of the Government of Haiti, USAID/Haiti's four cooperating sponsors, and the joint commodities warehouse in Port-au-Prince.

We reviewed the Development Activity Program agreements for each cooperating sponsor, internal reviews conducted by the Mission, prior audit findings, Regulation 11 of the U.S. Code of Federal Regulations, OMB Circular A-122, U.S. Government Auditing Standards, and research found on the Internet to determine best practices used by food program implementers.

With respect to financial data, we examined:

1. Detailed budgets of the four cooperating sponsors for fiscal year 2003 to determine if any significant reprogramming had to be made by any of the cooperating sponsors.

2. The income of the four cooperating sponsors consisting of direct grant funding from the Mission and monetization proceeds.

3. Expenses focusing on payroll, procurement and commodity management, storage, and transport.

With respect to the income, we verified the monetization proceeds by confirming amounts with the Haitian government and the checks issued to the cooperating sponsors in payment for the shipments of commodities which were monetized.

In examining the payroll area, we verified the numbers of personnel utilized to implement the program and salaries and benefits being charged against the program. Then we compared the size of each organization to determine if any large variances existed in functional areas. We verified that no management assessment of staffing levels had been conducted by any of the four cooperating sponsors.

In examining procurements, we identified procurement thresholds and confirmed whether the cooperating sponsors were securing procurements in accordance with their policies and procedures. We targeted large-ticket items such as vehicle purchases and computers.

For commodity management, which encompasses storage, transport, and distribution, we reviewed the warehouse contracts, transportation contracts, and local distribution of commodities. We verified that there had been no countrywide review of the commodity distribution system. For transportation of commodities, we obtained transport contracts for three of the four cooperating sponsors. We reviewed in-house transport capability and costs and verified that there had been no cost analysis undertaken to determine the most cost-efficient method of transporting commodities.

We calculated the actual cost of operating the program for each cooperating sponsor for the period October 1, 2002 to March 31, 2003. We then determined each cooperating sponsors' per capita cost per client and the cost per kilogram of commodities distributed for both that period and the estimated cost for the entire fiscal year. These costs were compared to determine if any significant cost variances existed among the programs of the cooperating sponsors.

Finally, we conducted a site visit to the Schodescosa commodity warehouse in Port-au-Prince, Haiti, jointly maintained by three of the four cooperating sponsors, to observe if the warehouse was being run in a clean, efficient, and cost-effective manner. We were not able to visit the main warehouse maintained by the fourth cooperating sponsor due to security concerns.

In answering the audit objective, we concluded that given the nature of our audit objective, it was more efficient to evaluate administrative and management costs to determine if cost savings could be achieved through economies and efficiencies. Consequently, we did not establish a materiality threshold in our audit program or determine if questioned costs existed.

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Management Comments

UNITED STATES GOVERNMENT

MEMORANDUM

DATE: October 2, 2003

REPLY TO ATTN OF: David Adams
USAID/Haiti Mission Director

SUBJECT: Comments on the RIG Draft Audit Report No.1-521-04-XXX-P

TO: Steven H. Bernstein
RIG/San Salvador

This memorandum constitutes USAID/Haiti's response to the RIG Draft Audit Report of the Management of USAID/Haiti's PL 480 Title II program.

General Comments:

USAID/Haiti appreciates the time and effort of your staff in carrying out the performance audit of the PL 480 Title II program. After completing its review of the Draft Audit Report, in collaboration with the Cooperating Sponsors, the Mission has some specific comments to make regarding the draft audit report. Based on the Cooperating Sponsors' inputs, the Mission would like RIG to make some factual corrections in the following pages:

Page 6: - the actual funding level for CARE is $1,000,000 not $1,200,000;
- the current level of food aid provided though World Vision is $3,062,900 not $1,397,300.

Page 9: table 2, the total personnel for World Vision is 184, 179 local staff and 5 Expatriates.

Page12: table 5, the costs of food aid and storage for both World Vision and Save the Children are respectively $3,062,900 and $925,308 for the first one and $1,467,404 and $790,795 for the latter. Therefore the cost of storage and distribution per $1.00 of Food Aid is $0.30 for World Vision and $0.54 for Save the Children.

Appendix II

Summary of audit recommendations:

Recommendation No 1: We recommend that USAID/Haiti conduct a personnel management survey of the four cooperating sponsors to determine the most efficient level of staffing.

Recommendation No. 2: We recommend that USAID/Haiti coordinate the creation of a joint intern training program among the cooperating sponsors.

Recommendation No 3: We recommend that USAID/Haiti (a) coordinate a cost analysis to determine the most cost-effective method of transporting commodities and (b) coordinate the negotiation of a joint transport contract or contracts by the four cooperating sponsors.

Recommendation No. 4: We recommend that USAID/Haiti coordinate a review of the four cooperating sponsors' commodity management systems to determine whether duplicate activities exist and whether storage and distribution operations could be consolidated.

Recommendation No. 5: We recommend that USAID/Haiti develop a plan with the cooperating sponsors to coordinate program activities to avoid duplication of effort and take advantage of economics and efficiencies of scale.

Management Response:

1. Recommendations No.1, No.3, No.4, No.5: Regarding the recommendations mentioned above, USAID/Haiti will contract out with a consulting firm experienced in PL 480 Title II management to perform the following tasks:
   - to conduct a personnel management survey,
   - to perform a cost analysis of commodity transport,
   - to review food storage and distribution costs, and
   - to develop a coordination plan for program activities.

USAID/Haiti, based upon actions planned to address recommendations No.1, No. 3, No. 4, and No. 5, is requesting that RIG consider management decisions have been reached for these 4 recommendations. USAID/Haiti will request to closure of these recommendations to M/MPI upon submission of the final report by the consulting firm.

2. Recommendation No.2: The current socio-economic environment in Haiti has had a negative impact on the Haitian labor force. Many qualified professionals have left the country in search of better opportunities abroad. As mentioned in page 3 of Frontlines for the months of July/August 2003 "Haitians will continue to leave their homeland until some hope of a better life can be assured and political obstacles to aid, investment, and economic growth can be resolved". Availability of qualified staff in Haiti

is not an issue we believe can be addressed by the creation of a joint intern training program. This is a broader issue which will require political and socio-economic changes before significant improvement in this area can be achieved.

USAID/Haiti in consultation with the cooperating sponsors will continue efforts to identify programs which could be implemented to foster an improved environment with regard to staff development and retention. However, we do not believe implementation of recommendation number 2 as stated in the draft audit report will address the root cause of the problem and will therefore not have the impact required to ensure qualified local personnel are available in Haiti at the salary levels offered by the cooperating sponsors.

Therefore, USAID/Haiti requests that RIG/San Salvador delete this recommendation prior to issuance of the final audit report.

In closing, USAID/Haiti would again like to express its appreciation for the manner in which the audit was conducted and the usefulness of the recommendations contained therein. It is our opinion that implementation of these recommendations will result in the more efficient management of the USAID/Haiti food distribution programs.