

# USAID

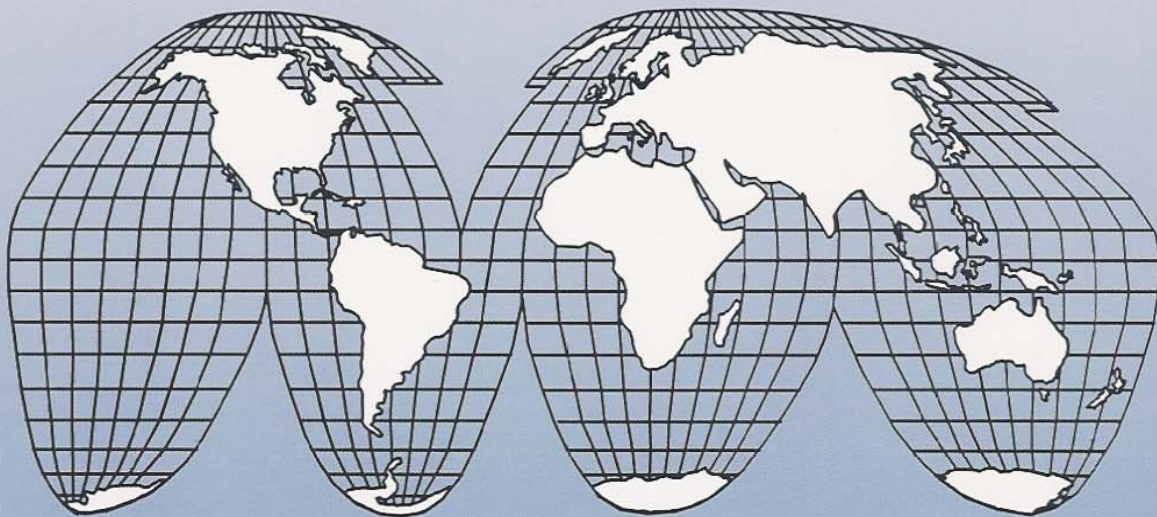
## OFFICE OF INSPECTOR GENERAL

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### **Audit of the Sustainable Economic Policy and Institutional Reform Support (SEPIRS) Program at USAID/Afghanistan**

**Report No. 5-306-04-005-P**

**August 17, 2004**



**Manila, Philippines**



August 17, 2004

## MEMORANDUM

**FOR:** USAID/Afghanistan Mission Director, Patrick C. Fine

**FROM:** Acting Regional Inspector General/Manila, George R. Jiron Jr.  
/ s /

**SUBJECT:** Audit of the Sustainable Economic Policy and Institutional Reform Support (SEPIRS) Program at USAID/Afghanistan  
(Report No. 5-306-04-005-P)

This memorandum is our final report on the subject audit. In finalizing the report, we considered your comments on the draft report, and we have included the comments (without attachments) in Appendix II. This report includes one recommendation. Based on the information provided by the Mission in response to the draft report, we consider that final action has been taken on the recommendation upon issuance of this report.

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

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**Summary of Results**

The Regional Inspector General/Manila conducted this audit to determine whether USAID/Afghanistan’s economic governance activities are on schedule to achieve planned outputs (page 6).

We could not determine whether the Sustainable Economic Policy and Institutional Reform Support (SEPIRS) program—USAID/Afghanistan’s economic governance program—is on schedule to achieve planned outputs because there was no current workplan for the program that contained expected accomplishments and milestones against which to measure progress (pages 7 and 8). This occurred because USAID/Afghanistan did not require the contractor implementing the SEPIRS program to prepare quarterly workplans, even though such workplans were required under the SEPIRS contract (page 8). However, we found that progress was being made and USAID/Afghanistan monitored the program in other ways (page 7).

So that it can fully monitor the progress and accomplishments of the SEPIRS program, this report is recommending that USAID/Afghanistan require the contractor to submit to USAID/Afghanistan for approval quarterly workplan reports that contain expected accomplishments as well as milestones (page 12).

USAID/Afghanistan generally agreed with the recommendation and it provided evidence of corrective actions. Based on that evidence, we consider that final action has been taken on the recommendation (page 13).

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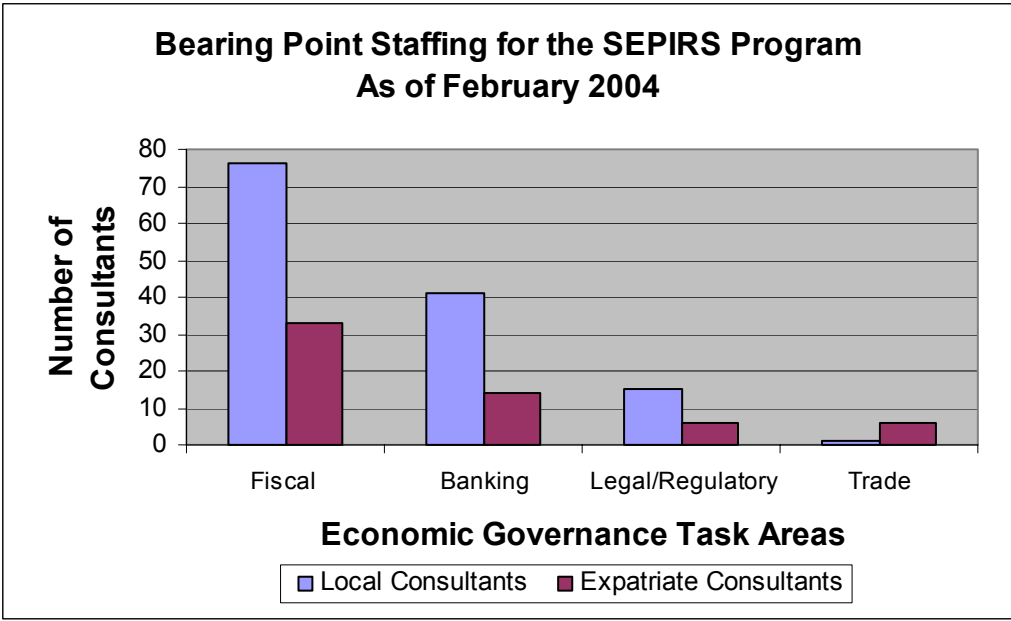
**Background**

Afghanistan is beginning the slow process of rebuilding from twenty years of conflict and disinvestments. Key institutions such as a central bank, treasury, customs and judiciary are weak or missing. The leadership of Afghanistan is trying to regain its national footing and establish political and economic stability. To help establish economic stability, USAID/Afghanistan began implementing economic governance activities through its Sustainable Economic Policy and Institutional Reform Support (SEPIRS) program. The purpose of the SEPIRS program is to assist the Transitional Afghan Authority in implementing and institutionalizing reforms to improve economic management and develop institutions for economic governance. More specifically, the SEPIRS program targets five economic governance areas for reform: fiscal, banking, legal/regulatory, trade, and privatization.

In December 2002, USAID/Afghanistan awarded a contract to Bearing Point to carry out the SEPIRS program. Bearing Point uses expatriate and local consultants to provide technical assistance to various ministries of the Transitional Afghan Authority. For example, under “fiscal reform”, consultants work with the Ministry of Finance on activities such as establishing an efficient tax administration system and a budget planning and reporting system. “Banking reform” includes not only strengthening the Central Bank but also working with it

on activities such as licensing and regulating banks, and maintaining a stable currency. “Legal/regulatory reform” includes activities such as the drafting and passing of laws governing banking, taxation, property and natural resources. Under “trade reform”, consultants provide technical assistance to the Ministry of Commerce on activities such as entering the World Trade Organization, developing exports and organizing women entrepreneurs. At the time of our audit fieldwork, “privatization reform” activities had been postponed.

The SEPIRS program has a three-year base period and a current life-of-project estimated cost of \$96 million. As the chart below illustrates, as of February 2004 Bearing Point had 192 consultants working on the program—mostly in the areas of fiscal, banking and legal/regulatory reforms. As of April 30, 2004, Bearing Point had spent \$28.2 million on reforms in these three areas. Because most of the SEPIRS program’s resources were being applied to the three areas, we focused our audit on them. The audit of the USAID/Afghanistan’s SEPIRS program covered the period from January 2003 to April 2004.



**Audit Objective**

The Regional Inspector General/Manila included this audit in its fiscal year 2004 audit plan to answer the following question:

Are USAID/Afghanistan’s economic governance activities on schedule to achieve planned outputs?

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

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**Audit Findings**

We could not determine whether the Sustainable Economic Policy and Institutional Reform Support (SEPIRS) program—USAID/Afghanistan’s economic governance program—was on schedule to achieve planned outputs because there was no current workplan for the program that contained expected accomplishments and milestones against which to measure progress. Bearing Point did not prepare such workplans on a quarterly basis as it was required to do under its contract, and USAID/Afghanistan did not require Bearing Point to provide the contractually-mandated workplans.

Although we were unable to determine whether the SEPIRS program is on schedule to achieve planned outputs, Bearing Point had made progress with regard to numerous responsibilities mentioned in its contract. The progress included:

- Developing a system to estimate government revenues and expenditures.
- Designing a “large taxpayer” unit to ensure that taxes are collected from such taxpayers.
- Introducing a taxpayer identification number system.
- Developing a computerized database for customs revenues.
- Creating and implementing a budget system at the national and provincial levels.
- Training Afghans to develop and monitor budgets.
- Creating a system to allocate equitably monies received from donors to provide public services.
- Assisting the Afghan Central Bank to establish national and international operations via standard banking telecommunications networks.
- Helping to develop criteria for the entry of new banks into the commercial banking system in Afghanistan.
- Assessing bank supervision in Afghanistan and implementing bank licensing policies and procedures.

Although USAID/Afghanistan did not obtain quarterly workplans from the contractor (only two such workplans were done since contract inception and both were outdated), the Mission did attempt to monitor the program in various ways. At the time our audit started (March 8, 2004), the Mission’s current Cognizant Technical Officer (CTO) was working with Bearing Point and with officials from



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the Transitional Afghan Authority to improve the monitoring of the SEPIRS program.<sup>1</sup> Specifically, the CTO was revising the contractor’s overall scope of work, helping to prepare an up-to-date workplan, and developing performance indicators—tasks he undertook since he arrived in Kabul in September 2003. He was making these changes in part because the Transitional Afghan Authority had complained about its lack of influence regarding activities carried out under the SEPIRS program. In addition to the above activities, the CTO and other Mission officials attempted to monitor the SEPIRS program by:

- Reviewing consultants’ scopes of work.
- Monitoring consultants’ deliverables and outputs.
- Tracking the program’s budget and expenditures.
- Examining invoices submitted by Bearing Point.
- Cultivating relationships with the contractor and the Transitional Afghan Authority.
- Meeting weekly with contractor staff.

However, as the following discussion explains, to fully monitor progress and accomplishments, the Mission needs to obtain from Bearing Point a current workplan for the SEPIRS program that contains expected accomplishments and milestones.

### **Mission Should Obtain Quarterly Workplans from the Contractor**

Summary: The contract for USAID/Afghanistan’s economic governance program requires Bearing Point to prepare quarterly workplans, including expected accomplishments and milestones for measuring the program’s progress. However, Bearing Point did not prepare workplans on a quarterly basis. Only two such workplans were done since January 2003, and both were outdated—and neither included milestones for the expected accomplishments. The Mission did not require the contractor to provide such workplans because of understaffing and because the program was supposed to be “flexible by design.” Consequently, a comprehensive, up-to-date list of activities and milestones to measure the program’s progress was not available, making it difficult to properly monitor this complex program.

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<sup>1</sup> According to USAID’s Automated Directives System Glossary, a Cognizant Technical Officer is the individual who performs functions that are designated by the Contracting or Agreement Officer, or is specifically designated by policy or regulation as part of contract or assistance administration.

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The contract for USAID/Afghanistan’s economic governance program requires Bearing Point to prepare workplans, including expected accomplishments and milestones. Specifically, the contract says that “The contractor shall prepare detailed quarterly reports which elucidate expected accomplishments in each major project component.”<sup>2</sup> In addition, the contract states that “the actual ‘milestones’ for the contract will be articulated in the approved workplan.”<sup>3</sup> Further, the contract requires the contractor to submit all quarterly workplans to USAID/Afghanistan for approval. According to USAID’s Automated Directives System, a milestone is “a type of indicator that measures progress toward a desired outcome by dividing the progress into a series of defined steps.”<sup>4</sup>

However, USAID/Afghanistan did not obtain quarterly workplans with milestones for expected accomplishments from Bearing Point. According to the contract, workplans should have been prepared quarterly, beginning in January 2003. By March 31, 2004, Bearing Point should have prepared a total of six workplans. However, the contractor had prepared only two: one in January 2003 and another in July 2003. A third was in draft on March 31, 2004, but consisted primarily of a series of some 60 workplans for individual expatriate consultants. Neither of the first two workplans were ever approved by USAID/Afghanistan. In addition, although these two workplans included a column labeled “Deliverables/Results,” the expected accomplishments listed in the column were vaguely worded and did not include milestones to measure progress.

Moreover, the current draft workplan had the same problems as the two earlier ones: (1) no clear expected accomplishments, and (2) no milestones that divided expected progress into a series of defined steps. Instead, the draft workplan consisted of a collection of individual workplans for each of the approximately 60 expatriate consultants that Bearing Point currently had on board—individual workplans that had not been condensed into a finalized workplan. Further, the related performance indicators for these consultants were also a work in progress.

In addition, the individual draft workplans did not always reflect activities that were actually underway. Based on interviews with 11 Bearing Point expatriate consultants, and reviews of their draft workplans, 5 of the 11 were found to be performing at least one significant activity that was not included in their workplans. In addition, 3 of the 11 were found not to be performing at least one significant activity that was included in their workplans. Furthermore, of the 28 activities tested for these 11 consultants, 27 activities had vague or missing expected accomplishments and none of the 28 had established milestones for achieving the expected accomplishments.

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<sup>2</sup> Bearing Point Contract, section C.3.2.

<sup>3</sup> Bearing Point Contract, section C.2.3.

<sup>4</sup> Automated Directives System 203.3.4.1, Milestone Indicator.

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Examples of these exceptions are discussed below and are grouped by the three task areas covered in this audit:

### **Fiscal Task Area**

- One Bearing Point consultant explained that one of his goals (expected accomplishments) was to reduce the number of “administrative requirements” in the customs process, and that he was using an indicator which he described as “administrative requirements before and after customs reforms;” however, his draft workplan does not mention this goal or this indicator.
- A second consultant indicated he was attempting to measure unreported tax revenue (e.g., revenue collected by officials in the provinces but not provided to the Transitional Afghan Authority), but the activity was not in his draft workplan.
- A third consultant was training tax collectors, even though the expected result for the number of employees trained was not in his draft workplan.
- A fourth consultant indicated he was working to issue Taxpayer Identification Numbers, even though this activity and the expected result were not included in his draft workplan.

### **Banking Task Area**

- One Bearing Point consultant was working to maintain a stable currency exchange rate and a single-digit rate of inflation, but these activities and expected accomplishments were not included in his draft workplan.
- The same consultant was working in the area of economic growth, attempting to achieve double-digit annual increases in the gross domestic product. This activity and the expected result were not mentioned in his draft workplan.
- Another consultant was working to implement a bank money transfer system (as opposed to the informal unregulated system, known as the *hawala*, in wide use), but the purported goal, an unspecified number of successful money transfers, was not documented in his draft workplan.
- A third consultant, working in the area of bank supervision and licensing, identified numerous goals for activities in this area, but the expected results of these activities were not documented in his draft workplan.



Photograph of currency traders, referred to as the *hawala*, who operate in an informal, unregulated setting. These traders also provide services such as money transfers. (Kabul, Afghanistan, March 2004)

### **Legal/Regulatory Task Area**

- The draft workplan did not include the name of one of the two consultants involved in the Telecommunications Sector Reform activity, and the expected results of this activity were not discussed in the draft workplan.

To summarize: quarterly workplans were not done as required and milestones for expected accomplishments were not included in the two workplans that were done—nor were they included in draft workplans for individual consultants. In addition, the expected accomplishments in the two workplans and in the draft workplans were vaguely defined and difficult to measure without milestones. And finally some consultants were not doing activities that were specified in their individual draft workplans, while others were engaged in activities not included in their individual draft workplans.

Quarterly workplans with milestones were not done because the Mission did not require Bearing Point to produce quarterly workplans as required by the SEPIRS contract. Two factors contributed to the Mission not enforcing this contract requirement: Mission understaffing and the “flexible design” of the program. The Mission indicated in its Federal Managers’ Financial Integrity Act submission for the year ended September 30, 2003 that it was understaffed. The Deputy Mission Director explained that they did not have adequate time to properly review workplans. However, understaffing is no longer as serious a problem as it was at

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the inception of the program when the Deputy Mission Director had to serve as the CTO for the program, along with his many other duties.

Further, Mission officials indicated that the SEPIRS program is flexible by design, and has been in flux from its inception. Even the contract itself is very flexible in nature. It provides lists of general contractor “responsibilities” in each of the program's five reform areas but does not specifically set forth expected accomplishments and milestones. Instead, the contract relies on quarterly workplans to do that, so as to provide a certain flexibility and responsiveness for the program.

This flexibility is also mirrored in the program’s funding which increased dramatically, from \$40 million in January 2003 to \$96 million as of April 2004. Because of the growth of the program, the contractor’s scope of work was in constant revision, and contract provisions for quarterly workplans were not enforced.

The current CTO for the SEPIRS program, who at the time of the audit was revising the contractor’s scope of work to fit the expanded program, believes the program is on schedule to achieve planned outputs. However, without a current approved workplan, it is difficult to make such an authoritative judgment. Also without an approved workplan, properly monitoring the progress of the program, with its many activities and numerous consultants and Transitional Afghan Authority counterparts, is difficult, if not impossible. For example, Bearing Point prepares monthly status reports to summarize program progress “against benchmarks,” but without workplans listing what those benchmarks are, these status reports merely report what is being done, without considering progress compared to expected results.

The Bearing Point workplan should document all key activities being performed by Bearing Point consultants, and the expected accomplishments of these activities. The workplan should also provide milestones to monitor the progress of these activities. USAID/Afghanistan should require Bearing Point to comply with the SEPIRS contract to facilitate better monitoring of the program. The following recommendation addresses this opportunity to improve the monitoring of the SEPIRS program.

**Recommendation No. 1: We recommend that USAID/Afghanistan require Bearing Point to comply with the Sustainable Economic Policy and Institutional Reform Support program contract by submitting to USAID/Afghanistan for approval quarterly workplan reports that include expected accomplishments and milestones.**

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## **Evaluation of Management Comments**

In response to our draft report, USAID/Afghanistan provided written comments that are included (without attachments) in Appendix II. USAID/Afghanistan generally agreed with the recommendation and it provided evidence of corrective actions. Based on our review of USAID/Afghanistan's comments and the documentation supporting its corrective actions, final action has been taken on the one recommendation in this report.

USAID/Afghanistan agreed with the need for quarterly workplan reports as a tool to measure the progress of the SEPIRS program and the performance of consultants. USAID/Afghanistan pointed out that Modification No. 9 to the SEPIRS contract, dated April 20, 2004, requires Bearing Point to submit an updated workplan for activities under the contract. In addition, the modification requires Bearing Point to put in place a system that allows quarterly updates and submission of quarterly workplan reports with expected accomplishments and milestones. We noted that the modification contains the same requirements that were already in the contract (see footnotes 2 and 3 on page 9). Nonetheless, USAID/Afghanistan provided other documentation to show enforcement of the modification.

For example, USAID/Afghanistan provided evidence that in July 2004, the contractor put in place a monitoring system that includes updated workplans. Further, USAID/Afghanistan provided a schedule of due dates for the quarterly workplans required under the contract. In addition, USAID/Afghanistan submitted the most recent contractor workplan it approved in July 2004, as well as other detailed supporting documentation, that illustrate additional corrective actions to enforce contract requirements. For example, the approved workplan specifically refers to the requirements of Modification No. 9. Further, after reviewing the approved workplan, the OIG concluded that it does include clear expected accomplishments and milestones that divide expected progress into a series of defined steps. Consequently, based on our review of USAID/Afghanistan's corrective actions, final action has been taken on the one recommendation in this report.

USAID/Afghanistan did disagree with the OIG contention that the current draft workplan did not convey clear expected accomplishments and milestones that divided expected progress into a series of defined steps. To support its disagreement, USAID/Afghanistan referred to the monitoring system put into place in July 2004 by the contractor, and the updated workplan approved by USAID/Afghanistan in July 2004. However, the action taken by the contractor was after the OIG completed its fieldwork in early April 2004. Further, the workplan USAID/Afghanistan refers to is not the same workplan discussed in this report. Rather, it is a workplan developed after our visit to Afghanistan.

Finally, as acknowledged in this report, USAID/Afghanistan stressed that it has monitored the program in several ways and that the contractor has made progress.

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**Scope and  
Methodology****Scope**

The Regional Inspector General/Manila conducted this audit in accordance with generally accepted government auditing standards. The purpose of the audit was to determine whether USAID/Afghanistan's economic governance activities are on schedule to achieve planned outputs. The audit covered USAID/Afghanistan's Sustainable Economic Policy and Institutional Reform Support (SEPIRS) program, which was being implemented by Bearing Point. As of April 15, 2004, the contract with Bearing Point was for three years (with a two-year option period) at an estimated cost of about \$96 million. At April 30, 2004, total expenditures under the contract were about \$28.2 million.

We conducted the audit fieldwork in Kabul, Afghanistan from March 8 to April 5, 2004, at the offices of USAID/Afghanistan and Bearing Point, and at other sites within the country. The audit of the USAID/Afghanistan's SEPIRS program covered the period from January 2003 to April 2004.

Under its contract, Bearing Point was to carry out reforms in five economic governance areas: fiscal, banking, legal/regulatory, trade and privatization. To help determine whether economic governance activities are on schedule to achieve planned outputs, we judgmentally selected 28 activities from three of the five task areas (fiscal, banking and legal/regulatory) for which we had 60 draft individual workplans—and from other activities which came to our attention which were not included in these draft workplans. The three areas were selected based on their relative funding and staffing levels. The results of our judgmentally selected sample of 28 activities cannot be statistically projected to the entire population of activities.

In planning and performing the audit, we reviewed internal controls related to ensuring that activities under the SEPIRS program are on schedule to achieve planned outputs. Specifically, we examined and assessed the following significant internal controls: (1) the requirements of the contract with Bearing Point, (2) activity workplans, (3) performance indicators where they existed, (4) actual performance results, (5) USAID/Afghanistan's system for monitoring the contractor's performance, and (6) USAID/Afghanistan's fiscal year 2003 self-assessment under the Federal Managers' Financial Integrity Act. Additionally, we reviewed risk assessments that related to the SEPIRS program. Further, we interviewed officials from Bearing Point and USAID/Afghanistan, reviewed other pertinent documentation, and visited sites where Bearing Point consultants were providing technical assistance.

The SEPIRS program did not have a quarterly workplan with milestones and planned outputs. As a result, we could not determine whether USAID/Afghanistan's economic governance activities are on schedule to achieve planned outputs. Although we could not render an opinion without a quarterly workplan with



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milestones and planned outputs, this did not preclude us from reporting on problem areas that came to our attention, and we have done so.

### **Methodology**

To answer the audit objective, we interviewed USAID/Afghanistan officials, including both the former and the current Cognizant Technical Officer for the contract with Bearing Point. We also interviewed officials from Bearing Point. From USAID/Afghanistan, we obtained documentation on its system for monitoring the SEPIRS program. We obtained and analyzed documents prepared by USAID/Afghanistan and Bearing Point related to the achievement of planned outputs such as the January 2003 and July 2003 workplans, draft workplans for individual expatriate consultants that were in process at the time of our audit, performance indicators where they existed, and actual performance results as reported by the contractor. We also obtained and reviewed the contract between the USAID/Afghanistan and Bearing Point.

In addition to the above activities, we visited 11 Bearing Point consultants to discuss the 28 technical assistance activities they were implementing. For example, at Jalalabad, Afghanistan, we interviewed consultants working on fiscal reform activities. We interviewed other consultants who were also working on fiscal reform activities at the Ministry of Finance. Under banking reform, we visited consultants working at the Afghan Central Bank. We also interviewed the legal advisor to Bearing Point about progress on legal/regulatory reforms. The discussions held with these individuals covered such topics as workplans, performance indicators and their supporting data, and activity progress and problems.

**Management  
Comments**



**United States Agency for International Development**

***Kabul, Afghanistan***

**August 2, 2004**

**MEMORANDUM**

TO: Mr. Bruce Boyer, RIG/A/ Manila

THRU: Charles Githaiga, Acting Controller /s/

FROM: Patrick Fine, Mission Director /s/

SUBJECT: Management Comments to RIG/Manila's Draft Performance Audit of the BearingPoint relating to Sustainable Economic Policy and Institutional Reform Support (SEPIRS) Program at USAID/ Afghanistan Audit Report No. 5-442-04-xxx-P

REF.: Boyer memo dated June 29, 2004

We appreciate the opportunity to respond to the subject draft report.

The Mission agrees with RIG's position regarding the need for quarterly workplan reports as a tool to measure the progress of the program and the performance of the individual advisors. **However as acknowledged on Page 12 of the report, the Mission strongly believes that it has been monitoring the program in several ways and Bearing Point has made substantial progress with regards to the deliverables in the contract.**

The Mission through Modification# 9 of the contract dated April 20, 2004 requires Bearing Point to submit updated work-plan for activities under the contract. This modification also requires BearingPoint to put in place a system that allows quarterly updates and submission of quarterly workplan reports.

**Page Nine** – The Mission disagrees with RIG's view that the current draft workplan doesn't convey (1) clear expected accomplishments and (2) no milestones that divided expected progress into a series of defined steps, for the following reasons:

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BearingPoint has in July 2004 put in place a monitoring system that includes updated workplans (approved by the mission on July 1, 2004), performance indicators, and a weekly reporting structure:

- The detailed workplan provides a snap shot in time of BearingPoint's activities within the five economic governance areas of fiscal, banking, legal regulatory, trade, and privatization.
- Workplans detail the major projects under each governance area, the milestones (key result areas or KRA) within each project, and the detailed activity required to achieve the KRA. For each task, completion dates and responsible staff to support the activity are identified. Further, as appropriate, deliverables and performance indicators are identified to allow measurement towards success / completion of the project.
- BearingPoint is maintaining two sets of indicators. The first are Key Indicators that measure BearingPoint's progress towards overall AEG program objectives within each governance area. The second set of indicators tie to detailed activities within the workplan and measure BearingPoint's progress towards completion of specific tasks.

Attached, please find the following documents detailing the workplan and the methodology used to develop it, as well as how the same would be reported on weekly and monthly basis. :

- 1-AEG Overview
- 2-Appendix A - Pre April 2004 Accomplishments
- 3-Appendix B - AEG Interview List
- 4-Appendix C - Sector Level AEG Workplan
- 5-Appendix D - Project Level AEG Workplan
- 6-Appendix E - KRA Level AEG Workplan
- 7-Appendix F - Task Level AEG Workplan
- 8-Appendix G - TA Weekly Reporting Template – Example
- 9-Appendix G - TA Weekly Reporting Template – Instructions
- 10-Appendix H - AEG Indicators

In addition to the above, BearingPoint has been asked to produce the quarterly reports referenced above (Appendix C, D, E, and F) updated according to the following schedule:

Second Quarter, 2004, due by July 31, 2004  
Third Quarter, 2004, due by October 30, 2004  
Fourth Quarter, 2004, due by January 31, 2005

First Quarter, 2005, due by April 30, 2005

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Second Quarter, 2005, due by July 31, 2005  
Third Quarter, 2005, due by October 30, 2005  
Fourth Quarter, 2005, due by January 31, 2006

The mission further recognizes that one of the major strengths designed into the AEG program is the flexibility in technical assistance that can be provided to the Government of Afghanistan. To mitigate risk while still allowing for this flexibility, the weekly reporting structure will capture ALL changes to each individual technical advisor's tasks in relationship to his/her workplan. Additions and deletions to the workplan will be captured through weekly reporting by individual technical advisors, and communicated to USAID on a regular basis.

We once again appreciate the opportunity to comment on the draft report.

Attachments: as stated

Clearance:CO:MDCruz\_\_\_\_\_