



OFFICE OF INSPECTOR GENERAL

AUDIT OF USAID/CAMBODIA'S COUNTER TRAFFICKING IN PERSONS PROJECT

AUDIT REPORT NO. 9-000-10-002-P
December 10, 2009

WASHINGTON, DC



Office of Inspector General

December 10, 2009

MEMORANDUM

TO: USAID/Cambodia, Director, Flynn Fuller

FROM: IG/A/PA, Director, Steven H. Bernstein /s/

SUBJECT: Audit of USAID/Cambodia's Counter Trafficking in Persons Project
(Report No. 9-000-10-002-P)

This memorandum transmits our final report on the subject audit. In finalizing the report, we carefully considered your comments on the draft report, and we have included the mission's comments in their entirety in appendix II.

This report includes three recommendations for your action. Based on management's comments, the audit considers that a management decision has been reached for each of the three recommendations. Determination of final action will be made by the Audit, Performance and Compliance Division upon completion of the planned corrective actions for all recommendations.

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

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SUMMARY OF RESULTS

USAID/Cambodia highlights within its operational plan that its overall goal is to reduce the incidence of trafficking in persons in Cambodia. This goal is implemented through the Counter Trafficking in Persons project. The goals of the project are to (1) provide protection to victims of human trafficking in Cambodia, (2) increase prosecution of human traffickers, (3) coordinate targeted prevention and awareness-raising activities, and (4) assist with the reintegration of trafficking survivors into Cambodian society. The Counter Trafficking in Persons project is implemented through a cooperative agreement between USAID/Cambodia and The Asia Foundation (see page 4).

The agreement was awarded on August 4, 2006, and was scheduled to end on September 30, 2009. The total amount obligated for the project was approximately \$4.6 million, and as of June 24, 2009, about \$3.8 million was disbursed to The Asia Foundation. On September 29, 2009, USAID/Cambodia extended the project an additional 2 years from September 30, 2009, to September 30, 2011, and increased the total estimated amount by \$2.7 million from \$4.6 million to \$7.3 million (see page 4).

The Counter Trafficking in Persons project completed, or substantially completed, 32 of 37 target activities. However, the target indicators and activities did not measure USAID/Cambodia's achievement of the project goals and objectives (see page 6) because of a lack of baseline data and development of measureable performance indicators that would determine the success of the project (see pages 8–13).

The mission noted that previous attempts by other organizations and researchers to collect data in Cambodia were unsuccessful (see page 9). A 2006 U.S. Government Accountability Office (GAO) audit report on human trafficking found that the accuracy of the estimates of trafficking is in doubt because of methodological weaknesses, gaps in data, and numerical discrepancies (see page 9). A 2007 GAO audit report on human trafficking states that baseline and target values of indicators are needed to assess project performance (see page 11). The United Nations Children's Fund noted that Cambodia has some issues in data collection because no judicial database is operational (see page 13).

The first year of the project experienced (1) programmatic changes caused by severe funding cuts to USAID programs and (2) revisions to the project to reflect USAID's new program focus on U.S. Government and Royal Government of Cambodia collaboration. The mission extended the 3-year project an additional 2 years in order to complete project activities in the four main component areas: coordination, prevention, protection and reintegration, and prosecution (see page 6).

Over the life of the project, USAID/Cambodia has focused on the coordination component and has helped build the Royal Government of Cambodia's capacity to take the lead in coordinating joint actions with nongovernmental organizations. However, USAID/Cambodia has not developed measurable performance indicators and targets to gauge the success of the coordination efforts (see page 6).

Although USAID/Cambodia's efforts to assist the Royal Government of Cambodia to combat human trafficking have achieved some outputs, the mission did not establish

baseline data and did not develop measureable performance indicators to monitor and evaluate progress toward project goals and objectives. Audit findings include the need to (1) collect baseline data on trafficking; (2) develop performance indicators and targets to measure progress and achievement of project goals; and (3) develop a standard methodology to track arrests, prosecution, and conviction cases through the judicial system (see pages 8–13). The report contains three recommendations to address these concerns.

The report recommends that USAID/Cambodia:

- Develop and implement a plan, in conjunction with the Royal Government of Cambodia, to establish and implement a national data collection system as a prerequisite to establishing baseline data on numbers of trafficking victims (see page 10).
- Develop performance indicators and targets to measure progress and achievement of the Counter Trafficking in Persons project goals (see page 11).
- Develop and implement a plan, in conjunction with the Royal Government of Cambodia, to improve the methodology to track arrests, prosecution, and conviction of trafficking cases that enter the judicial process (see page 13).

USAID/Cambodia generally agreed with all three recommendations. Based on management's comments, a management decision has been reached for each of the recommendations and a determination of final action is pending (page 14). Management comments are included in their entirety in appendix II.

BACKGROUND

The Department of State estimates that more than 800,000 women, children, and men are trafficked across national borders each year. According to the Secretary of State, “The Obama Administration views the fight against human trafficking, at home and abroad, as an important priority on our foreign policy agenda.” The U.S. Government has been at the forefront of efforts to stop trafficking in persons throughout the world, funding 140 antitrafficking programs in nearly 70 countries. Since 2001, the United States has provided approximately \$528 million in antitrafficking assistance overseas, and USAID has been a key player, providing about \$123 million in assistance to more than 70 countries.

Trafficking in persons not only abuses human rights but also threatens Cambodia’s future. Cambodia is a source, transit, and destination country for men, women, and children trafficked for the purpose of commercial sexual exploitation and forced labor. Cambodian women and children are trafficked to Thailand and Malaysia for sexual exploitation and forced labor. Cambodian men migrate willingly and eventually end up in conditions of forced labor in the fishing, construction, and agricultural industries in these countries. Sex trafficking of women and children occurs within Cambodia’s borders from rural areas to cities. Parents sometimes sell their children into involuntary servitude to serve as beggars or into domestic servitude, or to work in brothels. Deprived of the most fundamental human rights, women and children—some as young as 7 years old—are forced into the sex industry, where they suffer physical and mental abuse and are exposed to diseases, including HIV/AIDS.

The Royal Government of Cambodia is trying to combat trafficking with support from the highest levels of government. It is providing a new leadership role through its coordination efforts with the National Task Force against Human Trafficking, the Royal Government of Cambodia’s governing body for countertrafficking efforts in Cambodia. However, Cambodia does not fully comply with the minimum standards¹ for the elimination of trafficking set forth in the Trafficking Victims Protection Act of 2000, 22 U.S.C. 7101-7110, and did not recently show evidence of progress in protecting trafficking victims and convicting and punishing human trafficking offenders, including complicit public officials. The June 2009 annual State Department Trafficking in Persons Report to Congress noted that the Royal Government of Cambodia initiated 71 trafficking prosecutions but convicted only 12 trafficking offenders, a significant decrease from 52 convictions during

¹ Per section 108 of the Trafficking Victims Protection Act of 2000, 22 U.S.C. 7106, the minimum standards for the elimination of trafficking applicable to the government of a country of origin, transit, or destination for victims of severe forms of trafficking are the following: (1) The government of the country should prohibit severe forms of trafficking in persons and punish acts of such trafficking. (2) For the knowing commission of any act of sex trafficking involving force, fraud, coercion, or in which the victim of sex trafficking is a child incapable of giving meaningful consent, or of trafficking which includes rape or kidnapping or which causes a death, the government of the country should prescribe punishment commensurate with that for grave crimes, such as forcible sexual assault. (3) For the knowing commission of any act of a severe form of trafficking in persons, the government of the country should prescribe punishment that is sufficiently stringent to deter and that adequately reflects the heinous nature of the offense. (4) The government of the country should make serious and sustained efforts to eliminate severe forms of trafficking in persons.

the previous reporting period. As a result, Cambodia has been downgraded from Tier 2 to Tier 2 Watch List² on the Trafficking in Persons Report to Congress.

USAID/Cambodia's Counter Trafficking in Persons project is one of many antitrafficking programs funded by USAID around the globe. For fiscal year (FY) 2009, USAID/Cambodia's operational plan highlights that its overall goal is to reduce the incidence of trafficking in persons in Cambodia. In the short term, U.S. assistance aims to enable the Royal Government of Cambodia to play a strong role in the coordination of antitrafficking efforts by all actors in Cambodia and to promote the utilization of best practices in prevention, protection, and prosecution. On August 4, 2006, USAID/Cambodia awarded a cooperative agreement to The Asia Foundation to provide support for the Counter Trafficking in Persons project for 3 years, with a planned completion date on September 30, 2009. The total amount obligated for the project was approximately \$4.6 million, and as of June 24, 2009, about \$3.8 million had been disbursed to The Asia Foundation. On September 29, 2009, USAID/Cambodia extended the project an additional 2 years from September 30, 2009, to September 30, 2011, and increased the total estimated amount by \$2.7 million from \$4.6 million to \$7.3 million.

The Asia Foundation is the sole implementer of the Counter Trafficking in Persons project; however, several subgrantees and other stakeholders have been involved throughout the life of the project. Subgrantees have included international nongovernmental organizations such as Friends International, World Hope International, and World Vision International; Cambodia government ministries; government shelters and privately run shelters; and several local nongovernmental organizations.

The original goal of the Counter Trafficking in Persons project, based on the memorandum of understanding between USAID and the Royal Government of Cambodia dated December 15, 2006, is to (1) provide protection to victims of human trafficking in Cambodia, (2) increase prosecution of human traffickers, (3) coordinate targeted prevention and awareness-raising activities, and (4) assist with the reintegration of trafficking survivors into Cambodian society. According to the FY 2009 work plan, the overall objective of the project is to contribute toward strengthening the joint efforts of the Royal Government of Cambodia and civil society to combat human trafficking and to safeguard the human rights of those vulnerable to exploitation. In the same work plan, the project represents a four-pronged approach to combating trafficking and includes work in the areas of coordination, prevention, protection and reintegration, and prosecution, including the following:

² Per the *Trafficking in Persons Report 2009*, governments that fully comply with the Trafficking Victims Protection Act of 2000, 22 U.S.C. 7101-7110, are placed on Tier 1. Countries at Tier 2 do not fully comply with the Act's minimum standards, but are making significant efforts to bring themselves into compliance. Countries on the Tier 2 Watch List meet the Tier 2 definition and must meet one of three criteria: (1) the number of victims of severe forms of trafficking is very significant or significantly increasing; (2) there is a failure to provide evidence of increasing efforts to combat severe forms of trafficking in persons from the previous year, including increased investigations, prosecutions, and convictions of trafficking crimes; increased assistance to victims; and decreasing evidence of complicity in severe forms of trafficking by government officials; or (3) the determination that a country is making significant efforts to bring itself into compliance with the minimum standards was based on commitments by the country to take additional steps over the next year. Tier 3 countries do not fully comply with the minimum standards and are not making major efforts to do so.

- To build the capacity of the Royal Government of Cambodia to take the lead in coordinating joint action with civil society and other trafficking in persons actors to combat trafficking
- To develop and implement a national system for data collection on trafficked persons
- To facilitate targeted awareness-raising on trafficking in person related issues by mainstreaming the antitrafficking message
- To improve quality of assistance offered to trafficked persons
- To increase access to justice for trafficked persons
- To increase the capacity of law enforcement officials and social service providers to protect the human rights of trafficked and exploited persons

AUDIT OBJECTIVE

This audit was included in the Office of Inspector General's Fiscal Year 2009 annual plan and was conducted to answer the following question:

- Has USAID/Cambodia's Counter Trafficking in Persons project achieved its planned activities?

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

AUDIT FINDINGS

The Counter Trafficking in Persons project has completed, or substantially completed,³ 32 of 37 target activities. However, the target indicators and activities did not measure USAID/Cambodia's achievement of the project goals and objectives because of a lack of baseline data and development of measureable performance indicators that would determine the success of the project.

The first year of the project experienced (1) programmatic changes resulting from severe funding cuts to USAID programs during an Agencywide strategy review and prioritization process, and (2) revisions to the project to reflect USAID's new program focus on U.S. Government and Royal Government of Cambodia collaboration. As a result of subsequent cooperative agreement modifications, the mission extended the 3-year project an additional 2 years. With the extension, the mission intends to complete project activities in the four main component areas: coordination, prevention, protection and reintegration, and prosecution.

At the activity level, appendix IV presents the activities, target indicators, and achievements for fiscal year (FY) 2009. Examples of activities in the four component areas are discussed below.

Coordination: USAID/Cambodia has facilitated coordination between government and civil society and helped build the capacity of the Royal Government of Cambodia to take the lead in coordinating joint actions with nongovernmental organizations; however, it has not developed measurable performance indicators and targets to gauge the success of the coordination efforts (see page 10).

The memorandum of understanding between USAID and the Royal Government of Cambodia, dated December 15, 2006, stated that the purpose of the memorandum is to strengthen the cooperation and implementation of the Counter Trafficking in Persons project among the Royal Government of Cambodia, USAID, and The Asia Foundation in the areas of protection and reintegration, prevention, and prosecution. In the FY 2009 work plan, the coordination component had the following three purposes:

- (1) to improve coordination between government and civil society on counter-trafficking activities,
- (2) to build the capacity of the government to take the lead in coordinating joint action with civil society and other trafficking in persons organizations to combat trafficking, and
- (3) to develop and implement a national system for data collection on trafficking.

One of the activities performed during 2009 was assisting the Royal Government of Cambodia in coordinating the efforts of the National Task Force against Trafficking in Persons (the National Task Force) and the High-Level Working Group, established in

³ "Substantially completed" activities were completed later than planned, are on schedule to be completed, or were subject to minor scope adjustments during implementation.

March 2007 and August 2007, respectively. The National Task Force is composed of 11 government ministries and other government agencies, and coordinates the efforts of more than 150 local and international nongovernmental organizations to combat human trafficking and exploitation.

Prevention: The memorandum of understanding also stated that a goal of the project is to coordinate targeted prevention and awareness-raising activities. The project created a national campaign that targeted awareness of trafficking and provided economic opportunities to vulnerable groups. The purposes of the prevention component noted in the FY 2009 work plan are as follows:

- (1) to facilitate targeted awareness-raising on trafficking-in-persons-related issues by mainstreaming the antitrafficking message,
- (2) to provide economic opportunities and education to vulnerable groups, and
- (3) to highlight existence of trafficking for purposes other than sexual exploitation.

During FY 2009, the Counter Trafficking in Persons project assisted Cambodia in running a national campaign to promote awareness of trafficking, vocational training for at-risk individuals, and income generation for at-risk families.

The national campaign promoted family and community unity to combat trafficking and consisted of five provincial forums held in the provinces of Phnom Penh, Siem Reap, Sihanoukville, Svay Rieng, and Bantey Meanchey. These forums included attendees such as local government employees, community members, and nongovernmental organization representatives.

In addition, the Counter Trafficking in Persons project provided employment-linked vocational training to 111 students through local nongovernmental organizations, 297 interest-free loans to at-risk families to allow students to remain in school instead of dropping out in order to assist their families with income generation, and 206 scholarships for students to continue their education.

Protection and Reintegration: The goals of this component, as noted in the memorandum of understanding, are to provide protection to victims of human trafficking in Cambodia and assist with the reintegration of trafficking survivors into Cambodian society. The Asia Foundation designed the following protection and reintegration purposes in the FY 2009 work plan to accomplish these goals:

- (1) to improve the quality of the assistance offered to trafficked persons, and
- (2) to increase access to quality assistance programs.

The project improved access to existing shelters by providing a grant to World Hope International that supported approximately half of its annual operating budget. World Hope International's budget included items such as rent, cars, food, medical care, staff salaries, and properties. World Hope International operates a short-term emergency center in Cambodia for victim aftercare assistance with an assessment triage, and cares for an estimated 144 victims per year, of whom approximately 60 percent are trafficking victims.

Prosecution: As noted in the memorandum of understanding, USAID/Cambodia's goal for this component is to increase prosecution of human traffickers, focusing on the following purposes in the FY 2009 work plan:

- (1) to increase access to justice for trafficked persons, and
- (2) to increase the capacity of law enforcement to protect the human rights of trafficked and exploited persons.

As mentioned above, increasing the capacity of Cambodian law enforcement officials is important. The project has been instrumental in developing training for law enforcement officials on the new Law on Suppression of Human Trafficking and Sexual Exploitation, adopted by the Royal Government of Cambodia in February 2008. Official explanatory notes explaining the new law have been drafted and are due for release in 2009.

To further enhance the project's capacity-building efforts, a training module on conducting raids and rescues without violating the rights of victims was developed and implemented for both police officers and social service providers in a joint effort of The Asia Foundation and the Royal Government of Cambodia.

Audit Findings: Although the Counter Trafficking in Persons project completed, or substantially completed, 32 of 37 target indicators, factors that impair determining the achievement of the main goals are the lack of (1) baseline data on trafficking (see below), (2) indicators and targets to measure progress and achievement of project goals (see page 10), and (3) a case management mechanism to track arrest, prosecution, and conviction cases through the judicial system (see page 12).

USAID/Cambodia Needs to Establish Baseline Data on Trafficking Victims

Summary: Federal law and USAID guidance require missions to establish performance baselines against which to measure the achievement of set performance targets. USAID/Cambodia's Counter Trafficking in Persons project has not established baseline data on trafficking victims. Mission officials determined that establishing baselines is beyond the scope of the project and the financial resources available. Without estimates of the scope of human trafficking to use as baselines in project locations, it is difficult to determine where interventions are most needed and would have the greatest impact.

The Foreign Assistance Act of 1961, Section 621A, 22 U.S.C. 2381a, is entitled *Strengthened Management Practices* and states that Congress believes that U.S. foreign aid funds could be utilized more effectively by applying advanced management decision making, and information and analysis techniques. To meet this need, the President shall establish a management system that includes methods for comparing actual results of programs and projects with the results anticipated when they were undertaken.

In addition, Automated Directives System (ADS) 203.3.4.5 states that, for each indicator in a performance management plan, the assistance objective team should include performance baselines and set performance targets that are ambitious but that can be

achieved realistically within the stated timeframe and with the available resources. Baseline values should be measured using the same data collection source and method that will be used to collect actual performance data. If baseline data cannot be collected until later in the course of an assistance objective, the assistance objective team should document when and how the baseline data will be collected.

According to a U.S. Government Accountability Office (GAO) audit report⁴ on Human Trafficking dated July 2007, estimates of the numbers of trafficking victims are needed for baselines to evaluate how effectively specific interventions are reducing trafficking. Another GAO audit report⁵ on human trafficking issued in 2006 found that, for data collection as a whole, the accuracy of the estimates of trafficking is in doubt because of methodological weaknesses, gaps in data, and numerical discrepancies. The report further states that country data are not available, reliable, or comparable and a considerable discrepancy exists between the numbers of observed and estimated victims of human trafficking.

Furthermore, at a National Task Force meeting during March 2009, participants noted that the Royal Government of Cambodia has identified data collection as an area that needs continued effort to get accurate information on trafficking in persons in Cambodia in all aspects of protection, prosecution, and prevention activities. While USAID/Cambodia understands the importance of having baseline information on trafficking, the mission has determined that collecting baseline information is beyond the scope of the project. As such, the audit found that USAID/Cambodia has not established baseline data on trafficking victims in Cambodia.

USAID/Cambodia also noted other organizations and researchers have attempted to establish baselines in Cambodia without success. Developing baseline data is difficult in Cambodia for the following reasons:

- (1) Victims are a hidden population.
- (2) Service providers may be unwilling to share victim data because of confidentiality concerns.
- (3) The definition of the term “trafficking in persons” is broad.
- (4) Existing data may not be reliable.

Human trafficking victims may be unaware, unwilling, or unable to acknowledge that they are trafficking victims, so it is difficult to reach them to collect information using standard sampling techniques. The difficulty in defining trafficking in persons and the lack of criteria also hinder the government’s ability to identify victims, create consistent statistical databases, design analytical tools for surveys and estimates, and compare and combine data across provincial and national levels.

⁴ GAO-07-1034, *HUMAN TRAFFICKING: Monitoring and Evaluation of International Projects Are Limited, but Experts Suggest Improvements*, July 2007.

⁵ GAO-06-825, *HUMAN TRAFFICKING: Better Data, Strategy, and Reporting Needed to Enhance U.S. Anti-trafficking Efforts Abroad*, July 2006.

The GAO audit report suggested that baseline data could be developed using sampling methods that have been used to sample other hard-to-reach populations, including the homeless, hidden migrants, missing and exploited children, domestic violence victims, inmates, and drug users. One suggested method is sampling of “hot spots”—an intensive search for victims in areas known to have high concentrations of victims or in areas to which many victims return. Other methods include adaptive cluster, double, indirect, and snowball sampling. These methods could be used individually or in combination, depending on the methodologies that are appropriate for the selected location sampled in Cambodia. Appendix III contains a complete list of sampling methods suggested by a GAO-convened panel of experts to estimate the number of human trafficking victims.

Without estimates of the scope of human trafficking to use as baselines in project locations, it is difficult to determine areas where interventions are most needed and where interventions would have the greatest impact. Therefore, to address this problem, this audit makes the following recommendation:

Recommendation No. 1: *We recommend that USAID/Cambodia, in conjunction with the Royal Government of Cambodia, develop and implement a plan to establish and implement a national data collection system as a prerequisite to establishing baseline data on numbers of trafficking victims.*

USAID/Cambodia Needs to Develop Indicators and Targets to Measure Progress and Achievement of Project Goals

Summary: Federal law and USAID guidance require missions to develop performance management indicators and targets that will reveal whether desired results are occurring. USAID/Cambodia’s Counter Trafficking in Persons project has not developed performance indicators and targets to effectively assess progress and achievement of project goals. This was due to the mission’s development of lower-level indicators of outputs and processes at the activity level rather than outcome and impact indicators at the intermediate level. Without effective performance management indicators at the intermediate level, it is difficult to determine whether the project is efficient and effective and whether the project is on track to achieve its goals.

As noted in the Foreign Assistance Act of 1961, Section 621A, 22 U.S.C. 2381a, foreign aid funds could be utilized more effectively by the adoption of methods for comparing actual results of programs and projects with those anticipated when they were undertaken.

ADS 203.3.4 notes that missions/offices must include performance indicators in their performance management plans, and states that performance indicators are used to observe progress and to measure actual results compared with expected results and to help answer how or if a USAID mission/office or assistance objective team is progressing toward its objective. Performance indicators may measure performance at any level from outputs to the goals of the project.

Furthermore, according to ADS 203.3.4.7, it is expected that, over the life cycle of a project, different types of indicators will be more informative at different times: In the early stages, output indicators will be the primary source of performance information; at later stages, outcome and impact indicators will be more important.

Similarly, the 2007 GAO audit report on human trafficking noted the following as a weakness: Performance measures have not been established to gauge the overall impact of antitrafficking programs abroad, thereby preventing the U.S. Government from determining the effectiveness of its efforts and adjusting its assistance. The report further states that baseline and target values of indicators are needed to assess project performance.

USAID/Cambodia's Counter Trafficking in Persons project has not developed performance indicators and targets to effectively assess progress and achievement of project goals to (1) provide protection to victims of human trafficking in Cambodia, (2) increase prosecution of human traffickers, (3) coordinate targeted prevention and awareness-raising activities, and (4) assist with the reintegration of trafficking survivors into Cambodian society. This occurred because the mission developed lower-level indicators of outputs and processes at the activity level rather than outcome and impact indicators at the intermediate level. For example, USAID/Cambodia's performance management plan for FY 2008 listed a total of 19 output and process indicators and the target, actual, and percentage achieved for each indicator. The output indicators included the number of police trained, number of victims provided legal assistance, and number of vulnerable persons who received scholarships to stay in school. Conversely, an outcome indicator would depict the number of trafficking victims reduced as a result of project assistance.

USAID/Cambodia's operational plan showed three indicators, as well as the target, actual, and percentage achieved for each for FY 2008. The three indicators are the number of domestic human rights nongovernmental organizations receiving U.S. Government support; the number of curricula created or modified to focus on human rights with U.S. Government assistance; and the number of public advocacy campaigns on human rights supported by U.S. Government. As with the performance management plan, the indicators in the operational plan are output-oriented rather than outcome and impact indicators.

Determining the proper performance indicators and targets to measure whether a project is on track to achieve its goals was difficult for the following reasons. Presently, no agreed standard for collecting, analyzing, and comparing trafficking data exists in Cambodia. This lack of standardized data represents a significant challenge in understanding the extent of the trafficking problem and in designing appropriate performance indicators and targets.

Currently, performance indicators and targets to measure progress and achievements of project goals do not exist; as such, it is challenging to determine whether USAID/Cambodia is effectively assisting trafficking victims. To address this problem, this audit makes the following recommendation:

Recommendation No. 2: *We recommend that USAID/Cambodia develop performance indicators and targets to measure progress and achievement of the Counter Trafficking in Persons project goals.*

USAID/Cambodia Should Improve the Methodology of Processing Trafficking Cases

Summary: Prosecution is one of four components of USAID/Cambodia's Counter Trafficking in Persons project, with the primary goal to increase prosecution of human traffickers. Currently, a standard methodology is not available in Cambodia to track arrests, prosecutions, and convictions of trafficking cases. Because of the lack of a case management mechanism, trafficking cases processed at the provincial level are not reported at the national level, causing data deficiencies in the tracking and reporting of trafficking cases. In the past year, Cambodia experienced a reduction in the total number of prosecutions and convictions, and it was downgraded from Tier 2 to the Tier 2 Watch List by the U.S. State Department in its 2009 Trafficking in Persons Report.⁶

As noted in the memorandum of understanding between USAID/Cambodia and the Royal Government of Cambodia, one of the goals of the Counter Trafficking in Persons project is to increase the prosecution of human traffickers. In addition, one of the project's prosecution component activities that support the goal to increase prosecutions was to enhance the data collection system on prosecution.

Further enforcing the need for a case tracking methodology, under ADS 203.3.2.1, the first of the four principal steps in the performance management process is to establish a performance management framework. This principle states that the assistance objective team must plan how it will monitor and evaluate progress toward achieving long-term results, including the following:

- Identifying the data collection methods that will be used, the frequency of data collection, and the responsibility for data collection, compilation, analysis, and data quality assessments; and
- Deciding how data will be used for decision making on how to improve performance, resource allocation, and communication of the USAID mission/office's story.

Currently, a standard methodology to track arrests, prosecutions, and convictions of trafficking cases is not available in Cambodia. USAID/Cambodia has not been able to help the Royal Government of Cambodia develop data collection methods specific to trafficking cases. As such, the mission cannot utilize data to determine performance improvements or measure success of the Counter Trafficking in Persons project's prosecution component.

USAID/Cambodia has provided capacity-building opportunities to law enforcement officials in the form of training on the new trafficking law, rights, and responsibilities of nonlawyers as advocates for victims of crime, and training on legal case management. Although the Counter Trafficking in Persons project provided training to the Royal

⁶ The Trafficking in Persons Report is a diplomatic tool for the U.S. Government to use to encourage continued dialogue and to help focus resources on prosecution, protection, and prevention programs and policies.

Government of Cambodia regarding case management and judicial processes, a national mechanism has not been established to track the progression of trafficking cases as they move through the judicial system.

Based on discussions with The Asia Foundation, the audit ascertained that prosecutions at the provincial level were not included in data submitted to the Ministries of Justice and Interior at the national level. In addition, the United Nations Children's Fund (UNICEF) noted that Cambodia has some issues in data collection because a judicial database is not operational. Furthermore, the Ministry of Justice noted the following needs for Cambodia's judicial system:

- (1) better data collection on trafficking cases, and
- (2) more case analyses to identify and improve the major weaknesses within the judicial system that affect human trafficking prosecutions.

Because of the lack of a case management mechanism, the trafficking cases processed at the provincial level are not reported at the national level, causing data deficiencies in the tracking and reporting of trafficking cases.

Furthermore, the State Department's 2009 Trafficking in Persons Report has downgraded Cambodia's ranking from Tier 2 to Tier 2 Watch List (see footnote 2), noting that the Royal Government of Cambodia demonstrated uneven law enforcement efforts to combat trafficking during the last year. The Trafficking in Persons Report also highlighted the following recommendations for Cambodia:

- (1) Train law enforcement and other government officials to place greater emphasis on enforcing the human trafficking provisions in the February 2008 law.;
- (2) Significantly improve the number of prosecutions, convictions, and punishments of trafficking offenders.
- (3) Substantially improve efforts to prosecute, convict, and criminally punish public officials complicit in trafficking.
- (4) Hold labor-recruiting agencies criminally responsible for labor trafficking induced by fraudulent recruitments.

The Trafficking in Persons Report also stated that the Royal Government of Cambodia obtained convictions of 12 trafficking offenders and initiated 71 trafficking prosecutions over the past year. This was a significant decrease compared with the 52 convictions obtained during the previous reporting period.

Because a standard mechanism for tracking trafficking cases would improve the ability to report prosecutions and convictions, this audit makes the following recommendation:

Recommendation No. 3: *We recommend that USAID/Cambodia develop and implement a plan, in conjunction with the Royal Government of Cambodia, to improve the methodology to track arrests, prosecution, and conviction of trafficking cases that enter the judicial process.*

EVALUATION OF MANAGEMENT COMMENTS

In response to this report, USAID/Cambodia generally agreed with all three recommendations. Based on management's comments, a management decision has been reached for each of the recommendations, and a determination of final action is pending. An evaluation of the management comments for each recommendation is discussed below.

In response to recommendation no. 1, USAID/Cambodia did not disagree with the recommendation to develop a plan to obtain baseline data on numbers of trafficking victims. The mission considers the development of a methodology and implementation of a sustainable data collection system the prerequisite to establishing baseline data; as such, it has been the focus of the current project. A plan to establish and implement a national data collection system will be finalized by June 30, 2010. The mission stated that more focus will be placed on the establishment of baseline data in subsequently awarded agreements.

While the U.S. Government Accountability Office report on page 10 provides several options to estimate baseline data, the audit team believes that the mission's response is a logical approach to the development and implementation of a sustainable data collection system and establishing a valid baseline for human trafficking in Cambodia. Therefore, recommendation no. 1 has been revised to focus on the development and implementation of a national data collection system as a prerequisite to establishing baseline data on numbers of trafficking victims. Based on the mission's response, a management decision has been reached and determination of final action will be made by the Audit, Performance and Compliance Division upon completion of the planned corrective action.

USAID/Cambodia agreed with recommendation no. 2. To address the recommendation of developing performance indicators and targets to measure progress and achievement of the project goals, the mission modified the projects cooperative agreement during September 2009 to include a 2-year program extension through September 2011. The agreement modification requires an updated performance management plan and results framework that focuses on measurement outcomes and impact. The mission will issue final approval of the updated performance management plan and results framework no later than December 31, 2009. Based on the mission's response, a management decision has been reached, and determination of final action will be made by the Audit, Performance and Compliance Division upon completion of the planned corrective action.

In response to recommendation no. 3, USAID/Cambodia agrees that it should improve the methodology of processing trafficking cases and plans to offer direct assistance to the Royal Government of Cambodia's Ministry of Justice to better collect data on prosecutions and convictions. Implementation of a functional trafficking database will take place no later than June 30, 2010. Based on the mission's response, a management decision has been reached, and determination of final action will be made by the Audit, Performance and Compliance Division upon completion of the planned corrective action.

SCOPE AND METHODOLOGY

Scope

USAID/Washington conducted this performance audit in accordance with generally accepted Government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings, and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

The purpose of the audit was to determine whether USAID/Cambodia's Counter Trafficking in Persons project achieved its planned activities. Audit fieldwork was conducted at USAID/Cambodia from July 13 through July 31, 2009, and at USAID/Washington through September 4, 2009. The audit covered the period from August 4, 2006, to June 30, 2009. The total amount obligated for the project was approximately \$4.6 million; as of June 24, 2009, about \$3.8 million was disbursed to The Asia Foundation. On September 29, 2009, USAID/Cambodia extended the project an additional 2 years from September 30, 2009, to September 30, 2011, and increased the total estimated amount by \$2.7 million from \$4.6 million to \$7.3 million.

In planning and performing the audit, we assessed management controls related to management review of performance measures and indicators. Specifically, we obtained an understanding of and evaluated the Counter Trafficking in Persons cooperative agreement with The Asia Foundation, the prime implementing partner; subsequent modifications to the agreement; the monitoring and evaluation plan prepared by The Asia Foundation; the mission's fiscal year (FY) 2008 Federal Managers' Financial Integrity Act assessment; the oversight performed by the agreement officer's technical representative; performance measures; and data quality assessments.

We conducted the audit at USAID/Cambodia in Phnom Penh, and visited implementing partners and beneficiaries in Battambang, Sisophon, Poipet, and Siem Reap.

Methodology

To answer the audit objective, we met with personnel from USAID/Cambodia, The Asia Foundation, Royal Government of Cambodia officials, and beneficiaries. We reviewed documentation provided by USAID/Cambodia and The Asia Foundation, including the performance management plan, operational plan, monitoring and evaluation plans, the cooperative agreement, and subsequent modifications. We also reviewed progress reports and site visit reports.

To assess whether the planned activities of the project were achieved, we focused on the four components, which covered the key areas of coordination, prevention, protection and reintegration, and prosecution. These four component areas had a total of 37 target indicators for FY 2009, and we reviewed all 37 target indicators. We validated these reported results (1) by tracing mission-reported results to documented results and records (e.g., progress reports, participant training lists, and scholarship

recipients) at the offices of the implementing partner, (2) by conducting site visits, and (3) by speaking to mission personnel, implementing partners, Royal Government of Cambodia officials, and beneficiaries.

We reviewed the level of monitoring done by the agreement officer's technical representative and USAID/Cambodia as a whole by reviewing site visit reports, conducting data quality assessments, and interviewing officials from USAID/Cambodia and The Asia Foundation.

We reviewed applicable laws and regulations and USAID policies and procedures pertaining to USAID/Cambodia's Counter Trafficking in Persons project, including the cooperative agreement and modifications with The Asia Foundation; Automated Directives System chapters 202 (Achieving), 203 (Assessing and Learning), 253 (Training for Development), 303 (Grants and Cooperative Agreements to Nongovernmental Organizations), and 320 (Branding and Marking); and the Foreign Assistance Act of 1961 and Trafficking Victims Protection Act of 2000, as codified in Title 22 of the U.S. Code.

MANAGEMENT COMMENTS

USAID/Cambodia's Comments on the Office of Inspector General's Audit of USAID/Cambodia's Counter-Trafficking in Persons Project Audit Report No. 9-000-10-00X-P

Recommendation #1: USAID/Cambodia develops a plan to obtain baseline data on numbers of trafficking victims.

We do not disagree. However, before this data can be obtained, there are several things that must be accomplished. We are actively working to accomplish them.

- There is a lack of cohesive understanding across government and civil society on what comprises human trafficking, given the thin and often ambiguous line between trafficking, illegal migration, and human smuggling. The first step in developing an easily applicable methodology for data collection will be to ensure a common understanding on what qualifies as a human trafficking situation and to develop standardized formats based on common understanding. This will enable trends to be tracked and analyzed and be a valuable tool for the Royal Government of Cambodia (RGC) and the anti-trafficking community. To ensure that there is ownership and capacity within the RGC to sustain this activity after the CTIP program ends, all efforts including implementation of the methodology and data collection process will be directed and owned by the RGC.
- USAID/Cambodia's objective is to focus on the development of a methodology and implementation of a sustainable data collection system. The process of establishing a firm baseline (with any validity) is related to data collection; however, it is not the same process. A sound data collection system is the foundation for determining a valid, meaningful baseline. Concurrently, USAID is continuing to coordinate with other donors, implementers and the Royal Government of Cambodia (RGC) to interpret and analyze whatever data is available on the numbers of trafficking victims. If there is a follow-on project in the future, USAID/Cambodia will consider the establishment of baseline data but feel this is premature at this time for the reasons listed above.

Target date for completion: The current CTIP project does not include establishment of baseline data. Rather, the expectation is that there will be a data collection methodology developed in collaboration with the RGC that will be directed and owned by the national government. A plan to establish and implement a national data collection system will be developed and finalized in conjunction with RGC by June 30, 2010. Following the end of the CTIP agreement (September 30, 2011), it is expected that the RGC will use this system to identify the baseline data.

Recommendation #2: USAID/Cambodia develops performance indicators and targets to measure progress and achievement of the Counter Trafficking in Persons project goals.

We agree and have taken the following steps.

- In September 2009, USAID modified our cooperative agreement with TAF to include the two-year program extension from 2009-2011 which, in turn, requires an updated Performance Monitoring Plan (PMP) and Results Framework. By the end of November 2009, TAF will submit the revised PMP and Results Framework for USAID approval. The revised documents will focus on measuring outcomes and impact.
- Due to the budget allocation for FY 2008, Trafficking in Persons was funded under Human Rights in the operational plan (OP). Thus, OP indicators for CTIP were reported using OP Human Rights indicators. These OP Human Rights indicators did not effectively capture the CTIP project. In 2009 the CTIP program was funded and reported under Peace and Security in the OP. We believe Peace and Security OP indicators will better reflect the outcome of the CTIP work. While these indicators are output oriented, they are the standard indicators that were developed in coordination with a broad range of technical and regional experts from USAID and the State Department.

Target date for completion: The updated PMP and Results Framework are in process and final drafts of both will be submitted by TAF to USAID no later than November, 30, 2009. USAID will issue final approval of PMP and Results Framework no later than December 31, 2009.

Recommendation #3: USAID/Cambodia should, in conjunction with the Royal Government of Cambodia, improve the methodology of processing trafficking cases.

We agree and are taking the following steps.

- The CTIP program will continue to work with the National Committee to Lead the Suppression of Human Trafficking, Smuggling, Labor Exploitation and Sexual Exploitation in Women and Children -- the newly renamed structure including the Ministry of Justice (MOJ) -- in the area of data collection, which includes prosecution. In addition, through USAID's Rule of Law and Human Rights program, we will offer assistance specifically to MOJ, in coordination with the work of the National Committee, to better collect data on prosecutions and convictions.
- On November 20, 2009, USAID co-sponsored with the MOJ a workshop on Data Collection of Human Trafficking and Sexual Exploitation Cases. Approximately 90 RGC officials consisting of court presidents, prosecutors and court clerks from 21 municipal and provincial courts participated. The workshop trained court

officials on how to charge trafficking cases under the new Law on the Suppression of Human Trafficking and Sexual Exploitation; and how to improve reporting of this data to the Ministry of Justice using the new MOJ data collection methods. This will enable the RGC to more accurately represent its annual trafficking prosecution data. MOJ has already proposed follow-up field visits to individual courts in the months ahead to assist and support courts in processing and reporting on trafficking cases. The workshop and trafficking database are part of MOJ's larger effort to modernize its information systems and improve the reliability of case information.

Target date for completion: Implementation of a functional trafficking database and follow-up visits to individual courts will take place no later than June 30, 2010. It is also expected that the quality of reporting and processing will continue to be improved through the end of the program (September 30, 2011).

Submitted by:

_____/s/_____
Flynn Fuller,
Mission Director
USAID/Cambodia

Methods Suggested by Expert Panel to Estimate the Number of Human Trafficking Victims

This appendix describes the sampling methods suggested by a U.S. Government Accountability Office (GAO)-convened panel of experts to estimate the number of human trafficking victims (extracted from GAO's July 2007 Report on Human Trafficking, *Monitoring and Evaluation of International Projects Are Limited, but Experts Suggest Improvements.*)

Method	Description of method	Application to human trafficking
Stratified random sampling to oversample rare units	The population is divided into subgroups, and random samples are selected from each subgroup.	Geographic areas are divided into subareas, which allows for a more-intensive search of cases in trafficking "hot spots."
Double sampling	After selecting a sample of primary units to obtain preliminary estimates, a sample of secondary units is selected to obtain more accurate counts.	First, a preliminary estimate of human trafficking cases is obtained from reported cases in certain geographic areas. Second, a more precise estimate of actual victims is obtained by focusing on the areas with a higher concentration of reported cases.
Adaptive cluster sampling	After an initial set of units is selected, additional units in its neighborhood are added to the sample.	After an initial trafficking case is identified, additional cases in its "vicinity" are identified. The goal is to find clusters that usually are defined geographically.
Capture-recapture sampling	Two random samples are independently drawn, and the number of common and different units is used to estimate the size of the population.	Two random samples of reported trafficking cases are independently drawn, and the number of common and different cases is used to estimate the total number of reported cases.
Indirect sampling	A "sisterhood approach" to sampling involves sampling a related population that is not as difficult to sample as the population of interest. An estimate is obtained by using the relationship between the hard-to-reach and easy-to-reach populations.	Relatives or friends of trafficking victims are interviewed, and an estimate is obtained on the basis of the relationship between the two groups.
Sentinel site surveillance	A nonrandom sample of sites is selected over time to observe changes in characteristics.	Sites with higher concentrations of trafficking cases can be identified and observed over time to determine whether there is a change in the number of victims found or rescued, or both.
Snowball sampling	An initial observation is taken and augmented by the participants. This is a participant-driven approach.	An identified victim identifies other victims with whom he or she has been in contact. In turn, these victims identify others.
Model-based estimator	A model of human trafficking is developed, followed by empirical work aimed at obtaining parameter estimates.	Based on the underlying relationships of a human trafficking model, a multiplier of identified cases is used to extrapolate a total or aggregate estimate.
Use of decoys	Decoys are used to estimate an elusive population. For example, the U.S. Census Bureau used decoys in studies of the homeless to estimate how many of the homeless were not found.	An initial estimate of reported victims can be adjusted on the basis of the number of decoys that are not found by the enumerators to account for victims who may have been missed.
Random approximation	This procedure is an approximation of and is more practical than true random sampling. For example, systematic random sampling requires random sampling in the first step, while the units in the second step are selected in some systematic fashion.	Every 5th or 10th employment establishment, household, or reintegrated trafficking victim is selected to generate an estimate that can be used without losing the ability to generalize.
Sampling with certainty	Particular units are removed from the sampling design to reduce the variation in the estimates. These units are selected "with certainty," while the "noncertainty" units are randomly selected.	Some geographic areas with a known high incidence of trafficking can be included in the estimation with certainty, while sampling procedures can be applied in other parts of a country or region.

Audited Fiscal Year 2009 Work Plan Activities

This appendix documents the fiscal year (FY) 2009 planned activities of USAID/Cambodia's Counter Trafficking in Persons project (extracted from The Asia Foundation's *Fiscal Year 2009 Work Plan for the Counter Trafficking in Persons Project*.)

FY 2009 Work Plan Activities	Target Indicator	Achieved Through June 30, 2009
COORDINATION		
Activities	Target Indicator	Achieved through June 30, 2009
a) Effective and efficient coordination among the National Task Force, High-Level Working Group, nongovernmental organizations (NGOs), Working and Cluster Groups.	Three meetings of the National Task Force, coordinated with High-Level Working Group Secretariat.	Four meetings conducted, including representatives from civil society, government ministries, and NGOs.
	16 Working Group and Cluster Group coordination meetings.	More than 16 subcommittee meetings were conducted.
	Three staff supported at the secretariat.	Four employees were hired at the secretariat in Phnom Penh to provide assistance to the National Task Force.
	National Task Force Secretariat Manager and Program Assistant recruited.	Both positions were recruited and hired by The Asia Foundation.
	Two provincial capacity-building workshops attended.	Two provincial workshops were attended
	12 National Task Force newsletter issues distributed to stakeholders; Visibility Consultant recruited.	Not complete ; produced one annual report with hard copy in Khmer.
b) Establishment of a data collection system and mechanism for dissemination to stakeholders.	Document the number of trafficking victims rescued and report it to the National Task Force; Data Program Officer recruited.	Not complete ; pilot study complete but needs improvement and strengthening. No data indicator standard or defined interview process exists. NGOs have created databases but cannot validate or compare separate databases.
c) Provincial Task Force on Human Trafficking in two provinces is able to finalize and implement the work plan in coordination with stakeholders.	Two Provincial Task Force Work Plans.	Work plans developed for the provinces of Siem Reap and Svay Rieng.
	Two Provincial Task Force Implementation Plans.	Implementation Plans developed for the provinces of Siem Reap and Svay Rieng.
	Two Provincial Task Force Secretariats are actively engaged in the implementation of Work plans.	The Provincial Task Force Secretariats report every week to the High-Level Working Group and send monthly status reports.
	Four quarterly meetings documented.	Monthly meetings were held.
d) Monitoring and Evaluation.	12 field visits/monitoring reports.	More than 12 visits have occurred; the 24 provinces report progress on a monthly basis at a minimum. The National Task Force is highly involved in monitoring and evaluation.
PREVENTION		
Activities	Target Indicator	Achieved through June 30, 2009
a) Research on trafficking of men into the fishing industry to assist agencies to plan programs addressing this issue.	One study completed by December 2008 and distributed by February 2009.	Not complete ; data quality of report was not good and needs to be validated.
b) Followup activities of previous awareness-raising activities to address gaps.	Number of campaign events organized/supported; report on the followup survey disseminated to stakeholders; number of radio campaigns held.	Five provincial public forums were held with more than 2,000 government and NGO individuals trained. A radio campaign was run with 30 programs across nine stations for 15 weeks. Another radio campaign hosted 45 call-in programs across three radio stations at 40 minutes each. The call-in programs were hosted by the Ministry of Women's Affairs and averaged five callers per program. Two videos were produced to be used on television and at universities.

c) Stronger mechanisms to make children safe.	100 government and NGO personnel trained.	Friends International, a subgrantee, hosted two training programs at the provincial level for their ChildSafe program, with two more to follow.
d) Enhanced economic opportunities through education and skills training for 300 students.	Education scholarships provided to 250 students.	Substantially complete; 206 students received scholarships. As of June 30, 2009, we would expect approximately 188 of 250 students (75 percent) to receive scholarships. As 206 students were provided scholarships as of June 30, 2009, we consider this indicator achieved.
	Vocational training provided to 75 students.	111 individuals received vocational training.
	Opportunity for income-generation provided to 150 families.	297 families received interest-free loans.
e) Monitoring and evaluation.	Eight field visits and monitoring reports.	Not complete; monitoring reports are only received on a quarterly basis.
PROTECTION and REINTEGRATION		
Activities	Target Indicator	Achieved through June 30, 2009
a) Proposed subdecree on victims' rights endorsed by the National Task Force and signed by the Prime Minister referred to as the National Minimum Standards for Victim Protection and implementation of these standards.	A training-of-trainers curriculum developed; 10 trainings conducted in five provinces by January 2009.	Substantially complete; five work shops were conducted in five provinces and a training of trainers curriculum was developed; however, it is pending finalization of the National Minimum Standards and the Victims Assistance Manual and planned to be complete in 2009.
	15 organizations field testing the Victims Assistance Manual and National Minimum Standards.	The Victims Assistance Manual and National Minimum Standards were tested with eight shelters and three coalitions composed of multiple NGOs.
	2,000 copies in Khmer and 1,500 in English of the Victims Assistance Manual produced; launch two trainings on the Victims Assistance Manual and the National Minimum Standards.	Substantially complete; content has been approved, but the format has not been finalized; it is planned to be complete in 2009.
	Eight working and cluster groups meetings held.	More than eight meetings were held during this fiscal year.
	One subdecree proposed by the National Task Force to Council of Ministers by November 2008.	The subdecree was proposed as a policy/proclamation not law to avoid imposing a law that could be seen as punishment if shelters/NGOs were not in compliance with the laws. According to the implementer, the shelters do need to improve to meet the standards but should remain open and allowed the time to make the necessary improvements.
b) Support to Transit, Assessment, and Reception Centers.	Two shelters enhanced through Women In Development program.	Shelters in Koh Kong and Svay Rieng were assisted to improve physical premise and management and organizational capacity
	Workshop with 18 participants coming from five NGOs and one government-run shelter; four meetings held and proceedings prepared.	Two meetings were conducted and two more are planned with the same 18 participants.
	Four quarterly reports; 300 victims are provided assistance at shelters; 12 field monitoring reports.	Not complete; each victim visits two to six shelters with no way of accurately tracking their movement, so no usable data on this have been reported. Thus, the number of victims provided assistance cannot be accurately measured.
	One transit center for male trafficking victims is operational; 30 male victims counseled and given assistance.	A shelter in Koh Kong was established, servicing an estimated 100 men per quarter.
	Four shelters and one safe house supported to protect rights of victims.	Four shelters are supported. A safe house was established in Svay Rieng.
c) Monitoring and evaluation.	Monitoring visits and reports.	Provincial shelters are visited on a monthly basis at a minimum, and all project activities under this project were attended by the implementer.

PROSECUTION		
Activities	Target Indicator	Achieved through June 30, 2009
a) Research on <i>Building Blocks for Law and Order: An Assessment of Police Recruitment, Training, and Promotion Practices in Cambodia</i> .	Printing and distribution of 100 copies of <i>Building Blocks for Law and Order</i> ; hosting of four police training cluster group meetings.	The cluster group meetings were held, the research conducted, and the report written. However, it was determined that the report should be shared only with key stakeholders, and it was kept as an internal document for guiding training and capacity-building activities.
b) Active Involvement of the National Task Force in planning followup activities related with the new trafficking law.	Printing and distribution of 800 official commentaries on new law; hosting of four cluster group meetings.	Substantially complete ; awaiting finalized explanatory notes to conduct training and distribute copies. This should occur around November 2009.
c) Training judges and prosecutors on the new Trafficking Law–Active Involvement of the National Task Force in planning followup activities related with the new trafficking law.	300 new and continuing judges and prosecutors trained on the new trafficking law.	Substantially complete ; awaiting finalized explanatory notes but working with the Royal Academy of Judicial Professionals to accomplish this. Training has been designed and 260 current judges and 100 new judges should go through this training in November 2009.
d) Increasing access to justice for victims of trafficking.	Training curriculum with six modules and case studies; 25 government and NGO staff and community leaders trained.	Six modules were completed, with 64 government and NGO staff.
	Distribution of 300 legal aid service directories.	Approximately 2,900 legal aid directories were distributed.
e) Front-line police and service providers knowledgeable about the new trafficking law.	One practical education package for front-line police officers; one education package for frontline social service providers; two training of trainers' manuals for training police and social service personnel; one training film for training police; 2,000 copies of "Know Your Choices" distributed in Khmer.	Each of these was completed in fiscal year 2009.
f) Enhanced data collection system on prosecution.	Obtain number of court cases related with trafficking, disaggregated into status, results, and number of victims who logged cases in court.	Complete but not achieved ; have monitored nine courts and plan to give ownership of this over to the Ministry of Justice and Royal Academy of Judicial Professionals; however, the data sets obtained are not useful because of lack of validity and uniformity, and it has been hard to maintain consistency in collection efforts.

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