



*Office of Inspector General
for the Millennium Challenge Corporation*

May 31, 2011

Mr. Daniel Yohannes
Chief Executive Officer
Millennium Challenge Corporation
875 Fifteenth Street, NW
Washington, DC 20005

Dear Mr. Yohannes:

This letter transmits the Office of Inspector General's final report on the Review of Millennium Challenge Corporation-Funded Contracts with Government-Owned Enterprises in Ghana (Review Report No. M-000-11-003-S). In finalizing the report, we considered your written comments on our draft report and included those comments in their entirety in Appendix II of this report.

The review report contains three recommendations to assist the two government-owned enterprises included in this review with adhering to MCC policies and procedures in the areas of (1) worker health and safety, (2) environmental protection, (3) quality construction, and (4) sound labor practices when implementing MCC compact projects; and examines whether the Millennium Development Authority adhered to MCC's Program Procurement Guidelines when selecting government-owned enterprises to implement compact projects. We consider that management decisions have been reached on Recommendations 1, 2, and 3. Final action will not be reached on the recommendations until MCC provides additional documentation.

I appreciate the cooperation and courtesy extended to my staff during this review.

Sincerely,

/s/

Alvin A. Brown
Assistant Inspector General
Millennium Challenge Corporation

SUMMARY

This review is in response to Congressman Frank R. Wolf's September 29, 2010, request to review Chinese government-owned enterprises (GOEs) that receive contracts for Millennium Challenge Corporation (MCC)-funded programs. Congressman Wolf requested that the Office of Inspector General (OIG) review the extent to which Chinese GOEs adhere to health and safety, environmental, quality construction, and labor policies, and whether the procurement process was open, fair, and competitive.

On September 27, 2010, MCC amended its Program Procurement Guidelines (Interim Amendment Notice 2010-001) to prohibit GOEs from competing for MCC-funded contracts.¹ MCC made this amendment to help ensure a level playing field for commercial firms from all countries. Owing to the challenge of determining whether a company is actually government-owned, MCC has identified a process to recognize GOEs if they bid for contracts.

On August 1, 2006, MCC and the Government of Ghana signed a 5-year compact that totaled approximately \$547 million. The compact entered into force on February 16, 2007. The Ghanaian government designated the Millennium Development Authority (MiDA) as the accountable entity (also called the Millennium Challenge Account) with the legal authority to oversee the compact during the compact period.

MiDA awarded contracts to government-owned enterprises in two of its compact projects. One contract totaling \$42.2 million was awarded to China Railway Wujiaochang Corporation (China Railway) to upgrade a portion, Lot 1, of the N1 Highway.² MiDA signed the contract with China Railway on December 2008 with an expected completion date of June 2011. The other contract, totaling \$9.5 million, was awarded to Arab Contractors, an Egyptian firm, to design and build two ferries and rehabilitate the floating dock in Akosombo, Ghana. MiDA signed the contract with Arab Contractors on April 16, 2010, with an expected completion date of December 2011.

The objective of the review was to answer the following questions:

- Did the selected government-owned enterprises adhere to MCC policies and procedures that address (1) worker health and safety, (2) environmental protection, (3) quality construction, and (4) sound labor practices when implementing MCC compact projects?
- Did the Millennium Challenge Account (MCA) adhere to MCC's Program Procurement Guidelines when selecting government-owned enterprises to implement compact projects?

Based on the OIG review, China Railway and Arab Contractors did not always adhere to their health and safety plans, environmental management plans, or sound labor

¹ As of September 2010, contracts were awarded to government-owned enterprises that totaled \$400 million (see Table 3 in Appendix IV).

²N1 Highway Lot 1 is the Tetteh Quarshie and Apenkwa Interchange.

practices when implementing MCC compact projects. In addition, it does not appear that the firms complied with a certain part of the Ghana Labour Act as it relates to health and safety requirements. However, the team found no instances where China Railway and Arab Contractors did not adhere to quality construction requirements as stated in their contracts with MiDA. In addition, the team found no instances of MiDA noncompliance with MCC's Program Procurement Guidelines.

China Railway and Arab Contractors did not adhere to certain requirements on compact-funded programs in Ghana for several reasons. First, their lack of a health and safety focus led them not to fully implement their health and safety plans. In addition, insufficient monitoring and oversight of health and safety by the supervisory engineer for the N1 Highway Lot 1, ICT-BANS, contributed to China Railway not fully implementing its health and safety plans. For example, China Railway did not prepare and submit accident reports to ICT-BANS. In addition, neither China Railway nor Arab Contractors always provided personal protective equipment (PPE) to their employees. Further, employees who did have PPE mentioned that they did not always wear it while working. Such a lenient approach to health and safety could contribute to needless accidents, resulting in worker injury, lost work time, and project delays.

China Railway also did not maintain employment records as required by its contract. The OIG review team observed employee record-keeping deficiencies in which China Railway did not update its records of current employees. Poor record keeping could prevent China Railway from accurately calculating its employees' salaries.

With regard to the second objective, the review found no instances of MiDA noncompliance with the procurement guidelines when it contracted with China Railway and Arab Contractors. The procurement process was the same for both projects, except that MiDA did not require the companies that competed for the Ferry Project to prequalify for the contract. MCC approved the bidding documents that MiDA used for procurement. MiDA, together with the procurement agent, then advertised for bids, held prebid meetings, obtained bids, and had an evaluation panel evaluate the bids. MiDA then produced a bid summary report, which MCC reviewed to determine whether it should object to MiDA's decisions.

MiDA also initiated a prequalification bid for the N1 Highway Lot 1, in which the evaluation committee selected five firms. Two of the five firms selected did not submit an application, leaving three firms, including China Railway. The evaluation committee evaluated the bids first for technical compliance and then by price. Thereafter, the committee performed a qualification assessment on the bidders' documentation. China Railway Wuju Corporation was ultimately selected for the contract.

MiDA invited firms to bid on the Ferry Project, with two firms submitting bids. The evaluation panel evaluated the bids by focusing first on technical qualifications and then on bid price. The evaluation committee then evaluated the price of the bids that met the technical qualifications for the project.

The report recommends that MCC require MiDA to:

1. Require China Railway Wuju to timely submit a report of all serious injuries occurring on the worksite to the supervisory engineer as required in its contract (page 6).
2. Implement a process that requires the supervisory engineers for the Ferry Project and N1 Highway to perform and document periodic health and safety reviews in order to ensure that all employees wear their personal protective equipment (page 6).
3. Conduct a periodic review of China Railway Wuju's employee record-keeping system to ensure that it is organized and up-to-date (page 7).

Detailed results of this review appear in the following section. Appendix I contains the scope and methodology. Management decisions have been reached on Recommendations 1, 2, and 3. Final action will not be reached on the recommendations until MCC provides additional documentation.

REVIEW RESULTS

China Railway Wuju and Arab Contractors Did Not Adhere to Some Health and Safety Requirements

The contracts between the Millennium Development Authority (MiDA) and China Railway Wuju (China Railway), and MiDA and Arab Contractors (Sub-Clause 4.18) require each contractor to implement the health and safety requirements established in its approved environmental management plans.³ The contracts also require that they adhere to the Ghana Labour Act of 2003. In particular, the safety procedures section (Sub-Clause 4.8) requires that the contractor notify the supervisory engineer and MiDA within 48 hours or earlier of accidents that resulted in damage or injury. In addition, the contractors' health and safety plans specify that personal protective equipment (PPE) will be provided at no cost to their employees and as required by the Ghana Labour Act.

China Railway and Arab Contractors did not adhere to and fully implement their contracts as they related to the environmental management plans. It also appears that the contractors did not comply with all Ghana Labour Act requirements. China Railway did not report accidents to its supervisory engineer nor were these accidents mentioned in its monthly reports. In addition, neither China Railway nor Arab Contractors always provided PPE to their employees

Unreported Injuries – The Office of Inspector General (OIG) requested accident reports from China Railway, but neither China Railway nor the supervisory engineer, ICT-BANS, had these reports. Both China Railway and ICT-BANS stated that there was no need to submit accident reports. Further, China Railway explained that it reported only serious injuries to MiDA and that no such injuries had occurred. However, conversations with employees disclosed that serious injuries had occurred on the site and that China Railway had not always paid the injured workers' medical expenses. The types of injuries mentioned, such as broken legs and arms, are serious injuries that China Railway should have reported to ICT-BANS.

Personal Protective Equipment – Approximately 10 percent of China Railway's employees did not wear PPE (Appendix III). These employees claimed that China Railway did not replace their damaged PPE. China Railway stated that it will replace worn PPE if the worker returns the originally issued PPE. Nevertheless, although the health and safety plan requires China Railway to prohibit employees without PPE from working on the site, China Railway allowed these employees to continue their work without required PPE.

Further, although 92 percent of Arab Contractors' employees interviewed had PPE, 50 percent stated that they had not received their PPE until 1 week before the OIG review

³ China Railway's Environmental Management Plan, Section 4.6, Health and Safety Provisions, states that the contractor will ensure the health, safety, and welfare of its employees. Also, the plan requires that China Railway prepare and implement a health and safety plan. Arab Contractors' Environmental Management Plan, Section 7, states management's commitment to health and safety throughout the life span of the project and identifies staffing roles, including that of the health and safety officer, to manage health and safety issues onsite.

team arrived.⁴ Other employees stated that Arab Contractors required them to purchase their own PPE even though the health and safety plan requires the contractor to provide PPE to its employees.

Lack of a health and safety focus has prevented China Railway and Arab Contractors from fully complying with their health and safety plans. Insufficient monitoring and oversight of health and safety by the supervisory engineer, ICT-BANS, contributed to China Railway not fully implementing its health and safety plans. For example, although 72 percent of the employees stated that there have been several injuries on the site, the supervisory engineer was not aware that any had occurred. In addition, an estimated 60 percent of China Railway's workers stated that they did not attend health and safety training. MiDA and government officials stated that although China Railway's worksite continues to have health and safety violations, these problems have decreased since construction began on the site. MiDA ordered a work stoppage on the site in April 2010 owing to the health and safety violations committed by China Railway. In the case of Arab Contractors, there has been more focus on health and safety after sparks from welding near fumes from fresh paint ignited a fire that injured eight workers. As a result, the supervisory engineer ordered a work stoppage for 2 weeks in November 2010, and Arab Contractors switched from weekly to daily trainings and safety discussions for its employees.

When contractors and supervisory engineers do not comply with health and safety requirements, needless accidents can occur that could severely injure, maim, or kill an employee. Injured employees are also unable to work which contributes to construction delays. In the case of the accident on the Ferry Project, the worksite closed for 2 weeks in order to assess the damages and even after it reopened three employees (two local workers and one expatriate employee) could not immediately return to work because of their serious injuries. To address these issues, we are making the following recommendations.

***Recommendation 1.** We recommend that the Millennium Challenge Corporation's Vice President of Compact Operations require the Millennium Development Authority to require China Railway Wuju to timely submit a report of all serious injuries occurring on the worksite to the supervisory engineer as required in its contract.*

***Recommendation 2.** We recommend that the Millennium Challenge Corporation's Vice President of Compact Operations require the Millennium Development Authority to implement a process that requires the supervisory engineers for the Ferry Project and N1 Highway to perform and document periodic health and safety reviews in order to ensure that all employees wear their personal protective equipment.*

China Railway Lacks Proper Record Keeping of Employee Files

China Railway's contract with MiDA states that China Railway must maintain complete and accurate employee records at the worksite, including the name, age, gender, hours

⁴OIG visited Arab Contractors' worksite on December 13 and 14, 2010.

worked, and wages paid for all workers. However, the OIG review team identified the following problems with China Railway's employment records:

- China Railway did not maintain records to calculate employee payroll.
- China Railway did not maintain and update its current employee records.

Although the contract required China Railway to maintain an employee record-keeping system, China Railway did not have an organized system to maintain its employee records and therefore did not comply with the requirements of its contract. Its current employee records also included employees who no longer worked for the company.

The lack of an organized employee record-keeping system could result in improper payments. If it is unable to reconcile its employee records and payroll, China Railway may inaccurately calculate its employees' salaries, including overtime. To illustrate, an estimated 42 percent of China Railway's workers stated that they did not receive overtime pay, but owing to the lack of payroll records, OIG could not confirm the workers' statements. Inaccurate salary payments could lead to worker discontent and an administrative work stoppage, similar to an event that occurred in May 2010 following a dispute regarding the number of days for which workers should be paid. To address this issue, we are making the following recommendation:

Recommendation 3. *We recommend that the Millennium Challenge Corporation's Vice President of Compact Operations require that the Millennium Development Authority conduct a periodic review of China Railway Wuju's employee record-keeping system to ensure that it is organized and up-to-date.*

EVALUATION OF MANAGEMENT COMMENTS

The Millennium Challenge Corporation (MCC) provided written comments on our draft report that are included in their entirety in Appendix II of this report. In its comments, MCC agreed with each of the three recommendations.

MCC agreed with Recommendation 1 and will direct the Millennium Development Authority (MiDA) to ensure that China Railway Wuju reports all accidents to the supervisory engineer, and all serious accidents to both the supervisory engineer and MiDA. In addition, in the next update of its standard bidding documents for MCC-funded infrastructure projects, MCC will include a condition to require that serious accidents also be reported directly to MCC. On the basis of MCC's actions to require improved reporting, OIG considers that a management decision has been reached. However, final action will not occur until MCC provides additional documentation, including updated standard bidding documents.

MCC agreed with Recommendation 2 and has been working with China Railway Wuju and Arab Contractors and the supervisory engineers to improve compliance with the health and safety plans. To further advance this effort, MCC will require MiDA to ensure that the supervisory engineers monitor the implementation of the personal protective equipment requirement, including documenting periodic health and safety reviews by the engineers. On the basis of MCC's actions to improve health and safety monitoring, OIG considers that a management decision has been reached. However, final action will not occur until MCC provides documentation on the periodic health and safety reviews.

MCC agreed with Recommendation 3 and will work with MiDA to implement a periodic review by either MiDA or China Railway Wuju's supervisory engineer to monitor compliance with employee record-keeping requirements in China Railway Wuju's contract with MiDA. On the basis of MCC's actions to improve monitoring of record keeping requirements, OIG considers that a management decision has been reached. However, final action will not occur until MCC provides documentation on the periodic review of compliance with record-keeping requirements.

SCOPE AND METHODOLOGY

Scope

The Office of Inspector General (OIG) conducted this review as a response to Congressman Frank R. Wolf's September 29, 2010, request to review Chinese government-owned enterprises (GOEs) that receive contracts for Millennium Challenge Corporation (MCC)-funded programs. To put the results in a broader context, OIG expanded the review to other GOEs that received infrastructure contracts for MCC-funded programs. Congressman Wolf had four specific areas of concern regarding the contractors' compliance with MCC policies and procedures: (1) health and safety, (2) environmental protection, (3) quality construction, and (4) sound labor practices. He also asked whether the procurement was open, fair, and competitive.

Although this review was not an audit, we conducted this review in accordance with *Government Auditing Standards*, July 2007 Revision (GAO-07-731G) specifically Chapter 3 and Chapter 7, Sections 7.55 and 7.72 to 7.79. We planned and performed this review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our review objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions.

OIG conducted its fieldwork for this review from November 15, 2010, to March 4, 2011, at MCC's headquarters in Washington, DC, with site visits to Ghana from December 6 to 17, 2010, and February 21 to 25, 2011. OIG selected Ghana because it had two compact-funded GOEs that had contracts totaling \$51.7 million, and both contracts were in the implementation stage. However, because the request focused specifically on GOEs that received MCC funds, OIG did not review private sector companies implementing MCC projects.

Methodology

The review team met with MCC staff in Ghana and in Washington, DC. In addition, the review team conducted a statistical sample, with a 95 percent confidence level, of selected employees who worked for the government-owned enterprises in Ghana: China Railway Wujiaochang (China Railway) and Arab Contractors. To ensure a 95 percent confidence level, 5 percent error rate, and 4 percent precision, the OIG team determined the sample size to be 81 out of 447 China Railway local workers and all 16 of the Arab Contractors local workers.⁵

The review team also reviewed documents and assessed, through observations and interviews, whether China Railway and Arab Contractors adhered to MCC policies and procedures that address (1) worker health and safety, (2) environmental protection, (3) quality construction, and (4) sound labor practices when implementing MCC compact projects; and whether MCA adhered to MCC's Program Procurement Guidelines when selecting government-owned enterprises to implement compact projects.

⁵Because Arab Contractors had 16 local employees, OIG interviewed the entire population. However, two of the local employees who worked for Arab Contractors were not present owing to injury from the onsite accident that occurred in November 2010.

To answer the review's objectives, the team—

- Interviewed supervisory engineers responsible for overseeing the infrastructure projects and GOEs.
- Interviewed local and expatriate staff working on the construction sites to learn about their experiences working for the GOEs.
- Performed document reviews of worker wages records, accident and injury reports, and health and safety plans.
- Engaged an engineer to review the quality of construction and ensure that substandard materials were not used in the MCC projects.
- Examined weekly inspection reports submitted by an independent consultant that provided an analysis of the materials that the GOEs must use as specified in their contracts.
- Conducted a statistical sample to select a percentage of workers employed at the construction companies and asked similar questions of each employee. The sample size varied by the number of staff employed at each GOE.
- Reviewed documents supporting the procurement process.

MANAGEMENT COMMENTS



DATE: May 6, 2011

To: Mr. Alvin Brown, Assistant Inspector General
Millennium Challenge Corporation

From: Mr. Patrick Fine, Vice President
Department of Compact Operations
Millennium Challenge Corporation

The Millennium Challenge Corporation (MCC) appreciates the opportunity to respond to the Office of Inspector General's (OIG) draft report entitled "Review of Millennium Challenge Corporation-Funded Contracts with Government-Owned Enterprises in Ghana" (Report No. M-000-11-00X-S). MCC's specific responses to the three recommendations in the draft report are detailed below. In addition to providing a response to the audit recommendations, this serves as MCC's management decision.

Recommendation 1. We recommend that the Millennium Challenge Corporation's Vice President of Compact Operations require the Millennium Development Authority to require China Railway Wuju to timely submit a report of all serious injuries occurring on the worksite to the supervisory engineer as required in its contract.

MCC Response: MCC agrees with the recommendation.

MCC is committed to the monitoring and oversight of the health and safety of workers under MCC funded contracts. The contract with China Railway Wuju requires that the contractor report all accidents to the supervisory engineer, and all serious accidents to both the supervisory engineer and the Millennium Development Authority (MiDA). MCC will direct MiDA to ensure that the contractor and supervisory engineer fulfill their respective obligations to report and oversee that accidents are reported under the MCC funded Lot 1 works contract of the N1 Activity. In addition, in the next update of its standard bidding documents for MCC funded works projects, MCC will include a condition to require that serious accidents also be reported directly to MCC.

Recommendation 2. We recommend that the Millennium Challenge Corporation's Vice President of Compact Operations require the Millennium Development Authority to

implement a process that requires the supervisory engineers for the Ferry Project and N1 Highway to perform and document periodic health and safety reviews in order to ensure that all employees wear their personal protective equipment.

MCC Response: MCC agrees with the recommendation.

MCC agrees that wearing personal protective equipment (PPE) is an integral component of protecting the health and safety of workers under MCC funded contracts. The health and safety plans under the Ferry Activity and N1 Activity contracts require that all employees wear (PPE) when working on site. MCC also requires that contractors adopt a process to ensure compliance with its health and safety plans. MCC has been working with the contractors and engineers under the contracts for the Ferry Project and N1 Highway to improve compliance with the applicable health and safety plans. To further advance this effort, MCC will require that MiDA ensures that the supervisory engineers under both contracts monitor the implementation of the PPE requirement, including documenting periodic health and safety reviews by the engineers.

Recommendation 3. We recommend that the Millennium Challenge Corporation's Vice President of Compact Operations require that the Millennium Development Authority conduct a periodic review of China Railway Wuju's employee record-keeping system to ensure that it is organized and up-to-date.

MCC Response: MCC agrees with the recommendation.

MCC will work with MiDA to implement a periodic review by either MiDA or the supervisory engineer of China Railway Wuju's employee record-keeping to monitor the contractor's compliance with the employee record keeping requirements of its contract with MiDA. MCC agrees that compliance with those terms support contract implementation, and protects against fraud and non-compliance with local labor laws.

The actions specified above constitute management decision for all three of the above recommendations. If you have any questions, please contact Pat McDonald, MCC Compliance Officer, at 202-521-7260.

**Table 1: Summary of Responses of
China Railway Wuju Corporation Local Employees**

Sample Size = 81

Questions	Number of Employees Who Responded	Population Percentage
Number of employees who work overtime	78	96%
Number of employees who do not work overtime	1	N/A
Number of employees who are not sure if they work overtime	2	N/A
Number of employees who received overtime pay	38	38%
Number of employees who did not receive overtime pay	41	42%
Number of employees who were not sure if they were paid for overtime	2	N/A
Number of employees with medical expenses paid by the employer	6	9%
Number of employees whose medical expenses were not paid by the employer	15	52%
Number of employees for which this does not apply	60	N/A
Number of employees who wear safety gear	67	75% ⁶
Number of employees who do not wear safety gear	14	10% ⁶
Number of employees who wear safety gear every day	67	75%
Number of employees who do not wear safety gear every day	14	10%
Number of employees who attended health and safety training	25	22%
Number of employees who did not attend health and safety training	56	60%
Number of employees who did not have accidents	57	61%
Number of employees who have had accidents	24	20%
Number of employees aware of accidents on the site ⁷	65	72%

⁶Because the results projected are of the entire population, the team calculated a variation percentage or a measure of change for the results. Without a variation calculation, 83 percent of the employees the review team interviewed wore personal protective equipment (PPE) and 17 percent did not wear PPE.

⁷ Some workers reported the same accidents.

**Table 2: Summary of Responses of Arab Contractors Local Employees
Population Size = 14**

Questions	Number of Employees Who Responded	Results⁸
Number of employees who work overtime	14	100%
Number of employees who received all overtime pay	5	36%
Number of employees who may not have received overtime pay	9	64%
Number of employees with medical expenses paid by the employer	6	100%
Number of employees whose medical expenses were not paid by the employer	0	0%
Number of employees who wear safety gear	13	93%
Number of employees who do not wear safety gear	1	7%
Number of employees who wear safety gear every day	13	93%
Number of employees who do not wear safety gear every day	1	7%
Number of employees who attended health and safety training	14	100%
Number of employees who did not attend health and safety training	0	0%
Number of employees who did not have accidents	7	50%
Number of employees who had accidents	7	50%
Number of employees who received their safety gear 1 week before the review team arrived	7	50%
Number of employees who did not indicate that they received their safety gear 1 week before the review team arrived	7	50%
Number of employees aware of accidents on the site ⁹	14	100%

⁸The OIG team met with the entire population on the site.

⁹ Some workers reported the same accidents.

Table 3: Government-Owned Enterprises Awarded MCC-Funded Contracts

MCA Country¹⁰	Company Name	Nationality of Company	Value of Contract Award
Benin	GTZ	Germany	\$ 11,969,525
Burkina Faso	GTZ	Germany	\$ 9,628,943
Georgia	Oil & Gas Construction Trust	Azerbaijan	\$ 6,345,230
Georgia	Khazardenizneftgastikinti Trust	Azerbaijan	\$ 8,358,967
Georgia	Khazardenizneftgastikinti Trust	Azerbaijan	\$ 4,679,535
Georgia	Oil & Gas Construction Trust	Azerbaijan	\$ 2,806,440
Ghana	China Railway Wuju Corporation	China	\$ 42,168,601
Ghana	Arab Contractors, Osman Ahmed Osman & Co	Egypt	\$ 9,484,800
Madagascar	GTZ	Germany	\$ 3,415,396
Mali	SinoHydro	China	\$ 71,619,477
Mali	SinoHydro	China	\$ 46,328,142
Namibia	GTZ	Germany	\$ 7,826,423
Namibia	China Jiangsu International Ltd	China	\$ 4,587,734
Tanzania	SinoHydro	China	\$ 53,131,189
Tanzania	SinoHydro	China	\$ 59,845,418
Tanzania	China New Era	China	\$ 57,050,577
Total			\$ 399,246,397

Source: Millennium Challenge Corporation. Nonaudited data.

¹⁰OIG selected Millennium Challenge Account (MCA) countries in which Chinese government-owned enterprises were implementing Millennium Challenge Corporation infrastructure projects (Ghana, Mali, Namibia, and Tanzania). OIG also included any non-Chinese firms implementing infrastructure projects in these countries (Arab Contractors, Egypt). For MCA countries without a Chinese government-owned enterprise presence, OIG did not review the non-Chinese firms.

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