



OFFICE OF INSPECTOR GENERAL
U.S. Agency for International Development

USAID/EI Salvador's Crime and Violence Prevention Programs Need To Focus More on High-Risk Individuals To Advance Security Goals

AUDIT REPORT 9-598-21-001-P
November 30, 2020

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MEMORANDUM

DATE: November 30, 2020

TO: USAID/Bureau for Latin America and the Caribbean, Senior Deputy Assistant Administrator, Carlos Suárez

FROM: Principal Deputy Assistant Inspector General for Audit, Van Nguyen /s/

SUBJECT: USAID/El Salvador's Crime and Violence Prevention Programs Need To Focus More on High-Risk Individuals To Advance Security Goals (9-598-21-001-P)

This memorandum transmits the final report on our audit of USAID's crime and violence prevention activities in El Salvador. Our audit objective was to assess USAID's crime and violence prevention activities in El Salvador to advance the security goals of the U.S. Strategy for Engagement in Central America (CEN Strategy). Specifically, we (1) assessed to what extent USAID/El Salvador's activities targeted the most at-risk communities and individuals and (2) determined what challenges USAID faced in implementing the CEN Strategy. In finalizing the report, we considered your comments on the draft and included them in their entirety in appendix C.

The report contains two recommendations to improve the Bureau for Latin America and Caribbean's framework for achieving the CEN Strategy's security goals and enhancing mission staff's capacity to design and manage crime and violence prevention activities. After reviewing information you provided in response to the draft report, we consider recommendation 1 resolved but open pending provision of supporting documents, to include documentation supporting the described engagement with the LAC Bureau, within 30 days. We consider recommendation 2 resolved but open pending completion of planned activities.

For recommendations 1 and 2, please provide us evidence of final action, copying the Audit Performance and Compliance Division.

We appreciate the assistance you and your staff provided to us during this audit.

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INTRODUCTION

Central American countries, including El Salvador, have struggled with widespread insecurity, fragile political and judicial systems, and high levels of poverty and unemployment for more than a decade. Gang activity in the region has escalated, and the resulting crime and violence has made El Salvador one of the most violent countries in the world.¹ This situation, combined with a lack of economic opportunities and weak public institutions, is the root cause of high migration to the United States from the region.

In 2014, the United States launched a new strategy, the U.S. Strategy for Engagement in Central America (CEN Strategy), to help Central American countries improve economic opportunities, become more democratic, and provide a safe environment for their citizens. In 2017, in order to protect its border and citizens, the U.S. Government updated the CEN Strategy and placed a stronger emphasis on preventing illegal immigration and combatting transnational criminal activity. The updated strategy also stressed the need for crime and violence prevention activities to target not only at-risk communities in general, but also the individuals most likely to join gangs and those who have already been in conflict with the law.

As part of the CEN Strategy, the United States has committed approximately \$3.1 billion in foreign assistance to Central America since fiscal year 2016. USAID/El Salvador received approximately \$221 million of that amount and incorporated crime and violence prevention activities into its existing mission programming.

We conducted this audit to assess USAID's crime and violence prevention activities in El Salvador to advance the security goals of the CEN Strategy. Specifically, we (1) assessed to what extent USAID/El Salvador's activities targeted the most at-risk communities and individuals and (2) determined what challenges USAID faced in implementing the CEN Strategy.

To conduct our work, we interviewed staff and officials in USAID's Bureau for Latin America and the Caribbean (LAC Bureau) and USAID's mission in El Salvador. We reviewed five mission-level programs that included crime and violence prevention activities and reviewed related key strategic and policy documents; country-specific strategies and policies; training records; and program design, award, and performance documents. We conducted our work in accordance with generally accepted government auditing standards. Appendix A provides more detail on our scope and methodology.

¹ Human Rights Watch World Report 2020: El Salvador Events of 2019, <https://www.hrw.org/world-report/2020/country-chapters/el-salvador>, accessed September 9, 2020.

SUMMARY

To target the most at-risk communities and individuals, USAID classifies crime and violence prevention in three levels: primary (general population living in high-risk communities), secondary (at-risk youth), and tertiary (serious and chronic offenders). After years of implementing crime and violence prevention programs, USAID/EI Salvador was beginning to shift its focus from primary-level activities that targeted high-risk communities at large to also more closely targeting individuals at the tertiary level—a crucial component to improving the country’s security. Of USAID/EI Salvador’s five programs conducting crime and violence prevention activities during 2015-2018, all five worked at the primary level and were being carried out in 50 of the most at-risk municipalities in El Salvador. In addition, two programs offered individualized services to at-risk youth at the secondary level of prevention, while one—a pilot program—targeted the most at-risk individuals at the tertiary level.

However, several factors affected USAID/EI Salvador’s ability to target the most at-risk individuals.

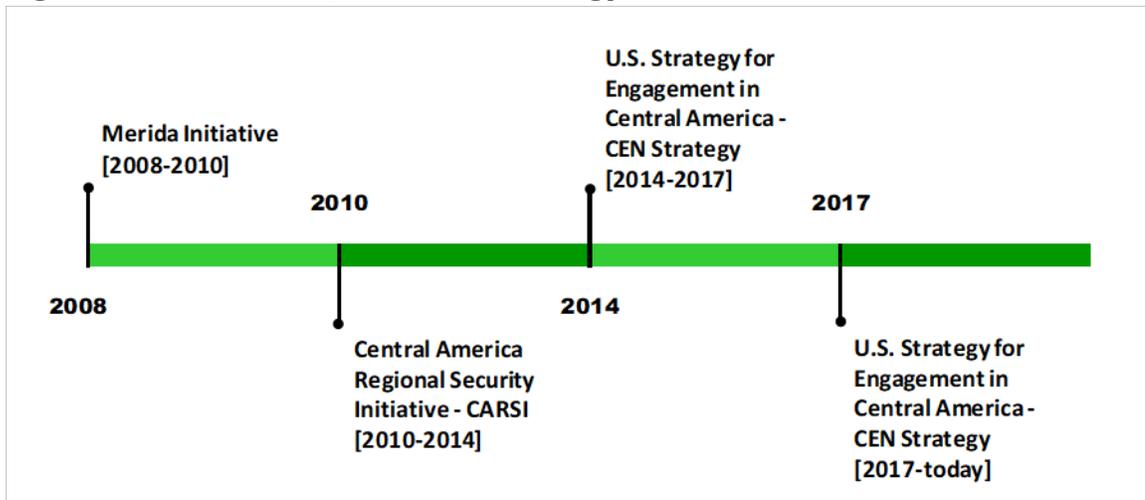
- Both the U.S. and Salvadoran Governments had legal requirements that limited the mission from implementing activities targeting gang members and individuals who had already engaged in criminal acts. Specifically, every 2 years, USAID/EI Salvador must obtain a license from the Department of the Treasury to engage with people in conflict with the law. Also, the Government of El Salvador restricts organizations from working with gangs that have been classified as terrorist organizations.
- USAID did not develop a bureau-level implementation plan to outline the Agency’s priorities and provide a coherent framework for guiding missions’ crime and violence prevention programming in support of the CEN Strategy. Without this level of guidance, USAID’s priorities and approach for achieving the security goals of the CEN Strategy were unclear.
- While USAID/EI Salvador staff were experts in their respective technical areas, they had limited knowledge and working experience in crime and violence prevention—a new field for USAID. Training was also inconsistent. It was largely left to USAID/EI Salvador staff to decide how to obtain the knowledge needed to advance the CEN Strategy’s security goals.

We made two recommendations to better ensure that crime and violence prevention activities carried out in El Salvador and across Central America advance the security goals of the CEN Strategy. We determined that the Agency’s planned actions meet the intent of the recommendations.

BACKGROUND

The United States is committed to promoting a safer and more prosperous Central America and has played a significant role in supporting and improving the stability of Central American countries, including El Salvador. Since 2008, the U.S. Government has developed several strategies and initiatives to address the region's problems (figure 1). Each initiative or strategy centered on improving security but differed slightly in its approach.

Figure 1. Timeline of the U.S. Strategy in Central America



Source: OIG's analysis of the U.S. Strategy in Central America documents.

In 2008, the United States began allocating funds to Central American countries including El Salvador, Guatemala, Honduras, and Nicaragua to combat organized crime and narcotrafficking through the Merida Initiative. This initiative was a security cooperation agreement between the governments of the United States, Mexico, and Central American countries. The focus of this assistance was (1) counternarcotics, border security, and counterterrorism; (2) public security and law enforcement; and (3) institution building and the rule of law.

In 2010, the U.S. Government re-initiated the Central America portion of the Merida Initiative as the Central America Regional Security Initiative (CARSI) and refocused U.S. security efforts to improve citizen security. Specifically, the initiative focused on providing support to local communities and governmental institutions to help strengthen their capacity to address security challenges and the underlying reasons that contributed to them.

In 2014, the U.S. Government launched the CEN Strategy. This strategy was designed as an overarching framework for all U.S. Government interaction in Central America and prioritized interagency coordination in three areas, or pillars. It sought to increase prosperity, governance, and security in Central America and address the root causes of the migration crisis. Related to the security pillar, this strategy deepened security cooperation to reduce gang violence and the influence of organized crime.

In 2017, the CEN Strategy was updated to focus on securing U.S. borders and protecting U.S. citizens. While the strategy addressed the same three pillars as the 2014 strategy, it emphasized combatting the drivers of illegal migration and illicit trafficking. Under the security pillar, the goal of disrupting transnational gangs and criminal organizations was updated to include scaling up integrated violence prevention and law enforcement activities and targeting individuals most susceptible to gang recruitment, including individuals who had already engaged in criminal activity.

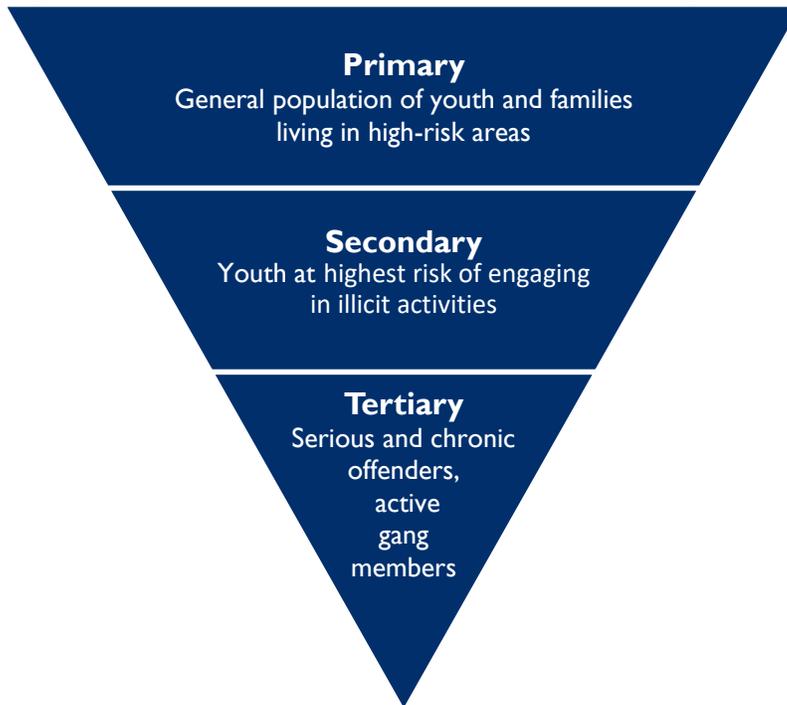
Although a number of U.S. agencies carry out programs to implement and advance the goals of the CEN Strategy, Congress appropriated the majority of funds for this work to the Department of State and USAID (see appendix B for funding information).² USAID's work supports all three of the strategy's key pillars—prosperity, governance, and security. In support of the security pillar, specifically, USAID's role is to improve citizen security by reducing violence at the community level and reducing the influence of organized crime and gangs. To do this, USAID designed crime and violence prevention activities that combined law enforcement interventions to strengthen at-risk youth, families, and communities.

To target the most at-risk communities and individuals, USAID classifies crime and violence prevention in three levels. Each level focuses on a specific stage of prevention and group of individuals (figure 2).³

² The Department of State and USAID work together to plan, manage, monitor, and evaluate foreign assistance supporting the CEN Strategy. The other agencies tasked with carrying out the CEN Strategy include the Departments of Agriculture, Commerce, Defense, Homeland Security, Justice, Labor, and Treasury, as well as the Millennium Challenge Corporation and the U.S. Trade and Development Agency.

³ These levels are based on the health impact pyramid developed by the U.S. Centers for Disease Control and Prevention.

Figure 2. Crime Prevention Levels and Target Populations



Source: OIG’s analysis of the USAID Crime and Violence Prevention Field Guide.

Primary. Crime and violence prevention activities at this level are usually designed to reach all individuals living in a community or area that has been identified as at-risk. Primary-level activities can include establishing youth outreach centers, hosting sporting events and after-school activities, and facilitating vocational job training and placement for job seekers.

Secondary. This level of prevention is more targeted to youth (individuals or groups) with several risk factors for becoming victims or perpetrators of crime and violence. At this intervention level, activities become more individualized and are designed to focus on mental health, mentoring, and family support services.

Tertiary. Tertiary-level prevention activities target individuals at the highest level of risk for engaging in gang or criminal activity as well as those who have already engaged in these behaviors and may also include victims of violence. This level reaches fewer individuals than either primary or secondary prevention and requires intensive interventions to reduce recidivism among known offenders. Activities such as specialized rehabilitation and therapeutic services implemented at this level are the most focused and difficult to implement.

USAID uses this model to determine appropriate interventions to address the unique needs of specific communities and individuals. While USAID’s LAC Bureau is responsible for guiding the implementation of the CEN Strategy at the Agency, country missions are responsible for the design and implementation of programs at the country level.

USAID/EL SALVADOR’S CRIME AND VIOLENCE PREVENTION PROGRAMS TARGETED AT-RISK COMMUNITIES AND WERE BEGINNING TO FOCUS ON HIGHER RISK INDIVIDUALS

USAID/El Salvador has mainly implemented programs at the primary and secondary crime and violence prevention levels and had just begun to implement programs targeting individuals at a higher risk—the tertiary level—as called for in the 2017 CEN Strategy.⁴

Of USAID/El Salvador’s five programs conducting crime and violence prevention activities to advance the security goals of the CEN Strategy during 2015-2018, all five worked at the primary level (table 1). These programs were being carried out in the 50 most at-risk municipalities in El Salvador as identified in the Salvadoran Government’s security strategy, Plan El Salvador Seguro. These programs included a variety of interventions to address the communities’ security concerns, such as working with the local government and providing safe places for youth to convene. For example, the programs developed several after-school activities, such as sporting activities, art clubs, and music programs. These activities were held in community outreach centers where youth had access to training courses on life and work skills. In addition, the programs helped local committees implement crime prevention plans to identify and address risk factors for violence in their communities. The programs also implemented small infrastructure projects at schools and parks to improve equipment and facilities.

Two of USAID/El Salvador’s five programs also worked at the secondary level of prevention to offer individualized services to at-risk youth and utilized tools to identify youth risk factors. According to USAID, more than 5,000 young people participated in surveys and received counseling services on personal and family issues with a goal of strengthening family bonds, improving communication with families, and modifying risky behaviors. Additionally, one of the programs provided post-trauma and psychological care in two national hospitals to treat youth victims of violence.

Table 1. USAID/El Salvador Crime and Violence Prevention Activities

Program Name	Funding (US\$ Million)	Period of Program	Targeted Level of Crime and Violence Prevention Activities
SolucionES	\$20.0	2012-2017	The program developed primary and secondary prevention activities, such as providing social skills programs to children and youth living in communities most at risk.

⁴ The CEN Strategy emphasizes engaging with individuals susceptible to gang recruitment and those already engaged in criminal activity.

Program Name	Funding (US\$ Million)	Period of Program	Targeted Level of Crime and Violence Prevention Activities
Youth and Community Development Program	\$7.4	2012-2019	The program included primary activities, such as afterschool programs and small infrastructure projects in 12 selected municipalities in El Salvador.
Crime and Violence Prevention Project	\$39.8	2013-2019	The program included primary, secondary, and tertiary activities. The tertiary activities were pilot programs that offered life skills training, drug rehabilitation, and income-generation opportunities to individuals seeking to reintegrate into society.
Bridges to Employment Activity	\$42.2	2015-2020	The program included primary and secondary activities, such as providing training for life and work skills and assessing youth risk factors to enhance employability of individuals.
Return and Reintegration in the Northern Triangle	\$16.8	2016-2019	The program included primary prevention activities, such as small-scale infrastructure projects in eight municipalities in El Salvador to recover public spaces.

Source: OIG’s analysis on the USAID/El Salvador’s program documents.

As early as 2014—and consistent with the 2014 and 2017 CEN Strategies—the LAC Bureau identified the need to go beyond the primary level of prevention and focus on the highest risk individuals in order to address gang violence, the principal driver behind the region’s acute crime problem.⁵ Further, a 2016 USAID-funded study noted that tertiary prevention programs were a critical component of missions’ efforts to reduce crime in the Northern Triangle.⁶ However, USAID/El Salvador only began shifting attention to tertiary programs in 2018, and only one mission program worked at this level. This program conducted pilot activities and offered psychosocial support, life skills training, drug rehabilitation, and income-generation opportunities to individuals seeking to reintegrate into society.

⁵ According to LAC Bureau officials, this need was outlined in a 2014 white paper designed to provide “a basis or common narrative” on USAID’s approach to citizen security programming in Central America that was never approved or formalized.

⁶ Democracy International, Inc., “What Works in Reducing Community Violence: A Meta-Review and Field Study for the Northern Triangle,” February 2016.

LEGAL REQUIREMENTS, THE LACK OF AN IMPLEMENTATION PLAN, AND STAFF CAPABILITY GAPS HINDERED USAID'S ABILITY TO TARGET THE HIGHEST RISK INDIVIDUALS

Mission staff noted that it was difficult to implement crime and violence prevention activities that targeted the highest risk individuals at the tertiary level. In particular, there were significant legal requirements that affected the mission's ability to engage in tertiary prevention activities. Further, the LAC Bureau did not develop an implementation plan that established priorities for advancing the security goals of the CEN Strategy, and USAID/El Salvador staff had limited knowledge and experience in the crime and violence prevention field.

U.S. and Salvadoran Legal Requirements Limited USAID/El Salvador's Ability To Develop and Implement Tertiary Prevention Programs

The 2017 update to the CEN Strategy placed emphasis on disrupting transnational criminal organizations, such as the gang Mara Salvatrucha-13 (MS-13) in El Salvador, as well as working with individuals at a higher risk level. However, both the U.S. and Salvadoran Governments had restrictions related to working with these populations.⁷ These restrictions impacted USAID/El Salvador's ability to implement tertiary prevention programs that worked with youth and adults in conflict with the law, specifically current and former gang members.

The U.S. Government required a special authorization to allow organizations and their employees, as well as their agents, contractors, and grantees, to engage in transactions where members of prohibited groups could be beneficiaries. Specifically, a regulation of the Department of the Treasury's Office of Foreign Assets Control (OFAC) required issuance of an OFAC license prior to engaging with current or former gang members through tertiary prevention programs.

The approval process for obtaining the 2-year OFAC license was lengthy, leading to delays implementing tertiary-level crime and violence prevention programs. USAID's LAC Bureau began the process of obtaining its first license in 2015 but did not receive it until 2017. As part of this process, the bureau was required to put procedures in place to review and approve ex-gang members to receive assistance. Based on lessons learned during 2015-2017, the LAC Bureau and USAID/El Salvador took steps to start the OFAC license application process earlier for the new license it obtained in 2019.

Another challenge identified by USAID officials was that organizations they worked with expressed concerns conducting tertiary-level activities given the Government of El

⁷ Executive Order 13581, dated July 24, 2011, as amended by Executive Order 13862, dated March 15, 2019, targets significant transnational criminal organizations by prohibiting financial and other transactions where members of prohibited groups could be beneficiaries.

Salvador's official stance on working with gang members. In August 2010, the Government of El Salvador declared some local gangs, such as MS-13, to be terrorist organizations, and prosecuted organizations that worked with them. In 2015, the Government of El Salvador drafted legislation—the Reinsertion and Rehabilitation Law—to provide a clearer legal framework that would allow organizations to deliver assistance to current and former gang members; however, the law has not yet been approved by the legislature.

Because of these requirements, USAID/El Salvador has faced barriers to fully implement tertiary prevention activities. Until resolved, the mission will continue to be limited in its ability to impact individuals at the highest risk of crime and violence.

Despite these challenges, USAID/El Salvador continued the groundwork to start implementing programs targeting the most at-risk individuals. For example, in February 2019, the mission developed a program to improve public service delivery for youth in conflict with the law, improve employability skills, and promote the approval and implementation of the draft legislation to reintegrate and rehabilitate ex-gang members. These interventions created opportunities for organizations to collaborate more openly with youth in conflict with the law. Further, through collaboration with other U.S. Government agencies working in El Salvador, the mission developed vetting procedures in line with the OFAC requirements. Given the mission's progress in moving forward while working within the parameters of these legal requirements, we are not making a recommendation at this time.

USAID Did Not Develop a Bureau-Level Implementation Plan To Ensure the CEN Strategy's Security Goals Were Advanced at the Mission Level

According to USAID policy, the role of a Washington operating unit such as the LAC Bureau is to ensure the proper implementation of strategies and initiatives, including ensuring that missions undertake activities that will advance these strategies and initiatives.⁸ The LAC Bureau has not developed an implementation plan for the CEN Strategy, even though it has done so for other large strategies and initiatives, such as the U.S. Strategy to Prevent and Respond to Gender-Based Violence.

Implementation plans are tools that USAID has used to operationalize strategies and initiatives in order to provide some level of assurance for achieving desired results. These plans act as a road map, describing what should be done to accomplish a strategy's goals. They may include a listing of tasks and activities, costs, challenges, lessons learned, plans, and procedures that are required to achieve the objectives of the strategy.

The LAC Bureau did not clearly lay out specific priorities and goals within the overall CEN Strategy for missions in the region, including El Salvador, and did not describe

⁸Automated Directives System (ADS) chapter 201.3.3.1, "Mission and Washington Operating Unit Roles in Project Design and Implementation."

implementation steps specifically targeted to achieve and advance the strategy's security goals for the region. Further, according to Agency policy, bureaus should provide guidance to missions on policies, priorities, and other regional issues, and should support missions with technical expertise.⁹

Based on interviews with LAC Bureau officials, there were multiple reasons for the absence of a bureau-level implementation plan to address the CEN Strategy. For example, LAC Bureau officials stated that the CEN Strategy itself served as the implementation plan, so there was no need for a more detailed plan. They also noted that they had weekly and biweekly phone calls with the relevant mission directors, which served as the forum to communicate priorities, share information, and discuss issues and challenges. LAC Bureau officials indicated that, because of the Agency's decentralized structure, missions were responsible for leading their own strategy. As a result, the LAC Bureau filled a supporting role.

LAC Bureau officials also stated that since the CEN strategy is an Administration-approved regional strategy, the appropriate place for incorporating the strategy's goals and corresponding action plans was in each mission's country development cooperation strategy (CDCS) and other internal documents used for planning, designing, and implementing programs. However, while USAID/EI Salvador aligned program documents supporting the CDCS to the CEN Strategy in 2015, at the time of our audit work, the mission had last updated the CDCS itself in 2013—1 year before the original 2014 CEN Strategy and 4 years before the updated 2017 CEN Strategy were launched. As a result, USAID/EI Salvador's CDCS aligned with the CARSI Initiative and had not been modified to align with the CEN Strategy.

Without an implementation plan established at the bureau level, the LAC Bureau largely left setting the priorities of advancing the security goals of the CEN Strategy to the missions. An implementation plan at the bureau level—as opposed to country-level programming documents—that outlined USAID's priorities and approach for achieving the security goals of the CEN Strategy could have provided a clearer blueprint for USAID and its mission. Without this level of guidance, it was unclear to both USAID/EI Salvador and the LAC Bureau what the Agency wanted to achieve overall in support of the security goals of the CEN Strategy. This, in turn, contributed to USAID/EI Salvador's slower shift toward a focus on activities at the tertiary level.

Mission Staff Had Limited Knowledge and Experience and Inconsistent Training in the Crime and Violence Prevention Field

Agency policy states that USAID's regional bureaus are responsible for providing guidance on policies and priorities to support missions with technical expertise and to ensure that strategies and initiatives are implemented.¹⁰ In addition, the U.S. Government Accountability Office's "Standards for Internal Control in the Federal

⁹ ADS chapter 201.3.3.1, "Mission and Washington Operating Unit Roles in Project Design and Implementation."

¹⁰ ADS chapter 201.3.3.1, "Mission and Washington Operating Unit Roles in Project Design and Implementation."

Government” notes that part of management’s responsibility is to train and empower staff to develop skills appropriate for their role and the organization’s needs.¹¹

Crime and violence prevention is a relatively new area for USAID, the LAC Bureau, and USAID/EI Salvador. As a result, USAID/EI Salvador staff had limited knowledge and working experience in this field. Since USAID did not have a staff specialty for crime and violence prevention, as they did for other technical areas, related activities were embedded into USAID/EI Salvador’s existing programs and managed by staff with expertise in these other fields. For example, many of the mission’s crime and violence prevention activities were included in democracy and governance and economic growth programs and managed by staff with expertise in those areas.

Additionally, LAC Bureau officials stated that bureau and mission staff were learning about the crime and violence prevention field by adopting best practices—emulating other countries’ proven models, which they thought would work with some adjustment to the realities of their region or specific country. As such, mission staff stated that they were really learning as they implemented the activities.

The LAC Bureau employed other methods to expand staff’s knowledge of this emerging field and made some efforts to provide guidance, tools, and training. For example, the bureau organized periodic conferences and workshops led by crime and violence prevention experts from around the world and hired experts to work in the LAC Bureau. LAC Bureau officials also stated they held weekly calls with missions, reviewed planned activities, and provided field support on designing crime and violence prevention activities to ensure they tied to the goals of the CEN Strategy. In addition, LAC Bureau officials developed field guides to provide the mission with instruction on implementing crime and violence prevention activities.¹²

However, it was largely left to USAID/EI Salvador staff to decide how to obtain the knowledge needed to advance the CEN Strategy’s security goals. The field guides developed by the LAC Bureau were not mentioned by mission staff as guidance or tools used for designing and implementing crime and violence prevention activities. Similarly, there was no requirement for staff to attend applicable conferences or workshops, nor was there a standardized method for mission employees to access available training information.

Training attendance by mission staff was inconsistent, resulting in staff adopting a “learn-as-you-go” strategy to help them navigate and expand their knowledge of the crime and violence prevention field. Five of seven mission employees interviewed stated that they were either unaware or could not attend relevant training courses being offered. Other staff recalled that they had attended one or two conferences on various crime- and violence-related topics but could not recall any in-depth, specialized training.

¹¹ U.S. Government Accountability Office, “Standards for Internal Control in the Federal Government” (GAO-14-704G), Principle 4 – Demonstrate Commitment to Competence, 2014.

¹² Democracy International, Inc., “What Works in Reducing Community Violence,” February 2016; and Democracy International, Inc., “Crime and Violence Prevention Field Guide,” July 2016.

Because of limited knowledge and experience and inconsistent training, USAID/EI Salvador's approach to crime and violence prevention may not have been as robust, impactful, or targeted as it could have been. Given that USAID has now worked in this field for some time, it is in a better position to create training plans or a toolkit with access to concrete, practical program options, lessons learned, and applicable trainings as the Agency starts to increase tertiary-level activities. Specific training would benefit all staff working to design, implement, measure, and evaluate crime and violence prevention activities. A training plan would also assist with ensuring that staff responsible for advancing the security goals of the CEN Strategy have the tools and competencies needed to meet the strategy's objectives.

CONCLUSION

Many citizens of Central American countries lead lives plagued with crime and violence and seek to leave those conditions. The U.S. Government's response—formulated by the CEN Strategy—continues to evolve and, in part, emphasizes the importance of reducing gang violence and the influence of organized crime by targeting the individuals most susceptible to gang recruitment and those already in conflict with the law. Although USAID/EI Salvador has engaged with at-risk communities for several years, it has yet to really target its efforts on individuals, particularly at the tertiary level. Going forward, USAID can do more to give USAID/EI Salvador and other missions in the region the tools and training they need to better ensure that their activities and programs target the most at-risk individuals. This includes developing an implementation plan that provides a framework for achieving the CEN Strategy's security goals and enhancing mission staff's capabilities to design and manage crime and violence prevention activities.

RECOMMENDATIONS

We recommend that USAID/LAC Bureau:

1. Develop and implement a bureau-level plan that sets the Agency's priorities and provides a framework for achieving the security goals of the CEN strategy.
2. Develop and implement a training plan that helps USAID/EI Salvador develop staff capacity to design and manage crime and violence prevention activities.

OIG RESPONSE TO AGENCY COMMENTS

We provided our draft report to USAID on September 11, 2020, and on October 9, 2020, received its response, which is included as appendix C.

The report included two recommendations and we acknowledge management decisions on both. While the Agency requested closure of both recommendations upon issuance of the report, we consider both recommendations open-resolved. For recommendation 1, the Agency's response varied from the recommendation, but the actions described as taken meet the recommendation's intent. Recommendation 1 is resolved but open pending provision of supporting documents, to include documentation supporting the described engagement with the LAC Bureau. For recommendation 2, the Agency described actions that are still underway. We consider recommendation 2 resolved but open pending completion of planned actions described by the Agency, to include the anticipated deployment of training content on violence prevention. The Agency plans to make this content available to the missions by March 2021.

APPENDIX A. SCOPE AND METHODOLOGY

We conducted our work from July 2018 through July 2020 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 objectives.

Our audit objective was to assess USAID's crime and violence prevention activities in El Salvador to advance the security goals of the U.S. Strategy for Engagement in Central America (CEN Strategy). Specifically, we (1) assessed to what extent USAID/El Salvador's activities targeted the most at-risk communities and individuals and (2) determined what challenges USAID faced in implementing the CEN Strategy. To capture the impact of the CEN Strategy, which became effective for U.S. agencies in late fiscal year 2014, our audit scope covered fiscal years 2015-2018. We conducted our review at USAID/LAC Bureau in Washington, DC, and at the USAID mission in El Salvador.

To gain an understanding of the audit topic, we reviewed the past and current U.S. strategies for aiding Central American countries, including the Merida Initiative, Central American Regional Strategy Initiative, original 2014 CEN Strategy, and updated 2017 CEN Strategy. We identified and reviewed key documents related to the CEN Strategy, such as the strategy's Monitoring and Evaluation Plan and Multiyear Spend Plan. We identified and reviewed USAID country- and regional-level strategy and planning documents, such as the Central America Regional Development Cooperation Strategy and USAID/El Salvador's Country Development Cooperation Strategy. In total, we reviewed approximately 200 documents, including prior audit reports from the U.S. Department of State and the Government Accountability Office (GAO) related to crime and violence prevention in the Northern Triangle; an impact evaluation; training records; and program and activity documents, including awards, work plans, and progress reports. We also identified relevant Agency, GAO, and Office of Management and Budget criteria, standards, and principles. We interviewed over 40 staff members in USAID's LAC Bureau and at USAID/El Salvador to identify the methods and processes used to implement the CEN Strategy, how at-risk communities and individuals were identified, and resources provided to USAID/El Salvador mission staff to help them advance the security goals of the CEN Strategy.

To help us answer the audit objective, we assessed the extent to which USAID/El Salvador's crime and violence prevention activities targeted the most at-risk communities and individuals. There were eight programs, totaling \$152 million, that included crime and violence prevention activities; however, three of the eight programs mainly focused on the regional level rather than the country level so were excluded from our testing. We tested the remaining five programs, totaling \$126 million or 83 percent of the total programs, and reviewed the program descriptions and their supporting documentation (original awards, modifications, annual work plans, and relevant supporting information) to identify the criteria and parameters used to classify the most at-risk communities, individuals, and prevention levels. We also interviewed Office of Inspector General, U.S. Agency for International Development

mission officials to determine the processes used to identify and target the most at-risk communities and individuals. Then we assessed whether the activities targeted the most at-risk communities and individuals and were implemented at the three levels of prevention (primary, secondary, and tertiary). To determine whether the activities were conducted in the most at-risk communities, we compared the activities' locations to the 50 most at-risk communities where the mission had decided to work. To determine whether the activities were planned and implemented at the three prevention levels, we compared the descriptions of the activities to illustrative activities outlined in USAID's Crime and Violence Prevention Field Guide. We did not look at program achievement performance.

To assess the challenges USAID faced in implementing the CEN Strategy, we held discussions with the LAC Bureau to identify how it communicated its plan and priorities to the mission. We conducted interviews and reviewed supporting documentation to obtain information about the process and methods, the plans and guidance developed, and resources used by the Agency to implement the security goals. We reviewed relevant U.S. and Salvadoran laws and regulations related to working with criminal organizations. We reviewed program documentation to determine whether the activities supported the security goals of the CEN Strategy. We also interviewed LAC Bureau and mission staff to determine whether training, conferences, and workshops were offered to educate staff on implementing crime and violence prevention activities. We reviewed training records and employee files for USAID/EI Salvador staff responsible for managing the programs to determine if they participated in training and attended workshops and conferences to increase their knowledge and capacity to implement crime and violence prevention activities.

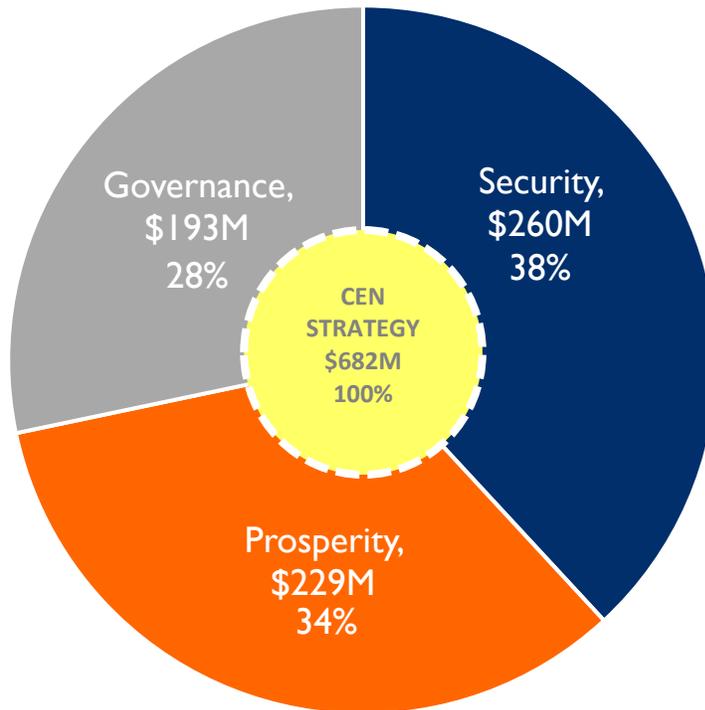
In planning and performing the audit, we evaluated the internal controls that were significant to the audit objectives. This included gaining an understanding of USAID's roles and responsibilities in advancing the security goals of the CEN Strategy as well as the technical assistance and training provided to ensure that the strategy's goals were implemented. We also considered legal requirements established by the U.S. and Salvadoran Governments for assisting individuals in conflict with the law. We did not rely extensively on computer-based information to answer the audit objective. The information we obtained from our interviews, document reviews, and sample testing provide context for the audit findings.

APPENDIX B. OVERVIEW OF THE FUNDING FOR THE U.S. STRATEGY FOR ENGAGEMENT IN CENTRAL AMERICA

Since fiscal year 2016, the U.S. Government has supported efforts to address economic, governance, and security challenges in Central American countries and committed approximately \$3.1 billion in foreign assistance through a number of strategies and initiatives.

Focusing on improving conditions in these countries and securing the U.S. border, in FY 2017, the U.S. Government allocated \$682 million to enhance security, governance, and prosperity. As shown in the chart below, most of the funds were targeted to address the countries' security issues.

Figure 3. FY 2017 Funding Allocation for U.S. Strategy for Central America (in Millions)



Source: The U.S. Strategy for Engagement in Central America's FY 2017 Spend Plan.

The majority of the funds under the security pillar (68 percent) were to support activities to reduce violence at the local level, including the influence of gangs among youth, through work with USAID and the Department of State's Bureau of International Narcotics and Law Enforcement Affairs.

APPENDIX C. AGENCY COMMENTS



MEMORANDUM

TO: Principal Deputy Assistant Inspector General for Audit, Van Nguyen

FROM: SDAA/LAC, Joshua Hodges

DATE: October 7, 2020

SUBJECT: Management Comments to Respond to the Draft Audit Report Produced by the Office of the Inspector General (OIG) titled, *USAID/El Salvador's Crime and Violence Prevention Programs Need To Focus More on High-Risk Individuals To Advance Security Goals* (9-598- 20-00X-P) (Task No. 11100118)

The U.S. Agency for International Development (USAID) would like to thank the OIG for the opportunity to provide comments on the subject draft report. This memorandum transmits our response to both recommendations included in the draft audit report for your review and consideration. USAID provides plans for implementing the recommendations and discusses significant progress already made below. We have reviewed the draft report carefully and offer the following comments:

USAID would like to clarify an important distinction between the Central America Regional Security Initiative (CARSI) and the U.S. Strategy for Central America (Central America Strategy). While CARSI programming is a component of the Central America Strategy, it is important to note that each has unique objectives, scopes, and operational plans. Since FY2008, the U.S. Government has supported security efforts in Central America through CARSI. In addition to providing equipment, training, and technical assistance, CARSI was designed to strengthen the long-term capacities of Central American governments to address security challenges and the underlying social and political factors that contribute to them. CARSI seeks to reduce crime and violence in Central America, and includes a partnership with the State Department's Bureau for International Narcotics and Law Enforcement (INL). CARSI also receives dedicated funding in annual appropriations that is provided specifically to USAID and INL.

The U.S. Government's Central America Strategy, by contrast, was conceived in FY2016 as a joint initiative of the Department of State and USAID to address the underlying

drivers of illegal immigration: the lack of economic prosperity, good governance, and justice. To better reflect the relationship of ongoing U.S. efforts, the chart on page 3, “based on OIG’s analysis” should be corrected to state that CARSI works in conjunction with, but as a component of the Central America Strategy, for example, by indicating the timeline for CARSI as 2008-present.

The OIG report emphasizes the importance of working at the tertiary level (with serious and chronic offenders) for crime and violence prevention. While USAID agrees that tertiary level prevention programs are an important component of CARSI-funded violence prevention programs, we disagree with the OIG’s assertion that tertiary prevention alone will fully address the endemic crime and violence that plagues El Salvador, Guatemala, and Honduras. Indeed, USAID’s experience indicates a need for the full spectrum of primary, secondary, and tertiary violence prevention programs in order to produce effective results. Tertiary prevention programs target individuals who have already engaged in violent or criminal behaviors because they are the group most likely to engage in that behavior again. Strategies that combine tertiary programs with interventions targeted to individuals who have not yet engaged in violence but are likely to do so (secondary prevention) and to communities with higher incidence of violence (primary prevention) are the most likely to promote sustainable violence prevention. In other words, best practice is for tertiary level programs to work in concert with primary and secondary activities simultaneously. Furthermore, programs that work to expand available opportunities on economic prosperity are a separate but critical component of the whole-of-government approach and strategy. Lastly, it is not always feasible within existing legal structures, as noted by the OIG report, to easily support individuals at the tertiary stage. In addition, neither the 2015 Central America Strategy, the 2017 Strategy update, nor USAID’s approach to CARSI-funded prevention programs have identified the need for or suggested an exclusive focus on highest risk populations (i.e., tertiary level).

Given the complex legal issues that tertiary prevention programming presents for U.S. Foreign Assistance and entities operating in El Salvador, as well as the lack of an explicit mandate to work solely on tertiary prevention programs, USAID believes its approach to tertiary programming is sound. As the OIG noted in its draft report, USAID and State began pursuing an Office of Foreign Asset and Control (OFAC) license in November 2015. The OFAC license request was granted in February 2017 for a period of two years, allowing USAID and State to engage in tertiary prevention programs, on the condition that appropriate safeguards were established in each country to ensure that no group (OFAC-designated or otherwise) would stand to benefit from these programs. USAID worked with U.S. Embassy-San Salvador’s Law Enforcement Working Group (LEWG) - composed of personnel from the Departments of State, Defense, Justice, and Homeland Security, as well as other agencies - to develop safeguards in line with the requirements of the license. Once the LEWG protocols were functional, USAID/El Salvador modified existing contracts and began designing new activities to work with tertiary prevention populations. The license renewal was granted in February 2019, after a six-month process.

With regard to concerns raised by the OIG about the experience of staff employed both in Washington and the field, USAID reviewed the education, background, and professional experience of the associated staff working on crime and violence prevention issues and disagrees with the finding that USAID staff lack technical knowledge. The findings document does not provide evidence for this claim beyond the fact that there is not a dedicated backstop for Crime and Violence Prevention in the Agency, nor does it take into account the many years of experience brought to bear by existing staff who were hired for their technical knowledge [especially foreign service national (FSN) and personal services contractor (PSC) staff] or of those staff who have increased their knowledge through experience.

Further, USAID submits that the considerable technical guidance and/or experiential training provided by USAID/Washington to Missions to increase their knowledge of state-of-the-art practices in the rapidly evolving field of crime and violence prevention is relevant. USAID provided to the OIG a detailed list of training and support opportunities created for the Missions during the time period under consideration. Training opportunities provided by the Bureau for Latin America and the Caribbean (LAC) include sponsorship of the well-regarded Los Angeles Gangs Conference in 2014, 2015, 2017, 2018, and 2019; the Place-Based Strategy Workshops in 2015; sponsorship of the Department of Justice (DOJ) Forum on Youth Violence Prevention in 2016¹³; the Citizen Security/Rule of Law Workshop in 2017; Community-Based Violence Prevention and Risk Assessment Tool Workshop in 2018, and the Strategic Citizen Security Overview Workshop in 2019. Additional meetings were held regularly with experts to deepen knowledge on specific topics, including a Focused Deterrence Workshop in 2017 and Cure Violence Conference in 2018. This constitutes nine learning events in the three years under consideration (2015-2018) where Mission staff were afforded in-person training sponsored by the LAC Bureau.

In addition, the LAC Bureau funded and created three essential learning documents during this period: *What Works in Reducing Community Violence* (2015), the *Crime and Violence Prevention Field Guide* (2016), and “What Works to Prevent Lethal Youth Violence in the LAC Region: A Global Review of the Research” (2019). These were developed and provided to Mission staff during the period of this assessment through the Youth Violence Prevention Task Order. In addition, the following guides were developed by USAID and made available to Mission staff: *A Field Guide for USAID Democracy and Governance Officers: Assistance to Civilian Law Enforcement in Developing Countries* (2011); *Community Policing in Central America: The Way Forward* (2011); and the *USG Security Sector Reform Guide* (2014).

USAID/LAC’s CARSI team, in cooperation with other LAC Bureau staff and USAID’s Center of Excellence on Democracy, Human Rights, and Governance (DRG Center), also provided technical guidance via weekly calls, frequent in-person and remote support for new project designs, and participation in program Technical Evaluation Committees (TECs). Activities conducted prior to the scope of the OIG’s audit further enhanced the knowledge of the field teams and the Agency as a whole, including the 2012

¹³ <https://ojjdp.ojp.gov/library/publications/national-youth-violence-prevention-update-2010-2016>

Memorandum of Understanding with Los Angeles' Gang Reduction and Youth Development Office to provide technical assistance on risk-based assessment tools, which provided the basis for USAID/El Salvador's work on risk-based violence prevention interventions.

Through the forums, guides, and other actions mentioned above, USAID/LAC and USAID/El Salvador have successfully identified evidence-based programs and analyses to meet the requirements outlined in the Automated Directives System (ADS) 201.3.1.2. The report aptly finds that USAID/LAC and USAID/El Salvador were "*emulating and adopting models that have been proven in other countries, which they thought would work with some adjustment to the realities of their region or specific country.*" This finding is consistent with ADS 201.3.1.2, which states that "*USAID's decisions... must depend on analyses and conclusions supported by evidence. "Analysis" refers to formal assessments, evaluations, and studies conducted by USAID or other development actors. It also includes structured thinking based on experiences, insights, and internalized knowledge, as well as consultations with key stakeholders, including beneficiaries.*" While violence prevention remains an evolving field, USAID is confident in our assessment that staff are applying rigorous analysis to complex violence-related development challenges in Central America.

With that said, we agree with the OIG that more can and should be done across USAID to enhance training in the field of crime and violence prevention, including in LAC. As such, LAC is engaged in conversations with the new Bureau for Conflict Prevention and Stabilization (CPS) to design and implement new training on this topic.

USAID also questions whether the ADS citation included in footnotes 8 and 9 of the draft report, which directly impacts the recommendations, is indeed applicable to USAID/LAC as a regional bureau. Specifically, the portion of the ADS cited as a basis for the recommendation that USAID/LAC (a regional bureau) create an implementation plan for the Security Pillar of the Central America Strategy refers to pillar bureau responsibilities for incorporating Agency strategies. USAID believes we are correctly following the guidance in ADS 201 for incorporating Joint Regional Strategies, which would clearly include CARSI and the Central America Strategy, into country-level programs through the Country Development Cooperation Strategy (CDCS) and Integrated Country Strategy (ICS) processes, rather than creating a separate, duplicative process.

Finally, USAID appreciates the review by the OIG of our programs in El Salvador and the implications for our crime and violence prevention programs. However, USAID considers it essential to highlight the impact that crime and violence prevention programs have had in El Salvador. According to an impact evaluation conducted by Creative Associates that reviewed the period from 2013 to 2016, the perception of security in target municipalities increased by 26.6 percent, and overall crime decreased by 30.9 percent (from 3,155 crimes to 2,180). In addition, municipalities supported during this period experienced a 74 percent reduction in victimization rates, and communities saw a 64.3 percent increase in use of public spaces. We believe it is important to highlight these accomplishments so the recommendations and findings in the report are presented in the full and proper context.

COMMENTS BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID) ON THE REPORT RELEASED BY THE USAID OFFICE OF THE INSPECTOR GENERAL (OIG) TITLED, *USAID/ El Salvador's Crime and Violence Prevention Programs Need To Focus More on High-Risk Individuals To Advance Security Goals (9-598- 20-00X-P) (Task No. 11100118)*

Please find below the management comments from the U.S. Agency for International Development (USAID) on the draft report produced by the Office of the USAID Inspector General (OIG), which contains two recommendations for USAID:

Recommendation 1: Develop and implement a bureau-level plan that sets the Agency's priorities and provides a framework for achieving the security goals of the Central America Strategy.

- **Management Comments:** USAID believes we have addressed this recommendation through the articulation and approval of El Salvador's new (2020) Country Development Cooperation Strategy. We maintain that a bureau-level plan would be redundant, as explained below. USAID's Program Cycle Operational Policy (ADS 201) directs each Mission to develop a Country Development Cooperation Strategy (CDCS) to implement U.S. foreign policy and guide Agency programs in each country. USAID/El Salvador's recently completed CDCS provides a framework for achieving the security goals of the Central America Strategy and the country-level programs under CARSI for programs in El Salvador. This includes utilization of context indicators and associated targets for reductions in violence as measured by statistics such as homicide rates, prevalence of extortion, and incidents of gender-based violence. As context will vary in each country, the Agency considers that a bureau-level plan would be redundant to an existing process, per ADS 201, where joint regional strategies are incorporated into Mission planning via the CDCS and Integrated Country Strategy (ICS) processes. Through the leadership of the LAC/CAM office, the Bureau will continue to work with and support the El Salvador Mission, and the Central America region, as it fulfills the security goals articulated in countries' respective CDCSs.
- **Target Completion Date:** The new El Salvador CDCS was completed in August 2020, with extensive consultation with the LAC Bureau. In addition, the CDCS in Guatemala has been finalized and Honduras is completing its Stage 2 process, each with extensive consultation with LAC and other regional bureaus. As such, USAID believes this recommendation is now satisfied. USAID requests closure upon issuance of the final report.

Recommendation 2: Develop and implement a training plan that helps USAID/El Salvador develop staff capacity to design and manage crime and violence prevention activities.

- **Management Comments:** USAID agrees with this recommendation, while noting that this is being done in USAID/El Salvador as part of the Mission's normal operations. Several training initiatives are underway at both the bureau and the Agency level. USAID/LAC is already in the process of developing training content on violence prevention for current and new staff working on these issues. The learning modules are being developed under the Youth Violence Prevention Task Order; they will be completed in 2020 and deployed to the field by March 26, 2021. The training includes information on violence prevention theory, needs and risk assessment tools, programmatic evidence, measuring impact, and cross-sectoral issues in violence prevention. In addition, the new Conflict and Violence Prevention Bureau (CPS) is committed, over the coming year, to creating professional pathways for Agency staff engaged in countries affected by conflict and violence, including those in Central America, that will include educational opportunities, training, mentoring and advising. USAID/LAC will continue to incorporate, and expand, where necessary, citizen security training opportunities - including conferences and workshops - in Individual Learning and Training Plans for LAC Bureau staff working on crime and violence prevention. The LAC Bureau will also work in coordination with the Bureau for Conflict Prevention and Stabilization, and is exploring the development of additional new training programs for violence prevention. The LAC Bureau and the Mission will identify and make available training and learning resources on crime and violence prevention to staff, as needed, and as made available by the CPS Bureau.
- **Target Completion Date:** USAID/ El Salvador already implements crime and violence prevention training as part of the Mission's normal operations. Further, as noted above, the Agency is continually updating the educational and training opportunities available to staff. The Agency's new CPS bureau will develop new training and educational opportunities for USAID on conflict and violence prevention that will be available to our Missions. As a consequence, the Agency believes this recommendation is now satisfied, and USAID requests closure upon issuance of the final report.

In view of the above, we request that the OIG inform USAID when it agrees or disagrees with USAID's management comments.

APPENDIX D. MAJOR CONTRIBUTORS TO THIS REPORT

The following people were major contributors to this report: Emily Gardiner, audit director; Alicia Pegues, lead auditor; Karla Robinson, auditor; and Juan Carlos Rivas, auditor.