

OFFICE OF INSPECTOR GENERAL

U.S. Agency for International Development

Withdrawal From Afghanistan: USAID Faced Challenges Assisting in the Evacuation and Relocation of Implementer Staff

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Evaluation



Office of Audits, Inspections, and Evaluations



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

DATE: March 18, 2024

TO: USAID Bureau for Asia, Assistant Administrator, Michael Schiffer

FROM: Inspections and Evaluations Division, Director, Amy Burns /s/

SUBJECT: Withdrawal From Afghanistan: USAID Faced Challenges Assisting in the Evacuation and Relocation of Implementer Staff

This memorandum transmits the final evaluation report on the evacuation and relocation of implementer staff from Afghanistan during and after the U.S. government withdrawal from the country in August 2021. Our objectives were to (1) review USAID's role in the evacuation of its implementing organization staff from Afghanistan and to identify opportunities for improvement in future withdrawals, (2) review USAID's role in the relocation of its implementing organization staff from Afghanistan and identify opportunities for improvement, and (3) determine if USAID's risk management procedures effectively prepared the Agency to carry out its role in the evacuation and relocation of its implementing organization staff from Afghanistan. In finalizing the report, we considered your comments on the draft and included them in their entirety, excluding attachments, in Appendix B.

The report contains seven recommendations to improve USAID's preparation to support implementers during a withdrawal. After reviewing the information you provided in response to the draft report, we consider two recommendations closed (Recommendations 1 and 2), one recommendation resolved but open pending completion of planned activities (Recommendation 7), and four recommendations open and unresolved (Recommendations 3 through 6).

For Recommendations 3 through 6, within 30 days please provide us with a revised management decision that includes planned or completed corrective actions along with target completion dates, copying the Audit Performance and Compliance Division. For Recommendation 7, please provide evidence of final action to the Audit Performance and Compliance Division.

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

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Pursuant to Pub. L. No. 117-263 § 5274, USAID OIG provides nongovernmental organizations and businesses specifically identified in this report 30 days from the date of report publication to submit a written response to USAID OIG. Comments received will be posted on <https://oig.usaid.gov/>. Please direct inquiries to oinotice_ndaa5274@usaid.gov.



Report in Brief

Why We Did This Evaluation

In April 2021, President Biden announced a full military withdrawal from Afghanistan after nearly 20 years of U.S. military support. Subsequently, the Taliban entered Kabul and established control of the country on August 15, 2021. By August 31, USAID personnel had left Afghanistan.

We initiated this evaluation in response to congressional requests that the Inspectors General for USAID, the Departments of State and Defense, and the Special Inspector General for Afghanistan Reconstruction examine the special immigrant visa process for Afghan refugees. Members of Congress were concerned that processing delays put Afghans working with USAID (i.e., implementing organizations that carry out development projects through USAID grants, contracts, and cooperative agreements) at an increased risk of violent retribution by the Taliban. Our evaluation also considered the U.S. Refugee Admissions Program's Priority 1 and Priority 2 (P2) refugee resettlement programs.

Our evaluation objectives were to: (1) review USAID's role in the evacuation of its implementing organization staff from Afghanistan and to identify opportunities for improvement in future withdrawals, (2) review USAID's role in the relocation of its implementing organization staff from Afghanistan and identify opportunities for improvement, and (3) determine if USAID's risk management procedures effectively prepared the Agency to carry out its role in the evacuation and relocation of its implementing organization staff from Afghanistan.

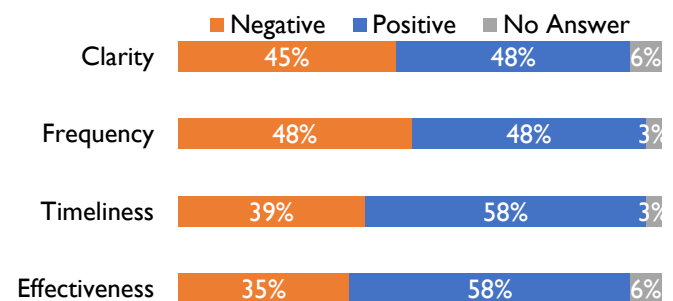
What We Recommend

We made seven recommendations to improve the Agency's preparation to support implementing organizations during a withdrawal. USAID agreed with six recommendations and disagreed with one. We closed two recommendations upon issuance of this report and will work with the Agency to close the outstanding five.

What We Found

USAID lacked a clear role and experienced challenges planning and communicating during the evacuation of implementing organization staff from Afghanistan. The Agency did not have defined evacuation-related roles and responsibilities or a mechanism to accurately track implementing organization staff. USAID was also constrained by insufficient staff and delayed guidance on how to address questions from implementing organizations, which had divided opinions about the Agency's communication efforts.

Implementing Organizations' Views of USAID's Communications During the Evacuation



Source: OIG interviews with implementing organization staff.

USAID coordinated relocation program referrals but was constrained by the timing of the P2 program announcement, lack of related guidance, and eligibility restrictions. USAID had a limited role in P2 processing, including verifying eligibility requirements and submitting referrals to the State Department. Strict P2 eligibility requirements and funding challenges also prevented some implementing organization staff from leaving Afghanistan.

USAID's Bureau for Asia did not conduct a comprehensive review of the risks that the USAID Mission in Afghanistan identified before the evacuation. This may have been due to the staff's inadequate knowledge and experience in this area and possibly weakened the Agency's response to the withdrawal.

Introduction

On April 14, 2021, President Biden announced a full military withdrawal from Afghanistan after nearly 20 years of U.S. support, including approximately \$145 billion of appropriated funding for reconstruction. With the sudden collapse of the Afghan government and Taliban takeover of Kabul on August 15, 2021, the U.S. government (USG) confronted a task of unprecedented scale and complexity to help coordinate and execute a massive evacuation from a chaotic and dangerous environment through the Hamid Karzai International Airport in Kabul. By August 31, all USAID personnel had left Afghanistan except for a few Foreign Service National (FSN) staff who, according to a USAID official, decided to remain.¹

This evaluation considered three mechanisms that allow Afghan nationals who worked with USAID in Afghanistan to potentially resettle in the United States. First, the Afghan Allies Protection Act of 2009 authorized Special Immigrant Visas (SIVs) for Afghans who worked for or on behalf of the United States in Afghanistan, including contractors, but not those working under cooperative agreements or grants. Second, the Priority 2 (P2) Program—announced by the State Department on August 2, 2021—allowed Afghans who worked for USG-affiliated programs and projects supported through a grant or cooperative agreement to qualify for refugee resettlement in the United States.

And third, the State Department designated categories of individuals eligible for the U.S. Refugee Admissions Program (USRAP) that includes the Priority 1 (P1) designation for individuals seeking resettlement whose cases are referred by the U.S. Embassy or other designated entity.

Figure 1. Afghanistan Evacuation, 2021

April 14	President Biden announces a full military withdrawal from Afghanistan.
April 27	State Department orders departure of all non-essential personnel.
August 2	State Department announces the Priority 2 Program.
August 15	The Taliban enters Kabul and establishes control of the country; U.S. embassy personnel evacuate through Kabul airport.
August 26	Terrorist attack at Kabul Airport kills over 150 Afghans and 13 U.S. troops.
August 31	Last USAID staff members depart Afghanistan.
September 7	USAID releases guidance authorizing administrative flexibilities for evacuation of implementer staff.
November 22	Administrative flexibilities end.

Source: Agency documentation, State Department guidance, and Congressional Research Service.

¹ USAID uses the term Foreign Service National for a non-U.S. citizen employee hired by a USAID mission abroad.

According to an August 2021 notice from USAID Administrator Samantha Power, during this chaotic period the Agency helped evacuate American citizens, allies, FSN staff, and other Afghans at risk. Specifically, the Agency reported it successfully evacuated 20 U.S. direct hires (USDHs),² as well as 143 FSN staff and more than 500 of their family members. In addition, USAID implementing organizations working in sectors such as healthcare, education, and humanitarian assistance said they evacuated expatriate staff and attempted to evacuate Afghan staff with some implementers more successful than others.³

We initiated this evaluation in response to congressional requests to our office and the Inspectors General for the State Department, the Defense Department, and the Special Inspector General for Afghanistan Reconstruction to conduct reviews of the SIV process. In the request letters, members of Congress raised concerns that delays in SIV processing put Afghan allies at an increased risk of violent retribution by the Taliban.

Our evaluation objectives were to:

1. Review USAID’s role in the evacuation of its implementing organization staff from Afghanistan and to identify opportunities for improvement in future withdrawals.
2. Review USAID’s role in the relocation of its implementing organization staff from Afghanistan and identify opportunities for improvement.
3. Determine if USAID’s risk management procedures effectively prepared the Agency to carry out its role in the evacuation and relocation of its implementing organization staff from Afghanistan.

For this report, “evacuation” refers to the events that occurred from the President’s April 2021 announcement of a full military withdrawal from Afghanistan until August 31, 2021, when the last USAID staff members departed the country—focusing on the last few weeks of that period. “Relocation” refers to visa and refugee processing for Afghan staff. In conducting this evaluation, we interviewed 39 Agency staff and representatives from 31 implementing organizations. We conducted our evaluation from July 2022 through December 2023 using the Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspection and Evaluation.

Background

At the time of the evacuation, USAID was actively working in Afghanistan on programs in the agriculture, economic growth, education, gender, healthcare, infrastructure, rule of law, and humanitarian assistance sectors with fiscal year (FY) 2021 spending totaling \$818.8 million. Divided among 118 activities and 82 implementers, most activities were awarded by USAID through contracts, grants, or cooperative agreements.

Several USG agencies played key roles in the evacuation and relocation of staff from Afghanistan. According to guidance from the Joint Chiefs of Staff, when directed by the State

² The Agency reported that this number includes only USDH staff evacuated on or after August 15, 2021.

³ Implementers are organizations that carry out development projects through USAID grants, contracts, and cooperative agreements.

Department, the Defense Department conducts noncombatant evacuations from a foreign nation. The State Department shares responsibility for SIV processing with the Department of Homeland Security and manages the P1 and P2 programs.

Within USAID, several offices supported Afghanistan evacuation efforts. The Bureau for Asia provides technical and programmatic support to the USAID Mission in Afghanistan (USAID/Afghanistan). The Bureau for Management, Office of Acquisition and Assistance (M/OAA) manages and directs the Agency's award process and systems, including governance and implementation of acquisition and assistance policies, regulations, and standards. USAID/Afghanistan has a Partner Liaison Security Office (PLSO) that collects and disseminates open-source security information to and from the mission's implementers and coordinates security efforts with mission staff and implementers.

The Bureau for Asia's role in the P1 and P2 Programs was to provide referrals to the State Department. The bureau's referral role transitioned into the Afghan Partner Relocation Task Force (APRTF) in October 2022. APRTF officials explained that they seek to streamline work on the resettlement of USAID-associated Afghans, coordinate interagency USG policy issues, and assign individuals to different government locations to continue work on relocation efforts. According to the APRTF, as of May 2023, USAID had received more than 14,000 inquiries and requests regarding P2 referrals and had processed 4,041 cases. The task force said that the State Department rejected 558 of USAID's submitted cases because, for example, the applicant was already in the United States, the applicant had an existing SIV application, or documentation was insufficient.

The Bureau for Asia and USAID/Afghanistan also certify the adequacy of internal controls. In accordance with requirements of the Federal Managers' Financial Integrity Act of 1982 (FMFIA), each USAID assessable unit (e.g., bureau, mission, independent office) provides an annual certification on the overall adequacy of its internal controls, including identifying significant deficiencies. In this case, the assessable units follow the order of authority: from Bureau for Asia to USAID/Afghanistan.

Based on Office of Management and Budget guidance,⁴ assessable units are also required to develop risk profiles to identify key risks they face. The profiles inform resource and management decisions in implementing enterprise risk management (ERM). In addition to assessing their own risks and internal controls, bureaus assess the certifications and risk profiles of their subordinate assessable units—in this case, USAID/Afghanistan. The Risk Management Council (RMC), with support from the Office of the Chief Financial Officer (OCFO), is responsible for assessing the composite enterprise risks identified based on input from bureaus and independent offices—in this case, Bureau for Asia.

⁴ Office of Management and Budget, *Circular No. A-123 – Management's Responsibility for Enterprise Risk Management and Internal Control*, July 2016.

USAID Lacked a Clear Role and Experienced Challenges With Planning and Communicating While Implementer Staff Evacuated Afghanistan

USAID did not have a direct role in evacuating implementer staff but assumed several responsibilities before and after the U.S. withdrawal from Afghanistan. Nonetheless, many implementers we interviewed said USAID/Afghanistan did not clarify USAID's responsibilities in the event of an evacuation. Agency staff and implementers thought the USG, including USAID, lacked sufficient planning for the possibility of a Taliban takeover and subsequent U.S. evacuation. Further, USAID lacked a mechanism to accurately track the number of implementer staff in Afghanistan. Insufficient staff to support the evacuation and delayed guidance also impacted the Agency's ability to communicate with implementer staff.

USAID Did Not Have Defined Roles and Responsibilities for Evacuating Implementer Staff

Many implementers said that before the collapse of the Afghan government, the mission did not make clear what USAID's role would be in the event implementer staff needed to be evacuated. According to Federal standards for internal control, management "should externally communicate the necessary quality information to achieve the entity's objectives."⁵

Agency staff we interviewed noted that because of the novel nature of the crisis, USAID did not have clear legal or programmatic guidance on how to handle evacuating implementers. Several Agency staff stated that USAID had either no role or a limited role. When we asked for examples of lessons learned, a senior mission official said that USAID should clarify the types of support mission staff can give to implementers. In interviews, implementers had differing opinions about whether USAID's role was clear; some said they understood it was their organization's responsibility to evacuate their staff. Nonetheless, a lack of clarity regarding USAID's role in the evacuation resulted in reputational risk as some implementers criticized the Agency in the media for its handling of the evacuation.

USAID's role at the Kabul airport during the final hectic days in August 2021 leading up to the full withdrawal of U.S. personnel was also not clear to USAID staff. According to a staff member, USAID received reports that FSN staff were having a hard time at the airport, and implementers complained that their staff were having trouble evacuating. According to mission staff, nobody was at the airport to assist USAID and implementer staff immediately after August 15 because USAID/Afghanistan's leadership had been evacuated. The State Department's *After Action Review on Afghanistan* report⁶ described the airport gates as beset with "large, uncontrolled crowds and constant threats from ISIS-K and the Taliban."⁷ The report also stated that "[c]hallenges in getting access to the airport and the often dangerous situation outside the

⁵ GAO, *Standards for Internal Control in the Federal Government* (GAO-14-704G), "Information and Communication," Principle 15.03, "Communication with External Parties," September 2014.

⁶ State Department, *After Action Review on Afghanistan*, March 2022.

⁷ In fact, on August 26, 2021, a terrorist attack at the airport by the Afghanistan branch of ISIS (ISIS-K) killed more than 150 Afghans and 13 U.S. troops.

perimeter meant that, in the end, many of those who would have been prioritized for evacuation never made it in before the airlift ended.”

USAID subsequently deployed two staff members to the airport between August 23 and August 28, 2021. USAID did not control access to the airport gates but according to the deployed staff, their role was to support the evacuation of FSN and implementer staff. During our interviews, many implementers described encountering challenges getting through the gates, though several said at least some of their staff were successful. One deployed staff member said he provided implementers with a lot of support, but the other said he was not able to help. Two issues of concern were the need for a senior-level official to coordinate the evacuation at the airport and determining how to evacuate implementers fairly. The two staff members said the lack of a senior USAID official at the airport made it difficult to advocate for implementer staff with the State Department and coordinate efforts of Agency personnel. However, the mission director indicated that a senior official would not have been helpful because conversations about policy priorities were happening in Washington, DC, and requests for evacuation assistance were going through the Afghanistan Coordination Task Force coordinated by the State Department. He was also concerned that it would create liabilities for the Agency if its staff on the ground could help some implementer staff evacuate but not others.

USAID’s indirect role and responsibilities in evacuating implementer staff included communicating to implementers about safety and security coordination. The USAID/Afghanistan PLSO provided updated security information to implementers and communicated with them about contingency plans as the security situation dissolved. According to mission staff, the Agency’s footprint in Afghanistan was reduced because most USAID staff worked remotely due to the COVID-19 pandemic. The PLSO Director stated that, in March 2020, after staff were ordered to depart from Afghanistan due to concerns about COVID-19, he requested but did not require implementers to create contingency plans. The mission also compiled spreadsheets that tracked implementer staff locations and personal information before and during the evacuation. According to a senior USAID official, USAID/Afghanistan shared the spreadsheets with the State Department.

In addition, USAID held regular meetings with implementing organizations and relevant U.S. government agencies between August and November 2021 during which USAID staff from the mission, the Bureau for Asia, and M/OAA gave updates, answered questions, and discussed the future of programming in Afghanistan. M/OAA also published guidance about several acquisition and assistance award flexibilities authorizing evacuation and payment of travel costs for implementer staff, described later in this report.

During this period, USAID also collaborated with other stakeholders within the USG. A senior mission official said that during the evacuation the Agency joined the State and Defense Departments as part of an interagency Afghanistan Country Task Force. Other USAID staff said they participated in the National Security Council’s (NSC) working groups focused on the evacuation.

Staff at the airport in Kabul, Bureau for Asia staff, and the personnel who set up an intake system to process Afghans at Washington Dulles International Airport assumed important roles in the evacuation of implementer employees. Many implementers said that individual USAID staff did the best they could in a difficult situation. Evacuated Afghan refugees were taken to the

Dulles Expo Center outside Washington, DC, where they were met by volunteers from USAID before being sent for further processing to military bases across the country. According to an Agency official, USAID was also called on to provide expertise relating to vulnerable women and children.

USAID and Other Agencies Did Not Sufficiently Plan for the Evacuation and USAID Lacked a Mechanism to Accurately Track Implementer Staff During the Taliban’s Rapid Takeover

Many Agency and implementer staff we interviewed expressed the opinion that the entire USG, including USAID, did not sufficiently plan for the possibility of a Taliban takeover and subsequent U.S. evacuation of Afghanistan. A USAID staff member said USAID/Afghanistan did not conduct scenario planning to prepare for the evacuation or consider the differences in how FSN staff, implementer staff, and expatriate staff might be treated. A Management Bureau official told us there was not enough planning done before the evacuation because they thought the military withdrawal date would be moved. In his testimony before Congress, the Defense Secretary explained that the Defense Department did not expect the Afghan National Defense and Security Forces to collapse as quickly as they did in the face of Taliban advances.⁸

Furthermore, several Agency staff told us that USAID had to follow the lead of the State Department regarding its footprint in Afghanistan. According to the State Department’s *After Action Review on Afghanistan* report, planning on when to begin evacuating diplomatic and assistance personnel was informed by the State Department’s concerns that moving too quickly might hasten the collapse of the Afghan government.⁹ Consequently, several staff we interviewed perceived USAID as having less influence in the interagency working groups, which they said impacted the Agency’s decision-making process before and during the evacuation. A senior mission staff member said that the mission felt pressure to follow the lead of State Department regarding its staffing levels. The staff member added that had the Agency made its own independent decisions, the mission would have reduced the number of staff in Afghanistan by the time of the evacuation, signaling to implementers that they too should have a smaller footprint.

In reviewing the evacuation, the Agency identified a lack of preparation as a lesson learned about USAID’s involvement in the Afghanistan evacuation. According to the Agency’s *Afghanistan Evacuation Hotwash*, focus groups suggested that better planning could have positioned the Agency to respond more efficiently. The hotwash cites several factors that may have contributed to the lack of planning, including the unexpected collapse of the Afghanistan government, the assumption that there would be more time to evacuate, and the unanticipated need to evacuate Afghan staff—the first time in USAID history that the Agency attempted to evacuate cooperating country nationals.¹⁰ Some mission personnel said that although evacuating

⁸ [Secretary of Defense Lloyd J. Austin III Prepared Remarks Before the House Armed Services Committee](#), September 29, 2021.

⁹ State Department, *After Action Review on Afghanistan*, March 2022.

¹⁰ A cooperating country national is an individual who is a citizen of a foreign country in which there is a program or activity administered by USAID or a citizen from a non-cooperating country lawfully admitted for permanent residence in the cooperating country.

cooperating country nationals is rare, USAID should have had a plan. The USAID team addressing the recommendations from the hotwash told us they were working on a readiness scorecard to gauge the preparedness of overseas missions, including compliance with Federal and Agency policies on contingency planning.

Many implementers highlighted that better contingency planning on the part of their organizations would be helpful in the future. Some said they were approaching contingency planning differently in other countries because of lessons learned from the Afghanistan evacuation. Looking back on the experience, several implementers said that while they had an evacuation plan for expatriate staff, they did not expect to evacuate Afghan staff. For example, implementers noted that staff members and their families needed to have passports to evacuate. Some added that organizations would have benefited from having historical or current employee data to help staff fill out flight manifests and complete visa applications. Several implementers said one of the main challenges was that the evacuation made it dangerous to move through the city and thus placed staff and their families at risk of violence by the Taliban. As a result, several implementers described having to prioritize staff for evacuation based on their risk level, such as gender or minority status.

At the same time, USAID attempted to keep track of implementer staff, which proved difficult. Although award language required implementers to report staff presence in Afghanistan in the Synchronized Pre-Deployment and Operational Tracker (SPOT) database, mission staff did not have access to the database. Thus, USAID/Afghanistan created a manual tracking system in lieu of SPOT. However, during the evacuation, USAID/Afghanistan staff decided not to rely on the manual tracking system or SPOT in case they were missing information. Instead, the staff sent data calls directly to implementers, asking which staff members were in the country at that time.

SPOT is maintained by the Defense Department pursuant to a July 2008 memorandum of understanding (MOU) with the State Department and USAID. The MOU designated the database as the system of record for contract and contractor personnel information in Afghanistan and Iraq.¹¹ In 2010, the MOU was revised to include grants and cooperative agreements—funding sources used by USAID for more than half of its active awards in Afghanistan around the time of the evacuation.

At USAID, access issues impeded the use of SPOT. While SPOT was intended to track and maintain awareness of the implementers in Afghanistan, mission staff told us they were unable to access the database. The staff explained that it was difficult to resolve access issues due to pandemic-related telework and whenever staff were away from the embassy. USAID/Afghanistan contacted the Defense Department and technical experts for assistance, but staff still did not get access to the database, according to a mission staff member.

Consequently, mission staff created “work-around” systems to track and monitor implementer Afghan and expatriate staff in lieu of SPOT. USAID also instructed implementers to report when their staff entered Afghanistan and how long they would be in Kabul. This resulted in

¹¹ The National Defense Authorization Act for Fiscal Year 2008, Section 861, required the identification of common databases for the Defense Department, State Department, and USAID that would serve as repositories of information on contracts in Iraq or Afghanistan and contractor personnel.

duplication of effort because, according to mission staff, implementers were also providing the same information directly to USAID staff.

During the evacuation, mission staff were unable to access information in SPOT so they sent data calls to implementers asking them to provide updates on the status of their staff in Afghanistan. One implementer staff member recalled being in a panic trying to get staff out of Afghanistan and feeling confused about why USAID could not access the data it needed to track implementer staff even though it had been entered into SPOT.

The multiple data calls and manual tracking placed a burden on implementers during a highly stressful time. Access to SPOT would have given mission staff the information on implementer staff needed for evacuation. USAID staff said the alternate tracking system they developed was inefficient and less effective than SPOT. For example, a mission staff member noted that since SPOT operated as a live, centralized data system, it would have eliminated the need for staff to input information manually.

As of March 2024, USAID/Afghanistan continued to have access issues to SPOT. Nonetheless, after the evacuation, the mission provided guidance to implementers that clarified that they were still required to submit data to SPOT. USAID has since attempted to withdraw from the MOU with the Departments of Defense and State citing access issues and reliance on its internal tracker, but as of March 2024, the MOU remained in place.

USAID Was Constrained by Insufficient Staff and Delayed Evacuation Guidance as It Supported and Communicated With Implementers

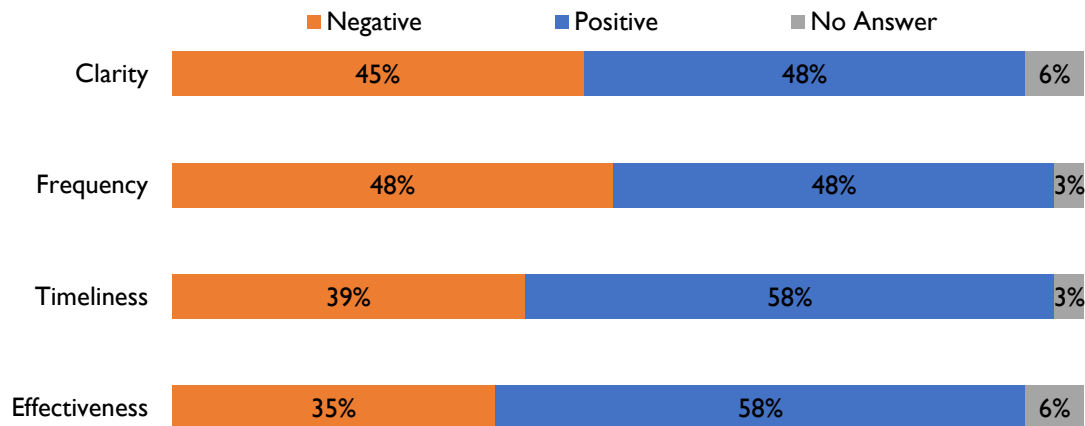
Many Agency staff we interviewed believed that USAID staffing was insufficient—including shortages in the PLSO and too few contracting officers—both in Afghanistan and in Washington, DC, to adequately respond to the crisis in Afghanistan. Agency staff stated that mission staff were not able to help with evacuation because they themselves were evacuating. The Agency’s hotwash also highlighted deficiencies/shortcomings, noting that staff and volunteers detailed to the effort from around USAID “did not always have the required institutional knowledge or skills to efficiently perform.”

A Bureau for Management official said surge staffing in emergencies is a continuing issue. The official said the Agency is generally short-staffed and relies on the same people in emergencies such as the Afghanistan evacuation. Headquarters staff raised concerns that the staffing shortage exacted a toll on those involved, including physical and mental effects from the stress of their involvement in the evacuation.

Several implementers said they felt that they did not get enough support from USAID because the mission was understaffed before and after the evacuation. Implementers also said they had trouble with accessing information from the mission during the evacuation. Many USAID staff said they also lacked necessary guidance from both USAID headquarters and from the State Department to adequately address implementer concerns and questions but that staff tried to share what they could.

Additionally, our interviews with staff from 31 implementers surfaced a difference of opinion about whether USAID’s communications about the U.S. departure from Afghanistan were clear and frequent enough. Figure 2 shows the differences in implementer perceptions regarding USAID’s communication efforts. Nearly 60 percent of the organizations we contacted said communication about the evacuation was timely and effective.

Figure 2. Implementers’ Views of USAID’s Communication During the Afghanistan Evacuation



Source: OIG interviews of 31 implementers.

Delayed communication of guidance from USAID also impacted the evacuation of implementer staff from Afghanistan. Agency policy and Federal guidance highlight USAID’s role in interpreting policy and sharing that information with implementers. According to USAID’s Automated Directives System (ADS) Chapter 303, M/OAA develops and interprets policy on behalf of USAID for the award and administration of grants and cooperative agreements. In addition, the Federal standards for internal control state that management should have “information requirements [that] consider the expectations of both internal and external users.”¹²

In this case, the USAID/Afghanistan mission director approved an action memorandum dated August 19, 2021, authorizing evacuation and payment of travel costs for Afghan and expatriate implementer staff. M/OAA produced a draft of the guidance by August 26, 2021, but the Agency did not share guidance with implementers until September 7, 2021—7 days after the U.S. withdrawal ended. The guidance authorized travel for implementer staff working under contracts and use of program funds for their travel and transportation costs. It also stated that, to maintain readiness, the Agency could use program funds for the safety and security of implementer staff working under grants and cooperative agreements as well as the payment of staff salaries.

USAID staff we interviewed said that release of the guidance authorizing evacuation and payment of travel costs for implementer staff was delayed due to the lengthy approval process

¹² GAO, *Standards for Internal Control in the Federal Government*, “Information and Communication,” Principle 13.02, “Identification of Information Requirements,” September 2014.

and coordination with the NSC. Several staff said they had to wait on the NSC to release coordinated guidance or give USAID approval to communicate with its implementers on allowable expenses. A number of staff involved in drafting and approving the guidance said that the Agency also wanted to make sure the memo was correctly worded so that it would not be misinterpreted. M/OAA staff members told us they thought the approval process could have been streamlined by reducing the number of reviewers or by clarifying the role of each reviewer.

The USAID Acquisition Regulation (AIDAR) gives the mission director the authority to authorize payments and allowances for U.S. nationals, third-country nationals,¹³ or cooperating country nationals under acquisition awards in the event of an emergency evacuation. As M/OAA staff members we interviewed pointed out, the AIDAR also gives the mission director the authority to authorize an evacuation. Although the USAID/Afghanistan mission director formally authorized the payments and allowances, USAID staff said the timing of this communication was determined by Agency headquarters and the interagency groups rather than the mission director. They explained that an approval would be smoother if the Agency determined who authorizes an evacuation and updated the AIDAR accordingly.

Several mission staff said they could not share information quickly with implementers because the guidance they needed came late. Almost half of the implementer staff we interviewed said they were able to use at least one of the flexibilities listed in the guidance. However, several organizations said that the official guidance came too late and was not actionable by the time it came out because, for example, there were no more flights available or their staff did not have visas. Further, some organizations reported they were unaware of any of the flexibilities offered.

Several mission and headquarters staff we interviewed emphasized the importance of building out a readiness toolkit or playbook for contracting or agreement officer's representatives that states what is allowable and which options they have access to in a future crisis. As one staff member said, the world USAID is operating in is different now than before because there are so many crises like Afghanistan, Ethiopia, and Kazakhstan. They added that while every situation is unique, a toolkit would go a long way to empower decisionmakers to respond to extremely difficult circumstances. According to some staff, the Agency is already working on a toolkit, though it had not yet been finalized.

USAID Coordinated Relocation Program Referrals but Was Constrained by the Timing of the P2 Announcement, Lack of Guidance, and Eligibility Restrictions

The State Department first announced that the P2 Program designation would apply to certain Afghan nationals on August 2, 2021—2 weeks prior to the evacuation of the embassy. The

¹³ A third-country national is an individual who is neither a U.S. national nor citizen or lawful permanent resident of the foreign country where USAID administers a program or activity.

limited time between the P2 Program announcement and the August 15 evacuation of the embassy limited the amount of time the State Department and USAID had to help implementer staff better understand the program. USAID staff and implementer staff highlighted other challenges with the P2 Program. These included a lack of adequate guidance to help individuals applying through either P1 or P2, a lack of preparation for the relocation process, eligibility restrictions, and funding challenges.

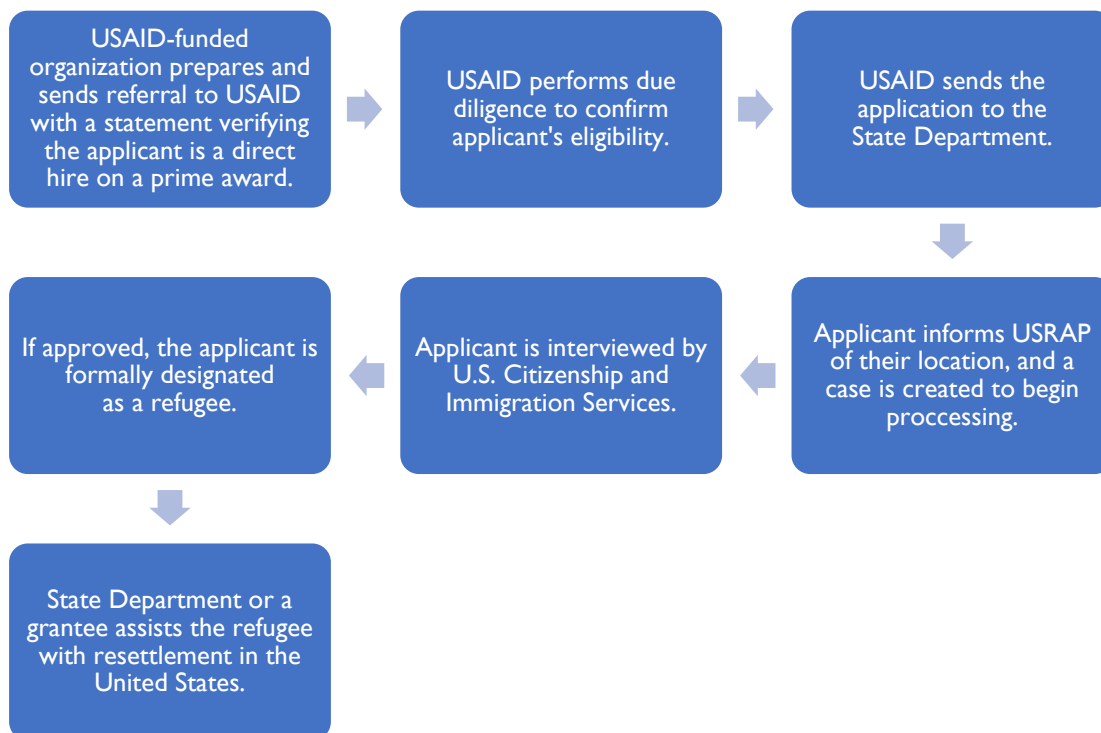
USAID Had Limited Time After the P2 Announcement to Help Potential Applicants Before the U.S. Departure

According to USAID staff, NSC working groups had internal conversations related to the P2 Program as early as May and June 2021. However, the State Department did not publicly announce the P2 Program until August 2, 2021. Thus, the State Department and USAID had a limited amount of time to help implementers better understand the program before the USG's evacuation from Afghanistan. Some USAID staff said the State Department was slow to release public details early to avoid creating a mass panic amongst the Afghan population.

USAID staff stated that they worked to provide as much information about the relocation process as they could to implementers. According to Agency documentation and interviewees, the Bureau for Asia and M/OAA hosted meetings with implementers after the evacuation, in which USAID shared available information related to the program. Several implementer staff members told us that at times USAID directed them to the State Department for answers to questions about the relocation process.

Almost two-thirds of the implementer staff we interviewed noted that USAID had a limited role in the coordination of visas and refugee resettlement for implementers. USAID's role involved verifying employment and providing referrals to the State Department. The Bureau for Asia verified that an applicant was an employee who had worked on a USAID-funded prime award and met program eligibility requirements before providing an employment verification letter and the application to the State Department. USAID was then responsible for submitting referrals to USRAP using an established process. Figure 3 shows the application process for the P2 Program.

Figure 3. P2 Application Process



Source: OIG analysis of Agency documentation and State Department guidance.

Similar to the evacuation-related staffing challenges identified earlier in this report, USAID's staffing shortages also hampered the Agency's ability to assist in the implementer relocation effort. Two USAID staff members we interviewed stated that part of the problem was that mission staff had already left Afghanistan and therefore could not provide adequate assistance. Five other USAID staff said that a general lack of staff both at the mission and in Washington, DC, impeded USAID's ability to adequately respond to the crisis. Staff also said they struggled to keep up with their email workload, had challenges engaging with the interagency working groups through USAID in Washington, DC, struggled to bring new staff onboard, and faced staff burnout due to a lack of adequate resources.

USAID/Afghanistan Did Not Have Adequate P1 and P2 Guidance to Support Implementers

Several USAID/Afghanistan staff members stated that they did not have adequate guidance related to the P1 and P2 process to provide sufficient support and guidance to the implementers before and during the evacuation. According to USAID/Afghanistan staff, at times they did not have any guidance on how to handle the P1 and P2 process for implementers. When guidance became available, it was not always clear, which caused implementers to ask questions and led to considerable confusion without sufficient answers from USAID. A senior staff member of USAID/Afghanistan at the time of the evacuation stated the guidance on those programs was unclear and appeared to be in flux. He added that he too found the P1 and P2 programs to be confusing. According to another USAID/Afghanistan staff member, better

guidance could have been given about program eligibility, and the Agency had to turn away people at the airport based on eligibility.

Several implementers described challenges with the P2 process such as a lack of clarity in the process including where to send the referral letters, the format of the letters, who could sign the letters, and how many letters were required. Implementers also noted that changes to the application requirements made an already long process more confusing. In addition, implementers described the difficulty P2 applicants had in understanding where they stood in the application process. Implementers expressed that a significant challenge with the relocation process was that applicants did not receive confirmation that their applications were received; in other cases, such confirmation was delayed. Some implementers stated that it was difficult for P2 applicants to obtain a case number.

Several USAID staff we interviewed stated that the Agency and mission were not adequately prepared for the relocation process after the collapse of the Afghan government. USAID works with a large group of people in Afghanistan and other countries, including prime award recipients, sub-award recipients, and contractors. The Agency's responsibilities for these different groups are not always clear. A senior mission staff member stated: "We couldn't give people good answers because there weren't good answers to give." The USAID/Afghanistan mission director said that the USG needs to clarify whether implementer staff should be given priority and that there needs to be a clear policy on who gets priority for the resettlement programs. According to the State Department's *After Action Review on Afghanistan* report, "constantly changing policy guidance and public messaging from Washington regarding which populations were eligible for relocation ... added to the confusion and often failed to take into account key facts on the ground."¹⁴

Several USAID staff also highlighted that the relocation process was essentially a refugee resettlement process, and USAID did not have the internal expertise or the mandate to work on these issues. A staff member explained, for example, that once an implementer employee flees a country, they are considered a refugee, which changes what USAID can do for that person. Once implementer staff shifts to refugee status, USAID's ability to help is further diminished because the process then falls under the State Department. A senior mission staff member said a lot of people in the Agency learned about the refugee resettlement process quickly, but the Agency did not initially have anyone with expertise to draw upon.

Furthermore, several staff said that the legal framework that the Agency operated in during the evacuation was vague and did not clearly define USAID's mandate or capacity to engage with implementers related to the resettlement process. A senior mission staff member noted that while getting guidance was an issue, the legal framework was also inadequate for dealing with the number of people seeking assistance with resettlement.

Strict P2 Requirements and Funding Challenges Prevented Some Implementer Staff From Leaving Afghanistan

Due to P2 Program restrictions, many implementer staff in Afghanistan were unable to apply for relocation to the United States. According to a USAID employee, the NSC decided not to

¹⁴ State Department, *After Action Review on Afghanistan*, March 2022.

allow sub-awardee staff into the P2 Program to reduce the potential pool of applicants. While Afghans who worked for USAID through a primary grant or cooperative agreement were eligible for the P2 Program, they had to choose to relocate to another country—outside of Afghanistan but not the United States—where program processing would begin. Several implementer officials also pointed out that the P2 requirements were not aligned with risk. For example, they told us that women and minorities who faced greater danger from the Taliban did not receive priority in the P2 process.

Implementers stated that restrictive visa and P2 requirements were another impediment preventing some individuals from leaving Afghanistan. For example, extended family members were ineligible for the P2 Program, and therefore implementer staff had to decide whether to leave them behind. Furthermore, according to a USAID employee, depending on the country they temporarily relocated to, individuals may have faced discrimination while they waited for the approval process. Some implementer officials described staff who were physically unable to leave Afghanistan or would no longer be employed by the implementer if they did.

According to a USAID employee, funding to relocate was also a challenge. Implementer staff eligible for the P2 Program had to relocate outside of Afghanistan at their own cost with no guarantee that they would receive approval for permanent relocation to the United States. Additionally, several implementers described challenges related to a lack of funding once staff relocated to another country. An implementer official said their staff relocated and the expected wait for the relocation process became longer and longer, and the financial aid the implementer can provide is limited.

Ultimately, implementer officials said that due to difficulties with the P2 process, they sought to communicate directly with members of Congress to try to resolve the challenges they were experiencing with the visa and P2 processes.

The Bureau for Asia Did Not Conduct a Comprehensive Review of the Risks the Mission Identified Before the Evacuation—Possibly Weakening the Agency’s Response to the Withdrawal

Contrary to ADS policies and Federal internal control standards, the Bureau for Asia did not review, assess, or document its analysis of USAID/Afghanistan’s mission risk profile as part of the ERM process. Furthermore, USAID/Afghanistan also did not identify and address risks directly associated with a potential evacuation from Afghanistan. These circumstances may have diminished the overall value of the ERM process and weakened the Agency’s response to the withdrawal. USAID/Afghanistan, however, did identify two ongoing deficiencies in the parallel FMFIA process: insufficient contracting officers to provide effective oversight and reduced program oversight and human capital.

At the time of the Afghanistan evacuation, ERM at USAID was governed by ADS Chapter 596 and the Mandatory Reference (MR) for ADS Chapter 596. According to the MR ADS 596,

bureau-level Management Councils on Risk and Internal Control (MCRICs)¹⁵ provide management and oversight for ERM and internal controls. MCRICs are also responsible for reviewing and assessing the FMFIA certifications and risk profiles of their subordinate assessable units. In this context, USAID/Afghanistan was subordinate to the Bureau for Asia. MR ADS 596 also states that each bureau MCRIC should establish its own governance structure and rules of engagement. In addition to USAID policy, Federal internal control standards provide the overall framework for establishing and maintaining an effective internal control system, which includes documentation of the internal control system.¹⁶

USAID's ERM Risk Profile Implementation Guidance for FY 2022 emphasized the ERM process can be as important as the written risk profiles. Bureau for Asia staff are responsible for the ERM process of the bureau's assessable units; in this role, they assess the mission's profile for completeness and determine whether risk treatments are sufficient for the risks identified. Federal internal control standards define risk identification and risk assessment as follows:

Risk assessment is the identification and analysis of risks related to achieving the defined objectives to form a basis for designing their risk response. ... Regardless of whether risks are analyzed individually or collectively, management considers the correlation among different risks or groups of risks when estimating their significance. The specific risk analysis methodology used can vary by entity because of differences in entities' missions and the difficulty in qualitatively and quantitatively defining risk tolerances.¹⁷

Nonetheless, we found little evidence that the Bureau for Asia sufficiently carried out the obligations outlined in the ADS policy and in conformance with Federal internal control standards. Staff within the Bureau for Asia and the RMC did not conduct a comprehensive review of their subordinate assessable units, which potentially diminished the process's overall value. Perhaps one reason for this is because, according to a mission staff member, mission teams do not use these processes on a day-to-day basis; rather, the mission risk profile is a reference document that is sent to Washington, DC.

Inadequate staff knowledge and experience may also have affected the Bureau for Asia's review of USAID/Afghanistan's risk assessment. One ERM staff member within the bureau told us that they were unable to comment on the risk profile produced by the Afghanistan mission because they did not have enough expertise to do so. Furthermore, when asked if the mission risk profile's level of detail was commensurate with the actual operating environment, a staff member responded it was difficult to speak to that because they had never been at the posts covered by the bureau. Another bureau staff member stated that they were not experts in the ERM process and did not have a large role in the review or assessment of mission risk profiles for FY 2020 or FY 2021. A Bureau for Asia staff member with ERM responsibilities stated that while the mission risk profile went to the Washington, DC, office for informational purposes,

¹⁵ There are two levels of MCRICs: one at the bureau/independent office-level and one at the mission/Washington office-level.

¹⁶ GAO, *Standards for Internal Control in the Federal Government*, "Control Environment," Principles 3.09, 3.10, 3.11, "Documentation of the Internal Control System," September 2014.

¹⁷ GAO, *Standards for Internal Control in the Federal Government*, "Risk Assessment," Principle 7.02, "Identification of Risks," and Principle 7.07, "Analysis of Risks," September 2014.

working in DC did not provide sufficient awareness of the environment surrounding the mission. Moreover, when asked if the RMC ever returned a bureau risk profile due to insufficiently identified risks and risk treatments, OCFO staff said not really and only if there was something obvious missing, such as no risk treatment for a given risk.

MR ADS 596 states that bureaus should establish their ERM structures and rules of engagement, and Federal government internal control standards recommend that management develop and maintain documentation of internal control systems. However, the Bureau for Asia did not provide us with such documentation. The documentation it did provide did not adequately demonstrate how the assessment was conducted but did include the risks that USAID/Afghanistan submitted to the bureau. Still, the documentation lacked the bureau's input or assessment on the purported risks or potential treatments.

A comprehensive review of the assessable unit, in this case USAID/Afghanistan, is important because, according to ERM staff in the OCFO, the Agency risk profile is an aggregation of all bureau risk profiles and mission profiles. Once the mission risk profile is approved, the risk profile is elevated to the bureau level. A risk management liaison within the bureau then compiles and synthesizes risk submissions and submits a composite risk profile that provides the RMC with a bureau portfolio view of risks. The RMC compiles an Agency-wide risk profile partly based on the respective bureau-wide risk profiles.

Risk identification is a necessary first step to properly mitigate risks that the Agency may face. The lack of a comprehensive analysis and assessment at the bureau and RMC levels increased the potential that the ERM process would fail to accurately identify risks and design risk treatments. This, in turn, potentially weakened the Agency's response to the evacuation from Afghanistan.

Conclusion

Starting in April 2021, USAID was involved in a complex, multi-agency evacuation and relocation effort of both U.S. personnel and Afghan nationals. USAID assumed several responsibilities during the evacuation. However, before the collapse of the Afghan government, the Agency did not make clear to implementers what its role would be. As USAID continues to be involved in complex crises globally, lessons learned include: preparing for evacuations with adequate staff and resources on the ground; accounting for implementer staff in a country at the time of an evacuation; communicating effectively through timely guidance; and facilitating the evacuation and relocation of implementer staff, such as by clearly determining refugee program eligibility for the various groups connected to USAID's work in the country. Further, the Agency should prepare for potential evacuations by identifying the potential risks facing both bureaus and their subordinate missions. This will help ensure that staff and the implementers with whom they work are prepared to effectively respond to the likely emergencies.

Recommendations

We recommend that the Office of Acquisition and Assistance take the following actions:

1. Perform an assessment to identify types of support USAID can provide implementers in a potential future country evacuation to set clear expectations with implementers.
2. Finalize readiness guidance or tools that outline options of what acquisition and assistance staff can provide to implementers in crisis situations.
3. Review the approval process of administrative guidance to implementers and make appropriate changes to streamline it for use in crisis scenarios, for example, by clarifying the role of each reviewer.

We recommend that the Bureau for Asia take the following action:

4. Resolve USAID/Afghanistan access issues to the Synchronized Pre-Deployment and Operational Tracker database.

We recommend that the Bureau for Asia, in coordination for the Office of the Chief Financial Officer, take the following actions:

5. Conduct a policy review of Automated Directives System (ADS) 596 and Mandatory Reference ADS 596 and implement actions necessary for the bureau to comply with requirements for oversight of its subordinate assessable units.
6. Document and disseminate to staff with enterprise risk management (ERM) equities, the bureau's ERM governance structure, the roles and responsibilities of each member within the structure, and the bureau's review and assessment process for its assessable units.
7. Conduct annual training for staff with ERM equities on the ERM process so that they have sufficient expertise to review and assess subordinate mission risk profiles.

OIG Response to Agency Comments

We provided our draft report to USAID on December 18, 2023. On January 19, 2024, we received the Agency's response, which is included as Appendix B of this report. USAID also provided technical comments, which we considered and incorporated as appropriate.

The report contains seven recommendations. The Agency agreed with six recommendations and disagreed with one. We consider Recommendations 1 and 2 closed and Recommendation 7 resolved but open pending completion of planned activities. We do not agree with the management decision for four recommendations and consider these open and unresolved. Specifically:

- For Recommendation 3, USAID agreed and provided a target completion date but did not outline the specific corrective action it intends to take. Accordingly, we are requesting a revised management decision within 30 days of the report date that includes planned corrective actions to resolve the recommendation.

- For Recommendation 4, USAID disagreed and requested closure as it seeks legislative repeal of the database requirement. We will consider closing the recommendation if Congress repeals the requirement; however, until such time, SPOT remains the system of record for contract and contractor personnel in Afghanistan. Therefore, we cannot close this recommendation, and we are requesting a revised management decision within 30 days of the report date that includes a target action date.
- For Recommendation 5, USAID agreed and requested closure, highlighting that it had conducted a policy review of ADS 596 and MR ADS 596. However, it did not identify planned or completed corrective actions to ensure the Bureau for Asia will fulfill its responsibilities. Accordingly, we are requesting a revised management decision within 30 days of the report date that outlines planned corrective actions for how USAID will direct the bureau to comply with requirements for the oversight of its subordinate assessable units.
- For Recommendation 6, USAID agreed and requested closure, however, the submitted documentation does not address the intent of the recommendation or correct the deficiency. Therefore, we cannot close this recommendation. MR ADS 596 states that “Each B/IO and Mission MCRIC should establish its own governance structure and rules of engagement.” Given the deficiencies identified, we request that the Bureau for Asia document and disseminate its processes through a bureau-specific governance structure and rules of engagement, including definition of staff roles and responsibilities and the bureau’s process for review and assessment of its assessable units. Accordingly, we are requesting a revised management decision within 30 days of the report date that includes revised planned corrective actions and a target action date to resolve the recommendation.

Appendix A. Scope and Methodology

We conducted this evaluation from July 2022 through December 2023 in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation. The scope of our evaluation was December 2019 through February 2023.

Our evaluation objectives were to:

1. Review USAID's role in the evacuation of its implementing organization staff from Afghanistan and to identify opportunities for improvement in future withdrawals.
2. Review USAID's role in the relocation of its implementing organization staff from Afghanistan and identify opportunities for improvement.
3. Determine if USAID's risk management procedures effectively prepared the Agency to carry out its role in the evacuation and relocation of its implementing organization staff from Afghanistan.

In performing this evaluation, we reviewed Agency policy, guidance, and documentation and conducted interviews. From August 2022 through February 2023, we interviewed 39 USAID staff members and representatives from 31 implementing organizations.

To answer the first objective, we gathered and reviewed existing data and literature publicly available or available on USAID intranet regarding USAID's evacuation from Afghanistan, documentation from the Agency, and award language for a sample of the largest and smallest program awards. We interviewed Agency staff to better understand USAID's role in the evacuation and to identify challenges or constraints they faced. We also interviewed implementing organization staff to identify challenges, constraints, and lessons learned related to the evacuation.¹⁸

To answer the second objective, we gathered and reviewed documentation from the Agency and interviewed Agency staff to better understand USAID's role in the relocation process and to identify challenges or constraints they faced. We also interviewed implementing organization staff to assess their understanding of USAID's role in the relocation process and identify challenges, constraints, and lessons learned.

To answer the third objective, we reviewed relevant Agency policy and the Afghanistan mission risk profiles for FY 2020 and FY 2021 to determine if USAID identified and addressed risks associated with evacuating implementing organizations. We also interviewed USAID staff who were responsible for implementing the Agency's ERM system.

¹⁸ We did not interview implementers that reported having no staff on the ground at the time of the evacuation or implementers working under public international organization grants or government-to-government agreements, such as United Nations agencies.

Appendix B. Agency Comments



MEMORANDUM

TO: Amy Burns, Director, Inspections and Evaluations, USAID/OIG

FROM: Michael Schiffer, Assistant to the Administrator, USAID/Asia Bureau /s/

DATE: January 19, 2024

SUBJECT: Management Comments to Respond to the Draft Audit Report Produced by the Office of Inspector General (OIG) titled, USAID's Withdrawal From Afghanistan: USAID Faced Challenges Assisting in the Evacuation and Relocation of Implementer Staff (Task No. EE1F0122)

The U.S. Agency for International Development (USAID) would like to thank the Office of Inspector General (OIG) for the opportunity to provide comments on the subject draft report. The Agency agrees with six recommendations and disagrees with one and herein provides plans for implementing them, and reports on significant progress already made.

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’s Withdrawal From Afghanistan: USAID Faced Challenges Assisting in the Evacuation and Relocation of Implementer Staff (Task No. EE1F0122)

Please find below the management comments (Corrective Action Plan) 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 seven recommendations for USAID:

Recommendation 1: Perform an assessment to identify types of support USAID can provide implementers in a potential future country evacuation to set clear expectations with implementers.

- **Management Comments: USAID agrees with this recommendation.**
We agree that setting clear expectations with implementing partners (IPs) is crucial during a country evacuation. At a 2022 Management Bureau Senior Leaders Retreat it was determined that USAID needed a single reference guide created specifically for Mission Contracting and Agreement Officers (COs/AOs) on how to respond to a crisis. OAA formed a working group to create a reference guide for Contracting and Agreement Officers to prepare for and respond to an emergency or evacuation. We developed a Crisis Playbook which includes helpful statutory and policy references as well as tools and templates and other guidance to be customized and quickly shared with our implementing partners.
- **Target Completion Date: M/OAA requests closure upon issuance of the Final OIG Report.**

Recommendation 2: Finalize readiness guidance or tools that outline options of what acquisition and assistance staff can provide to implementers in crisis situations.

- **Management Comments: USAID agrees with this recommendation.**
We note the necessity of providing Agency A&A staff with guidance and tools in order to better support IPs in crisis situations. As referenced in Management Comments for Recommendation 1, The Crisis Playbook was developed to provide COs/AOs and Washington leadership a reference guide for preparing for and responding to an emergency or evacuation. The playbook consolidates lessons learned and transforms them into practical guidance, recommendations, references, and tools. The Crisis Playbook consolidates long term planning and award management recommendations as well as considerations for effective coordination with implementing partners (IPs). It also contains relevant regulations and policies that may impact awards and IP staff.
- **Target Completion Date: M/OAA requests closure upon issuance of the Final OIG Report.**

Recommendation 3: Review the approval process of administrative guidance to implementers and make appropriate changes to streamline it for use in crisis scenarios, for example, by clarifying the role of each reviewer.

- **Management Comments: USAID agrees with this recommendation.**

This recommendation cannot be fully addressed by USAID. Each crisis is different, and an approval process for administrative guidance to implementers can only be finalized after USAID/Washington, State Department, the NSC, the Embassy at Post and other interagency counterparts agree on a whole-of-USG response, specific to the particular crisis. Once USAID has USG guidance on the next steps in a crisis, the above mentioned Crisis Playbook (in responses to Recommendations 1 and 2) contains recommendations to Agency staff to work to track status and specific authorizations and limitations of any departure cables, and, based on that, work with the Mission to identify what authorizations for IP staff would be appropriate. It further recommends keeping a tracker of what has been approved and when approvals expire.

- **Target Completion Date: 1/10/2025**

Recommendation 4: Resolve USAID/Afghanistan access issues to the Synchronized Pre-Deployment and Operational Tracker database.

- **Management Comments: USAID disagrees with this recommendation.**

The FY 2008 National Defense Authorization Act (FY 08 NDAA) mandated that the Secretary of Defense, the Secretary of State, and Administrator of USAID enter into a memorandum of understanding that included identification of common databases to serve as repositories of information on contracts in Iraq and Afghanistan and contractor personnel in Iraq or Afghanistan. Subsequently, the Department of Defense (DoD) Synchronized Predeployment and Operational Tracker (SPOT) was used to track contractor and implementing partner personnel in-country and generate letters of authorization for personnel to process through DoD deployment centers or benefit from DoD services.

USAID will seek legislative repeal of the database requirement (as set forth in the FY08 NDAA) in coordination with State and DoD.

- **Target Completion Date: Request closure upon issuance of the Final OIG report.**

Recommendation 5: Conduct a policy review of Automated Directives System (ADS) 596 and Mandatory Reference ADS 596 and implement actions necessary for the bureau to comply with requirements for oversight of its subordinate assessable units.

- **Management Comments: USAID agrees with this recommendation.**

USAID has implemented its ERM Governance Structure based on OMB Circular A-123 guidance. [ADS 596](#), "Management's Responsibility for Enterprise Risk Management and Internal Control," was recently updated on 3/9/23, advancing the maturity of USAID's

ERM governance structure. ADS 596 Section 596.2 Primary Responsibilities Roles & Responsibilities Clause 596.2.I clearly outlines the responsibility of USAID/W Bureaus and Independent Offices (B/IOs) to 1) Review/coordinate subordinate units' annual certifications for internal control and submission of the units' Risk Profile; 2) Consolidate the annual OMB Circular A-123, FMFIA certification, and the GAO Green Book based on compliance documentation for the B/IO using information submitted by subordinate units' and their own AUs information; 3) Designate a Risk Management Liaison (RML) for their respective B/IO; 4) Ensure risks are operationalized, identified, and managed by B/IO technical experts for their respective discipline and environment as part of the AU's risk assessment process for developing the AU's Risk Profile and the Risk Appetite Statement (RAS); and 5) Ensure technical experts have risk resources (e.g., funding, staff, time, and capacity) that serve to inform Agency Task Force priorities and ERM Governance Councils on identified risks in their area of expertise and environment.

USAID/Washington (USAID/W) B/IOs have the flexibility to designate lower-level organizational units as AUs or use an alternative means of ensuring a comprehensive report on the status of controls in the B/IO is prepared. **The Bureau for Asia concurs with M/CFO's management comment.**

- **Target Completion Date:** Request closure upon issuance of the Final OIG report.

Recommendation 6: Document and disseminate to staff with enterprise risk management (ERM) equities, the Bureau's ERM governance structure, the roles and responsibilities of each member within the structure, and the Bureau's review and assessment process for its assessable units.

- **Management Comments: USAID agrees with this recommendation.**
The annual ERM Risk Profile Implementation Guidance details the ERM Governance process for Missions and Regional Bureaus: While Missions are tracking several risks at any given time, only key risks (generally 5-7) should be elevated for consideration to higher bodies using the '*Elevate*' field in the *ERM Tool*. Hence, Mission teams must convene and agree on the risks they seek to submit upward. The same concept applies to Regional Missions. Regional Bureaus must review the Mission risk profiles submitted within the ERM Tool to inform Bureau risk profiles. Regional Bureaus should look for regional commonalities that warrant inclusion in the Bureau risk profile. They may also choose to elevate a Mission specific risk if it needs to be raised to senior leadership.

The Risk profile for Regional Bureaus is not only a collated list of their respective Missions' submitted risks, but includes the selection of cross-cutting risks that apply across their Bureau that need to be elevated to Agency leadership (based on the Bureaus' analysis and conversations with respective stakeholders). The Bureau makes the final decision by determining which risks within their AU, and those submitted by Missions, are cross-sectional, repeated, or are worth escalating to Agency leadership. **The Bureau for Asia concurs with M/CFO's management comment.**

- **Target Completion Date:** Request closure upon issuance of the Final OIG report.

Recommendation 7: Conduct annual training for staff with ERM equities on the ERM process so that they have sufficient expertise to review and assess subordinate mission risk profiles.

- **Management Comments:** **USAID agrees with this recommendation.**
M/CFO will conduct annual training for staff with ERM equities during the “Enterprise Risk Management: Risk Profile Implementation Guidance for Fiscal Year 2024” kickoff webinar that will provide sufficient expertise for Regional Bureaus to review and assess subordinate mission risk profiles. The webinar will be recorded for future reference.
The Bureau for Asia concurs with M/CFO’s management comment.
- **Target Completion Date:** 6/30/2024

Appendix C. Major Contributors to This Report

Members of the evaluation team include:

- Amy Burns, Inspections and Evaluations Director
- Alexandra Miller, Assistant Director & Lead Analyst
- Benjamin August, Program Analyst
- Christian Krog, Program Analyst

The evaluation team would also like to acknowledge contributions from Jennifer Herrmann, Wangui Kiundi, Emily Laur, and Jane Lusaka.



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