



OFFICE OF INSPECTOR GENERAL

AUDIT OF USAID/COLOMBIA'S AFRO-COLOMBIAN AND INDIGENOUS PROGRAM

AUDIT REPORT NO. 1-514-15-004-P
JANUARY 30, 2015

SAN SALVADOR, EL SALVADOR



Office of Inspector General

January 30, 2015

MEMORANDUM

TO: USAID/Colombia Mission Director, Peter Natiello

FROM: Regional Inspector General/San Salvador, Van Nguyen /s/

SUBJECT: Audit of USAID/Colombia's Afro-Colombian and Indigenous Program
(Report No. 1-514-15-004-P)

This memorandum transmits our final report on the subject audit. In finalizing the audit report, we considered your comments on the draft and included them in their entirety in Appendix II. This report includes six recommendations to help USAID/Colombia improve the Afro-Colombian and Indigenous Program.

The mission agreed with all six recommendations. Based on comments from the mission, management decisions have been reached on five, with final action taken on Recommendations 4 through 6. A management decision was not reached for Recommendation 2. For recommendations with questioned costs, a management decision will be reached when the mission determines the allowability of the costs.

Please provide the Audit Performance and Compliance Division in the USAID Office of the Chief Financial Officer with the necessary documentation to achieve final action on Recommendations 1 through 3.

Thank you and your staff for the cooperation and assistance extended to us during this audit.

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SUMMARY OF RESULTS

Throughout the history of Colombia, Afro-Colombians and indigenous people have been marginalized, which has limited their social and economic opportunities. In response, the Colombian Government created special laws in 1991 that were designed to help these groups improve their status while protecting their cultures. However, implementation of the laws has been limited, mostly because it was unclear on how that should be done.

To address this, on August 30, 2011, USAID/Colombia signed a \$61.4 million, 5-year cooperative agreement with ACDI/VOCA to implement the Afro-Colombian and Indigenous Program. The award states that the program's main goal is to improve the socioeconomic status of Afro-Colombians and indigenous people in the Pacific, Caribbean, and Central regions of the country.

The program had four objectives:

1. Strengthen the Colombian Government's ability to implement policies that address the needs of ethnic minorities.
2. Strengthen ethnic minority community-based organizations so they can advocate for their rights.
3. Increase ethnic minorities' access to economic opportunities.
4. Increase awareness of problems and issues that affect ethnic minorities.

Meeting these objectives would help Afro-Colombians and indigenous people gain control of their land, which also is a goal of the program.

As of August 13, 2014, USAID/Colombia had obligated about \$44.9 million, and the program had spent about \$33.5 million.

The purpose of this audit was to determine whether the USAID/Colombia's Afro-Colombian and Indigenous Program is achieving its main goal of improving the socioeconomic status of ethnic minorities.

The program had made progress. Through it, more than 1,100 state officials were trained to implement public policies related to ethnic minorities. The program also helped 48 national and local entities implement public policies, invest public resources, and improve information systems designed to serve Afro-Colombian and indigenous people.

In addition, ACDI/VOCA developed a system to assess ethnic minority organizations' sustainability and capacity. Based on the assessments, the contractor then provided technical assistance where it was needed and trained more than 13,600 Afro-Colombian and indigenous leaders on organizational capacity, governance, and advocacy skills.

The program helped improve economic opportunities for Afro-Colombian and indigenous people in rural areas by training more than 2,000 farmers and producers to use improved production and post-harvest management, and to create links to markets. In addition, as of September 1,

2014, the program trained and provided at least 6 months of employment to more than 1,600 Afro-Colombian and indigenous people, and it is in the process of training and finding employment for 7,100 more.

Last, the program trained almost 600 private-sector employees on increasing their “awareness of ethnic and gender diversity and promoting principles of non-discrimination, equal opportunity, and inclusion of ethnic minorities and women in the private sector.” In addition, it posted signs, and ran radio ads to increase knowledge and awareness about ethnic minority issues through positive messaging initiatives.



**Using skills taught in a USAID program, men and women in Cali make shoes.
(Photo by RIG/San Salvador, August 2014)**

However, the program did not make much progress in helping Afro-Colombians and indigenous people get rights to their lands because the Colombian Government did not approve the title requests that ACIDI/VOCA submitted (page 4). This will hurt the program’s ability to succeed.

The audit also found the following problems.

- ACIDI/VOCA did not comply with competition requirements (page 5). It awarded more than \$2.1 million to subcontractors for 12 activities without competition.
- ACIDI/VOCA did not have enough supporting documentation for trainees (page 7).
- ACIDI/VOCA did not conduct a midterm evaluation as planned (page 7).

To address these concerns, we recommend that USAID/Colombia:

1. Document and implement a plan of action, with milestones, for the remainder of the program, to address the land titling plans that were submitted to the Colombian Government for approval (page 5).
2. Determine the allowability of \$2,086,829 in ineligible questioned costs for subawards that were not competed, and recover from ACDI/VOCA any amounts deemed unallowable (page 6).
3. Review all subawards issued by the program that were awarded without competition and determine whether an adequate justification for exception to competition exists, take remedial action, including recovering any costs deemed unallowable, and document the results (page 6).
4. Give ACDI/VOCA a written notice of its responsibilities related to competition, and document any exceptions to competition (page 7).
5. Instruct ACDI/VOCA in writing to provide proper documentation supporting training that lasts more than 1 day to USAID (page 7).
6. Determine and document whether the midterm evaluation should be conducted as planned, and make changes if appropriate and document results (page 8).

Detailed findings appear in the following section. The scope and methodology are described in Appendix I. Management comments are included in their entirety in Appendix II, and our evaluation of management comments is on page 9.

AUDIT FINDINGS

Colombian Government Did Not Approve Requests for Land

According to the award:

Both Afro-Colombians and indigenous populations have the right to govern their own collective territories . . . Common problems restricting Afro-Colombian and indigenous people’s access to land include the existence of untitled collective territories on state or privately held land; the need to legally expand boundaries of indigenous reserves; forced displacement from collective territories; and occupation of collective territories.

The program included “increase in land rights” as an important intermediate result of the program. While Colombia has laws to help these ethnic groups obtain and protect their collectively owned and ancestral lands, carrying them out has been problematic mostly because it is unclear how the government and the communities should do so.

To address this issue, the program developed a land formalization process, which involves working with key communities, identifying and surveying land, performing technical studies, and preparing, presenting, and submitting the request for the collective land titling to the Colombian Government for its approval. The program established three key indicators and targets to measure progress toward obtaining land rights, shown in Table 1.

Table 1. Indicators Related to Land Formalization (Audited)

Indicator	Final Target	Approved as of September 16, 2014	Submitted for Approval*
<i>Number of collective territories formalized</i>	25	3	42
<i>Number of rural hectares formalized</i>	200,000	3,494	109,865
<i>Number of households with formalized land</i>	23,000	3,425	23,880

* These are estimated figures from ACDI/VOCA based on studies performed since September 16, 2014.

As indicated in the table, the program has made little progress toward these results. ACDI/VOCA has submitted land formalization requests (about half submitted more than a year ago) to the Colombian Government; however, it has not approved these requests.

Mission officials said they have discussed land formalization with Colombian Government officials throughout the year. The meetings helped resolve one collective land territory in Cartagena, but none of the remaining requests submitted as of May 2014. Since then, many of the Colombian officials left office, and mission employees said their replacements are not as knowledgeable or supportive of land title rights for the ethnic communities. Furthermore,

according to USAID and ACDI/VOCA officials, the Colombian Government has not demonstrated commitment toward achieving this goal and has delayed the approval of land formalization requests, affecting the progress of this result.

Having the government formally recognize these land rights is important to Afro-Colombians and indigenous people because it means political recognition of a historical right to land. Until that happens, ethnic minorities are vulnerable to losing their lands, homes, and important cultural sites. This also could negatively affect the working relationships that ACDI/VOCA and the mission have established with the minorities. Most importantly, not achieving land rights will hurt the program's overall goal. Therefore, we make the following recommendation.

Recommendation 1. *We recommend that USAID/Colombia document and implement a plan of action, with milestones, for the remainder of the program, to address the land titling plans that were submitted to the Colombian Government for approval.*

ACDI/VOCA Did Not Comply With Competition Requirements

Both U.S. law and USAID policy require competition. Title 22 of the Code of Federal Regulations, Part 226.43, states, "All procurement transactions shall be conducted in a manner to provide, to the maximum extent practical, open and free competition." USAID's Automated Directives System (ADS) 303 mirrors this requirement, but allows for certain exceptions, if they are justified in writing. These competition requirements also are included in ACDI/VOCA's subawards manual approved by USAID, stating that the contractor would "strive for competition when awarding grants," and noted that when competition was not used, it would prepare a memorandum to justify an exception to competition, per ADS.

Despite these requirements, we found multiple examples of ACDI/VOCA not requiring competitions for subawards, and no justification memorandums were prepared. In certain instances, both USAID/Colombia and ACDI/VOCA officials said the subpartners selected were the only ones capable of performing the required activity, though this was not documented as an exception to competition. In other cases, the program awarded grants to organizations without competition, and no justification for that was apparent.

For example, ACDI/VOCA awarded agreement ACIP-03-027-G to Fundación Cerrejón for \$623,571 (\$188,598 disbursed) without competition. The AOR said ACDI/VOCA did not compete the award because officials there believed that because Fundación Cerrejón had submitted this proposal previously to the mission under a different solicitation, competition was not required. However, ADS 303 does not allow exceptions in such circumstances. Instead, a USAID solicitation is separate from the program's procurement system and cannot be used as a reason for bypassing competition.

In another instance, ACDI/VOCA awarded ACIP-01-005-G to Economía Urbana for \$293,525 (\$278,479 disbursed) without competition. The approval document noted that Economía Urbana was a "unique source." While unique source is not listed in ADS 303 as an exception to competition, USAID allows for exceptions in cases when a grantee has "exclusive or predominant capability." However, when using this justification, ADS 303 notes that exclusive or predominant capability can be based on factors such as the "proprietary resources" of the organization or if the organization has a "unique" relationship with the country or beneficiaries.

Further, ADS 303 also notes that when the exception to competition is used, it must “describe in detail the uniqueness of the proposed recipient and how it applies to the activity to be supported.” Despite this, ACDI/VOCA did not justify the exception to competition.

The audit found other similar instances, listed in Table 2.

Table 2. Subawards Without Competition (Unaudited)¹

Subpartner	Award Number	Total Disbursed as of June 2014 (\$)
Consejo Regional del Cauca	ACIP-03-067-G	253,258
	ACIP-04-083-G	38,790
ASPROFINCA	ACIP-03-162-G	179,951
Universidad Nacional	ACIP-04-039-G	70,308
AMUNAFRO	ACIP-01-006-G	235,969
Instituto de Investigaciones del Pacífico	ACIP-01-024-G	451,335
	ACIP-01-054-G	198,792
AFRODES	ACIP-01-004-G	15,567
	ACIP-01-043-G	47,372
ECOBRA	ACIP-03-163-G	128,410
Fundación Cerrejón	ACIP-03-027-G	188,598
Economía Urbana	ACIP-01-005-G	278,479
Total		2,086,829

ACDI/VOCA did not follow the competition requirements because officials there said they believed that USAID/Colombia’s approval of their proposal and work plan allowed them to work directly with certain community organizations.

We relayed this information to the mission’s agreement officer, and she disagreed. She explained that an approved work plan or list of organizations in ACDI/VOCA’s proposal did not absolve them of their responsibilities related to competition.²

As a result, the program has given more than \$2 million to organizations without competition and did not have adequate justification for an exception to competition. These actions exposed the U.S. taxpayer to the risk of overpaying for services that potentially resulted in costs that are not eligible under the award due to noncompliance with U.S. law and USAID policies. To address this concern, we make the following recommendations.

Recommendation 2. *We recommend that USAID/Colombia determine the allowability of \$2,086,829 in ineligible questioned costs for subawards that were not competed, and recover from ACDI/VOCA any amounts deemed unallowable.*

Recommendation 3. *We recommend that USAID/Colombia review all subawards issued by the Afro-Colombian and Indigenous Program that were awarded without competition and determine whether an adequate justification for exception to competition*

¹ For the purposes of testing compliance with competition requirements, the audit judgmentally selected 18 of 177 awards.

² Cooperative agreements like this one limit USAID’s involvement in program implementation; therefore, the Agency often must rely on its partners to comply with applicable laws and regulations.

exists, take remedial action, including recovering any costs deemed unallowable, and document the results.

Recommendation 4. *We recommend that USAID/Colombia issue a written notice to ACDI/VOCA of its responsibilities related to competition, and document any exceptions to competition.*

ACDI/VOCA Did Not Have Enough Supporting Documentation for Trainees

According to ADS 253.3.4.5, USAID missions “must monitor and report on in-country training programs and Participants to ensure that problems are identified and resolved quickly and that the Participant Training Program is successful.” It further states that at a minimum, monitoring must show that the participant is “regularly attending scheduled activities or sessions of a technical program.”

The program has spent about \$1.6 million on various training courses for ethnic minority organizations and government entities that were tracked and reported to USAID. Many of the results depend on the success of these courses, such as training for government officials on understanding and implementing policies related to minorities in Colombia and on managing resources, and for organizations on improving their capacity, governance, and advocacy skills.

However, a review of the supporting documentation showed that for training courses that lasted more than 1 day, ACDI/VOCA collected only the first day’s sign-in sheet; it did not collect or maintain any other documentation to show that trainees finished the courses.

ACDI/VOCA employees said this happened because many of the participants were reluctant to sign the initial sign-in sheet. So the staff decided to eliminate the sheets on subsequent days, but continued to monitor physical attendance.

Without proper monitoring of training activities, the training may not contribute to the program’s expected results. To address this concern, we make the following recommendation.

Recommendation 5. *We recommend that USAID/Colombia instruct ACDI/VOCA in writing to provide proper documentation supporting training lasting more than 1 day to USAID.*

ACDI/VOCA Did Not Conduct Midterm Evaluation as Planned

According to ACDI/VOCA’s performance monitoring plan for the program, by end of fiscal year 2014 (September 2014), it would have reported results for a midterm evaluation on six key performance indicator results to measure the program’s impact on Afro-Colombian and indigenous people’s income, inclusion in politics, and the roles of women and youth have in key communities. The program can measure progress toward these key indicators only after the baseline assessment, midterm, and final evaluations are completed.

Despite the need to conduct the baseline assessment at the start of the program, it was not

completed until January 2013—more than a year later—and the final report was issued in August 2013. This caused a delay in completing the midterm evaluation, which should have been done around January 2014. Instead, it is scheduled to start in January 2015. Mission staff said the midterm evaluation could not be conducted any sooner than 2 years after the baseline assessment.

These delays occurred because of changes in the program description and challenges with finalizing the indicators. Mission officials said they wanted to change the program to be more “results-oriented and strategically focused with measurable impact indicators and targets.” The revised description was approved in October 2012, and the mission did not want to start the baseline assessment until the indicators were defined.

Consequently, the mission could not begin the baseline assessment until the program indicators were finalized, which delayed the start of the midterm evaluation. Therefore, we make the following recommendation.

Recommendation 6. *We recommend that USAID/Colombia determine whether the midterm evaluation should be conducted as planned, make changes if appropriate, and document the results.*

EVALUATION OF MANAGEMENT COMMENTS

USAID/Colombia agreed with all six recommendations. Based on comments from the mission, management decisions have been reached on five, with final action taken on Recommendations 4 through 6. A management decision has not been reached on Recommendation 2.

Our detailed evaluation of management comments follows.

Recommendation 1. The mission has held key meetings with Colombian Government officials to address issues with land titling. In addition, the mission has modified targets for Year 4 to reflect implementation challenges and has decided to suspend land titling activities with Colombian Institute for Rural Development if the mission does not make progress with the government by April 30, 2015. We acknowledge the mission's management decision on this recommendation.

Recommendation 2. The mission expects to complete its review of 90 subawards to determine the allowability of cost by February 17, 2015. However, for recommendations with questioned costs, the amount of allowable costs must be determined to achieve a management decision. Therefore, a management decision has not been reached on this recommendation.

Recommendation 3. The mission plans to review all ACDI/VOCA subawards by February 17, 2015, to determine whether they were competed properly. We acknowledge the mission's management decision.

Recommendation 4. The mission issued written guidance on competition and adequate documentation to ACDI/VOCA on December 11, 2014. We acknowledge the mission's management decision, and final action has been taken.

Recommendation 5. The mission provided written instruction to ACDI/VOCA on October 17, 2014, to provide proper training data to USAID. We acknowledge the mission's management decision, and final action has been taken.

Recommendation 6. The mission plans to conduct the midterm evaluation during the first quarter of 2015 as planned, and it should help make any corrections to the award. We acknowledge the mission's management decision, and final action has been taken.

SCOPE AND METHODOLOGY

Scope

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

The purpose of this audit was to determine whether USAID/Colombia's Afro-Colombian and Indigenous Program is achieving its main goal of improving the socioeconomic status of ethnic minorities in Colombia.

To implement this program, on August 30, 2011, USAID/Colombia signed an agreement worth \$61.4 million with ACDI/VOCA that ends on August 28, 2016. As of August 13, 2014, USAID/Colombia had obligated about \$44.9 million, and the program had spent about \$33.5 million. The audit visited and tested activities worth \$7.9 million. Related to competition, the audit reviewed 18 of 177 subawards.

In planning and performing the audit, we assessed significant management controls the mission used to manage the program and make sure it provided adequate oversight. We reviewed USAID/Colombia's performance plan report; FY 2013 annual self-assessment of management controls (which the mission is required to perform to comply with the Federal Managers' Financial Integrity Act); environmental compliance, award, and modification requirements; and the program's performance monitoring plan, progress reports, work plans, and the country development cooperation strategy.

The audit covered selected activities from the program's inception through June 30, 2014. We reviewed applicable laws and regulations as well as USAID policies and procedures pertaining to the program.

We also reviewed award documentation; interviewed staff at the mission and ACDI/VOCA, Colombian Government officials, organizations, and beneficiaries; and reviewed documentation maintained at the mission and ACDI/VOCA's offices in Bogota and throughout Colombia. We conducted fieldwork from August 10 through August 29, 2014, and conducted site visits in six departments where activities were being implemented.

Methodology

To answer the audit objective, we reviewed program documentation, including the cooperative agreements and subawards, progress reports, and data quality assessments, and corroborated information through interviews and site visits. We evaluated the mission's management and oversight of the program, the performance of ACDI/VOCA, and the effectiveness of the activities. We met with officials from USAID/Colombia and ACDI/VOCA and its recipients. We also interviewed beneficiaries and Colombian Government officials.

Through these interviews and the review of program documentation, we obtained an

understanding of (1) the program's goals, (2) how indicators and targets were established to measure progress, (3) how the mission verifies the quality of the data that ACIDI/VOCA reported, (4) how the mission monitors program activities, and (5) whether the mission is aware of any allegations of fraud or other potential illegal acts or noncompliance with laws, regulations, and agreement terms.

In addition, we performed the following audit tests:

- Reviewed and tested indicators, targets, and results to determine their appropriateness.
- Reviewed and tested the procedures to monitor and confirm the accuracy of the program's reported results.
- Documented and tested compliance with award requirements for sustainability, gender analysis, branding and marking, competition, cost share, and environmental compliance.

Related to competition, we spoke with officials at USAID/Colombia and ACIDI/VOCA to understand the program's responsibilities related to competition. When subawards were not competed, we judgmentally sampled the subawards and reviewed award files maintained by ACIDI/VOCA, program approval documents, and negotiation memorandums to determine whether ACIDI/VOCA documented justifications for exceptions to competition.

With respect to the program's cost-share requirements, we judgmentally selected cost share amounts reported under the program and reviewed supporting documentation maintained by the subawardee to determine whether the cost share was supported adequately.

In addition, we visited program activities in three regions in Colombia: Pacific, Caribbean, and Central to verify program activities. Within these regions, we visited activities implemented in Barranquilla, Bogota, Cali, Cartagena, Quibdo, and Sierra Nevada. Due to security concerns, we could not travel to the Department of Cauca. However, while in Cali we met with Afro-Colombian and indigenous beneficiaries from Cauca.

Given the breadth of the program activities spread out over various parts of Colombia, we judgmentally selected and visited awardees and beneficiaries associated with 53 (or 27 percent) of the 194 activities, representing \$7.9 million (or 37 percent) of the \$21.7 million spent for activities as of August 1, 2014. We conducted these field visits to validate reported results to the extent possible. Because the testing and site selections were based on judgmental samples, the results and conclusions related to the analysis were limited to the items and areas tested, and cannot be projected to the entire population. We believe our testing was sufficient to support the audit's findings.

MANAGEMENT COMMENTS



January 7, 2015

MEMORANDUM

TO: Regional Inspector General/San Salvador, Van Nguyen

FROM: Peter Natiello, USAID/Colombia Mission Director

SUBJECT: Response to draft Audit Report of USAID Colombia's Afro-Colombian and Indigenous Program (ACIP)

Per the following supporting documentation, USAID/Colombia is responding to the draft Audit Report of USAID Colombia's Afro-Colombian and Indigenous Program.

Recommendation 1: *We recommend that USAID/Colombia document and implement a plan of action, with milestones, for the remainder of the program, to address the land titling plans that were submitted to the Colombian Government for approval.*

We agree with this recommendation. USAID/Colombia has established the following plan to address the delays in the titling processes of collective territories with the Colombian Institute for Rural Development (INCODER):

1. Engage a broader scope of GOC agencies in the process:

- a. On Thursday, November 16, USAID and ACDI-VOCA held a meeting with the incoming Vice-Minister of the Interior to present the ACIP portfolio and raise the importance of the Ministry's engagement in the land-titling process. A second meeting between a broader team from the Ministry of the Interior (MOI) and the ACIP team is being scheduled for the second week of January 2015 to determine specific MOI actions that can support the process.
- b. On Friday, December 5, USAID and ACDI-VOCA held a meeting with the Colombian Presidential Agency for Cooperation (APC, for its Spanish acronym) with participation of GOC agencies including the Ministry of the Interior – the institution responsible for Afro-Colombian and Indigenous Issues - and INCODER. The concern over the lack of results in the commitment to advance the collective titling processes was raised by USAID. In addition, USAID requested them to advance these processes as soon as possible. APC will

participate in a meeting in January 2015, as well as additional meetings as needed, with the Ministry of the Interior to ensure the process advances.

2. Engage high-level USAID or USG representatives requesting action from INCODER:

When the INCODER General Manager requested a coordination meeting with the USAID/Colombia Mission Director, the Mission Director stated that a coordination meeting will be held only once there are significant advances on the collective land titling activities. This decision was communicated to the INCODER cooperation manager on Tuesday, November 4, 2014. At an upcoming high-level meeting between the USAID Mission Director and the Minister of Agriculture – which supersedes INCODER in hierarchy – a request will be made to advance the collective land titling processes (See Annex 1).

3. Suspend remaining ACIP land titling activities with INCODER and modify targets:

ACIP targets for Year 4 have been modified to reflect challenges in implementation (See Annex 2); additionally, should the aforementioned actions prove to be unsuccessful by April 2015, USAID Colombia will suspend titling activities with INCODER under the Afro-Colombian and Indigenous Program and modify its Program targets.

Recommendation 2: *We recommend that USAID/Colombia determine the allowability of \$2,086,829 in ineligible questioned costs for sub-awards that were not competed, and recover from ACDI/VOCA any amounts deemed unallowable.*

The USAID/Colombia Mission's Office of Acquisition and Assistance has conducted two desk review exercises (dated October 16-20, 2014 and December 19, 2014) and requested additional information from ACDI-VOCA. On December 19, 2014, USAID representatives conducted an additional review to verify ACDI/VOCA compliance with the justification for no competition which was to be done through an addendum to the NegMemo. The second review will be finalized the third week of January. Due to the amount of subawards to be reviewed (about 90), a final determination on the allowability of costs will be determined by February 17, 2015.

Recommendation 3: *We recommend that USAID/Colombia review all subawards issued by Afro-Colombian and Indigenous Program that were awarded without competition and determine if an adequate justification for exception to competition exists, take remedial action, including recovering any costs deemed unallowable, and document the results.*

The USAID/Colombia's Office of Acquisition and Assistance has conducted two desk review exercises (dated October 16-20, 2014 and December 19, 2014) and requested additional information from ACDI-VOCA. Due to the amount of subawards to be reviewed (about 90), a final determination on the allowability of costs will be determined by February 17, 2015. It was also recommended that in the future, ACDI/VOCA should

consider utilizing other competitive mechanisms or award types to ensure competition requirements are met or JECs are properly utilized.

Recommendation 4: *We recommend that USAID/Colombia issue a written notice to ACIDI/VOCA of its responsibilities related to competition and document any exceptions to competition.*

On December 11, 2014, USAID/Colombia's Office of Acquisition and Assistance (OAA) issued written guidance on competition and adequate documentation and requested a revision to the Sub-Awards Manual that was submitted by ACIDI-VOCA on December 16, 2014 (See Annex 3). OAA is reviewing the Sub-Awards Manual to determine its compliance with competition requirements. OAA expects to have their recommendations ready by January 30, 2015.

Recommendation 5: *We recommend that USAID/Colombia instruct ACIDI/VOCA in writing to provide proper documentation supporting training lasting more than 1 day to provide accurate training information to USAID.*

We agree with this recommendation and have taken the actions to implement it. Written instructions were provided to ACIDI-VOCA on October 17 to provide proper documentation supporting training lasting more than one day. Further, USAID requested a modification to the Program's Performance Evaluation Management Plan (PEMP) to reflect this change. A modified version of the PEMP was submitted by ACIDI-VOCA on October 17 and approved by the ACIP Assistance Officer Representative (AOR) on that same date (See Annex 4). Based on the actions taken, we request this recommendation be closed.

Recommendation 6: *We recommend that USAID/Colombia determine if the midterm evaluation should be conducted as planned, make changes, if appropriate, and document the results.*

An evaluation is an important part of the Agency's program cycle; this importance gains greater relevance since the Afro-Colombian and Indigenous Program is the first of its kind in the USAID/Colombia Mission. Further, and contingent upon availability of funds, the Mission anticipates planning and implementing continued programming for Colombia's ethnic communities. The results from the mid-term evaluation will provide valuable input for the Mission as it begins its planning process. Evaluation results will not only be valuable to make any correction in the remaining time of the existing award, it will also be incorporated into the design of the next award.

Therefore, the Mission's determination is to conduct the independent ACIP mid-term evaluation as planned during the first quarter of calendar year 2015.

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