



OFFICE OF INSPECTOR GENERAL

AUDIT OF USAID/DOMINICAN REPUBLIC'S EFFECTIVE SCHOOLS PROGRAM

AUDIT REPORT NO.1-517-14-001-P
OCTOBER 7, 2013

SAN SALVADOR, EL SALVADOR



Office of Inspector General

October 7, 2013

MEMORANDUM

TO: USAID/Dominican Republic Mission Director, Alexandria Panehal

FROM: Regional Inspector General/San Salvador, Jon Chasson /s/

SUBJECT: Audit of USAID/Dominican Republic's Effective Schools Program
(Report No. 1-517-14-001-P)

This memorandum transmits our final report on the subject audit. In finalizing the audit report, we considered your comments on the draft report and included them in their entirety in Appendix II of this report.

This report includes ten recommendations to help USAID/Dominican Republic improve the Effective Schools Program. Based on your written comments in response to the draft report, final action was taken for three recommendations and management decisions have been reached on seven.

I want to thank you and your staff for the cooperation and assistance extended to us during this audit.

CONTENTS

- Summary of Results** 1
- Audit Findings**..... 3
 - Program Monitoring Was Weak 3
 - Documents Related to Program Were Missing or Outdated 6
 - Program Did Not Publicize Its Success Stories 8
- Evaluation of Management Comments** 10
- Appendix I—Scope and Methodology** 12
- Appendix II—Management Comments** 14

Abbreviations

The following abbreviations appear in this report:

ADS	Automated Directives System
AOR	agreement officer’s representative
DQA	data quality assessment
FY	fiscal year
M&E	monitoring and evaluation
PMP	performance management plan
PPR	performance plan and report
PUCMM	Pontificia Universidad Catolica Madre y Maestra
RIG	Regional Inspector General
TraiNet	Training Results and Information Network

SUMMARY OF RESULTS

In 2010 the United Nations Educational, Scientific and Cultural Organization and the World Forum assessed the quality of education in the Dominican Republic and ranked its primary education as the worst in the Central American and Caribbean region. Despite high enrollment, students were not learning at the expected rate and received low scores on achievement tests in fundamental literacy and mathematics.

To enhance the quality of education in the country, USAID/Dominican Republic implemented the Effective Schools Program. It focuses on improving the quality of primary education (grades one through four) and has three components:

- Education management to strengthen school governance practices.
- In-service training and curriculum development provided to existing teachers in participating elementary schools to achieve significant improvements in reading, writing, and math.
- Monitoring and evaluation (M&E) to provide valid, reliable feedback about the program that supports changes, if warranted.

The program is implemented through a cooperative agreement to Pontificia Universidad Catolica Madre y Maestra (PUCMM). It started on October 1, 2009, and ends on September 30, 2014, with an estimated total cost of \$16.7 million. As of March 31, 2013, USAID/Dominican Republic had obligated \$11.4 million and disbursed \$9.7 million for program activities.

The Regional Inspector General/San Salvador (RIG/San Salvador) conducted this audit as part of its fiscal year (FY) 2013 audit plan to determine whether USAID/Dominican Republic was achieving its main goal of significantly contributing to the improvement of the quality of primary school education.

The program had provided significant assistance to primary school education through school materials and activities such as training classes, teacher mentoring, and workshops. Feedback from teachers and ministry officials was positive overall; teachers said training was helpful and practical. During 2012, the mission reported that it had trained 4,729 teachers, surpassing the target of 3,600.

However, the program might have been more successful if the various components were integrated better. The grant agreement with PUCMM stated that the components would be integrated to bring a comprehensive approach to affect the formal education system as a whole. Yet the November 2012 midterm evaluation observed that components operated autonomously, and recommended that PUCMM “seek opportunities to collaborate across components at the project and at the school level,” which would have made the program more efficient.

Despite this recommendation, PUCMM continued to manage the components as if each one was a separate project. The math and Spanish language portions of the second component worked independently, using their own groups of M&E specialists and mentors. PUCMM had different teams for each component and managed separate budgets. The teams rarely met or coordinated activities with one another. They did not track or manage results in an integrated manner and had their own set of indicators. Since the program ends on September 30, 2014,

the program cannot be readjusted at this point to allow the recommended integration.

The audit also identified the following problems.

- Monitoring was weak (page 3). The program and mission performance management plans (PMPs) were outdated and incomplete, reported data were not reliable, and the mission did not perform site visits regularly.
- Documents related to the program (PMPs, sustainability plan, branding and marking plan, and agreement modifications) were missing or outdated (page 6).
- The program did not publicize its success stories (page 8). Although the agreement required PUCMM to include success stories and lessons learned in its annual reports, PUCMM did not document these adequately.

To improve the effectiveness of the program and mission operations, the audit recommends that USAID/Dominican Republic:

1. Work with its implementing partner to revise the program's PMP to include (1) definitions for each indicator including the data source and collection methodology, (2) results disaggregated by gender, and (3) updated targets and actual results (page 6).
2. Update the education team's PMP, and confirm that it agrees with indicators being reported in the program PMP and the performance plan and report (PPR) (page 6).
3. Work with its implementing partner to implement an improved record-keeping system that supports each reported result (page 6).
4. Implement a site visit plan that includes frequent visits and data verification (page 6).
5. Verify in writing that all necessary training information is entered into USAID's Training Results and Information Network (TraiNet) (page 6).
6. Provide and document training to its staff on how to report results in TraiNet (page 6).
7. Work with its implementing partner to implement a sustainability plan, and document the experiences and lessons learned during the program as required by the agreement (page 8).
8. Work with its implementing partner to update its branding and marking plan, including the use of banners or posters with the USAID logo during training sessions (page 8).
9. Modify its agreement to include changes to the program's activity description and add required standard provisions (page 8).
10. Work with its implementing partner to document success stories in its FY 2013 annual report (page 9).

Detailed findings appear in the following section. Appendix I describes the audit scope and methodology. The mission's comments are in Appendix II, and our evaluation of the mission's comments are on page 10.

AUDIT FINDINGS

Program Monitoring Was Weak

According to USAID's Automated Directives System (ADS) 202.3.6, monitoring the quality and timeliness of outputs produced by implementing partners is a major task of USAID officials. Also, according to ADS 200.3.5.5, missions should track whether projects achieve intended results by (1) planning how they will systematically monitor and evaluate progress, (2) regularly monitoring the achievements of programs and projects, and (3) collecting and analyzing performance information to track progress toward planned outcomes.

ADS 203.3.11.3 requires missions to conduct data quality assessment (DQAs) "to ensure that decision makers are fully aware of data strengths and weaknesses and the extent to which data can be trusted when making management decisions and reporting." ADS 203.3.2.1 states that DQAs should confirm that the data reported to Washington meet USAID data quality standards and identify data quality issues and limitations.

The agreement stated that the program's PMP "must include indicators, targets, data sources and collection methods, baseline information, benchmarks and schedule for periodic evaluations. All data collected must be disaggregated by gender, if applicable."

ADS 253.3 states that all USAID units involved in funding or managing participant training must "design, implement, and track the training or program event for results and impact," and "report on their Participant Training activities as part of their broader performance measurement (monitoring), evaluation, and reporting requirements."

ADS 203.3.2.1 states that part of performance monitoring responsibilities includes activity-level oversight like site visits in accordance with USAID policy. Furthermore, the mission issued an order in July 2010 stating that the education team should perform and document site visits regularly that include an assessment of progress and verification and validation of reported results and data.

However, USAID/Dominican Republic's monitoring and oversight efforts did not ensure that all of these requirements were met, as discussed below.

PMPs Were Outdated and Incomplete. PUCMM did not update the PMP to include current targets and actual results. As of April 2013, PUCMM had not reported some targets and results for 2012, and some targets for 2013 were missing. In addition, the PMP did not disaggregate results by gender as required, and did not agree with the targets included in the agreement as noted in the table on the next page.

Inconsistent Program Targets (Percent) (Not Audited)

Result	Agreement target	2009 PMP target	2009 PMP results	2011 PMP target	2011 PMP results
The reading and writing literacy competencies of the trained teachers and technicians are strengthened.	80	60	65	65	65
The pedagogical and methodological strategies of the teachers trained are consistent with the curriculum proposed by the Ministry of Education and are applied in the classrooms for the strengthening of student learning.	80	50	60	60	70

Furthermore, although the program intended to contribute significantly to improving education in grades one through four, the PMP did not include an indicator to measure the students' improvement.

Finally, USAID/Dominican Republic's PMP, which should have been consistent with the program's PMP, contained only results from FY 2009; therefore, these indicators were no longer being used. The PMP also was missing indicator reference sheets, which explain indicator data sources and collection methods for each indicator. These reference sheets are particularly important because there are many ways to count the number of beneficiaries trained or reached.

According to PUCMM's chief of party and mission officials, they were focused on other implementation priorities that caused them to overlook the importance of maintaining a complete, updated, and accurate PMP and related data.

Program Results Were Not Always Reliable or Supported. The audit identified data weakness in the following areas.

- PUCMM reported 859 Spanish language teachers trained during 2010 and 933 teachers trained during 2011. However, the supporting documentation provided showed that 870 and 902 teachers were trained in those respective periods.
- PUCMM reported that 15,930 second- and third-graders enrolled in Spanish language classes. This figure was obtained from an official database of students that was not scrutinized carefully to remove, for example, students who had enrolled but left before completing the term.
- At the beginning of each school year, PUCMM estimated the number of teachers who would be trained. This estimate was later reported to USAID/Dominican Republic as the number of teachers trained, even though the actual number of teachers trained was available. Thus, PUCMM reported that 1,240 teachers were trained in math in 2012, while the program's own training database showed that 1,306 teachers were trained.
- PUCMM estimated that 65 percent of teachers improved; however, it could not provide any data to support this claim. The midterm evaluation concluded that PUCMM did not provide

sufficient evidence to determine whether teacher capacity had improved. Therefore, it was not possible to know what percentage had improved.

- PUCMM could not readily or completely support some results included in its quarterly reports. For example, PUCMM's database of math students was updated continuously, and all historical data were discarded. Therefore, it was not possible to determine the results at the end of a specific quarter or year. Furthermore, while PUCMM maintained numerous files and Excel spreadsheets with names of schools and beneficiaries (principals, teachers, ministry technicians, parents, and students), the data were not organized to support reported results. Files sorted by district or school generally were not summarized in a manner that supported the reported results.
- USAID/Dominican Republic did not keep documentation supporting the results reported in its annual PPR. Different education projects contributed to a reported result, but the mission could not provide support for each project's exact contribution. Therefore, it was not possible to match the result reported by PUCMM with the result reported in USAID's PPR.
- Training data were not reported in TraiNet. Although PUCMM conducted numerous training courses for principals, mentors, teachers, parents, and school and ministry officials, none were entered in the system as required by ADS 253.3. Therefore, the mission's training results were incomplete, and information related to USAID/Dominican Republic's training activities, such as subject area, number of participants, and costs incurred, was not available for review.

The mission officials explained that while some types of training were entered in TraiNet, they did not know they needed to include other types of training such as those given by PUCMM. In addition, mission staff had not received training on how to use the system, and PUCMM was unfamiliar with TraiNet as well as any requirements to report training.

Furthermore, the mission did not have a system in place to verify the results and confirm that they were accurate or met quality standards. Despite the USAID requirement to have DQAs, one of five required and conducted was missing. Additionally, the four others did not identify any areas for improvement even though this audit uncovered various weaknesses described above.

Site Visits Were Not Performed Regularly. USAID did not regularly perform and document site visits to schools assisted under the program. Mission officials said visits should be performed at least quarterly; however, during the program's first 3 and a half years, only six site visit reports were available, and most of the visits did not include data verification.

The officials said, the absence of the agreement officer's representative (AOR) for nearly a year prevented the mission from conducting more frequent site visits and more thorough data verification.

Without proper monitoring and verification of reported results, the likelihood of not achieving program goals increases. Without regular site visits, the mission cannot determine whether the program is progressing as planned, or make decisions based on the current situation in the field. Furthermore, the mission cannot approve payments properly to PUCMM if it cannot verify accomplishments. To address these concerns, this audit makes the following recommendations.

Recommendation 1. We recommend that USAID/Dominican Republic work with its implementing partner to revise the program's performance management plan to include (1) definitions for each indicator including the data source and collection methodology, (2) results disaggregated by gender, and (3) updated targets and actual results.

Recommendation 2. We recommend that USAID/Dominican Republic update the education team's performance management plan, and confirm that it agrees with indicators being reported in the program performance management plan and the performance plan and report.

Recommendation 3. We recommend that USAID/Dominican Republic work with its implementing partner to implement an improved record-keeping system that supports each reported result.

Recommendation 4. We recommend that USAID/Dominican Republic implement a site visit plan that includes frequent visits and data verification.

Recommendation 5. We recommend that USAID/Dominican Republic, in conjunction with its implementing partner, verify in writing that all necessary training information is entered into USAID's Training Results and Information Network.

Recommendation 6. We recommend that USAID/Dominican Republic provide and document training to its staff on how to report results in USAID's Training Results and Information Network.

Documents Related to Program Were Missing or Outdated

ADS 202.3.6.3 states that USAID missions must adjust tactics when conditions warrant. This may include simply modifying and changing existing programs or activities. ADS 303.3.17 states that when a modification to the award is necessary, the AOR should prepare internal USAID documentation that supports it.

USAID guidance also requires that missions maintain several documents to ensure that the programs meet their objective. For example, ADS 201 requires a sustainability strategy, and ADS 320.6 defines a branding implementation plan as one that describes how the program will be communicated to the beneficiaries and promoted to people in host countries. A marking plan outlines the public communications, commodities, program materials, and other items that will visibly bear or be marked with the USAID logo.

However, in several instances described below, program documents were absent or outdated.

Program Lacked Sustainability Planning. To achieve sustainability, the agreement required PUCMM to make sure teachers, directors, technicians, instructors, and the program's technical team document their experiences and publicize the PUCMM teacher training model. However, PUCMM has not developed a method for documenting the experiences learned to ensure that the program continues after USAID's assistance stops. PUCMM officials said they have not done this because they thought this should take place as the program comes to its end.

Branding and Marking Plan Was Incomplete. ADS 320.3.1 requires that “all USAID-funded foreign assistance must be branded through the use of a ‘Branding Strategy’ and marked through the use of a ‘Marking Plan.’” The agreement required PUCMM to create a branding and marking plan within 30 days after the award was signed.

The plan consisted of only two pages, was not dated, did not specify who would be responsible for tasks such as ensuring compliance, did not include key milestones for completing actions, and did not specify the type and level of marking.

Furthermore, while PUCMM and school officials were aware of USAID’s support, parents were not. School materials were well marked, but during our visit to one training event, we noted that the event did not indicate that USAID sponsored it.

The AOR explained that the plan was developed in 2009, and she believed that it met USAID’s requirements at that time. However, USAID has provided more guidance since 2009 and has examples of detailed plans from other education projects.

Agreement Modifications and Standard Provisions Were Not Documented. Since 2009 the AOR and PUCMM agreed verbally to several changes to the program’s scope and operations. For example:

- The grant agreement initially required PUCMM to implement a quality management model for improving school administration based on the development of a new education management culture developed by the Ministry of Education. In 2011 PUCMM and the AOR agreed to adopt a different approach.
- Some school districts that were to receive program services under the initial grant agreement were removed from the program.
- Training was going to be provided to 2,000 members of education centers and/or parents’ associations related to the quality management model, but it was eliminated.
- The requirement for PUCMM to publish bimonthly newsletters and develop a Web page was eliminated from the agreement’s scope of work.

However, the mission did not revise the agreement’s scope of work or keep documentation to show its approval for these adjustments. Furthermore, these changes resulted in lower program costs that should have been reflected in a revised program budget.

The modifications were not documented adequately because of poor communication between the AOR and the mission’s contracting office. Furthermore, the designated AOR was out of the office for nearly a year starting in October 2011; although other mission staff provided program oversight in her absence, they did not monitor the program closely.

In addition, some standard USAID provisions were not updated or added to the existing agreement. It did not include the most recent standard provisions to require the implementer to complete a gender analysis, upload documents to USAID’s Development Experience Clearinghouse, or report results to TraiNet. These provisions were not added because of an oversight by the mission’s contracting office. The only modification the mission made since the program started related to funding increases.

The lack of adequate program documents may lead to improper implementation of the program. In addition, the absence of some USAID requirements in the agreement results in noncompliance by PUCMM. To address these concerns, this audit makes the following recommendations.

Recommendation 7. We recommend that USAID/Dominican Republic work with its implementing partner to implement a sustainability plan, and document the experiences and lessons learned during the program as required by the agreement.

Recommendation 8. We recommend that USAID/Dominican Republic work with its implementing partner to update its branding and marking plan, including the use of banners or posters with the USAID logo during training sessions.

Recommendation 9. We recommend that USAID/Dominican Republic modify its agreement to include changes to the program's activity description and add required standard provisions.

Program Did Not Publicize Its Success Stories

The mission's outreach and communications strategy aims to "increase public awareness of support for USAID's assistance program in the Dominican Republic and to generate a positive image and increased visibility of the United States and the American people." The agreement required PUCMM to include success stories and lessons learned in its annual reports. PUCMM's branding and marking plan added that the program "planned to print periodical bulletins including success stories, beneficiary testimonials, pictures and accomplishments." Despite the program's many accomplishments, success stories and lessons learned have not been prepared and disseminated adequately.

USAID, PUCMM, and school officials repeatedly expressed their satisfaction with the program's accomplishments. Forty-five school principals and teachers interviewed said it has made significant contributions to improve teacher performance, which supports improved student performance. All of the principals and teachers interviewed said the training and mentoring provided by the program improved their performance as well as the performance of their colleagues.

Furthermore, student evaluations have consistently showed improved performance. The longer teachers have been in the program, the more likely their students were to outperform their peers who were not part of it. Many of those interviewed also shared stories about specific students who overcame challenges. Some people we interviewed said that USAID's two previous basic education projects were highly successful and laid the groundwork for the current program.

Despite these positive impacts, PUCMM had not documented success stories and lessons learned as required by the agreement. PUCMM officials said the stories were written, but had not been translated into English and thoroughly reviewed, edited, or published. PUCMM intended to address this shortcoming by hiring a contractor to document, edit, and help publish success stories and lessons learned. Mission officials also explained that they did not monitor the agreement properly and overlooked this requirement. They added that the mission has not published success stories for any of its programs recently.

Without well-publicized success stories, stakeholders may not be aware of the mission's contributions to basic education in the Dominican Republic. This weakness, combined with poor communications and public relations, may have contributed to USAID's elimination of the education component from the mission's portfolio. Therefore, we make the following recommendation.

Recommendation 10. *We recommend that USAID/Dominican Republic work with its implementing partner to document success stories in its partner's fiscal year 2013 annual report.*

EVALUATION OF MANAGEMENT COMMENTS

In response to our draft report, USAID/Dominican Republic agreed with all ten recommendations. Based on our evaluation of management comments on our draft report, we have determined that final action has been taken on three recommendations and management decisions have been reached on seven. Our evaluation of management comments follows.

Recommendation 1. The mission agreed to work with PUCMM to develop a more detailed, comprehensive PMP by December 31, 2013. Based on this planned action, we acknowledge that a management decision has been reached on this recommendation.

Recommendation 2. The mission updated the performance plan on September 18, 2013, to agree with the program PMP. Based on these actions, we acknowledge that a management decision has been reached on this recommendation.

Recommendation 3. The AOR visited PUCMM's office on July 17, 2013, and confirmed that it was following the new procedures of maintaining historical data when data are updated. Additionally, USAID clarified with the partner that the number of beneficiaries registered should be reported at the end rather than at the beginning of each school year. Based on these actions, we acknowledge that final action has been taken on this recommendation.

Recommendation 4. The mission developed a site visit plan for the period of September 2013 through March 2014. According to this plan, the AOR will conduct at least one visit per quarter. The plan will be updated on a quarterly basis and will include data verification through actions such as school visits. Based on these actions, we acknowledge that final action has been taken on this recommendation.

Recommendation 5. The mission agreed to train PUCMM on proper procedures for entering all required training data into TraiNet. The AOR will verify that all trainings have been entered into the system and confirm in writing that all requirements have been met. This action will be completed by March 31, 2014. Therefore, we acknowledge that a management decision has been reached on this recommendation.

Recommendation 6. By October 31, 2013, the mission will hold an internal training course on reporting training results in TraiNet. Based on this action, we acknowledge that a management decision has been reached on this recommendation.

Recommendation 7. The mission will require PUCMM to prepare a sustainability plan. Furthermore, the mission and PUCMM have hired a consultant to produce a series of reports to document and publicize the project's experiences and successes. These actions are expected to be completed by March 31, 2014. Based on these actions, we acknowledge that a management decision has been reached on this recommendation.

Recommendation 8. The mission and PUCMM have contracted a consultant to update the branding and marking plan. The plan is being drafted and will be approved by the outreach and

communications specialist and the AOR by the end of February 2014. Based on these actions, we acknowledge that a management decision has been reached on this recommendation.

Recommendation 9. On June 11, 2013, the agreement with PUCMM was modified to include changes in the program description and the required applicable updated standard provisions. Further revisions to the provisions, per an agency notice dated August 22, 2013, will be included in an upcoming modification. Based on these actions, we acknowledge that final action has been taken on this recommendation.

Recommendation 10. The mission has requested PUCMM to include success stories in its FY 2013 report. This action will be completed by the end of November 2013. Based on these actions, we acknowledge that a management decision has been reached on this recommendation.

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 that the evidence obtained provides that reasonable basis.

The purpose of the audit was to determine whether USAID/Dominican Republic was achieving its main goal of significantly contributing to the improvement of the quality of primary school education.

USAID/Dominican Republic's Effective Schools Program has a total estimated cost of \$16.7 million. It started on October 1, 2009, and ends on September 30, 2014. As of March 31, 2013, the mission had obligated \$11.4 million and disbursed \$9.7 million for program activities. This represents the amount tested as part of this performance audit.

The audit fieldwork was conducted at USAID/Dominican Republic, PUCMM's office in Santiago, and at schools in four districts targeted by the program (La Vega/Jarabacoa, Puerto Plata, Santiago, and Santo Domingo) from April 15 through May 3, 2013. We interviewed key staff members from the mission and PUCMM, as well as various government and school officials.

As part of the audit, we assessed the significant internal controls the mission used to monitor the program. The assessment included controls to determine whether the mission (1) conducted and documented site visits to evaluate progress and monitor quality, (2) reviewed and approved required deliverables, (3) reviewed and tested indicator targets and results, and (4) performed DQAs and portfolio reviews. Additionally, we reviewed the mission's annual certification required by the Federal Managers' Financial Integrity Act of 1982, 31 U.S. Code 3512 to verify whether the assessment cited any relevant weaknesses. We reviewed prior audit reports in the education area for any issues related to the audit objective.

Methodology

To answer the audit objective, we evaluated the mission's management and oversight of the programs, the performance of PUCMM, and the effectiveness of the activities. We met with various USAID/Dominican Republic officials including the AOR, the education office director, and the M&E specialist. We held numerous meetings with PUCMM employees, including the chief of party, component managers, and mentors. We met with project beneficiaries including ministry officials, principals, and teachers.

To gain an understanding of the program, the audit team reviewed the mission's cooperative agreement and associated modifications, the PMP, the operational plan, the PPR, DQAs, site visit reports, and portfolio review results. We also reviewed PUCMM's work plans, progress reports, branding and marking plan, training records, and other documents that support the program and results reported to USAID. We reviewed applicable policies and procedures

pertaining to USAID/Dominican Republic's implementation of the program, such as ADS and selected mission orders.

We used a judgmental sample rather than a statistical sample, because a statistical sample would have required more time and a larger budget for traveling around the Dominican Republic. Therefore, we judgmentally selected seven schools to conduct field visits in addition to three schools selected by PUCMM. The sample selection was based on an analysis of relevant factors, including teacher availability, accessibility, and travel time and cost. Because we did not use a statistical sample, the sample results cannot be projected to the entire population.

MANAGEMENT COMMENTS



UNITED STATES GOVERNMENT

MEMORANDUM

Date: September 19, 2013
To: Jon Chasson, Regional Inspector General/San Salvador
From: Alexandria L. Panehal, Mission Director /s/
Through: Marina Taveras, AOR/AAO (Audit Action Officer) /s/
Subject: Mission Comments on Performance Audit Draft Report of
 USAID/Dominican Republic's Effective Schools Program.

On August 28, 2013 RIG/San Salvador issued its draft audit report of the USAID/Dominican Republic's Effective Schools Program and requested the Mission provide its review and comments. The draft report included ten recommendations, listed below, which the Mission wishes to respond to in the following manner:

Recommendation 1. *We recommend that USAID/Dominican Republic work with its implementing partner to revise the Program's performance management plan to include (1) definitions for each indicator including the data source and collection methodology, (2) results disaggregated by gender, and (3) updated targets and actual results.*

Mission comments - USAID/DR agrees with the recommendation. The Education Office and the implementing partner have been working closely to have a more detailed and comprehensive performance management plan (PMP) in place which will address this recommendation. The revised plan is expected to be completed by December 31, 2013.

Recommendation 2. *We recommend that USAID/Dominican Republic update the education team's performance management plan, and confirm that it agrees with indicators being reported in the program performance management plan and the performance plan and report.*

Mission comments - USAID/DR agrees with the recommendation. The Education Team's performance management plan was updated on September 18, 2013, in coordination with the Program Office. The Program Office confirms that the revised Education Team PMP agrees with program PMP and includes appropriate indicators to be reported in the FY 2013 Performance Plan and Report. USAID/DR recommends that this recommendation be considered closed and not be included in the final audit report.

Recommendation 3. *We recommend that USAID/Dominican Republic work with its implementing partner to implement an improved record-keeping system that supports each reported result.*

Mission comments - USAID/DR agrees with this recommendation. The implementing partner has agreed to keep historical data when the data is updated. On July 17, 2013, the AOR visited the Project's office in Santiago and confirmed that this new procedure is being followed. USAID/DR also clarified with PUCMM that the project results are required to be reported at the end of each fiscal year (the project was reporting the data it had available at the beginning of each school year, which starts in mid-August). USAID/DR and PUCMM agreed that they will report the number of beneficiaries registered at the end of each school year (June). Based on adoption of these new agreed-upon procedures, USAID/DR recommends that this recommendation be considered closed and not to be included in the final audit report.

Recommendation 4. *We recommend that USAID/Dominican Republic implement a site visit plan that includes frequent visits and data verification.*

Mission comments - USAID/DR agrees with the recommendation. The Education Office developed and submitted to the Program Office a site visit plan for the period of September 2013 through March 2014, with at least one visit per quarter. The site visit plan will be updated on a quarterly basis. Site visits planned include data verification through actions such as visits with participating schools. USAID/DR requests that this recommendation be closed and not to be included in the final audit report.

Recommendation 5. *We recommend that USAID/Dominican Republic, in conjunction with its implementing partner, verify in writing that all necessary training information is entered into USAID's Training Results and Information Network.*

Mission comments – USAID/DR agrees with the recommendation. USAID/DR's Participant Training Specialist will train the implementing partner on proper procedures for entering all trainings funded by the project into USAID's Training Results and Information Network (TraiNet). Once PUCMM completes data entry, the Participant Training Specialist will generate a report to allow the AOR to verify that trainings have been entered into the system, as required, and confirm in writing to the Participant Training Specialist that all requirements have been met. It is expected that this action will be completed by March 31, 2014.

Recommendation 6. *We recommend that USAID/Dominican Republic provide and document training to its staff on how to report results in USAID's Training Results and Information Network.*

Mission comments – USAID/DR agrees with the recommendation. Although USAID/DR's Participant Training Specialist is already trained on the procedures to report results in TraiNet, there are opportunities to improve AORs' and CORs' knowledge of this requirement as well. The Program Office will hold an internal training with all AORs and CORs. Their participation will be confirmed through a sign-in sheet, which will be kept on file in the Program Office. We expect this action to be completed by October 31, 2013.

Recommendation 7. *We recommend that USAID/Dominican Republic work with its implementing partner to implement a sustainability plan and document the experiences and lessons learned during the program as required by the Agreement*

Mission comments – USAID/DR agrees with this recommendation. USAID/DR will request that the implementing partner prepare a sustainability plan. USAID/DR and the implementing partner contracted a consultant that will produce a series of reports that will document and publicize the project's experience and successes. These actions are expected to be completed by March 31, 2014.

Recommendation 8. *We recommend that USAID/Dominican Republic work with its implementing partner to update its branding and marking plan, including the use of banners or posters with the USAID logo during training sessions.*

Mission comments – USAID/DR agrees with the recommendation. The consultant mentioned above will also be updating the Branding and Marking Plan. This plan is being drafted and will be approved by USAID/DR's Outreach and Communications Specialist and the AOR. USAID/DR will make sure that this plan includes the use of banners posted during training sessions. This action will be completed by the end of February 2014.

Recommendation 9. *We recommend that USAID/Dominican Republic modify its agreement to include changes to the program's activity description and add required standard provisions.*

Mission comments – USAID/DR agrees with this recommendation. On June 11, 2013 the agreement with PUCMM was modified to include changes in the program description and added the required applicable updated standard provisions (see attachment). Further revisions to the provisions, per Agency Notice dated August 22, 2013, will be included in an upcoming modification. USAID/DR recommends that this recommendation be considered closed and not be included in the final audit report.

Recommendation 10. *We recommend that USAID/Dominican Republic work with its implementing partner to document success stories in its partner's fiscal year 2013 annual report.*

Mission comments – USAID/DR agrees with this recommendation. USAID/DR has requested PUCMM to include success stories in its fiscal year 2013 report. This action will be completed by the end of November 2013.

USAID/DR also acknowledges the auditors' observation in the Summary of Results that "*the program might have been more successful if the various components were integrated better*". USAID/DR previously shared these same observations from the USAID/DR Mid-Term Performance Evaluation of the Education Portfolio with PUCMM and will follow up in writing to PUCMM about integrating program components by October, 2013.

We appreciate the RIG's consideration of the Mission's comments on these recommendations and look forward to receiving the final audit report. Please let us know if you need any additional information.

U.S. Agency for International Development
Office of Inspector General
1300 Pennsylvania Avenue, NW
Washington, DC 20523
Tel: 202-712-1150
Fax: 202-216-3047
<http://oig.usaid.gov>