



OFFICE OF INSPECTOR GENERAL

AUDIT OF USAID/HAITI'S EDUCATION ACTIVITIES

AUDIT REPORT NO. 1-521-14-013-P
AUGUST 11, 2014

SAN SALVADOR, EL SALVADOR



Office of Inspector General

August 11, 2014

MEMORANDUM

TO: USAID/Haiti Mission Director, John Groarke

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

SUBJECT: Audit of USAID/Haiti's Education Activities
(Report Number 1-521-14-013-P)

This memorandum transmits our final report on the subject audit. We considered your comments on the draft report and included them, without annexes, in Appendix II of this report.

This report contains eight recommendations to help USAID/Haiti improve implementation of its education activities. The mission made management decisions on all eight recommendations and took final action on Recommendations 1 through 2 and 4 through 7. 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 the remaining recommendations.

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

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SUMMARY OF RESULTS

Improving Haiti's education is a tremendous challenge. According to a UNESCO report on adult and youth literacy, "Less than half of the Haitian adult population was able to read and write and the youth literacy rate actually decreased between 2000 and 2010." USAID has reported that the majority of the population is younger than 24, and more than half never attended or did not complete primary school. The Agency also has reported that despite the high demand for schooling, education in Haiti is "characterized by weak state capacity to provide education services and to govern the sector." The weakness in the educational sector is "compounded by teachers who are young, often poorly qualified, and lack experience. About 75 percent of all teachers have only a 9th - to 12th-grade education, and often with no teacher training."

In response to these challenges, on August 2, 2012, USAID/Haiti signed a \$13 million firm-fixed price contract with RTI International (RTI).¹ The title of this activity is *Tout Timoun Ap Li* (Applied Research Activity), referred to as TOTAL.² The estimated period of performance is 2 years and 4 months, ending in December 2014. As of February 27, 2014, USAID/Haiti has obligated \$9 million and disbursed \$8 million.

TOTAL's objective is to help the Haitian Ministry of Education develop and test an instructional model to improve the reading skills of children in first through third grades in Haiti's development corridors.³ Over the 2.4-year period, the project is to provide curricula that meet international standards for best practice and respond to Haiti's culture and students' educational needs.

The audit objective was to determine whether USAID/Haiti's education activities are achieving their main goal of helping the Haitian Ministry of Education develop and test an instructional model to improve the reading skills of children in first through third grades in the mission's development corridors.

The audit determined that the activities contributed to the development and testing of an instructional model to improve the reading skills of children in first grade. RTI developed first-grade French and Creole curriculum materials and distributed them to more than 300 schools in the development corridors. Those schools were separated into two groups, Treatment 1 and Treatment 2. The 225 Treatment 1 schools were to receive materials, teacher training, and ongoing support. The 75 Treatment 2 schools were to receive the same assistance, and RTI would provide additional community-based activities to support reading. USAID/Haiti planned to compare the two groups and evaluate the overall impact of the project and community reading activities at the end of 2 school years.

RTI also assessed student reading performance and school management effectiveness at the schools, and it strengthened TOTAL through partnerships with other international and local organizations. Feedback from principals and teachers during our site visits to 15 schools was positive overall; teachers said the training was helpful and practical, and the first-grade materials were useful.

¹ The contract is a completion task order under the Education Data for Decision Making (EdData II) blanket purchase agreement No. ECH-E-00-04-0004-00.

² This means "All Children Reading" in Haitian Creole.

³ USAID targets three areas of the country designated by the Haitian Government as "development corridors": Cul-de-Sac, which includes the capital, Port-au-Prince; Northern; and St. Marc.

However, the project did not achieve all of its expected results—particularly with respect to developing and testing an instructional model for children in the second and third grades—and the project is significantly behind schedule to achieve its overall goals within the planned time frames. For example, RTI did not distribute the first-grade curriculum and materials until late March 2013—2 months past the deadline; second- and third-grade materials also were late (page 3).

In addition, RTI did not implement community literacy strategies fully, and its monitoring of teachers was weak. Implementation delays reduce USAID/Haiti's ability to assess and evaluate the cost-effectiveness of various instructional approaches.

The audit team found other problems:

- RTI's reporting on indicators and targets was missing or not accurate (page 5).
- USAID/Haiti did not formally notify RTI of poor performance (page 7).

To strengthen the project, we recommend that the mission:

1. Clarify and document with RTI the mission's specific expectations about further development of curricula and materials (page 5).
2. Require RTI to complete a staffing plan to confirm the project has employees with appropriate experience in curriculum materials development and implementation (page 5).
3. Require RTI to implement a plan to mitigate the negative impact on the project's research findings of not fully implementing community-based activities for Treatment 2 schools or conducting adequate ongoing teacher monitoring (page 5).
4. In conjunction with RTI, implement a detailed work plan that links each of the contract's performance requirements, standards, and deliverables to the milestone payment schedule (page 5).
5. Work with RTI to review and revise as appropriate each of the 17 performance indicators, implement targets for each indicator, and instruct RTI in writing to collect data and report progress made against each of the performance indicators, including disaggregating data by development corridor and gender in quarterly progress reports (page 7).
6. Instruct RTI in writing to implement procedures for recording accurate data for participants who successfully complete training (page 7).
7. Complete the contractor performance assessment report (CPAR) for RTI in accordance with Automated Directive System (ADS), Section 302 (page 8).
8. Give RTI a written notice to implement a written plan that will correct the contract nonperformance issues in time to meet the delivery requirements of the contract (page 8).

Detailed findings follow. Appendix I describes the audit scope and methodology. Our evaluation of USAID/Haiti's management comments will appear on page 9, and the mission's comments will appear in Appendix II.

AUDIT FINDINGS

Development and Implementation of Contract Deliverables Were Consistently Late

According to ADS 202.3.6, monitoring the quality and timeliness of outputs produced by implementing partners is a major mission responsibility. The outputs specifically described in contracts are critical to achieving results, and delays in completing outputs or problems in output quality may be signs that results will not be achieved as planned. Therefore, it is essential to respond promptly to problems.

The contract specified that RTI must meet 26 performance requirements and 76 standards to USAID/Haiti's satisfaction. RTI also was to prepare and submit 37 deliverables by a certain date to the mission's contracting officer's representative (COR). The COR had to approve and accept each of the deliverables. The firm-fixed price contract with RTI also included a milestone payment schedule for validating deliverables and services performed when reimbursing RTI for costs incurred.

Despite the contract's requirements, RTI completed only 13 of the 31 deliverables that were due through March 31, 2014. Eleven were late, and seven have yet to be delivered. The following key deliverables were not implemented as planned.

Reading Curriculum and Materials Were Not Delivered on Schedule. During the first year of the project, RTI was to provide Haitian Creole and French first-grade textbooks, supplementary materials, and teacher training materials to first and second grades in 200 of the 300 schools by January 2013. According to the contract, giving textbooks to students in grades above the target grade could help them because "those students will likely have had limited literacy instruction [in earlier grades]." In the second year, 100 more schools were to receive the first-grade materials before the beginning of the school year. In addition, RTI was to distribute the second-grade curriculum and materials to second and third grades. However, the development and distribution of curriculum and materials was not implemented as planned.

- **First-Grade Curriculum and Materials Were Distributed Late.** In the first year of the project, RTI did not distribute first-grade curriculum and materials to the 200 schools until late March 2013—2 months past the deadline. During our visits to 15 of the schools, principals and teachers said they appreciated the materials, but several still had not received reading materials for each of their students; one classroom was not using the writing materials because there were not enough for the students to share.
- **Second- and Third-Grade Curriculum and Materials Were Not Developed.** As of March 31, 2014, RTI had not developed and distributed second-grade curriculum and materials by the project's original June 2013 deadline (subsequently amended to March 31, 2014). RTI officials said they would not meet the deadline of developing third-grade materials by June 2014.

Late and Weak Implementation of Community-based Activities for Treatment 2 Schools. During the first year of the project, RTI was to implement community-based activities in 75 of the

200 schools. However, it did not implement many of the activities fully. For example, RTI did not (1) develop report cards for teachers and parents that showed whether students' reading skills were improving, (2) hold literacy fairs at schools, (3) facilitate parent meetings, and (4) hold weekly reading clubs as required. Other planned activities were dropped, including (1) Big-Brother/Sister Reading Partners, (2) bookmaking workshops, and (3) initiating a radio listening club. According to RTI, based on the lessons learned from the first year of the project, the plan for implementing community-based activities for the second year was modified. However, RTI officials said they are concerned about the implementation of many of these activities, and they are working with their subcontractor to increase the pace of implementation and improve reporting and information gathering.

During site visits to three Treatment 2 schools, we confirmed that, aside from the reading clubs (that RTI conducted usually monthly, not weekly), principals and teachers were not familiar with any of the other community-based activities.

Weak Implementation of Teacher Coaching. RTI's subcontractor was required to conduct nine visits to each of the 200 schools during the 2012-2013 school year to provide important coaching and support to the teachers. However, the subcontractor only conducted an average of three visits per school because of the delay in implementing the project. The subcontractor also continued to underperform for the 2013-2014 school year, completing an average of four to five visits per school through February 2014, whereas it was contracted to conduct eight visits through the end of December 2013.

USAID/Haiti and RTI disagreed about the cause of the late teaching materials. Mission officials said RTI's staff lacked experience in developing the training materials, and some team members had no experience in Haiti or did not speak French or Creole. This resulted, they said, in poor-quality materials that required substantial revisions. RTI officials said the revisions were needed because of a fundamental difference in expectations between USAID/Haiti and RTI. They also contributed delays on the unknown Ministry of Education shifting needs and expectations, the problems that exist in a challenging environment like Haiti's, and the lack of clarity in the definition of deliverables.

Mission officials said they did not ask for substantial revisions, but they did expect RTI to provide deliverables that met basic standards. They pointed out examples such as (1) a comprehensive training plan that was neither comprehensive nor a plan, (2) a capacity mapping report with no mapping, (3) an annual report with no reporting on performance indicators, and (4) instructional material based on repetition/memorization, lacking cultural appropriateness, and not meeting international standards. USAID/Haiti officials said the expectations were defined clearly in the contract, which required RTI to develop:

Innovative, evidence-based student and teacher grade 1 Haitian Creole and French reading curricular materials that meet international standards for best practice literacy instruction and respond and are relevant to Haiti's culture, development contexts, and children's educational needs.

USAID/Haiti and RTI officials agreed that the subcontractor did not deliver many of the community-based activities and did not provide ongoing mentoring of teachers. But they disagreed on the root cause; RTI officials said they assigned the subcontractor to the project at USAID/Haiti's insistence, but mission officials said this was not true. The subcontractor simply noted that it had a difficult working relationship with RTI.

The project's work plan may also have contributed to the project delays and differences in USAID/Haiti and RTI expectations. While the contract was well written and clearly delineated the results, requirements, and standards, the project did not have a work plan that linked activities to deliverables and ultimately to the milestone payment schedule. Nearly 50 percent, or 15 of the 37 deliverables, were not linked to the schedule. These consisted of key activities such as training, community-based activities to be implemented in Treatment 2 schools, and ongoing mentoring of teachers. Because RTI is reimbursed by USAID/Haiti only when it has satisfactorily completed a milestone per the payment schedule, not clearly linking requirements, standards, and deliverables to the schedule does not give for RTI the financial incentive to focus its efforts on completing those activities.

These implementation problems put the project significantly behind schedule to achieve its goals. The delays will make it difficult for USAID/Haiti to assess the instructional materials and compare the progress of Treatment 1 to Treatment 2 schools. To correct these problems, USAID/Haiti and RTI need to work together to clarify expectations and make sure that appropriate personnel are in place to deliver quality materials and community-based activities. Therefore, we make the following recommendations.

Recommendation 1. We recommend that USAID/Haiti clarify and document with RTI International the mission's specific expectations regarding the further development of curricula and materials.

Recommendation 2. We recommend that USAID/Haiti require RTI International to complete a staffing plan to confirm that the project has employees with appropriate experience in developing and implementing curriculum materials.

Recommendation 3. We recommend that USAID/Haiti require RTI International to implement a plan to mitigate the negative impact on the project's research findings of not fully implementing community-based activities for Treatment 2 schools or conducting adequate ongoing teacher monitoring.

Recommendation 4. We recommend that USAID/Haiti in conjunction with RTI International implement a detailed work plan that links each of the contract's performance requirements, standards, and deliverables to the milestone payment schedule.

Reporting on Indicators and Targets Was Missing or Not Accurately Reported

According to ADS 203.3.2, performance monitoring is the "ongoing and routine collection of performance indicator data to reveal whether desired results are being achieved and whether implementation is on track." Additionally, ADS 203.3.6 states that when selecting performance indicators, "USAID Missions/Offices and Washington operating units should ensure that the selected indicators will lead to performance monitoring data that meet the quality standards of validity, integrity, precision, and reliability."

According to the project's performance monitoring plan (PMP), RTI was required to report data for the performance indicators at least annually, and when data made it possible to update a particular indicator, that update was to be reported to USAID in the relevant quarterly report. In addition, data were to be disaggregated by gender and corridor when applicable.

RTI's quarterly reports and annual report for August 2012 to September 2013 did not contain any reporting against each of the 17 performance indicators established in the project's PMP. There has not been any periodic reporting of progress made against the indicators for fiscal year 2014.

During the audit, RTI revised its annual report ending September 2013 and reported the following results. However, the project still did not establish targets for all indicators in the revised annual report.

Status of Indicators per RTI's Revised September 2013 Annual Report (Audited)

Indicator	Fiscal Year 2013 Target	Fiscal Year 2013 (Actual)
<i>Number of standardized learning assessments supported by the U.S. Government (USG)</i>	2	2
<i>Number of teachers who successfully completed in-service training or received intensive coaching or mentoring with USG support</i>	441	427
<i>Total number of person hours of teachers who successfully completed in-service training or received intensive coaching or mentoring with USG support</i>	40,000	38,032
<i>Number of textbooks and other teaching and learning materials provided with USG assistance</i>	61,682	33,249
<i>Number of learners receiving reading interventions at the primary level</i>	15,500	16,980
<i>Number of parent-teacher associations or similar "school" governance structures supported</i>	75	no reporting
<i>Number of parents or community members who received training with USG support</i>	750	no reporting
<i>Number of students in schools benefiting from community literacy strategies implemented with USG support</i>	5,700	no reporting
<i>Percent of principals providing regular support to teachers</i>	no target	no reporting
<i>Percent of schools with increased inspector visits per semester</i>	no target	no reporting
<i>Percent of schools with improved opportunities to learn</i>	no target	no reporting
<i>Percentage of teachers with improved reading instruction in subset of schools in the USG Development Corridors</i>	no target	no reporting
<i>Proportion of students who, by the end of two grades of primary schooling, demonstrate that they can read and understand the meaning of grade-level text</i>	no target	no reporting
<i>Number/Proportion of students with improved reading skills at the end of grade 1</i>	no target	no reporting
<i>Number/Proportion of students with improved reading skills at the end of grade 2</i>	no target	no reporting
<i>Number of officials and university and other partners trained in the assessment of early grade learning</i>	90	277
<i>Number of administrators and officials successfully trained with USG support</i>	230	218

The audit also found weaknesses in the controls RTI used to collect and report on the number of teachers, administrators, and officials who successfully completed training offered by TOTAL. For example, for a 2-week training activity, it was RTI's practice to use the attendance sheet for the day with the longest list of attendees and count them as participants who successfully completed all of the training regardless of whether they did not attend all the sessions and were not listed in the other attendance sheets. In some cases, attendance sheets were missing.

Additionally, RTI did not always disaggregate data by corridor or gender as required.

These weaknesses occurred because, according to RTI officials, they focused their efforts on developing materials and curriculum and did not consider reporting on progress against the indicators to be a high priority. They said the contract was unclear as to how and when to report against the indicators and added that USAID/Haiti did not ask them to include this in their quarterly reports.

While the contract does not provide this level of specificity, the project's PMP does require RTI to report progress against the indicators at least annually and quarterly when possible. The audit did note that the COR was monitoring the contractor's performance and documented incidents of faulty or nonconforming work, delays, and problems, including the need to report progress against the indicators, at least annually.

RTI officials said they were developing a database and updating their data collection system to provide better controls over data reporting.

Without reliable data and periodic reporting actual results compared to expected results, the mission cannot measure the project's progress toward objectives accurately, nor can officials make informed decisions about how to make the project more effective. Therefore, we make the following recommendations.

Recommendation 5. We recommend that USAID/Haiti work with RTI International to review and revise as appropriate each of the 17 performance indicators, implement targets for each indicator, and instruct RTI International in writing to collect data and report progress made against each of the performance indicators, including disaggregating data by development corridor and gender in quarterly progress reports.

Recommendation 6. We recommend that USAID/Haiti instruct RTI International in writing to implement procedures for recording accurate data for participants who successfully complete training.

USAID/Haiti Did Not Formally Notify Contractor of Poor Performance

According to USAID's *Policy Guide for Assessment and Use of Contractor Performance and Integrity Information*, USAID is required to assess contractor performance using the Naval Sea Logistics Center's Contractor Performance Assessment Reporting System (CPARS). This is a Web-based system used to enter data on contractor performance. Per the guide, the contracting officer (CO) is "in charge of the overall contract execution and is responsible for the accurate and timely review and processing of past performance evaluations in CPARS." Also, the COR assists the CO by "providing a timely and quality narrative."

Contractor performance is assessed in CPARS (1) at least annually (for contracts and orders exceeding 1 year in duration) and (2) on completion of the contract period of performance. In addition, the guidance also points out:

[Agreement officers] and [agreement officer's representatives] must be vigilant to ensure that the report contains an accurate portrayal of the contractor's performance. The past performance reports are a tool for use by the CO and

COR in order to incentivize contractors to provide USAID with superior products and services.

There are other actions that USAID can take to correct problems that may arise during performance. For example, the CO may issue a cure notice⁴ if inspection of the work shows that the contractor is not performing in accordance with requirements of the contract. According to Federal Acquisition Regulation 49.4, "Termination for Default," termination for default is "generally the exercise of the Government's contractual right to completely or partially terminate a contract because of the contractor's actual or anticipated failure to perform its contractual obligations." Also:

The Government has the right . . . to terminate the contract completely or partially for default if the contractor fails to . . . make progress and that failure endangers performance of the contract. . . . If the termination is predicated upon this type of failure, the contracting officer shall give the contractor written notice specifying the failure and providing a period of 10 days (or longer period as necessary) in which to cure the failure.

As early as November 2012, the COR documented that key deliverables were overdue. The COR continued to raise nonperformance issues with RTI in numerous conference calls, including in April 2013 when a conference was held with RTI officials to discuss USAID/Haiti's "dire concerns" about the continued delay in providing key deliverables and the quality of the deliverables. The COR concluded at that time that the contract was "non-functioning."

However, despite these ongoing concerns, USAID/Haiti's CO did not take additional steps to clarify USAID's expectations with RTI so it could correct the problems. For example, USAID/Haiti did not complete the annual CPARS for RTI when it was due in August 2013; as of March 2014, the COR and the contracting office were still finalizing it.

Staffing issues within USAID/Haiti's contracting office may have contributed to the delayed action in this case. However, the CO said that since he arrived in May 2013, the mission had added two additional COs, which should allow the office to act more swiftly.

USAID/Haiti has maintained consistently that the main causes for the delays in implementation have been the poor quality of RTI's work resulting from its lack of qualified experienced staff. However, unless USAID/Haiti's CO is actively involved in clarifying the mission's expectations, requiring RTI to correct the problems, and confirming that the CPARS accurately portrays RTI's performance, the project's implementation is not likely to improve. To address these problems, we make the following recommendations.

Recommendation 7. We recommend that USAID/Haiti complete the Contractor Performance Assessment Report for RTI International in accordance with Automated Directives System 302.

Recommendation 8. We recommend that USAID/Haiti's contracting officer give RTI International a written notice that it implement a written plan that corrects the nonperformance issues in time to meet the contract's delivery requirements.

⁴ In contract law, this is issued to "cure" or fix a problem.

EVALUATION OF MANAGEMENT COMMENTS

USAID/Haiti agreed with all eight recommendations. Based on comments from the mission and supporting documentation, management decisions have been reached on all eight, with final action taken on Recommendations 1 through 2 and 4 through 7. Our detailed evaluation of management comments follows.

Recommendation 1. USAID/Haiti decided to and has worked with RTI to clarify and document expectations of the development of curricula and materials. RTI submitted a document that clarified those expectations, and the mission approved it in April 2014. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 2. USAID/Haiti decided to ask RTI for an updated staffing plan confirming that RTI hires employees with the appropriate experience in developing curricula and materials. RTI submitted the plan, and the mission approved it in April 2014. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 3. USAID/Haiti decided to ask RTI for a mitigation plan that addressed project delays and weaknesses in implementation. RTI submitted it in May 2014, and the mission provided feedback. The mission expects to approve the revised plan by August 30, 2014. We acknowledge the mission's management decision on this recommendation.

Recommendation 4. USAID/Haiti decided to and has worked with RTI on an updated work plan that linked all deliverables and activities to the contract's requirements, standards, and milestone payment schedule. This process was completed in April 2014. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 5. USAID/Haiti decided to instruct RTI to report on each of the project's performance indicators. In response, RTI included all the requested data in its annual report submitted on June 15, 2014. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 6. USAID/Haiti decided to instruct RTI to implement procedures for recording accurate data for participants who successfully completed training. The COR gave RTI technical directions to carry this out in June 2014. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 7. USAID/Haiti decided to complete the CPARS for RTI and did so in June 2014. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 8. USAID/Haiti decided to give RTI a written notice requesting them to address nonperformance issues. The contracting officer expects to send the notice by August 30, 2014. We acknowledge the mission's management decision on this recommendation.

SCOPE AND METHODOLOGY

Scope

We conducted this 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 this audit was to determine whether USAID/Haiti's education activities are achieving their main goal of helping the Haitian Ministry of Education develop and test an instructional model to improve the reading skills of children in first through third grades in USAID/Haiti's development corridors.

In planning and performing the audit, the team assessed significant management controls the mission used to manage the project and confirm that it provided adequate oversight. The team reviewed USAID/Haiti's activity approval document, operational plan report, fiscal year 2013 annual self-assessment of management controls (which the mission is required to perform to comply with the Federal Managers' Financial Integrity Act), award and modification requirements, and PMP. As of December 31, 2013, the mission had obligated \$9 million and disbursed \$8 million. The allocated amount represents the amount tested.

The audit covered project activities from August 2012 through March 31, 2014. We reviewed applicable laws and regulations as well as the following USAID policies and procedures pertaining to the project; ADS 103, 200, 201, 202, 204, 302, 320, and USAID's *Policy Guide for Assessment and Use of Contractor Performance and Integrity Information*. The audit relied on the following sources of evidence: interviews with employees of USAID/Haiti, the Haitian Government, and implementing partners RTI, CARE International in Haiti, CARITAS, Concern Worldwide, UNICEF, and World Bank; and documentation maintained at the mission. The audit team conducted fieldwork in Haiti from February 10 through February 28, 2014, and conducted site visits to 15 schools in the development corridors.

Methodology

To answer the audit objective, we conducted interviews and site visits, and we evaluated the mission's management and oversight of the program, the performance of the implementing partners, and the effectiveness of activities. We met with officials from USAID/Haiti, the Haitian Government, RTI, CARE International in Haiti, CARITAS, Concern Worldwide, UNICEF, and the World Bank.

Through these interviews and the review and analysis of project documentation, the audit team obtained an understanding of (1) the project's goals, (2) how the mission designed, procured, implemented, and provided oversight of the project, and (3) 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:

- Documented and tested compliance with gender analysis, human trafficking, and sustainability.
- Tested for accuracy the results reported in the September 2013 annual report.

We selected site visit locations judgmentally, based on our ability to travel to field locations in order to meet with schools in each of the three development corridors that could give us qualitative feedback on the project's activities. Since we based the testing and site selections 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 substantive testing was sufficient to support the audit's findings.

MANAGEMENT COMMENTS

ACTION MEMORANDUM

TO: John Chasson, Regional Inspector General

THROUGH: Christian Barratt, Deputy Mission Director

FROM: Mark A. White, Acting Mission Director /s/

DATE: June 27, 2014

SUBJECT: Mission response to the draft report of audit of USAID/Haiti's Education Activities (RIG draft Report No. 1-521-14-00X-P)

This memorandum represents USAID/Haiti's actions taken to address and reach the management decisions for the recommendations reported in the draft Audit of USAID/Haiti's Education Activities/ RIG Report No. 1-521-14-00X-P. The mission agrees with all eight recommendations. The responses to these recommendations are below.

Recommendation 1. We recommend that USAID/Haiti clarify and document with RTI International the mission's specific expectations regarding the further development of curricula and materials.

Mission response:

USAID/Haiti agrees with the recommendation and has addressed it in the following manner: In April 2014, the Contracting Officer requested from RTI a document presenting requirements and standards for the development of ToTAL (Tout Timoun Ap Li) curricula and instructional materials. RTI submitted the document entitled, "USAID/Haiti ToTAL Materials Development Requirements/Standards". This document was submitted on April 28, 2014 and approved by USAID. This document includes input from USAID and is based on international standards developed by RTI for USAID under Ed Data II, Blanket Purchase Agreement. In addition, it provides clarity for all parties regarding expectations regarding development of curricula and materials.

Plan of Action and timeline:

This action was taken in April 2014

Recommendation 2. We recommend that USAID/Haiti require RTI International to complete a staffing plan to confirm the project has employees with appropriate experience in curriculum materials development and implementation.

Mission response:

USAID/Haiti agrees with the recommendation and has addressed it in the following manner: In April 2014, the Contracting Officer requested that RTI present an updated staffing plan. This plan was received on April 25, 2014 and was approved by USAID. This document includes an organizational chart and position descriptions. The staffing plan confirms that employees hired should have the appropriate experience in development of curricula and materials.

Plan of Action and timeline:

This action was taken in April 2014

Recommendation 3. We recommend that USAID/Haiti require RTI International to implement a plan to mitigate the negative impact on the project's research findings of not fully implementing community-based activities for Treatment 2 schools or conducting adequate ongoing teacher monitoring.

Mission response:

USAID/Haiti agrees with the recommendation and has addressed it in the following manner: In April 2014, the Contracting Officer requested that RTI present a mitigation plan that addresses the fact that the project has faced delays and weaknesses in implementation. This plan was submitted on May 9, 2014. USAID has provided feedback and RTI is currently revising the plan.

Plan of Action and timeline:

This action was taken in April 2014 and RTI will submit the plan in June 2014. RTI has committed to send final revised version on July 15, 2014.

Recommendation 4. We recommend that USAID/Haiti in conjunction with RTI International implement a detailed work plan that links each of the contract's performance requirements, standards, and deliverables to the milestone payment schedule.

Mission response:

USAID/Haiti agrees with the recommendation and has addressed it in the following manner: In April 2014, the Contracting Officer requested that RTI present an updated work plan linking all deliverables and activities to contract's requirements, standards and milestone payment schedule. This updated work plan was submitted on April 14, 2014.

Plan of Action and timeline:

This action was taken in April 2014; upcoming work plans will keep this updated format including deliverables, standards and milestones.

Recommendation 5. We recommend that USAID/Haiti work with RTI International to review and revise as appropriate each of the 17 performance indicators, implement targets for each indicator, and instruct RTI International in writing to collect data and report progress made against each of the performance indicators, including disaggregating data by development corridor and gender in quarterly progress reports.

Mission response:

USAID/Haiti agrees with the recommendation and has addressed it in the following manner: In November 2013, the Contracting Officer Representative requested that RTI report on performance indicators in their Annual Report. The report was resubmitted to USAID in March 10, 2014. However it still did not provide a full report on performance indicators. The last version of the Annual Report was submitted on June 15, 2014 and incorporated all requested data. Year 2 end line data for EGRA and SSME has been collected during the months of May and June 2014, and the final report, to be submitted in October 2014, will provide complete data for Agency reporting.

Plan of Action and timeline:

This action was taken as of November 2013, final revised Annual Report with expected reporting on all performance indicators was received on June 15, 2014.

Recommendation 6. We recommend that USAID/Haiti instruct RTI International in writing to implement procedures for recording accurate data for participants who successfully complete training.

Mission response:

USAID/Haiti agrees with the recommendation and has addressed it in the following manner: The Contracting Officer Representative provided technical directions on June 26, 2014 to RTI for the implementation of procedures for recording accurate data for participants who successfully complete training.

Plan of Action and timeline:

This action was taken in June 2014

Recommendation 7. We recommend that USAID/Haiti complete the Contractor Performance Assessment Report for RTI International in accordance with Automated Directives System 302.

Mission response:

USAID/Haiti agrees with the recommendation and has addressed it in the following manner: CPAR was entered in the system in June 2014 for the period of August 2012 to March 2014. The Contracting Officer has taken action to complete the performance assessment report for RTI/ToTAL

Plan of Action and timeline:

This action was taken in June 2014

Recommendation 8. We recommend that USAID/Haiti's contracting officer give RTI International a written notice requesting them to implement a written plan that will correct the contract nonperformance issues in time to meet the delivery requirements of the contract.

Mission response:

USAID/Haiti agrees with the recommendation and has addressed it by requesting a mitigation plan from the Contractor addressing non-performance issues. A draft was received on May 9, 2014. The COR requested changes to the plan. A final plan is due from the Contractor on June 30, 2014. The plan will ensure that the Contractor corrects contract nonperformance issues in order to meet all the delivery requirements.

Plan of Action and timeline:

This action was taken in April 2014.

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