



## OFFICE OF INSPECTOR GENERAL

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# AUDIT OF USAID/HAITI'S IMPROVING JUSTICE SERVICE DELIVERY AND SECTOR REFORM IN HAITI PROJECT (PROJUSTICE)

AUDIT REPORT NO. 1-521-16-003-P  
JANUARY 6, 2016

SAN SALVADOR, EL SALVADOR



*Office of Inspector General*

January 6, 2016

**MEMORANDUM**

**TO:** USAID/Haiti Acting Mission Director, Christian Barratt

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

**SUBJECT:** Audit of USAID/Haiti's Improving Justice Service Delivery and Sector Reform in Haiti Project (PROJUSTICE) (Report Number 1-521-16-003-P)

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

The report contains four recommendations. On the basis of actions proposed by the mission, we determined that management decisions have been reached on all recommendations and final action taken on one. 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 three outstanding recommendations.

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

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## Abbreviations

The following abbreviations appear in this report:

ADS	Automated Directives System
COR	contracting officer's representative
DQA	data quality assessment
FY	fiscal year
M&E	monitoring and evaluation
PMP	performance management plan
RIG	Regional Inspector General

# SUMMARY OF RESULTS

Improving Haiti's judicial system is one of the most critical priorities in the efforts to bring stability to the country. High crime rates, ineffective prosecution of criminals, and widespread abuse of executive power have troubled Haitians for years.

To combat these issues, on April 28, 2009, USAID/Haiti awarded a 5-year, \$17.9 million cost-plus-fixed-fee contract to Tetra Tech DPK<sup>1</sup> to implement the Improving Justice Service Delivery and Sector Reform in Haiti Project (PROJUSTICE). On July 2, 2015, the mission amended the contract, increasing the estimated costs to \$22.3 million and extending the completion date to July 7, 2016. As of September 30, 2014, the mission had obligated \$17.9 million and spent \$16.6 million for the project.

The project seeks to enhance the performance of the Haitian judicial system while fostering an environment conducive for judicial sector overhaul and institutional improvements. According to the contract, the project has four main expected results:<sup>2</sup>

1. A strengthened criminal justice system that deters crime while protecting human rights. Activities under this component are designed to discourage crime, enforce the law, protect citizens, identify and protect the innocent, and punish the guilty while protecting their rights.
2. Improved noncriminal justice services. This component involves improving services offered by justices of the peace, notaries, land courts, and community mediators.
3. Improvements in standardization, independence, control, and oversight of justice-sector operations, including independence and self-governance.
4. Help the Haitian Government develop a comprehensive sector reform strategy and action plan. Activities under this component are designed to complete a justice-sector reform plan that will enable coordination between donors and the Haitian Government.

The Regional Inspector General in San Salvador (RIG/San Salvador) conducted this audit to determine whether USAID/Haiti's PROJUSTICE activities were achieving these four results.

The project clearly had a positive impact in some areas. For example, it:

- Provided legal services to many citizens who otherwise would not have had the means to pay for them.
- Opened two mediation centers in two very volatile areas, which resulted in less violence in those areas.

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<sup>1</sup> Tetra Tech DPK is based in Pasadena, California.

<sup>2</sup> The project had five expected results, but we determined that only four were relevant to the audit objective. The fifth expected result allowed Tetra Tech to respond to unanticipated events in the justice sector that affected the four other results. So we excluded it and the associated performance indicators from the scope of our audit.

- Helped place an independent nine-member oversight group to vet current judges before their terms are renewed.
- Established Haiti's first electronic case management information system in a pilot jurisdiction. The project was in the process of establishing the system in another jurisdiction.

However, we could not answer our objectives because neither USAID/Haiti nor Tetra Tech DPK established appropriate indicators or targets to measure the progress toward the project's goals and expected results (page 3).

In addition:

- Some reported data were not reliable and could not be verified (page 4). There were discrepancies between reported and audited results, and the mission did not perform data quality assessments (DQAs) on custom indicators even though they were tied to the contract's fixed-fee deliverables.
- The mission did not manage files properly (page 6). Some documents that mission employees provided did not appear to be final versions, some were not readily available, and others were approved too late.

In response to these audit findings, we recommend that USAID/Haiti:

1. Develop indicators and targets that reflect the project's goals and expected results (page 4).
2. Require Tetra Tech DPK to implement procedures to verify reported data before submitting them to the mission (page 5).
3. Implement procedures to allow contracting officer's representatives (CORs) to inform the monitoring and evaluation (M&E) specialist, in writing, if additional DQAs for custom indicators are critical to the performance of the project or as a basis for payment for completing a milestone (page 5).
4. Release a mission notice establishing quality standards for record keeping, determining timelines for submission, and approvals of principle guiding documents (page 7).

Detailed findings appear in the following section, and the scope and methodology is described in Appendix I. Management comments are included in their entirety in Appendix II, and our evaluation of them is on page 8.

# AUDIT FINDINGS

## **Mission and Tetra Tech DPK Did Not Establish Indicators Related to Project's Goals and Expected Results**

USAID's Automated Directives System (ADS) 203.3.9, "Setting Performance Baselines and Targets," defines a target as "the specific, planned level of result to be achieved within an explicit timeframe with a given level of resources . . . [Targets] add notions of quantity, quality, and time." The ADS goes on to state that "both the targets themselves and the justifications for the final targets should be maintained and updated with the indicator data in the Mission's performance management plan [PMP]." In addition, ADS 203.3.4.3, "Project M&E Plan: Monitoring," says that the PMP "must include indicators to monitor each level of the project results," including the project's purpose, goal, and specific outputs. Furthermore, baselines and targets must be established for each indicator.

According to the contract, Tetra Tech was required to establish quantifiable indicators to track the impact each of the results had on the criminal justice sector. In addition to tracking those impacts, having the indicators in place was important because USAID was to use them when evaluating Tetra Tech DPK's work for the permanent performance record.

However, the mission did not establish indicators or targets that measured progress toward the project's overall goals. Moreover, Tetra Tech DPK's performance indicators did not track progress toward the expected results as defined in the contract. Most tracked only lower-level outputs; 15 of the 16 performance indicators counted the "number of . . ." a given output. The remaining indicator did measure outcomes, but only for one of the project's four main results, and this indicator was dropped after a year because Tetra Tech DPK could not collect meaningful data for evaluation.

As a result, USAID could not track progress toward PROJUSTICE's overall goals and expected results. For example, according to the PMPs, significantly reducing pretrial and illegal detention was key to the success of improving the criminal justice system. However, the only indicator the project used to measure this result merely counted *Number of people in illegal and excessive pretrial detention provided with legal assistance*. A more useful indicator would have measured the percentage of change in pretrial and excessive detention because of the number of people provided with legal assistance.

Mission officials said they did not set long-term targets on purpose to give them some flexibility in managing the project following the January 2010 earthquake. The project's initial PMPs did include some outcome indicators, but they were revised to reflect a shift in the post-earthquake priorities. For the revised PMPs, mission officials said they chose the most applicable of the State Department's mandated indicators, and Tetra Tech DPK established custom indicators as required, but both overlooked the fact that none of the indicators was outcome-based or dealt specifically with the project's overall goals.

Without established indicators and targets that tracked progress towards the project's goals and expected results, it was not clear what USAID's investment was expected to produce by the end of the \$22.3 million contract. Further, USAID/Haiti had incomplete information for its evaluation

for Tetra Tech DPK's permanent performance. To address this problem, we are making the following recommendation.

**Recommendation 1.** *We recommend that USAID/Haiti develop, in accordance with current USAID policy, indicators and targets that reflect the project's goals and expected results.*

## **Some Reported Data Were Not Reliable and Could Not Be Verified**

Several sections of ADS 203 address the importance of good data. ADS 203.3.11.1, "Data Quality Standards," states that performance data have to meet quality standards for validity, integrity, precision, reliability, and timeliness "to be useful for performance monitoring and credible for reporting," and 203.3.11.2, "Purpose of Data Quality Assessments," states that missions should be aware of "the strengths and weaknesses of their data" and the "extent to which the data integrity can be trusted to influence management decisions." According to ADS 203, USAID managers should be aware of the strengths and weaknesses of all indicators they collect to monitor performance.

And although missions and offices are not required to conduct DQAs for data that are not reported to USAID/Washington, they do have the option to do so.

Despite these requirements and guidance, some of the data Tetra Tech DPK reported were inaccurate. We tested results for 11 of 16 indicators—5 for FY 2013 and 6 for FY 2014—and found problems with data for 6. For example:

- Tetra Tech DPK incorrectly counted bar associations as both legal institutions and legal aid groups, entities which were measured by two different indicators. Consequently, it overstated the number of legal institutions or legal aid groups that received assistance from the U.S. Government.
- In the FY 2014 annual report, Tetra Tech DPK said the project informed 12,941 citizens of their legal rights and responsibilities during the year. However, disaggregation by location and gender showed 11,458, and a graph in the same report showed 13,304. We then verified 15,228 with supporting documentation.
- The data Tetra Tech DPK reported quarterly in FY 2013 for *Number of persons in illegal and excessive pretrial detention provided with legal assistance* (63, 308, 291, and 257 for each quarter, respectively, totaling 919) did not add up to the reported annual result of 960. The audit verified 673 with supporting documentation.
- The audit could not verify reported results for four of the indicators tested for FY 2013 and two for FY 2014, shown in the table on the next page. The results of these indicators were not supported and were thus reported inaccurately.

## Discrepancies for Selected FY 2013 and FY 2014 Performance Indicators (Audited)

Performance Indicators	Reported Results	Audited Results	Overstated (Understated) Amount	Percent Overstated (Understated)
<b>FY 2013</b>				
<i>Number of courts operating in areas of low-income populations with USG [U.S. Government] assistance</i>	67	45	22	49
<i>Number of legal institutions and associations supported by the USG</i>	8	5	3	60
<i>Number of USG-assisted courts with improved case management systems</i>	66	43	23	53
<i>Number of persons in illegal and excessive pretrial detention provided with legal assistance</i>	960	673	287	43
<b>FY 2014</b>				
<i>Number of USG-assisted courts with improved case management systems</i>	43	46	(3)	(7)
<i>Number of citizens informed of their legal rights and availability</i>	12,941	15,228	(2,287)	(15)

These inaccuracies occurred in part because Tetra Tech DPK did not have sufficient procedures for reviewing data and making sure that what was reported agreed with supporting documentation. The chief of party acknowledged that there were mistakes in the data reported and said the staff revised the project's reporting procedures to avoid future mistakes. In addition, although the mission conducted DQAs of performance indicators that were reported to Washington, it did not conduct DQAs of the project's custom performance indicators that Tetra Tech DPK used for reporting progress and getting payments.

Because of these inaccuracies, USAID/Haiti risks making decisions based on data that do not meet prescribed quality criteria.

In addition, although we did not find any instances of improper payments, we noted several custom indicators were associated with deliverables on the implementer's milestone plan,<sup>3</sup> and once they were reported as completed, USAID/Haiti paid Tetra Tech DPK a percentage of the contract's fixed fee. For example, the FY 2012 milestone of 300 inmates provided with legal assistance, for which Tetra Tech DPK earned 3 percent of its fee, was tied to the custom indicator *Number of persons in illegal and excessive pretrial detention provided with legal assistance*.

To address this problem, we make the following recommendations.

**Recommendation 2.** We recommend that USAID/Haiti require Tetra Tech DPK to implement procedures to verify reported data before submitting them to the mission.

**Recommendation 3.** We recommend that USAID/Haiti implement procedures to allow contracting officer's representatives to inform the monitoring and evaluation specialist, in

<sup>3</sup> The milestone plan lists deliverables to be accomplished over the course of each fiscal year for the contractor to be paid the negotiated amount of the fixed fee.

*writing, if additional data quality assessments for custom indicators are critical to the performance of the project or as a basis for payment for completing a milestone.*

## **Mission Did Not Manage Files Properly**

According to the COR's designation letter, the COR is responsible for creating and maintaining adequate files. The letter adds that these files are the COR's main means of performing their duties and responsibilities, and for documenting their decisions.

Additionally, the U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government* states that appropriate internal controls include maintaining readily available documents of all transactions and significant events for examination.

During the course of the audit, the documentation we got from USAID/Haiti showed that the staff is not maintaining their files. For example:

- **Final documents were missing.** The COR could not find final versions of the project's PMP or annual work plan for FY 2013. He also could not find documentation of the approval for fiscal years 2011 and 2012 PMPs.
- **Some documents were not readily available.** The COR asked Tetra Tech DPK's staff to provide the audit team a listing of all of the project's activities to date. We received the list almost 3 months later. Also, it took the mission more than a month to get us the final signed contract.
- **The mission did not approve work plans and PMPs according to best practices.** Annual work plans and PMPs are important tools that allow USAID and implementers to plan activities, set goals, and track progress over the upcoming year. Therefore USAID should approve these documents as early as possible each year.

PROJUSTICE followed a FY calendar, beginning October 1. However, some of the documents we reviewed were approved several months later, and others had no documented approvals at all. One PMP was not approved until mid-September—2 weeks before the end of the fiscal year.

The COR said he kept some documents in draft to record the decision-making process. For others, he explained, he kept the same schedule as his predecessor, who required Tetra Tech DPK to submit annual work plans by the end of October. He said Tetra Tech DPK asked for extensions regularly, and he approved them. Furthermore, the contract did not establish clear timelines for submission and approval of these key documents.

Inadequate files impede the COR's ability to manage the contract and therefore may jeopardize PROJUSTICE. Moreover, any subsequent COR would have an extremely difficult time taking it over. Last, delayed approvals of important documents hinder the effective monitoring of Tetra Tech DPK's progress in providing deliverables and meeting milestones.

Because the project is in its final year and no more annual work plans or performance M&E plans will be submitted, we are not issuing a recommendation specific to PROJUSTICE. However, to address the file management issues, we make the following recommendations.

**Recommendation 4.** *We recommend USAID/Haiti release a mission notice establishing quality standards for record keeping, determining timelines for submission, and approvals of principle guiding documents.*

# EVALUATION OF MANAGEMENT COMMENTS

In its response to the draft report, USAID/Haiti agreed with all four recommendations. Based on our evaluation of the management comments, we have determined that the mission has made management decisions on all four and taken final action on one.

**Recommendation 1.** USAID/Haiti agreed with the recommendation and made a management decision to focus its corrective actions in the follow-on project because PROJUSTICE is ending in July 2016. The mission stated that it will incorporate necessary indicators and targets in the follow-on project by September 30, 2016, as required by its mission order 203-B on monitoring. We acknowledge the mission's management decision.

**Recommendation 2.** USAID/Haiti agreed with the recommendation and stated that Tetra Tech DPK has revised its filing system and trained its reporting officer on M&E. In addition, mission officials said the COR and the democracy and governance M&E officer will conduct a site visit and DQA by December 31, 2015. They said the mission would continue to monitor the project's reporting until it ends on July 31, 2016. We acknowledge the mission's management decision.

**Recommendation 3.** USAID/Haiti agreed with the recommendation. Mission officials sent an e-mail to COR/AORs on November 27, 2015, to encourage them to include critical custom indicators in the annual performance plan and report. We acknowledge this management decision and final action since the mission's actions address the issue of critical custom indicators receiving DQAs.

**Recommendation 4.** USAID/Haiti agreed with the recommendation, and mission officials said they plan to organize meetings with CORs and AORs to remind them of their duties regarding filing and record keeping. They plan to hold the meetings during the first two quarters of FY 2016, and set October 30, 2016, as a target date for final action. We acknowledge the mission's management decision.

# SCOPE AND METHODOLOGY

## Scope

RIG/San Salvador conducted this audit in accordance with generally accepted government auditing standards. They 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 PROJUSTICE Project was achieving its main goals of strengthening the Haitian criminal justice system; improving noncriminal justice services; improving standardization, independence, control, and oversight of justice-sector operations; and supporting the development of a comprehensive sector reform strategy and action plan.

On April 28, 2009, USAID/Haiti awarded a 5-year, \$17.9 million cost-plus-fixed-fee contract to Tetra Tech DPK to implement the project. The mission subsequently increased the estimated costs to \$22.3 million and extended the completion date to July 7, 2016. As of September 30, 2014, the mission had obligated \$17.9 million and spent \$16.6 million for the project.

The audit covered the project from its inception through September 30, 2014. In planning and performing the audit, the team obtained an understanding of and assessed the mission's controls used to manage and provide sufficient oversight of the project.

The audit team conducted fieldwork from October 9, 2014, to March 13, 2015, at USAID/Haiti in Port-au-Prince, and Tetra Tech DPK's offices in Canapé Vert and Cap Haitian. We visited 19 activities in Bel-Air, Cap Haitian, Caracol, Cité Soleil, Croix Des Bouquets, Port Margot, and Port-au-Prince. We could not visit five scheduled locations in Fort Liberté because violent protests broke out there in the week of November 25, 2014.

## Methodology

The team obtained an understanding of the project by interviewing USAID/Haiti's COR and M&E specialist for the project, Tetra Tech DPK's chief of party and technical team, Haitian Government officials, and various beneficiaries. The team also examined key documentation, including the contract and modifications between the mission and Tetra Tech DPK, annual work plans, PMPs, and performance reports.

In addition to reviewing documentation on file at Tetra Tech DPK's main office in Canapé Vert, the audit team also verified records at the project's two mediation centers located in Cité Soleil and Ti Bois Grand Ravine.

To assess the progress toward project goals, the auditors validated the reported results for 11 of 16 performance indicators. To select our judgmental sample, we tested at least one fiscal year of each of the project's State Department-mandated indicators and at least one custom indicator for each result area. The team established a materiality threshold of 5 percent. For example, if the total deficiencies identified exceeded 5 percent of the tested data, we concluded that the

reported data reviewed were not reliable. Because the data were tested based on a judgmental sample, they cannot be extrapolated to the entire universe of a particular indicator or to the entire universe of indicators. We believe the selection provides a reasonable basis for our conclusion.

To answer the audit objective, we considered but did not rely extensively on computer-processed data in Tetra Tech DPK's Quickbooks and Microsoft Word-based reports. As discussed in the audit report, some of the data reported by Tetra Tech DPK were inaccurate. Our review of system controls and the results of data tests showed weaknesses that cast doubt on the data's validity. However, when these data are viewed with other available evidence obtained during interviews, document review, and site visits, we believe the opinions, conclusions, and recommendations in the report are valid.

# MANAGEMENT COMMENTS



**TO:** Jon Chasson, Regional Inspector General

**FROM:** Veena Reddy, Acting Mission Director /S/

**DATE:** November 9, 2015

**SUBJECT:** Mission response to the Draft Audit of USAID/Haiti's Improving Justice Service Delivery and Sector Reform in Haiti Project (PROJUSTICE) Report No. 1-521-15-00X-P

This memorandum represents USAID/Haiti's written comments on the draft report, including management decisions in response to the recommendations reported in the draft OIG Report No. 1-521-15-00X-P for USAID/Haiti's Improving Justice Service Delivery and Sector Reform in Haiti Project (PROJUSTICE). The mission acknowledges and accepts all recommendations and herein provides a plan and timeline for its implementation.

**Recommendation 1:** *We recommend that USAID/Haiti develop, in accordance with current USAID policy, indicators and targets that reflect the project's goal and expected results.*

**Mission Response:**

The mission accepts recommendation 1. Because the PROJUSTICE project started shortly before the 2010 earthquake and the 2010 presidential elections, USAID acknowledges that previously the Mission was unable to put in place measurable life-of-project high-level outcome indicators in 2010 and after the earthquake due to the uncertain situation on the ground on multiple fronts including political, environmental, social, economic and security.

However, the mission and the implementer have established 11 indicators and annual targets that reflected the PROJUSTICE project's goals and expected results that are in line with the Office of U.S. Foreign Assistance Resources (F) standard foreign assistance indicators. Aggregate results over the life of the project are currently available.

**Plan of Action and Timeline:**

The PROJUSTICE project will be ending in July 2016 and the Mission does not expect to receive a new Monitoring and Evaluation plan from the project prior to that date. The Mission is now in the process of designing a new follow-on justice project and will incorporate indicators and targets that reflect the project's goals and expected results into the RFP for the new project.

In addition, Mission Order 201-D on Project Design (has been submitted to OIG) which requires project logframes at the concept stage which is a framework for a measurable and monitorable project design. Moreover, as per Mission Order MO 203-B on Monitoring, the Policy Coordination and Program Support Office (PCPS) will continue to work with technical staff to ensure that indicators and targets for project goals, objectives, and intermediate results are included in each Scope of Work or Project Description.

The target date of closure of this recommendation will be September 30, 2016.

**Recommendation 2:** *We recommend that USAID/Haiti require Tetra Tech to implement procedures to verify reported data before submitting them to the mission.*

**Mission Response:**

The Mission agrees with recommendation 2. The Contracting Officer's Representative (COR) has instructed Tetra Tech DPK to take action to address that recommendation.

**Plan of Action and Timeline:**

Corrective actions have been taken by the contractor. In August-September 2015, Tetra Tech DPK revised and improved its filing system to ensure that documents are maintained in a more orderly fashion and are readily available. The project has also trained its reporting officer on monitoring and evaluation procedures to more rigorously verify the quality of the project's data before submission to the Mission and to ensure that all pertinent supporting documentation is in the appropriate file. By the end of the first quarter of FY 2016, the COR and the DG M&E Officer will conduct a site visit to the PROJUSTICE office to conduct a data quality assessment which will determine how effective these measures have been. The COR and the DG M&E Officer will closely monitor the project's reporting until its completion in July 2016.

The target date of closure of this recommendation will be July 31, 2016.

**Recommendation 3:** *We recommend that USAID/Haiti implement procedures to allow contracting officer's representative (COR) to inform monitoring and evaluation (M&E) specialists, in writing, if additional data quality assessments for custom indicators are critical to the performance of the project or as a basis for payment for completion of a milestone.*

**Mission Response:**

The Mission accepts recommendation 3. USAID/Haiti is in compliance with ADS 203.11.2 which stipulates that USAID Missions/Offices are not required to conduct data quality assessments for data that are not reported to USAID/Washington.

**Plan of Action and Timeline:**

By November 30, 2015, the Mission will remind CORs/AORS by email of their responsibilities, as per Mission Order 203-B, to ensure the quality of Activity Monitoring and Evaluation (M&E) Plans submitted by implementing partners and to ensure that these are consistent with and meet the data collection needs of the Project M&E Plan, the PMP, and the PPR. Through this email message, the Mission will additionally encourage CORs/AORS to include custom indicators that are critical to the performance of a

project in the annual PPR results reporting process which will ensure that data quality assessments are conducted for these indicators according to ADS 203.11.2.

**Recommendation 4:** *We recommend that USAID/Haiti release a mission notice establishing quality standards for record-keeping, submission timeliness, and approvals of principal guiding documents.*

**Mission Response:**

The Mission accepts recommendation 4. PROJUSTICE began in 2009 and after the 2010 earthquake; most of the mission's files were significantly disorganized due to direct and indirect effect of the earthquake, the Mission's response efforts, and the changes of CORs. The mission acknowledges that early projects documents were initially difficult to locate. However, administrative documents that were requested by the OIG have been shared at the early stage of the audit. To help facilitate the implementation of this performance audit, the COR requested PROJUSTICE to produce activity lists including lists of beneficiaries and lists of purchased equipment per institutions. Given the specific nature of these lists, and the level of details that was required, the lists could only be established by the contractor.

**Plan of Action and Timeline:**

The COR designation letter outlines the contract administration duties assigned by the CO to the COR. In order to address recommendation 4, the USAID Haiti Contracting Office will organize brown bag sessions with CORs and AORs to specifically remind them of their obligations to comply with the requirements defined in their award, in their AOR/COR designation letters, and in accordance with the Automated Directives System (ADS) and the Agency's policies related to filing and record keeping. The brown bag sessions are planned to occur during the first and second quarter of FY 2016.

The target date of closure of this recommendation will be October 30, 2016.

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