



OFFICE OF INSPECTOR GENERAL

AUDIT OF USAID/NICARAGUA'S HIV/AIDS PREVENTION PROGRAM

AUDIT REPORT NO. 1-524-14-011-P
JULY 18, 2014

SAN SALVADOR, EL SALVADOR



Office of Inspector General

July 18, 2014

MEMORANDUM

TO: USAID/Nicaragua Mission Director, Arthur W. Brown

FROM: Acting Regional Inspector General/San Salvador, David Clark /s/

SUBJECT: Audit of USAID/Nicaragua's HIV/AIDS Prevention Program
(Report No. 1-524-14-011-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 includes seven recommendations to help USAID/Nicaragua manage its HIV/AIDS Prevention Program and other crosscutting issues. Written comments in response to the draft report indicate the mission made management decisions on all seven recommendations and took final action on Recommendations 1 through 4 and 6 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 recommendation.

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
C-TIP	counter-trafficking in persons
NGO	nongovernmental organizations
PrevenSIDA	Preventing Transmission of HIV/AIDS From High Risk Groups in Nicaragua Program
TraiNet	Training Results and Information Network
URC	University Research Co. LLC

SUMMARY OF RESULTS

Although the prevalence rate of HIV/AIDS in Nicaragua is very low—affecting around 0.2 percent of the population—the rate for men who have sex with men, who make up 15 percent of people living with HIV/AIDS in the country, is higher.¹ Commercial sex workers and transvestites are also at high risk, with transvestites having the highest rate.

In the past 10 years, nongovernmental organizations (NGOs) in Nicaragua have provided most-at-risk groups with education, counseling, and testing, and advocated for them with the national government. However, most of these NGOs lack the structure, administrative capacity, and financial management skills to be sustainable. They also lack the means for coordinating their efforts, leading to some duplication of work and preventing the most effective use of their financial resources.

To help reduce the transmission of HIV/AIDS by most-at-risk populations and strengthen the NGOs that serve them, USAID/Nicaragua signed a 5-year, \$5 million cooperative agreement with University Research Co. LLC (URC) on September 20, 2010, to implement the Preventing Transmission of HIV/AIDS From High Risk Groups in Nicaragua Program (known as PrevenSIDA). The mission extended this award through September 20, 2016, and increased its value to \$7 million. As of February 20, 2014, cumulative obligations totaled \$4.95 million and disbursements, \$3.75 million.

PrevenSIDA's goal is "to increase healthy behaviors in order to reduce HIV/AIDS transmission" among high-risk groups and to the population at large. To achieve this, the program intends to accomplish four results:

1. Strengthen the institutional capacity of at least 20 local NGOs to participate in the HIV/AIDS national response plans.
2. Improve access to and the quality of HIV/AIDS preventive services.
3. Reduce stigma and discrimination against most-at-risk populations and people living with HIV/AIDS.
4. Improve the advocacy of NGOs representing most-at-risk populations and people living with HIV/AIDS in the national response to HIV/AIDS.

The Regional Inspector General/San Salvador conducted this audit to determine whether the program was achieving its main goal of increasing healthy behaviors to reduce HIV/AIDS transmission among members of these most-at-risk populations and to the population at large.

The program was on target to achieve the four primary results. The mission will commission a final evaluation at the end of the program to determine the extent to which these activities changed behavior among these key populations. In 2016, the Centers for Disease Control and Prevention will conduct an independent survey to determine whether HIV/AIDS programs in the country have reduced HIV transmission among members of most-at-risk populations.

¹ Based on Nicaraguan Ministry of Health's epidemiological reports for 2009.

By the end of the third year, the program had surpassed many of its indicator targets and was on track to meet all its end-of-program results, as shown in the following table.

Selected Indicators, Targets, and Results as of September 30, 2013 (Audited)

Result	Indicator	Cumulative Target	Reported Result
Result 1	1. Number of NGOs that developed and implemented their institutional capacity-building plans	At least 20	33
	2. Number of NGOs' staff trained and provided with technical assistance on HIV-related topics	More than 200	189
Result 2	3. Number of NGOs' staff trained in preventive services	At least 200	204
	4. Number of NGOs providing appropriate behavior-change communication, counseling and testing, condom provisions, and other prevention services	More than 20	21
	5. Number of MARPs [members of most-at-risk populations] reached through community outreach activities that promote HIV/AIDS prevention	At least 37,000	69,425
	6. Number of contacts reached through community outreach activities that promote HIV/AIDS prevention	At least 155,000	119,314
Result 3	7. Number of NGOs' staff trained in strategies and educational tools to reduce stigma and discrimination	100	110
	8. Number of NGOs who have implemented and evaluated annual plans to reduce stigma and discrimination	More than 20	15
Result 4	9. Number of NGOs' staff trained in effective techniques and strategies to improve participation of MARPs and people living with HIV/AIDS in the national response to HIV/AIDS	More than 200	114
	10. Number of NGOs provided with technical assistance on HIV-related policy development	Approximately 20	16

In addition, 13 of the 33 NGOs that URC has worked with have demonstrated significant improvement in administrative and financial controls to continue independently after the program ends. USAID and other donors have acknowledged their progress and have begun to provide many of them with funding.

Because of the significant progress, USAID/Nicaragua and URC raised the program's targets. For example, URC increased from 20 to 50 the number of assisted NGOs that will develop and implement a capacity-building plan, and from 200 to 300 the number of NGO staff URC will train on HIV-related topics. URC also agreed to develop additional activities for lesbians, gays, bisexuals, and transvestites, and expanded the program to the entire country to reach more

people affected by HIV/AIDS.

Despite the program's success, one area was weak. URC did not provide training to improve grantees' data management skills (page 4). Some grantees submitted substandard data to URC. Not having good data management skills could jeopardize these grantees' ability to be sustainable after USAID assistance ends.

Auditors also found that:

- USAID/Nicaragua did not validate data that URC entered into the Training Results and Information Network (TraiNet) (page 6). URC entered incorrect training numbers because it had not defined what constitutes a person trained for each module. In addition, USAID did not have a coordinator to provide guidance on how to use and monitor TraiNet.
- USAID/Nicaragua did not provide counter-trafficking-in-persons guidance to its implementers (page 7). The Agency has a field guide but has not instructed missions to distribute it to implementers, who are more likely than mission personnel to encounter victims of trafficking.

The report recommends that USAID/Nicaragua:

1. Work with URC to provide technical assistance, training, and guidelines to grantees on data verification and quality control, and document all such activities (page 4).
2. Work with URC to distribute to grantees best practices and lessons learned on using the database (page 5).
3. Work with URC to define which participants to count as trained for each module, and update TraiNet to reflect this new definition (page 6).
4. Provide and document training for its staff on using and monitoring TraiNet (page 6).
5. Establish a process to validate data that implementers enter into TraiNet (page 6).
6. Give all implementers the *Counter-Trafficking in Persons Field Guide*, which includes guidance for reporting suspected cases of trafficking through the Office of Inspector General Hotline, and document the distribution (page 7).
7. Disseminate a fact sheet highlighting services available in Nicaragua that assist victims of trafficking and other people in need, and document its actions (page 8).

The detailed finding follows, along with other matters. The audit scope and methodology are described in Appendix I. Our evaluation of USAID/Nicaragua's management comments appears on page 9; the mission's comments, minus annexes, appear in Appendix II.

AUDIT FINDING

Implementer Did Not Provide Training to Improve Grantees' Data Management Skills

The agreement called on URC to improve managerial capabilities of NGOs working to prevent the spread of HIV/AIDS among the most-at-risk populations. Through URC's training and technical assistance, the NGOs would sharpen their decision-making abilities and management skills and prepare to play a larger role in HIV prevention efforts throughout Nicaragua. As part of this effort, URC was to establish an information system to collect data, then document and disseminate lessons learned and best practices for using the database.

Accordingly, URC developed a contact database for NGOs that it gave grants to. These grantees enter data on their work with most-at-risk populations and generate reports, which the database transmits to URC monthly. URC relays the information to USAID, which relies on it for managing the program. According to Automated Directives System (ADS) 203.3.11.1, "Data Quality Standards," to help USAID with performance monitoring and decision making, data should be valid (i.e., should "clearly and adequately represent the intended result") and reliable.

However, URC did not provide training or guidance to the grantees on how to check for errors in the database. For example, new employees at the 11 NGO offices visited did not know how to update information, correct errors, or run reports. Although experienced monitoring and evaluation specialists at some of these grantee organizations were familiar with the database operations and had established their own quality controls, the newer specialists did not know how to verify data.

As a result, some grantees were reporting inaccurate information to URC. While URC subsequently verified and corrected these reports to ensure that data provided to USAID were accurate, it did not provide training and technical assistance to improve the NGOs' data management skills. Instead, URC officials said, they have worked since the development of the database in 2011 to make it usable, adding new tools to help grantees with data quality.

Furthermore, although URC was supposed to compile lessons learned and best practices on using the database for the grantees, it had not done so. URC officials said they had focused on other aspects of the program, such as the best way to identify locations where most-at-risk populations congregate.

Without accurate and reliable information, URC and the mission cannot make informed decisions. Although URC checked the data for accuracy, by not teaching grantees to use the database correctly and verify data themselves, URC was jeopardizing their ability to function independently after USAID assistance ends. Therefore, we make the following recommendations.

Recommendation 1. We recommend that USAID/Nicaragua work with University Research Co. LLC to provide technical assistance, training, and guidelines to grantees on data verification and quality control, and document all such activities.

Recommendation 2. *We recommend that USAID/Nicaragua work with University Research Co. LLC to distribute to grantees best practices and lessons learned on using the database.*

OTHER MATTERS

USAID/Nicaragua Did Not Validate Data the Implementer Entered Into the Training Record System

ADS 253.3, “Policy Directives and Required Procedures,” states that all USAID units involved in funding or managing 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.” The units must enter into TraiNet information on any training lasting at least 2 days or 16 hours, according to ADS 253.3.4.5, “Monitoring and Reporting.” In addition, the units must verify that participants are “regularly attending scheduled activities or sessions of a technical program.”

URC hired two subcontractors to provide training to NGOs on managerial skills and HIV/AIDS prevention activities and monitor the day-to-day activities. The training program consisted of various modules, each requiring 1 to 3 days to complete. Participants had to complete 80 percent of the program to receive a certificate of completion.

The training was delivered as planned, but the record keeping for the training was flawed for two reasons. URC did not use the subcontractors’ sign-in-sheets, which contained accurate information on who attended each day. Instead, it relied on its own, less detailed sign-in sheets. Moreover, URC did not define what constituted a person trained for each module—i.e., how much of each module a person had to complete. It simply counted participants who completed 1 day of a module lasting multiple days as having completed the entire module. When auditors asked for documentation, URC could not produce all of its sign-in sheets. The sheets it made available had incomplete data that did not fully support the number of participants reported in TraiNet and did not show which days participants attended.

USAID did not monitor training and did not detect that URC had recorded inaccurate information in TraiNet. Mission officials said the person on staff who had monitored and provided guidance on TraiNet left the mission. The mission has since appointed a new TraiNet coordinator, but officials said that all staff need more TraiNet training to verify that the information entered into TraiNet by implementers is correct.

Without defining what constitutes a trained participant, the program risks entering inaccurate data into TraiNet. Inaccurate training data will not allow the mission to assess whether the training is advancing the program’s goal. Therefore, we make the following recommendations.

Recommendation 3. We recommend that USAID/Nicaragua work with University Research Co. LLC to define which participants to count as trained for each module, and update the Training Results and Information Network to reflect this new definition.

Recommendation 4. We recommend that USAID/Nicaragua provide and document training for its staff on using and monitoring the Training Results and Information Network.

Recommendation 5. We recommend that USAID/Nicaragua establish a process to validate data that implementers enter into the Training Results and Information Network.

USAID/Nicaragua Did Not Provide Counter-Trafficking-in-Persons Guidance to Implementers

USAID has identified trafficking in persons as a massive development problem affecting millions of men, women, and children. According to its *Counter-Trafficking in Persons and Contractor/Recipient Compliance*, an Agency-wide standard operating procedure, USAID is working to demonstrate its leadership in countering trafficking. In its 2012 *Counter-Trafficking in Persons Policy*, USAID lists its five C-TIP objectives, one of which is providing training and coordination to enhance institutional accountability for combating trafficking.

The standard operating procedure states that USAID must “equip personnel with the necessary knowledge and tools to recognize, report, and address human trafficking offenses.” Moreover, USAID’s *Guidance on the Implementation of the Counter Trafficking in Persons (C-TIP) Code of Conduct* (a mandatory reference for ADS 201, 203, 302, and 303) states that USAID employees will receive general training to raise “their awareness of human trafficking and its many manifestations.”

However, the mission has not provided any guidance or training on C-TIP to its implementers. Furthermore, 7 out of the 11 grantees visited reported being aware of trafficking or potential victims of trafficking, yet only 1 of those NGOs reported receiving any orientation from URC on how to recognize and respond to trafficking situations.

The grantees did not receive C-TIP guidance because USAID has offered its C-TIP training to USAID employees only and does not have any guidance or training specifically for implementers or those working for them. In April 2013, the Agency released its *Counter-Trafficking in Persons Field Guide*, but did not instruct missions to disseminate it to implementers. Furthermore, the Agency has not trained an important segment of its own work force: a recent OIG review of USAID’s C-TIP program² found that missions’ C-TIP coordinators were unaware of their roles and responsibilities for providing training or guidance to implementing partners. Coordinators did not receive training on their responsibilities, including training implementing partners.

While USAID/Nicaragua staff make occasional visits to field sites, implementers are in the field observing the day-to-day activities of the Agency’s beneficiaries. The implementers and those working for them therefore are more likely to observe instances of trafficking and would therefore benefit from training and guidance. Therefore, disseminating the field guide to the implementers would help extend protection to those most vulnerable to trafficking in Nicaragua and contribute to meeting USAID’s C-TIP objectives.

Recommendation 6. *We recommend that USAID/Nicaragua give all implementers the Counter-Trafficking in Persons Field Guide, which includes guidance for reporting suspected cases of trafficking through the Office of Inspector General Hotline, and document the distribution.*

² *Review of USAID’s New Counter-Trafficking in Persons Program*, Report No. 9-000-14-001-S, November 27, 2013.

Recommendation 7. *We recommend that USAID/Nicaragua disseminate a fact sheet highlighting services available in Nicaragua that assist victims of trafficking and other people in need, and document its actions.*

EVALUATION OF MANAGEMENT COMMENTS

USAID/Nicaragua agreed with all seven recommendations. Based on comments from the mission and supporting documentation, management decisions have been reached on all seven recommendations, with final action taken on Recommendations 1 through 4 and 6 through 7. Our detailed evaluation of management comments follows.

Recommendation 1. USAID/Nicaragua agreed to work with URC to develop a validation and implementation training guide and provide training to the grantees to improve data verification. This process was completed in May 2014. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 2. USAID/Nicaragua agreed to work with URC to compile a best practice and lessons learned manual on using the database. URC shared the manual with grantees during a lessons learned session held in May 2014. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 3. USAID/Nicaragua agreed to work with URC to define which participants to count as trained for each module and to update TraiNet accordingly. With URC, the mission reviewed all training entered into TraiNet to identify errors using The President's Emergency Plan for AIDS Relief's definition of a trained person. The mission verified that, as of May 2014, URC had updated all TraiNet records entered under the program to reflect this change. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 4. USAID/Nicaragua agreed to coordinate TraiNet training for its administrative assistant in April 2014 and for its implementers in May 2014. The mission provided documentation showing that the training took place. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 5. USAID/Nicaragua agreed to establish a process to validate data that implementers enter into TraiNet. The mission held a TraiNet training course for all implementers in May 2014, and agreement officer's representatives were in the process of validating TraiNet data entered by the implementers. In addition, the mission was in the process of hiring a training coordinator who will be responsible for data validation. The mission expected to complete this task by September 30, 2014. We acknowledge the mission's management decision.

Recommendation 6. USAID/Nicaragua agreed to give all implementers the *Counter-Trafficking in Persons Field Guide*. The mission e-mailed the C-TIP Field Guide to all of its implementers in June 2014. We acknowledge the mission's management decision and final action on this recommendation.

Recommendation 7. USAID/Nicaragua agreed to disseminate a fact sheet highlighting services available in Nicaragua to victims of trafficking and other people in need. In coordination with URC, the mission compiled the fact sheet, made it available to the public through PrevenSIDA's Web site in May 2014, and in June 2014 e-mailed it to its implementers. We acknowledge the mission's management decision and final action 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 the audit was to determine whether USAID/Nicaragua's PrevenSIDA was achieving its main goal of increasing healthy behaviors to reduce HIV/AIDS transmission among the most-at-risk populations and to the population at large.

The mission awarded URC a 5-year, \$5 million cooperative agreement to implement PrevenSIDA. The award was extended for another year (total of 6 years) and increased to \$7 million. As of February 20, 2014, cumulative obligations and disbursements for URC totaled \$4.95 million and \$3.75 million, respectively.

The audit covered program activities from inception through February 27, 2014, and 11 grant activities worth approximately \$800,000. Auditors conducted fieldwork from February 3 through February 13, 2014, and from February 25 through February 27, 2014, in Managua, León, Matagalpa, and Región Autónoma del Atlántico Sur.

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, and (3) performed data quality assessments and portfolio reviews. Additionally, we reviewed the mission's annual certification required by the Federal Managers' Financial Integrity Act of 1982, 31 U.S.C. 3512, to verify whether the assessment cited any relevant weaknesses. We reviewed prior audit reports on HIV/AIDS prevention 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 URC, and the effectiveness and sustainability of the activities. We met with various USAID/Nicaragua officials, including the agreement officer's representative and various program office staff. We held numerous meetings with URC staff, including the chief of party, monitoring and evaluation personnel, and financial staff; subcontractors; and grantees. We also interviewed Peace Corps staff.

To gain an understanding of the program, the audit team reviewed the mission's cooperative agreement, its modifications, and the performance monitoring plans. During fieldwork at the mission and site visits to the implementer's, subcontractors', and grantees' locations, we verified reported progress and compared it with actual achievements. Specifically, we reviewed URC's work plans, progress reports, environmental documents, branding and marking plan, and training records. We also evaluated its use of the contact database, tracking of commodities such as condoms and rapid test results, compliance with USAID's prohibition of assistance to

drug traffickers, disposal of medical waste, and gender integration in program activities. We reviewed applicable policies and procedures pertaining to USAID/Nicaragua's implementation of the program, such as ADS and selected mission orders.

We visited 11 of the 28 grantees who were provided funding for FY 2014. We used a judgmental sample rather than a statistical sample for site visits. The sample selection was based on an analysis of factors such as travel time to location, grant amount, and the target population that grantees were working with. The final itinerary was refined through discussions with USAID/Nicaragua and the implementer. During site visits, we validated the use of funds and existence of sites and activities; verified controls over commodities; and documented aspects of monitoring, reporting, and compliance with environmental requirements. Since a statistical sample was not used, the sample results cannot be projected to the entire population.

MANAGEMENT COMMENTS



MEMORANDUM

DATE: June 6, 2014

TO: Regional Inspector General/San Salvador, Jon Chasson

FROM: Acting Mission Director, Kenneth Maclean

TRHOUGH: Director Office of Financial Management, Virginia Prudo

SUBJECT: Audit of USAID/Nicaragua's HIV/AIDS Prevention Program
(Report No. 1 524-14-00X-P)

REF: Jon Chasson /Arthur Brown memo, dated May 8, 2014

Following are the Mission's management decisions and corrective actions for the seven recommendations contained in the subject audit report:

Recommendation No. 1: We recommend that USAID/Nicaragua work with University Research Co. LLC to provide technical assistance, training, and guidelines to grantees on data verification and quality control, and document all such activities.

Following are the USAID/University Research Co. LLC (URC), corrective actions taken to comply with the recommendation on data verification and quality control to grantees:

1. Design of a data quality managing system in order to develop, validate and implement a single record system for the services produced by the project, including a training records' module according to PEPFAR definitions.

Implementation date: March 31, 2014

Support documentation: Annex 1. A 56 page of the "Registro único de identificación de Poblaciones En Mas Alto Riesgo (PEMAR) y "Personas Viviendo con VIH" (PLWVIH) English acronym".

2. Develop, validate and implement a training methodology guide for the implementation of the single record system.

Implementation date: March 31, 2014

Support documentation: Annex 5 – Reportes de capacitación y lista de ONGs con Sistema Automatizado de Registro Único (Training reports and list of local NGOs with the Automated Registry System, installed).

3. Develop, validate and implement a data quality verification guide.

Implementation date: March 2014.

Support documentation: Annex 2 - 12 training reports completed from February through May 2014.

4. Implement systematic mechanisms for data quality verification as part of the Monitoring and Evaluation process of the Project.

Implementation date: February 2014.

Support documentation: Annex 3 – Monitoring and Evaluation tool (page 2/6)

Recommendation No. 2: We recommend that USAID/Nicaragua work with University Research Co. LLC to distribute best practices and lessons learned on using the database to grantees.

URC implemented a national workshop in May 2014, with participation of 20 NGOs receiving sub-grants to share and distribute NGOs best practices, lessons learned on using the database. This activity included the dissemination of standardized instruments for collection, recording, and data verification through collaborative learning of data quality. In order to ensure a proper dissemination of the information, URC implemented:

- 1) A methodological design in April 2014 (Annex 4);
- 2) A learning session to improve data quality in the NGOs monitoring system (Annex 5)
- 3) A website for success stories in May 2014. Please see link attached (http://www.prevensida.org.ni/images/stories/documentos_pdf/pasos_para_el_abordaje_del_trfico_de_personas_versin%20_final.pdf)

Recommendation No. 3: We recommend that USAID/Nicaragua work with University Research Co. LLC to define which participants to count as trained for each module and update the Training Results and Information Network to reflect this new definition.

The following steps were taken to implement the corrective action:

1. Organize and review, in a single document, the project's training strategy including all operational definitions of all past trainings as well as those planed in the future, standardizing the definitions of TraiNet with those of PEPFAR. Note: There are three

categories of general definitions for PEPFAR (H21D, H22D and H3DD) and 25 operational definitions according to methodological designs. Prevensida's project training strategy documentation was verified by the AOR at URC's office, this review was finalized on April 15, 2014.

2. Organize and review all quarterly training report files for the period October 2010 to May, 2014, ensuring the inclusion of the operational definition for training in their respective methodological designs. Prevensida's TraiNet quarterly reports were verified by the AOR at URC's office, the review was finalized on May 6, 2014.
3. As a result of the above, the AOR conducted a review of Prevensida TraiNet reports for FYs 2013/2014 on May 21, 2014; and a conciliation of Prevensida TraiNet report for FYs 2011/2012 that concluded on May 20, 2014. See TraiNet reconciliación F12, FY13, FY14 Q1 y Q2 (Annex 6). The results of the review revealed that the initial verifications had limitation in the register of the data. Unified criteria for approving registration information were achieved after the reconciliation.
4. Additionally, on May 8, 2014, nine Prevensida Technical Staff were trained on TraiNet with the purpose of unifying the correct criteria for the data to be uploaded into TraiNet. (Annex 8)

Recommendation No. 4: We recommend that USAID/Nicaragua provide and document training for its staff on using and monitoring the Training Results and Information Network.

The following steps were taken to implement the corrective action:

1. USAID/Nicaragua coordinated a VTC TraiNet training with USAID/Washington, six staff involved in the participant training process were trained on June 28, 2013. (Annex 7).
2. USAID/Nicaragua coordinated a VTC TraiNet training with USAID/Washington on April 24 and 25, 2014 for Administrative Assistant. (Annex 7.1)
3. USAID/Nicaragua conducted, a classroom TraiNet-VCS refresher training on May 6-8, 2014, for the Mission's Partners who have the role of Initiator (R1), and Verifier (R2) in the Participant Training Program. See agenda and invitation email submitted on April 30, 2014. (Annexes 8 and 8.1)

Recommendation No. 5: We recommend that USAID/Nicaragua establish a process to validate data that implementers enter into the Training Results and Information Network.

USAID/Nicaragua is in the process of validating data that implementers enter into the TraiNet. Based on the audit experience, a process for data validation was developed by the AOR for Prevensida to be adopted by all USAID implementing partners. A Mission partner's training will be conducted on the process. In addition, the Mission is in the process of hiring a GDO

Administrative Assistant who will act as participant training coordinator and responsible for data validation.

Expected completion due date: September 30, 2014

Recommendation No. 6: We recommend that USAID/Nicaragua give all implementers the Counter-Trafficking in Persons Field Guide, which includes guidance for reporting suspected cases of trafficking through the Office of Inspector General Hotline, and document the distribution.

Following the corrective action:

USAID/Nicaragua will submit via e-mail the Counter-Trafficking in Persons (CTP) Field Guide, along with the factsheet to all implementing partners.

Expected completion due date: June 30, 2014

Recommendation No. 7: We recommend that USAID/Nicaragua disseminate a fact sheet highlighting services available in Nicaragua that assist victims of trafficking and other people in need, and document its actions:

PrevenSida and USAID/Nicaragua developed, validated and is in the process to disseminate 500 copies of the “Identificación y referencia de casos de tráfico de personas” (fact sheet). Annex 9. Additionally, the fact sheet was published in the web page of PrevenSida. The fact sheet will also be distributed via email to all implementers.

(http://www.prevensida.org.ni/index.php?option=com_k2&view=item&id=153:identificación-y-referencia-de-casos-de-tráfico-de-personas)

Completion due date: May 21, 2014 (web version) - May 2014 (printed version)

Based on the corrective actions taken, evidenced by the support documentation, and except for Recommendations No. 5 and No. 6, we consider the rest of recommendations as closed.

cc: Natalie Thunberg, RAO
Allen Vargas, R/Controller
Marianela Corriols, AOR
Angela Cardenas, Director of GDO

List of Annexes:

Annex 1. Registro único de identificación de PEMAR y PLWVIH March 2013 - 56 pages.

Annex 2. 12 reportes de capacitación sobre registro único y calidad del dato.

Annex 3. Monitoring and Evaluation tool.

Annex 4. Diseño metodológico de colaborativo de calidad del dato. Abril 2014.

Annex 5. Reporte de capacitación en calidad del dato, historia de éxito y listado de participantes.

Annex 6. TraiNet Conciliación F12, FY13, FY14 Q1 y Q2

Annex 7. USAID Mail - Fwd_ VYC Training 28 June 2013

Annex 7.1 Visa Compliance, Participant Training and Exchanges_ Policy Procedures, and
Systems Workshop April 24-25 2014

Annex 8. USAID Mail - Fwd_ TraiNet-VCS Training

Annex 8.1 TraiNet Agenda, May 2014, USAID.Nicaragua

Annex 9. Factsheet

U.S. Agency for International Development
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Washington, DC 20523
Tel: 202-712-1150
Fax: 202-216-3047
<http://oig.usaid.gov>