



OFFICE OF INSPECTOR GENERAL

AUDIT OF USAID/EAST AFRICA'S MONITORING AND EVALUATION PROGRAM FOR SOMALIA

AUDIT REPORT NO. 4-649-15-005-P
September 23, 2015

PRETORIA, SOUTH AFRICA



Office of Inspector General

September 23, 2015

MEMORANDUM

TO: USAID/Kenya and East Africa Mission Director, Karen Freeman

FROM: Acting Regional Inspector General/Pretoria, John Vernon /s/

SUBJECT: Audit of USAID/East Africa's Monitoring and Evaluation Program for Somalia
(Report No. 4-649-15-005-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, excluding attachments, in Appendix II.

The audit report contains ten recommendations to help USAID/East Africa strengthen its monitoring of activities in Somalia. After reviewing information provided in response to the draft report, we determined that the mission has taken final action on Recommendations 1, 2, 3, 4, 6, 7, and 8 and has made management decisions on Recommendations 1 to 9. We disagree with the decision on Recommendation 4. We did not acknowledge a management decision for Recommendation 10.

Thank you for the cooperation and assistance extended to the audit team during this audit.

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Abbreviations

The following abbreviations appear in this report:

- ADS Automated Directives System
- COR contracting officer’s representative
- DFID Department for International Development
- IBTCI International Business & Technical Consultants Inc.
- MEPS Monitoring and Evaluation Program for Somalia
- MOU memorandum of understanding
- PMP performance management plan
- SPSS Somalia Program Support Services

SUMMARY OF RESULTS

USAID manages projects in Somalia out of its regional office in Kenya. However, because of security concerns stemming from general lawlessness and terrorism threats, the staff who oversee the projects cannot make frequent monitoring visits to oversee their progress.

To help provide oversight, USAID contracted with International Business and Technical Consultants Inc. (IBTCI) for \$9.9 million to verify and monitor the Agency's activities in Somalia. The Monitoring and Evaluation Program for Somalia (MEPS) contract was signed in April 2011 and ended in December 2014; several months before then, in July 2014, IBTCI was awarded a follow-on, 5-year contract for Somalia Program Support Services (SPSS) to continue the work.

In addition to monitoring, verifying, and evaluating USAID programs, MEPS was expected to provide reporting and reviews of specific activities, projects, and the portfolio as a whole at least on a quarterly basis.

The program's main deliverables were to:

- Develop and implement a performance management plan (PMP) covering all USAID activity implementers in Somalia.
- Hire Somali partners to verify activities.
- Hire a local implementer with knowledge of the local security and political situation to verify compliance with environmental requirements.
- Prepare assessments and evaluations of the security situation in Somalia at least annually.
- Disseminate information to educate and inform the Somali public about the results of USAID's assistance.

The objective of the audit was to determine whether MEPS was delivering products that were timely, relevant, and useful for performance management, and whether the mission was using those products to manage its portfolio.

The audit found that several were late or incomplete (page 3). For example, although IBTCI submitted a draft PMP to USAID for approval approximately 2 months after the program started, the mission did not approve it until October 2014, 2 months before the end of the contract.

We also found the following problems.

- Contracting officer's representatives (CORs) did not always document their follow-up on findings from IBTCI's monitoring and evaluation visits (page 7).
- The mission did not address a conflict of interest issue with one of its contractors before awarding a contract and subcontract to the firm (page 10).

- The partnership with the United Kingdom's Department for International Development (DFID) competed for program resources (page 11).

To strengthen USAID/East Africa's monitoring and evaluation of its activities in Somalia, we recommend that the mission:

1. Implement a plan to provide supervisory oversight to CORs in charge of managing its monitoring programs in Somalia (page 7).
2. Train the staff responsible for managing its Somalia programs about the monitoring and evaluation resources available to them (page 7).
3. Obtain written acknowledgement from IBTCI that all deliverables are understood during the implementation of monitoring and evaluation activities under SPSS (page 7).
4. Give IBTCI a written outline of its management structure to ensure familiarity (page 7).
5. Identify a COR for SPSS who has or can be taught the skills needed to manage the program effectively (page 7).
6. Implement a monitoring plan that includes reviews of award deliverables to confirm that IBTCI is meeting its deliverables under SPSS (page 7).
7. Offer training to USAID staff to boost awareness, participation, and cohesiveness between USAID staff managing programs in Somalia and SPSS (page 9).
8. Define standard operating procedures for the use of the clearinghouse, which includes roles, responsibilities, and time frames (page 9).
9. Develop and issue a mission order that is relevant to monitoring needs for programming in Somalia (page 9).
10. Work with IBTCI to evaluate possible conflicts of interest caused by subcontractor relationships and document its resolution of those conflicts (page 11).

Detailed findings appear in the following section and the scope and methodology appear in Appendix I. Management comments are included in their entirety in Appendix II, and our evaluation of them starts on page 12.

AUDIT FINDINGS

Key Deliverables Were Delayed or Not Completed

Automated Directives System (ADS) 202.3.6 states that monitoring the quality and timeliness of implementers' outputs, normally outlined in their contracts, is a major responsibility of CORs and development objective teams. However, according to ADS 302.3.4.16.d, "COR authority does not include directing the contractor, either in writing or verbally, or otherwise committing to changes that affect price, quality, quantity, delivery or other terms and conditions of the contract. Only a [contracting officer] has the authority to take such actions."

Furthermore, according to ADS 202.3.5.1, missions should be sure that implementing partners have all the necessary information about the results the Agency expects and how their activities are expected to contribute to them; this can be done through briefings, statements of work, and program descriptions in all requests for proposals.

Despite this guidance, IBTCI had the following problems with its deliverables.

PMP Was Not Developed And Approved in Timely Manner. PMPs are designed to help missions make decisions, allocate resources, and adapt projects and programs as needed. ADS 203.3.3 requires them to prepare mission-wide PMPs that include performance indicators, baseline data, and targets.

IBTCI's contract required it to develop and implement a PMP that USAID/East Africa could use to plan and manage the process of assessing and reporting progress toward the assistance and foreign policy objectives established for Somalia by the U.S. and Somalian Governments. In addition, the PMP would establish a systematic process to (1) monitor and evaluate the achievements of USAID, (2) collect and analyze performance information for tracking progress toward planned results, (3) prepare evaluations that would influence decision-making and resource allocation, and (4) communicate results achieved. After the mission approved the plan, IBTCI was to develop training materials and train mission staff and implementers who work in Somalia to use the PMP.

Despite the provisions of the contract, the mission did not approve and implement the PMP in a timely manner. IBTCI initially drafted and submitted a PMP for fiscal years 2011 to 2013 for review and approval on June 28, 2011 (2 months after the program began). Afterward, IBTCI followed up via e-mail several times with the COR and asked for a meeting to discuss getting approval. However, the COR did not respond until November 2012, when he informed IBTCI that the PMP was no longer a priority and that IBTCI would no longer be expected to develop and implement a PMP. This was 17 months after the PMP initially was supposed to be submitted to USAID for approval, according to the proposed timelines in IBTCI's technical proposal for the MEPS contract.

Meanwhile, the COR did not seek approval from his supervisors to make changes to IBTCI's deliverables, nor did he seek permission from the contracting officer as required by ADS, despite this significant departure from the contract. In August 2013 IBTCI sent an e-mail to the

COR asking for a meeting with the regional deputy mission director to discuss the PMP, but the COR still did not respond or alert his managers of IBTCI's intention to work on it.

This occurred because of the COR's poor performance and lack of supervision by higher-level officials in USAID/East Africa's Somalia office. The COR—whom mission officials said did not have monitoring and evaluation experience and was incapable of properly managing the program—was allowed to manage MEPS with minimal supervision. One of his direct supervisors in that office said it was understaffed at the time and the employees there were chronically busy, which left her little time to supervise the COR.

The COR's duties have since been reassigned, and USAID approved a PMP covering fiscal years 2014 to 2017 in October 2014. However, by this time IBTCI had wrapped up all monitoring and evaluation work in Somalia and was in the process of closing out MEPS-related operations. Due to the reasons outlined above, IBTCI spent time and resources developing a PMP that was never reviewed or used, and the mission lost the benefit of having an approved PMP to guide its program. Furthermore, not having a PMP meant that the mission did not comply with ADS.

Annual Stability Assessments Were Not Performed. According to the contract, assessments and evaluations were an integral part of MEPS and would be conducted throughout the program. Regular assessments of the stability situation in Somalia were to be conducted at least annually so USAID could adjust its programs as needed.

Although IBTCI did five evaluations and three assessments, this work occurred during the last 12 months of the program; none was conducted in fiscal year 2013 or before. IBTCI officials said they did not conduct assessments regularly because USAID never provided the guidance and resources they needed to complete this deliverable. The mission confirmed that the assessments were not performed, but the former COR kept limited records on the matter.

Because of not conducting these assessments, USAID did not have the information it needed to know whether to adjust programs in Somalia.

Environmental Compliance Verifications Were Delayed And Limited. According to the MEPS contract, IBTCI should have hired a Somali partner to verify compliance with environmental rules and regulations for USAID construction activities. This would have included examining project-level initial environmental evaluations and environmental reviews, taking into account USAID's environmental guidelines.

Although activities implemented in Somalia should have used environmental verifications during the first 3 years of MEPS, none was performed, and only 14 of a possible 176 construction activities that could have benefited from verifications were done during MEPS's final year.

The COR told IBTCI initially to stop planning for environmental verifications because the mission intended to hire Ecotech (a Kenyan engineering firm that was already doing other construction work for USAID in Somalia). Then in November 2013—about a year before MEPS was scheduled to end—the mission informed IBTCI that environmental verifications were again its responsibility. According to the MEPS chief of party, there was pressure from USAID/East Africa to conduct some environmental verifications and as a result she scrambled to complete them before the contract ended. However, because the mission did not approve a work plan that listed how many environmental verifications were needed or which activities were priorities, IBTCI verified only 14—approximately 8 percent.

An official from one of USAID's projects that could have received environmental verifications said consistent verifications would have been very useful because the implementer was working on more than 320 activities in Somalia. He said at least 50 percent of his program's activities in Somalia should have been visited by the verification team to ensure compliance with environmental requirements, but none was.

Not performing environmental verifications meant that the mission did not have the information it needed to confirm that it was following environmental regulations and as a result did not know whether any of its activities had environmental defects.

Outreach Activities Were Not Conducted. The contract required IBTCI, in consultation with the COR and the mission's development outreach and communications specialist, to develop an information dissemination and public education plan, although the contract did not clarify what exactly this plan would entail or address. The contract also said IBTCI should support USAID in publishing the results of its assistance through publications, public education at the community and national levels, and disseminating materials to include videos and reports, produced in collaboration with USAID and its implementers in Somalia.

However, IBTCI never developed the plan and produced only three videos on projects in Somalia. IBTCI officials said they did not receive any guidance from USAID on what to do or how to proceed with this part of the contract. They also said the mission's development outreach and communications specialist blocked them from completing some of the deliverables, as she thought completing them would duplicate the efforts of most programs in Somalia, which had their own particular communication needs and the staff and resources to address them. This was corroborated by a chief of party who said her project already had a program information office that provided these services. Another implementer explained that given the sensitivities of working in Somalia, it was not advisable for their communication needs to be handled by a third party who may not understand the program's intricacies and unique security challenges.

As a result, beneficiaries and other relevant stakeholders in Somalia and the United States were unaware of USAID's results.

Data Quality Assessments Were Not Conducted. Although IBTCI's contract called for it to conduct data quality assessments and performance audits of USAID projects in Somalia, the mission and implementer did not come up with a plan that covered how many were required or when they would be conducted.

So, except for limited participation with the mission on one data quality assessment in 2013, IBTCI did not conduct any assessments. IBTCI officials said they did not work on this deliverable because the former COR told them that assessments and performance audits were out of their scope. As a result, implementers missed opportunities to receive valuable feedback that could help ensure good data quality.

IBTCI Was Confused About Analyses. According to its contract, IBTCI was required to provide sectorial progress and impact analyses as needed, as well as "rapid response, flexible, activity-level results analyses" and targeted activity-level performance audits and monitoring site visits.

IBTCI officials said they interpreted this to be a mix of deliverables, but were unsure exactly what they needed to do. They said they believed they met the requirements through their monitoring and verifications, but USAID did not give any guidance.

In addition to those discussed above, all of these problems shared the following common causes.

- IBTCI lost its chief of party and deputy chief of party shortly after MEPS began. The chief of party resigned after 2 months, and the deputy resigned 7 months later. According to the current chief of party who was recruited in September 2011, she noticed that the program staff's morale was low, which contributed to the slow start of activities. Furthermore, after she started, IBTCI decided to eliminate the deputy chief of party position so it could hire more experienced technical staff. However, because the chief of party had limited experience in managing such a complex monitoring and evaluation project, eliminating the deputy position also contributed to IBTCI's poor performance.
- USAID did not provide the former COR with the training he needed to ensure that he could manage MEPS successfully because, according to his former supervisor, the COR's and IBTCI's poor performance were only discovered in October 2013 when a new supervisor arrived. Employees in the contracting office said they had no idea that IBTCI had problems or that the COR was having difficulty managing the program. In fact, the contracting office gave IBTCI outstanding performance ratings in 2012 and 2013.

The supervisory contracting officer said she would have done everything in her power to assist IBTCI, but because she was not aware of its troubles, the program struggled to meet its goals. The COR was replaced in February 2014, and a mission official said the new COR's monitoring and evaluation experience made her a better fit for the job. However, on March 10, 2015, the mission notified us that this COR resigned.

- IBTCI officials said they were not very familiar with USAID's organizational structure and therefore did not know how to address the performance concerns they had with the former COR. The chief of party said she was not sure whether speaking with senior mission officials about IBTCI would be seen as circumventing the COR's authority and did not want to create any problems.
- According to IBTCI officials, the contract was vague and lacked clarity in defining MEPS's deliverables. Although they tried several times to get this situation resolved through the COR, he did not discuss the problems with anyone in the contracting office. The supervisory contracting officer said the contract's ambiguity was intended to provide flexibility in project implementation, and the Somalia office should have brought all these issues to her attention for timely resolution.

After we informed the mission that we would be conducting this audit, the program office asked the contracting office to retroactively modify the contract to address changes that should have been made. These concerns were reiterated in an e-mail from the program office to the contracting office dated August 6, 2014, which said auditors were coming and if the mission wanted to minimize audit recommendations, it should consider modifying the contract. The program officer added that there would be consequences to not doing so.

However, the contracting officer refused, in an e-mail that same day, stating that the office:

cannot modify a contract to correct things done in the past. We can only do the modification and make it effective for events that will occur after the modification is done . . . We simply can't do a modification to "make right" instructions given to a Contractor, that were in contravention to the authorities given to the COR's. The fact that an audit looms does not alter that.

Because of these situations, MEPS did not accomplish all of its goals. Although approximately \$8 million was disbursed to IBTCI for this project, USAID's programs in Somalia were not monitored and evaluated as planned. Accordingly, we make the following recommendations.

Recommendation 1. We recommend that USAID/East Africa implement a plan to provide supervisory oversight to contracting officer's representatives in charge of managing its monitoring programs in Somalia.

Recommendation 2. We recommend that USAID/East Africa train the staff responsible for managing its Somalia programs about the monitoring and evaluation resources available to them.

Recommendation 3. We recommend that USAID/East Africa obtain written acknowledgement from International Business and Technical Consultants Inc. that all deliverables are understood during the implementation of monitoring and evaluation activities under the Somalia Program Support Services award.

Recommendation 4. We recommend that USAID/East Africa give International Business & Technical Consultants Inc. a written outline of its management structure to ensure familiarity.

Recommendation 5. We recommend that USAID/East Africa identify a contracting officer's representative for the Somalia Program Support Services award who has, or can be taught, the skills needed to manage the program effectively.

Recommendation 6. We recommend that USAID/East Africa implement a monitoring plan that includes reviews of award deliverables to confirm that International Business & Technical Consultants Inc. is meeting its deliverables under Somalia Program Support Services.

Mission Did Not Always Follow Up on Problems Found During Monitoring Visits

ADS 203.3.2.2 lists key principles and practices for effective performance monitoring of USAID activities. This includes involving partners in performance management by interpreting and sharing performance monitoring information and knowledge with them.

ADS 202.3.6 states that monitoring the quality and timeliness of an implementing partner's activities is a key task for mission officials. The guidance also says that an implementing partner's outputs are essential to achieving results and that "problems in output quality provide

an early warning that results may not be achieved as planned” and that “early action in response to problems is essential in managing for results.”

Furthermore, ADS 202.3.4.6 adds that missions must be sure they have adequate official documentation on agreements used to implement USAID-funded activities, resources spent, problems found, and corrective actions taken. This is reiterated by the designation letters for the CORs audited, which state that they are responsible for establishing and maintaining proper files.

IBTCI invested more than \$750,000 in a monitoring and evaluation clearinghouse. This was a secure, Web-based database designed to support USAID in meeting daily information needs so managers can make informed decisions about programs in Somalia. As part of that, it served as a data repository for program monitoring and evaluation data; IBTCI entered results of its monitoring and evaluations into the system, and USAID managers—including CORs—were able to view them and develop action plans to address findings.

Between May 2012 and July 2014, five IBTCI subcontractors visited 309 sites to verify whether activities were progressing as intended. They inspected results and talked to government and community officials and beneficiaries to determine whether activities were useful, whether there were problems, and if the activities met their expectations. The subcontractors reported any problems they discovered during these visits to USAID for resolution.

We reviewed verification reports for three projects that IBTCI subcontractors visited to determine whether the findings needing resolution were addressed and found very little documentation for the 56 visits to support that corrective action had been taken.

For example, the COR for the \$100 million Transition Initiative for Stabilization program could not give us proof that any of the problems found during 18 of the 21 monitoring verifications were resolved. One of the subcontractors who visited a university in Banadir during June 2014 discovered that although USAID had provided a grant to purchase equipment, it was not achieving its intended purpose; video conferencing equipment was not being used mainly because Internet provider could not provide enough bandwidth, and the university did not have any employees who knew how to operate it. In addition, the university could not afford to pay the \$3,000 monthly Internet connection and did not have anyone who could deliver lectures via video conference. Although the monitors flagged these problems as serious and needing the COR’s attention, nothing was done.

Also in June 2014, monitors visited a project that was supposed to build 12 wells in 6 districts to determine whether findings from an earlier visit in 2012 had been addressed. In this case, monitors could verify the existence of only three of six wells they were meant to check, and only one of those was working. People in the community gave the monitors various reasons why the wells were not working— none had ever worked, the water from the wells was too contaminated to use, and a community member destroyed a well to build a house. Since the problems were not resolved, it indicates that USAID had not followed up on the 2012 results.

Auditors also found problems with Somalia Youth Leadership Initiative verifications. The COR provided support for corrective actions on only four out of eight visits. In March 2014 monitors visiting a school in Warta Nabbada District discovered concrete debris, timber and frames with exposed nails, broken chairs, pieces of metal, and loose electrical wires in the school’s kitchen that were loose and not connected properly. When we asked the COR for supporting

documentation to confirm that these findings were addressed, she wrote in an e-mail, “USAID reviewed the implementing partner's response and determined that no further actions were needed.” However, she did not provide documentation that showed how USAID made that decision or how the problems were fixed.

The situations above occurred for the following reasons:

- Although IBTCI produced a user manual on how to enter or modify data in the clearinghouse, USAID did not make its use mandatory.
- Because of limited training opportunities and technical issues, USAID staff and implementers had difficulties using the clearinghouse as it was intended initially.
- USAID/East Africa did not outline the benefits of MEPS to its staff and show how using the clearinghouse would help them manage programs in Somalia. Implementing partners there already had their own monitoring programs for their activities and said they were unsure how this added layer fit into their programs. For example, the chief of party for one program said that although MEPS identified some problems with their construction project, it did so after the same problems had already been identified by the program’s own monitoring and evaluation system and were addressed.
- USAID/East Africa’s mission orders about monitoring, dated November 2012, predate the mission’s attempt to satisfy Somalia’s unique monitoring needs with third-party monitors and the needed upkeep of the clearinghouse. Work to update these mission orders started in January 2013. By May, final drafts was submitted to the program office for clearance but had not been approved by the end of audit fieldwork in November 2014. According to ADS 527, mission orders are required when mission-specific procedures are necessary to implement ADS. Without a mission order that specifically addresses the unique monitoring requirements of programs implemented in Somalia, USAID programs will continue to have problems with oversight.

As a result, problems that were identified by the monitoring verifications either were never fully resolved or not resolved at all, thereby leading to a waste of USAID resources. So we make the following recommendations.

Recommendation 7. We recommend that USAID/East Africa offer training to USAID staff to boost awareness, participation, and cohesiveness between USAID staff managing programs in Somalia and the Somalia Program Support Services award.

Recommendation 8. We recommend that USAID/East Africa define standard operating procedures for the use of the clearinghouse, which includes roles, responsibilities, and time frames.

Recommendation 9. We recommend that USAID/East Africa develop and issue a mission order that is relevant to monitoring needs for programming in Somalia.

Mission Did Not Address Conflict of Interest

Subpart 9.5, “Organizational and Consultant Conflict of Interest,” of the Federal Acquisition Regulation states that a contracting officer must identify, evaluate, and resolve any conflict or appearance of conflict of interest. In accomplishing this requirement, contracting officers should avoid creating delays, unnecessary information requirements, and excessive documentation; they can accomplish this by seeking advice from legal counsel and other technical specialists before awarding a contract.

Despite the guidance outlined above, the Kenyan engineering firm Ecotech got a contract from USAID/East Africa and subsequently a subcontract from USAID implementer IBTCI related to the same construction projects. In total, 4 of the 14 environmental verifications that Ecotech performed for MEPS activities had also received architectural design reviews from the subcontractor.

In September 2011 Ecotech signed a 3-year contract to provide architectural design and engineering reviews and construction monitoring to USAID’s activities in Somalia and to evaluate infrastructure projects to be sure they complied with Somalian and international design and construction standards.

Then in December 2013 Ecotech got a subcontract through IBTCI to perform environmental verification and monitoring of some USAID projects in Somalia, the same construction projects that they were providing architecture and engineering design reviews for, thereby creating a conflict of interest.

Two months before, the COR sent an e-mail to the contracting officer about IBTCI’s plans to award the subcontract and to get advice on possible conflict of interest issues. The contracting officer forwarded the e-mail to the mission’s legal advisor for his input. However, the advisor (who left the mission and now works for USAID in South America) never responded, and the contracting officer never followed up. Moreover, the contracting officer never responded to the COR even though program employees sent him an e-mail that echoed the COR’s concerns.

The mission maintained poor documentation on this matter; the current legal advisor could not locate any of this correspondence in his files, and his predecessor said he looked through his e-mails and did not recall anything specific about this matter.

IBTCI officials acknowledged that they knew subcontracting to Ecotech posed a possible conflict of interest. However, they said they did not have much time to solicit bids from other firms that could have performed these services, as discussed previously on page 4.

Because of this conflict, Ecotech may not have reported problems found in the environmental verifications—which should have been resolved during the design review stage.

To address these concerns, auditors recommend the following.

Recommendation 10. *We recommend that USAID/East Africa work with International Business & Technical Consultants Inc. to evaluate possible conflicts of interest caused by subcontractor relationships and document its resolution of those conflicts.*

Partnership With British Development Agency Competed for Program Resources

In February 2013 USAID/East Africa signed a memorandum of understanding (MOU) worth approximately \$8.6 million with the United Kingdom's Department for International Development (DFID) for MEPS to include monitoring and evaluation services for DFID-funded programs in Somalia. USAID was to manage DFID contributions, while IBTCI provided monitoring and evaluation of activities through its subcontractors (the same ones USAID trained and used). Since USAID and DFID implemented activities in the same areas, USAID/East Africa officials expected IBTCI's observations on DFID activities to help oversee the Agency's activities. After it was signed, IBTCI subcontractors visited 84 DFID sites between 2013 and 2014.

However, this partnership took resources away from MEPS because DFID used USAID/East Africa's management services without paying for them. DFID deposited \$8.6 million with USAID/East Africa, and the mission's financial management officers managed these funds and paid IBTCI for expenses incurred while performing monitoring and evaluation activities for DFID.

The partnership was not efficient. USAID, DFID, and IBTCI did not work together to decide on how sites were selected for monitoring, when visits were performed, or how collaboration could be fostered among all parties. Although results from DFID's verifications were shared with USAID, and USAID also shared its verification results with DFID, the arrangement did not add much value to USAID's monitoring program.

Furthermore, despite the fact that IBTCI was struggling to implement USAID deliverables, it had to focus also on DFID's demands. According to an USAID/East Africa official, some IBTCI officials were not available to attend to USAID matters because they were busy working on DFID demands. Although IBTCI hired two technical employees to help manage the DFID deliverables, they were not enough. IBTCI officials said they had to work well beyond billed hours throughout this shared USAID-DFID contractual period to meet USAID's unplanned requests.

This situation occurred because USAID did not perform proper due diligence to determine exactly what benefits or possible challenges a partnership with DFID would cause. Although there were perceived benefits, these were never formally outlined.

Because of the challenges discussed, the mission decided to end its relationship with DFID on September 30, 2014, 3 years earlier than scheduled. Since the mission has already addressed this situation, we make no recommendation.

EVALUATION OF MANAGEMENT COMMENTS

In its comments on the draft report, USAID/East Africa agreed with all ten recommendations and made management decisions on Recommendations 1 to 9. We did not acknowledge a management decision for Recommendation 10 because the mission did not explain how it would work with IBTCI to evaluate whether possible conflicts of interest exist in its subcontractor relationships. The mission took final action on Recommendations 1, 2, 3, 4, 6, 7, and 8. RIG/Pretoria disagreed with management's decision on Recommendation 4.

Recommendation 1. USAID/East Africa agreed with this recommendation and confirmed that the Somalia Office program officer currently is serving as the COR for the SPSS contract. The mission's plan is to recruit a qualified M&E adviser to oversee the SPSS contract. Once hired, that person will serve as the COR for SPSS. The contracting officer for the SPSS contract will supervise the COR. The program officer will be supported by another employee with M&E experience. We acknowledge the mission's management decision and final action.

Recommendation 2. USAID/East Africa agreed with this recommendation. The mission noted improvements have been made since the SPSS contract was awarded to IBTCI.

Several presentations on the services offered by SPSS have been made to USAID/East Africa officials during staff meetings and quarterly implementing partner meetings with mission officials since the award. IBTCI has also provided presentations on the monitoring and verification methodology used under SPSS and provided the mission with debriefs on findings uncovered during monitoring and verification visits which took place between January-February 2015, March-May 2015, and June-August 2015. We acknowledge the mission's management decision and final action.

Recommendation 3. USAID/East Africa agreed with this recommendation and added that some of the corrective actions we recommended are already in place. The mission added that the contract signed between USAID/East Africa and IBTCI is a binding document, and by signing it, IBTCI is agreeing to all the terms. Furthermore, the mission added that it held a post-award meeting with IBTCI on October 2, 2014, to introduce IBTCI officials to relevant USAID officials. We acknowledge the mission's management decision and final action.

Recommendation 4. USAID/East Africa agreed with this recommendation. While we acknowledge their decision and final action, we disagree with it. Although the mission stated that the COR designation letter which has been provided to IBTCI outlines USAID's management structure, a similar letter was provided to IBTCI officials during the implementation of MEPS. Still, IBTCI officials were uncertain. IBTCI officials said they were not sure whether speaking with senior mission officials about MEPS would be seen as circumventing the COR's authority and did not want to create any problems.

Furthermore, the COR designation letter only includes the responsibilities and authorities of the CO and COR but not of other USAID/East Africa officials. During the audit, the MEPS chief of party said IBTCI is a small business with limited experience. Therefore, providing it with an

outline of USAID/East Africa's management structure should help the company understand the hierarchy and whom they should ask for help.

Recommendation 5. USAID/East Africa agreed with this recommendation. The COR that managed the program left the mission in June 2015. Since then, a senior program adviser will fill the position until the mission recruits a permanent employee, by March 31, 2016. Therefore, we acknowledge management's decision.

Recommendation 6. USAID/East Africa agreed with this recommendation. The mission added that since SPSS's contract is a fixed-priced indefinite delivery indefinite quantity contract it will only make payments when defined deliverables are completed. We acknowledge the mission's management decision and final action.

Recommendation 7. USAID/East Africa agreed with this recommendation. Although the audit team found the training provided by the mission's former adviser in 2013 to be inadequate, several improvements have been made since then.

USAID/East Africa officials have received presentations on SPSS during staff meetings and partner meetings. IBTCI has also delivered presentations to mission officials on its monitoring and verification methodology and held meetings on findings from monitoring and verification exercises. We acknowledge the mission's management decision and final action.

Recommendation 8. USAID/East Africa agreed with this recommendation. After spending more than \$750,000 developing a monitoring and evaluation clearinghouse, the mission decided that it was not an effective management tool and stopped paying for it in June 2015. Also contributing to the decision to cease the use of the clearinghouse, the mission noted high monthly maintenance costs (\$25,000) and USAID's planned move to AIDTracker Plus (a Web application that helps missions manage data related to projects and implementing mechanisms). We acknowledge the mission's management decision and final action.

Recommendation 9. USAID/East Africa agreed with this recommendation. Previously, the Somalia office was part of USAID/East Africa. But following a restructuring that was established and approved in May 2015, USAID's Somalia Office is now part of the USAID/Kenya and East Africa mission. The new mission will develop a new monitoring and evaluation mission order, in close consultation with the Somalia office, by March 31, 2016. We acknowledge the mission's management decision.

Recommendation 10. USAID/East Africa agreed with this recommendation; however, RIG/Pretoria did not acknowledge a management decision. Although USAID/East Africa confirmed it was obliged to work with its prime contractors on conflict of interest issues and has included more explicit language on conflict of interest in the SPSS contract, the mission did not present a plan to work with IBTCI to evaluate possible conflicts caused by subcontractor relationships and document its resolution of those conflicts.

SCOPE AND METHODOLOGY

Scope

RIG/Pretoria conducted this performance 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 to our audit objective. We believe the evidence obtained provides that reasonable basis.

The audit objective was to determine whether MEPS delivered products that were timely, relevant, and useful for performance management, and whether the mission was using them to manage its portfolio. In total, USAID obligated \$8.2 million and disbursed \$7.95 million to the MEPS contract. From April 2011 to December 2014, MEPS monitored eight programs, which had a total estimated cost of \$205 million. We selected three for review, which as of September 30, 2014, had \$139 million in obligations and \$78 million in disbursements.

In planning and performing the audit, we assessed the effectiveness of USAID/East Africa's strategy and performance monitoring plan, pertinent mission orders, organizational structure, COR designation letters, and program evaluations. Auditors also reviewed documentation supporting the mission's compliance with the Federal Managers' Financial Integrity Act,¹ which identified deficiencies in the mission's operations.

To gain an understanding of MEPS, auditors reviewed documentation including the contract, its modifications, and subcontracts; the MOU between USAID and DFID; implementing partners' work plans; quarterly and annual programmatic reports; and budget and financial reporting.

Audit fieldwork was conducted from October 27 to November 14, 2014, in Nairobi, Kenya, where USAID and most of the implementing partners for Somalia are based due to security reasons. Here auditors interviewed USAID/East Africa staff, such as the MEPS COR, program officers for the East Africa and Somalia programs, financial management staff, the contracting officer, and CORs for USAID programs that use MEPS's services. Auditors also met with DFID representatives, the IBTCI chief of party and other personnel, and subcontractors charged with verifying activities.

Methodology

To understand how MEPS helps USAID/East Africa reach its stabilization goals, auditors met with USAID's Somalia unit and other U.S. Government officials to learn about the country's history, USAID's ongoing activities, and the security situation. Auditors then reviewed program documentation in detail to gain a thorough understanding of expectations USAID/East Africa had for MEPS to broaden monitoring of activities in Somalia.

To answer the audit objective, auditors established criteria for assessing the timeliness, relevance, and usefulness of the program's deliverables and then interviewed USAID/East Africa and IBTCI staff to learn about the issues and challenges encountered during

¹ Public Law 97-255, as codified in 31 U.S. Code 3512.

implementation that resulted in deviations from the planned results, as well as plans for the follow-on award. Auditors also reviewed and selected IBTCI deliverables defined in the contract to determine whether they were timely, relevant, and useful per established criteria.

Auditors met with mission officials responsible for oversight to assess their knowledge and implementation of USAID guidance and requirements as well as their familiarity with the project activities. Auditors met with the COR to clarify the time frame for the award and learn about the follow-on award. They also met with IBTCI at its main offices in Nairobi to study the information management system developed and used by MEPS and review the data verification process of partners' programs.

Auditors met with DFID staff to understand how and why it benefits from MEPS services and learn of its experience. We also met with the mission's financial management office to understand the impact changes in program budget had, as well as the implications of DFID's contributions, which were managed by USAID. We met with the subcontractors hired to make monitoring visits in their Nairobi headquarters and via phone to discuss the sampled site visit reports, gauge their understanding of their responsibilities, review their training levels, and identify weaknesses in using this method of verification and monitoring.

To conduct testing of MEPS activities, auditors judgmentally selected three out of eight programs in which MEPS provides services based on highest dollar value of the program and accessibility to program staff. For those selected, auditors reviewed award documents to understand their objectives, implementation, and monitoring requirements, and met with USAID staff overseeing these programs to learn what role MEPS played in accomplishing these goals. Because the programs were selected judgmentally, results and overall conclusions were limited to the programs and items tested, and they were not projected to the entire population.

In conjunction with the interviews, auditors validated results of third-party verification efforts carried out during fiscal years 2013 and 2014. The selected audit sample represented 68 percent of the total 309 verification visits completed and reported to IBTCI for the three programs selected for testing. Since these samples were selected judgmentally, based on their status in the clearinghouse, the results cannot be projected to the entire population. However, we believe our substantive testing was sufficient to support the audit's findings.

For this testing, we relied on the computer-processed data in the clearinghouse maintained by IBTCI. We assessed the reliability of monitoring and evaluation data together and conducted sufficient tests of them. These tests and assessments led us to conclude that the data are sufficiently reliable to be used in answering the audit objective.

The audit team did not perform site visits in Somalia because the relevant parties, systems, and controls in place to provide monitoring and oversight of activities were based predominantly in Kenya.

MANAGEMENT COMMENTS



To: Sarah E. Dreyer, Regional Inspector General/Pretoria

From: Tina Dooley-Jones, Acting Mission Director USAID/Kenya and East Africa (KEA)

Date: 9 September 2015

Subject: Audit of USAID/East Africa's Monitoring and Evaluation Program for Somalia (Report No. 4-649-15-00X-P)

Ref: RIG/Pretoria's memorandum dated July 9, 2015

The purpose of this memo is to provide USAID/Kenya and East Africa's (The Mission) comments on the subject draft audit report.

Introduction

The USAID/Kenya and East Africa Mission recognizes that there was an initial learning curve in managing and implementing the Monitoring and Evaluation Program for Somalia (MEPS) contract. MEPS deliverables have clearly contributed to improvements in USAID's overall program in Somalia. USAID and its partners are making more of a difference in the lives of Somalis today based on information generated by MEPS, and improvements continue to be made under the current Somalia Program Support Services (SPSS) contract.

The Monitoring and Evaluation Program for Somalia (MEPS) was USAID's first formal attempt to use a third party to monitor and evaluate its investments in Somalia. Because USAID staff are restricted from traveling to most of the country, USAID awarded this contract to serve as the "eyes and ears" on the ground for USAID staff and to give them the essential information they need to make management decisions. Establishing monitoring and evaluation systems in such a complex and dynamic operating environment was highly challenging, especially when the main tasks involved travel to often insecure locations to ask probing questions.

While some deliverables were not submitted by the dates required in the original contract, a great deal was achieved through the MEPS contract. The contract provided significant information to USAID activity managers that was essential from both the compliance and learning perspectives.

In addition to conducting on-going monitoring and verification visits throughout Somalia, MEPS completed eleven critical, in-depth research efforts for USAID during its contract period. It completed final evaluations for USAID's democracy and governance and education activities, and mid-term evaluations of the Partnership for Economic Growth (PEG), Somalia Youth Leaders Initiative (SYLI), and TIS. USAID made major revisions to each on-going program or in the design of follow-on programs based on evaluation findings. For example, as a result of the SYLI mid-term evaluation, USAID discontinued the workforce development component given it was not achieving intended results. USAID also shifted Phase 2 from infrastructure development in Somaliland and Puntland to improving the quality of educational services in those regions. Furthermore, USAID expanded SYLI operations into south central Somalia where they are now operational.

MEPS also completed four major assessments that were essential to the design of USAID's new strategy for Somalia. MEPS assessed, for example, the current context and gaps in assistance to improve democracy and governance, economic growth, gender equality, and natural resource management in Somalia. An evaluation of the entire Somalia assistance portfolio by MEPS also provided information critical to the development of USAID's new strategic approach to development assistance in Somalia.

MEPS also completed a Performance Management Plan (PMP) for Somalia for 2014 to 2017 that the Mission approved in October 2014, and it currently uses it to guide monitoring of program progress toward intended objectives. The PMP was also an important tool used in completing a Somalia Program Evaluation (finalized in March 2015). SPSS is currently updating the PMP to add indicators for newly awarded activities and to make other required modifications to keep it relevant for the coming year.

After award of the MEPS contract, USAID allowed the United Kingdom's Department for International Development (DFID) to add funds to the contract with the intent of reducing both entities' costs by having one set of monitors visit both USAID and DFID sites while in Somalia. There was also a plan to jointly fund assessments that could yield better products at a lower cost. However, upon evaluation of this partnership at the end of the MEPS contract, USAID found that costs savings had not been realized and USAID did not continue this arrangement under SPSS.

The Mission learned a great deal—from both successes and challenges—implementing MEPS and used these lessons to design the Somalia Program Support Services (SPSS) contract. To ensure SPSS had clear deliverables to be achieved on time and of good quality, the Mission used an indefinite delivery, indefinite quantity (IDIQ) contract with fixed price task orders. USAID competed the SPSS contract in a public, full and open, request for proposals. USAID determined that IBTCI's offer was the best value to the government on the basis of all proposals received. Under the type of contract used for SPSS, each time USAID requires an evaluation or assessment, USAID issues a task order with a very specific statement of work that has clear deliverables and deadlines. The contractor is paid only after USAID accepts that the deliverable meets the required quality standards, which is why these fixed price contracts are low risk to USAID and maximize USAID's ability to control costs.

SPSS visited over 300 project sites funded by USAID in Somalia in its first year of operation to monitor progress achieved and to verify compliance with USAID regulations. SPSS developed a comprehensive set of monitoring tools to investigate everything from construction processes to beneficiary perceptions of assistance provided to them. Findings from site visits have led to numerous changes by USAID in infrastructure design, training methodologies, and other aspects of program implementation that will improve the results achieved with each taxpayer dollar invested in Somalia. Similarly, when MEPS reported that girls were not using the bathrooms built in the schools because they were too close to the boys' latrines, USAID changed school designs to ensure that toilets for girls and boys were constructed at an appropriate distance from one another. Likewise, when MEPS observed Transition Initiatives for Stabilization (TIS) community planning sessions, they noted that although women were present in the sessions, they felt shy to air their needs in such a public forum. To encourage more female participation, TIS hired a female gender specialist as a facilitator for its remaining planning sessions. Within the framework of each planning session, this gender specialist held a session for women only in which women could share their thoughts in a safe and welcoming environment. This led to increased women's input into TIS interventions.

SPSS is completing a baseline assessment for Strengthening Somali Governance and SYLI Phase 2, so that actual changes resulting from USAID investments can be measured over time. It is also performing a final performance evaluation of TIS, so that USAID can incorporate lessons learned from the past five years into the new TIS+ contract. Furthermore, SPSS is conducting a final performance evaluation for PEG to incorporate lessons learned into the new economic growth activity.

USAID greatly values the lessons learned to date in its third-party monitoring and verification activities, many of which are captured in the audit report. The lessons learned contributed to the comprehensive and successful monitoring and evaluation contract – Somalia Program Support Services (SPSS).

Recommendation 1. *We recommend that USAID/East Africa implement a plan to provide supervisory oversight to Contracting Officer's Representatives in charge of managing its monitoring programs in Somalia.*

The Mission agrees with this recommendation and confirms that supervisory oversight is provided to the Monitoring and Evaluation (M&E) Advisor position by the Somalia Office Program Officer. The M&E Advisor also serves as the Contracting Officer's Representative (COR) and is overseen in that capacity by the Contracting Officer for the MEPS contract.

The M&E Advisor recently left the Mission, and until the position is refilled with an equally qualified candidate, the Senior Program Advisor will serve as COR for the SPSS contract, supported by the technical expertise of an experienced M&E Fellow hired through the Policy Planning and Learning M&E Cap contract.

Attached is a copy of the M&E Advisor job description and COR designation letter evidence that corrective action has been taken.

Based on these actions, the Mission requests that this recommendation be closed.

Recommendation 2. *We recommend that USAID/East Africa train the staff responsible for managing its Somalia programs about the monitoring and evaluation resources available to them.*

The Mission agrees with this recommendation and confirms that all Somalia Office staff have been trained and are deemed adequately aware and knowledgeable about monitoring and evaluation resources available to them. The Mission has offered training to staff since March 2013 when a new, qualified M&E Advisor was hired. Presentations on the services offered by the Somalia Program Support Services (SPSS) contract have been provided in several Somalia Office staff meetings in the year since its award, and in each Implementing Partners' (IP) quarterly meeting held (three IP meetings to date). The International Business and Technical Consultants Inc. (IBTCI) also made presentations on the monitoring and verification (M&V) methodology employed under SPSS, and provided detailed debriefs on findings from M&V Rounds 1 (January-February 2015), 2 (March-May 2015), and 3 (June-August 2015).

Attached are copies of selected training materials and meeting agendas as evidence of corrective action taken on this recommendation. Based on these actions, the Mission requests that this recommendation be closed.

Recommendation 3. *We recommend that USAID/East Africa obtain written acknowledgement from International Business & Technical Consultants Inc. that all deliverables are understood during the implementation of monitoring and evaluation activities under the Somalia Program Support Services award.*

The Mission agrees with the intent of this recommendation and confirms that the corrective action recommended is already in place and hence no new action is necessary. The contract between IBTCI (the Contractor) and the U.S. Government is a binding document, and upon signature, the Contractor is agreeing to all the terms of the contract, including deliverables. In essence, signing of the contract is written acknowledgement of the deliverables. The contract also states the points of contact, including the Contracting Officer (CO) and Contracting Officer's Representative (COR), should the Contractor have any questions they wish to discuss. Additionally, a post-award meeting was held with IBTCI for the Somalia Program Support Services (SPSS) contract on October 2, 2014 to introduce the Contractor to relevant parties including the CO and COR, and to orient the Contractor with the provisions and requirements of the contract.

Based on these corrective actions, the Mission requests that this recommendation be closed.

Recommendation 4. *We recommend that USAID/East Africa give International Business & Technical Consultants Inc. a written outline of its management structure to ensure familiarity.*

The Mission agrees with the intent of this recommendation and confirms that the corrective action recommended is already in place and hence no further action is necessary. The COR Designation Letter, which is always provided to a contractor each time a new COR is designated

by the CO, clearly outlines USAID's management structure necessary for proper implementation of the contract. The designation letter also includes the respective responsibilities and authorities of the CO and the COR. Such a letter was provided to IBTCI for the MEPS contract on April 18, 2011.

Attached is a copy of the COR's designation letter provided to IBTCI. Given that no further corrective action is required, the Mission requests that this recommendation be closed.

Recommendation 5. *We recommend that USAID/East Africa identify a contracting officer's representative for the Somalia Program Support Services award who has, or can be taught, the skills needed to manage the program effectively.*

The Mission agrees with this recommendation. A highly experienced M&E Advisor served as COR for the Somalia Program Support Services (SPSS) contract for its first year of operation. The COR recently left the Mission. The Senior Program Advisor, who has 20 years of USAID experience, will serve as the interim COR for the SPSS contract until an equally qualified candidate is hired. The interim COR is supported by the technical expertise of an experienced M&E Fellow hired through the PPL M&E Cap contract.

The recruitment of a new M&E Advisor who will serve as COR for the SPSS contract is in process and is expected to be on board by March 31, 2016.

Based on current and projected staffing for M&E management, the Mission requests that this recommendation be closed.

Recommendation 6. *We recommend that USAID/East Africa implement a monitoring plan that includes reviews of award deliverables to confirm that International Business & Technical Consultants Inc. is meeting its deliverables under Somalia Program Support Services.*

The Mission agrees with this recommendation and confirms that the corrective action recommended is already in place and hence no further action is necessary. The SPSS activity is contracted as a fixed priced Indefinite Delivery Indefinite Quantity (IDIQ) contract. Each task order awarded under the IDIQ has defined deliverables with due dates that are attached to a payment schedule mutually agreed upon by USAID and IBTCI. IBTCI is only paid for deliverables that fully meet the requirements of the task order, as well as the quality standards outlined in the base IDIQ. Attached is a copy of the SPSS IDIQ.

Given that no further corrective action is required, the Mission requests that this recommendation be closed.

Recommendation 7. *We recommend that USAID/East Africa offer training to USAID staff to boost awareness, participation, and cohesiveness between USAID staff managing programs in Somalia and the Somalia Program Support Services award.*

The Mission agrees with this recommendation and started implementation in March 2013 when a new, qualified M&E Advisor was hired. Presentations on the services offered by the Somalia

Program Support Services (SPSS) contract have been provided in several Somalia Office staff meetings in the year since its award, and in each Implementing Partners' (IPs) quarterly meeting held (three IPs meetings, to date). IBTCI made presentations on the monitoring and verification (M&V) methodology employed under SPSS, and provided detailed debriefs on findings from M&V Rounds 1 (January-February 2015), 2 (March-May 2015), and 3 (June-August 2015).

Attached are copies of selected training materials and meeting agendas as evidence of corrective action taken on this recommendation. Based on actions already taken, the Mission requests that this recommendation be closed.

Recommendation 8. *We recommend that USAID/East Africa define standard operating procedures for the use of the clearinghouse, which includes roles, responsibilities, and time frames.*

The Mission agrees with this recommendation. After several months of careful review, both internally and with its partners, it was determined that the CH was not an effective management tool and a management decision was made to cease operation of the Clearinghouse (CH) at the end of June 2015. In addition to operational inefficiencies and difficulties of implementation, the cost of keeping the CH functioning was over \$25,000 per month. The cost of modifying the CH to make it more useful/relevant would have been prohibitive due to its original design, which required programmers to make even the smallest changes.

Given that the Agency is currently moving to AIDTracker Plus and a Development Information System, the Office decided to migrate all performance data in the CH to Microsoft Excel in preparation for later migration to the new systems. Roles and responsibilities for maintenance of this performance indicator Excel spreadsheet, in the meantime, are clearly defined in the Monitoring, Verification and Reporting task order that was awarded to SPSS on August 7, 2015. The cost to maintain this Excel spreadsheet should be about 1/10th the cost of maintaining the CH.

SPSS quarterly reports now have red, yellow and green flags from each monitoring and verification (M&V) site visit that AORs/CORs must respond to within 15 working days. The Senior Program Adviser and IBTCI review these responses and raise concerns with the Deputy and Office Chief for resolution.

Given the Clearinghouse is no longer in use and that the standard operating procedures are in place, the Mission requests that this recommendation be closed.

Recommendation 9. *We recommend that USAID/East Africa develop and issue a mission order that is relevant to monitoring needs for programming in Somalia.*

The Mission agrees with this recommendation. The Somalia Office is currently part of USAID/Kenya and East Africa (KEA) Mission, which was established and approved in May 2015. Previously, the Somalia Office was a part of the USAID/East Africa Mission. As such, USAID/KEA Monitoring and Evaluation Mission Orders will be developed, in close consultation

with the Somalia Office by March 31, 2016 and specific attention will be made to monitoring and evaluation in non-permissive and restricted environments.

Recommendation 10. *We recommend that USAID/East Africa work with International Business & Technical Consultants Inc. to evaluate possible conflicts of interest caused by subcontractor relationships and document its resolution of those conflicts.*

The Mission agrees with this recommendation and confirms that USAID has a legal obligation to work closely with its prime contractors on conflict of interest matters. The prime contractor has an obligation to make sure that conflict of interest rules and regulations “flow down” to its subcontractors. In this instance, the MEPS IDIQ contract included the necessary conflict of interest clauses, which should have “flowed down” to Ecotech. Due to the conflict of interest issues experienced under MEPS, USAID has included more explicit conflict of interest special clauses in the new SPSS contract beyond the standard language required by CIB 99-17. See H.26 of the attached SPSS Contract.

Based on these actions taken, the Mission requests that this recommendation be closed.

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