



# OFFICE OF INSPECTOR GENERAL

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## AUDIT OF USAID/GHANA'S PARTNERSHIP FOR ACCOUNTABLE GOVERNANCE IN EDUCATION PROJECT

AUDIT REPORT NO. 7-641-13-004-P  
July 22, 2013

DAKAR, SENEGAL



*Office of Inspector General*

July 22, 2013

**MEMORANDUM**

**TO:** USAID/Ghana Mission Director, Cheryl Anderson

**FROM:** Regional Inspector General/Dakar, Abdoulaye Gueye /S/

**SUBJECT:** Audit of USAID/Ghana's Partnership for Accountable Governance in Education Project (Report No. 7-641-13-004-P)

This memorandum transmits our final report on the subject audit. We have considered carefully your comments on the draft report and have included them in their entirety (without attachments) in Appendix II.

The report contains eight recommendations to help USAID strengthen its education project in Ghana. Based on management's comments on the draft report, we acknowledge that management decisions have been reached on all recommendations.

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 all eight recommendations.

I want to express my sincere appreciation for the cooperation and courtesy extended to my staff during the audit.

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# SUMMARY OF RESULTS

According to a report issued by USAID/Ghana in November 2012, roughly half of all Ghanaian students fail their basic education<sup>1</sup> completion exam, and the quality of education in the West African nation is poor.

To help the Ghanaian Government improve the educational system, USAID signed a 3-year, \$8.25 million agreement with Cooperative for Assistance and Relief Everywhere (CARE) in June 2010 to implement the Partnership for Accountable Governance in Education project. Its objective was to help more students succeed through strengthened school governance and supervision activities in targeted districts by working with various stakeholders<sup>2</sup> through the Ghana Education Service. The project was implemented in 46 of Ghana's 216 districts and supports several activities under four components:

- Stakeholder outreach.
- Collaboration and development of district-specific frameworks for education governance and supervision.
- Improvement of school supervision through training circuit supervisors and head teachers.<sup>3</sup>
- Building capacity of school management committees (SMCs) and parent-teacher associations (PTAs).

According to CARE, the project was designed on the hypothesis that if education leadership and management improve through accountable, transparent governance systems, and school supervision is strengthened, then the performance of students at the basic level will improve. This required working closely with the Ghana Education Service to build the capacity of district officials, especially circuit supervisors and head teachers, and other employees so they could work more effectively and efficiently.

The audit's objective was to determine whether USAID/Ghana's education program is on track to improve student achievement in basic schools through strengthened educational governance and supervision. The audit determined that it was not. The delayed signing of a memorandum of understanding between CARE and its subpartner, the Ghana Education Service, set activities back by more than a year, and that affected the program's first- and second-year results (page 4). For example, CARE did not train any of the 3,680 head teachers as scheduled in fiscal year (FY) 2011, and it started implementing activities without a proper work plan or input from the districts where these activities were taking place.

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<sup>1</sup> Basic education covers 11 years of school at no cost.

<sup>2</sup> The stakeholders are district assembly and education officials, head teachers, civil society organizations, school management committees, and parent-teacher associations.

<sup>3</sup> Circuit supervisors are assigned by district education offices to monitor and supervise schools to improve students' work. They assign head teachers and teachers. Head teachers are school administrators or principals. They manage the teaching and learning activities in their school, and their roles and responsibilities include staff development.

The audit found the following additional problems.

- Data was not always accurate, reliable, or adequately supported (page 5). Some of results for fiscal years 2011 and 2012 changed several times during the audit, indicating that data were not reliable.
- Head teachers at the schools visited were not using all the supervision and monitoring techniques that they learned in training provided by the program (page 6). Neither CARE nor the mission made sure the head teachers were able to apply the skills they had acquired.
- CARE incorrectly attributed and computed its cost-share contributions (page 7). As a result, CARE did not give the correct amount of funds and in-kind contributions to the program.
- The program's performance management plan (PMP) lacked performance indicators that measured outcomes (page 8). It also did not have reference sheets that defined indicators clearly. This affected CARE's understanding and reporting of the program's results.

To address the weaknesses noted, the report recommends that USAID/Ghana:

1. Require Cooperative for Assistance and Relief Everywhere to revise the implementation work plan for the districts where the program is being implemented and verify that activities are carried out in a logical, timely manner (page 5).
2. Require Cooperative for Assistance and Relief Everywhere to implement a process to make sure that feedback it receives from district offices is documented, acted upon, and resolved in a timely manner (page 5).
3. Implement policies and procedures to include data verification as part of performance monitoring site visits (page 6).
4. Require Cooperative for Assistance and Relief Everywhere to implement a plan to confirm that appropriate supervision and monitoring techniques are used in schools where head teachers received supervision and monitoring training, and document the results (page 7).
5. Determine the allowability of \$384,085 in questioned cost-sharing contributions and recover from Cooperative for Assistance and Relief Everywhere any amounts determined to be unallowable (page 8).
6. Review Cooperative for Assistance and Relief Everywhere's other cost-share contributions, disallow any contributions deemed inappropriate, and implement a plan that requires the partner to pay its share by the end of the project (page 8).
7. Revise its performance management plan for the Partnership for Accountable Governance in Education project to include performance indicators that measure intended project outcomes (page 9).
8. Review the performance monitoring plan for the Partnership for Accountable Governance in Education project, and confirm that all indicators are defined clearly and have reference sheets (page 10).

Detailed results appear in the following section, and the scope and methodology appear in Appendix I. Management comments appear in their entirety in Appendix II, and our evaluation of management comments is included on page 11 of the report.

# AUDIT FINDINGS

## **CARE Rushed Some Activities to Make Up For Late Start**

Project activities were scheduled to start in June 2010 when USAID/Ghana and CARE signed a cooperative agreement. According to the work plan, CARE was to work with the Ghana Education Service and Ministry of Education that month to help implement project activities. Officials from the program and the education service were supposed to sign a memorandum of understanding and launch the program in July 2010.

However, many problems affected implementation and results, as described below.

**Program Started Late.** Under its subagreement with the education service, CARE was to rely on host-country systems and resources to implement project activities. Therefore, the education service was to carry out the activities, which included town hall meetings in selected communities, school performance appraisal meetings, capacity-building activities, and radio programs. In addition, CARE was to use government systems to pay for activities in the districts by providing the education service with funds; these funds would then be transferred to the 46 districts using the service's existing systems for activity implementation.

According to CARE officials, however, officials at the education service had other priorities that prevented them from dedicating the time and resources needed to review the terms of the subagreement and sign it until June 7, 2011, 12 months after the program started. During that time, mission officials said, CARE made good efforts by laying the foundational and preparatory work for PTA and education administrators' training.

The education service director and his chief accountant said the delays occurred because district accountants needed to be trained on how to keep proper records for the project and how to account for disbursement of funds for project activities. In addition, education service officials said they had to be sure the rural bank they were working with had the capability to receive and disburse project funds as needed, and this took a lot of time.

The program's former agreement officer's representative (AOR) said the mission made many attempts to get the subagreement signed, including hosting weekly meetings with the education service and CARE officials to provide them with needed support to ensure timely implementation. Mission officials attributed the delays to disagreements over the tools the education service would use to transfer funds to the districts.

As a result, 28 of the 39 activities slated for implementation in the first year were delayed; others were not fully implemented or not implemented at all. The program could not train any of the 3,680 head teachers it planned to train in FY 2011 and was able to support only 870 out of 3,680 PTAs or similar entities that it was supposed to help. It was able to train 1,434 out of a target of 5,080 administrators and officials.

The project had similar problems in FY 2012.

**Activities Were Rushed.** After the subagreement was signed late, CARE tried to make up for lost time. Districts were asked to implement too many activities at once with little time to adequately plan for them. In addition, people in some districts we visited said CARE did not respond to their requests to replace community outreach programs with radio programs so they could reach a wider audience on topics of general concern to the population

The problems occurred primarily because CARE did not work with districts to make sure the activities still met their needs and that they had enough time to plan and implement them. Additionally, the AOR for the program did not make sure that CARE had revised its work plans once the subagreement with the Ghana Education Service was finally signed.

Because of these problems, the activities in some communities had little impact. To resolve these problems, we make the following recommendations.

***Recommendation 1.** We recommend that USAID/Ghana require Cooperative for Assistance and Relief Everywhere to revise the implementation work plan for the districts where project implementation is taking place and confirm that activities are implemented in a logical, timely manner.*

***Recommendation 2.** We recommend that USAID/Ghana require Cooperative for Assistance and Relief Everywhere to implement a process to confirm that feedback from district offices provided to its officials is documented, acted upon, and resolved in a timely manner.*

## **Some Data Were Not Accurate, Reliable, or Supported Adequately**

According to Automated Directives System (ADS) 203.3.11.1, high quality data are crucial for making decisions. To be useful for monitoring and credible for reporting, data must be valid, accurate, precise, reliable, and timely. ADS 203.3.2 further states that performance monitoring links and informs all aspects of the program cycle, from the country development cooperation strategy to program design and implementation and evaluation. Program managers and development objective teams analyze performance by comparing actual results achieved with targets set at the beginning of a program or activity. This helps them track progress.

The audit judgmentally tested the results for 23 of the 37 activities implemented in FY 2012 in the five districts visited. We found that data from 9 were not accurate, reliable, or supported adequately.

- Although CARE reported to have trained 73 head teachers in Ga East in its 3-day course in FY 2012, the data it provided showed that only 26 attended 2 days of training, and no attendance sheet was available for the third day.
- Although CARE reported to have conducted 2 days of SMC/PTA trainings in Ga East with 250 participants, the implementer did not maintain any documentation of them.
- For the SMC/PTA training held in Mfansteman, we were able to validate only 120 of 128 participants reported.

- For the SMC/PTA training held in Savelugu Nanton District, CARE reported to have trained 597 participants; however, our testing of the supporting documents identified 784 participants.
- For the 2-day SMC/PTA training held in July 2012 in Ga South, the same participants were supposed to attend both days. CARE's records showed 165 participants. However, we were able to verify only 72 participants for the first day and 137 for the second day.
- For the SMC/PTA training held in October 2011 in Ga South, the number of participants according to CARE's records was 178. However, we were able to verify only 80 participants for the first day and 20 for the second day.
- According to CARE's records, 216 people came to the town hall meeting in Mfansteman; however, we were able to verify only 206.
- CARE reported that 232 people participated in a community activity in Savelugu Nanton. However, district officials said the activity was not yet carried out.
- For the head teachers training held in Mfansteman, CARE said 127 people attended, yet we found that 135 attended.

In general, officials did not maintain adequate records in the district offices we visited. Records were not readily available, and it took a lot of effort to validate the data in them. At several districts, we found that training attendance sheets were not always dated and did not always include the title of the training held.

This situation occurred because the mission and CARE did not provide adequate monitoring to confirm the integrity of reported data. In fact, when we asked the district officials whether anyone from the mission or CARE had visited them or performed similar data verification by tracing the numbers reported to the source documents, they all said no. On several occasions, CARE could not replicate historical data. Our requests for CARE to generate the same data at different periods during the audit yielded different results each time, which indicated that CARE did not have a reliable monitoring and evaluation system.

Without reliable data, it is difficult to assess the progress of the program accurately and determine whether it is meeting its intended targets. Therefore, we make the following recommendation.

***Recommendation 3.*** *We recommend that USAID/Ghana implement policies and procedures to include data verification as part of performance monitoring site visits.*

## **Supervision and Monitoring Techniques Were Not Implemented**

A component of the project sought to improve school monitoring and supervision by providing circuit supervisors and head teachers with capacity-building training to help them monitor schools better and also to provide effective supervision and support related to school quality and student achievement. After the training, the head teachers were expected to apply what they learned at their respective schools with supervision from circuit supervisors.

Although head teachers and circuit supervisors whom we met during this audit had attended training put on by CARE and found it useful, the monitoring and supervision techniques they learned in those trainings were either only partially implemented at their respective schools or not at all. Moreover, during our visits to some school, we did not see any evidence that CARE or mission officials had made sure the techniques were used after the training.

The head teachers explained that for implementation of school monitoring and supervision methods to be effective, the teachers they supervise would need to be trained as well. However, this was not done because, according to the mission, it would have been cost-prohibitive to do so and it was not part of the project design. Additionally, the districts' limited budgets did not cover such expenses.

The head teacher at the Lower Town Municipal School in Mfansteman said she implemented some aspects of the techniques. But to do so fully would take at least 2 full days of training, and that would mean reimbursing teachers for transportation and meals for those days. She said she explained this to the staff in the municipal education office that was in direct communication with CARE, but did not receive a response. The principal of a school in the Northern Region had similar problems and had not implemented any of the techniques due to lack of funds even though she found the tools and skills useful.

These problems occurred because mission and CARE officials did not make sure that the head teachers and supervisors were using what they learned in Agency-funded training. District officials said they told the project official responsible for the district of the challenges they were facing but never got a response on how to resolve them. Additionally, CARE officials said they did not budget for monitoring at the schools because they expected the education service would handle that—even though they did not provide the service with direction or funding to do so.

As a result, an estimated \$82,705 has been spent training 2,035 head teachers, but the effect has been limited. To address this situation, we make the following recommendation.

***Recommendation 4.** We recommend that USAID/Ghana require Cooperative for Assistance and Relief Everywhere implement a plan to confirm that head teachers are using the appropriate supervision and monitoring techniques learned in training, and document the results.*

## **Partner Incorrectly Attributed and Computed Cost-Share Contributions**

Per ADS 303.3.10, a cost share is the amount of resources an agreement recipient is expected to contribute to the program's total cost. ADS also states that recipients may satisfy cost-share requirements through in-kind contributions such as donated supplies, equipment, and other property. A recipient's cost-share contributions must be verifiable through its records. If a recipient does not meet its requirement, the mission's agreement officer has several options to address the situation: he or she can (1) apply the difference in actual cost share amount from the agreed-upon amount to reduce the amount of USAID funding for the following funding period, (2) ask the recipient to refund the difference to USAID when the award expires or is terminated, or (3) reduce the amount of cost share.

The mission and CARE entered into a cooperative agreement on June 3, 2010, with total funding of \$8.25 million. According to the agreement, CARE's cost-share was at least

\$833,333 or 10 percent of total activity costs for the 3-year project. However, the auditors noted that the criteria CARE used to compute part of its cost share to the project were inaccurate, overstated, and lacked supporting documentation. For example, CARE included time spent by Ghanaian Government employees at project activities sponsored by the mission as part of its cost-share contribution. However, CARE did not incur any of the \$384,085 costs associated with training those employees.

Mission officials expressed concern about how CARE was accounting for its cost-share contributions and noted that a review of them would be appropriate to verify compliance with USAID guidance. According to CARE, its contributions as of February 15, 2013, were \$774,752.

The agreement officer said that though the mission revised the amount of cash CARE was expected to contribute to include in-kind contributions also, CARE had to comply with U.S. Government guidelines. These include Title 22 of the U.S. Code of Federal Regulations 226.23, which states that cost-sharing contributions must be verifiable from the recipient's records and allowable under the applicable cost principles.

This problem occurred because CARE misinterpreted USAID's cost-sharing guidance and was not willing to work with mission officials to resolve it, nor did CARE maintain documentation to support its contributions. Although the project's AOR expressed her concerns about how CARE was attributing and calculating the contributions, CARE officials insisted the calculations were accurate and made no attempt to revise them.

A partner's cost-sharing contributions are key to the U.S. Government's international development efforts, and the Ghanaian people cannot fully benefit if CARE does not contribute its share. Therefore, to address this situation, we make the following recommendations.

***Recommendation 5.*** We recommend that USAID/Ghana determine the allowability of \$384,085 in questioned cost-sharing contributions and recover from Cooperative for Assistance and Relief Everywhere any amounts determined to be unallowable.

***Recommendation 6.*** We recommend that USAID/Ghana review Cooperative for Assistance and Relief Everywhere's other cost-share contributions, disallow any contributions deemed inappropriate, and implement a plan that requires the partner to contribute its share by the project's end date.

## **Performance Management Plan Was Not Complete**

According to ADS 203.3.2:

Performance monitoring is the ongoing and routine collection of performance indicator data to reveal whether desired results are being achieved and whether the implementation is on track . . . Data for performance indicators are collected periodically and analyzed in order to inform judgments about the characteristics and outcomes of programs and projects as a basis to improve effectiveness, and/or inform decisions about current and future programming. . . . Performance indicators are the basis for observing progress and measuring actual results compared to expected results. Performance indicators help answer the extent to which USAID is progressing towards its objective(s).

However, the audit identified the following deficiencies with the mission's PMP for the project.

**Lack of Performance Indicators.** Despite the Agency's focus on managing for results, the mission's PMP did not contain performance indicators that measured progress. For example, the outcome indicators *Percentage of P1-3 (grades 1 to 3) pupils who demonstrate progress toward achieving Ghanaian language literacy* and *Percentage of P1-3 (grades 1 to 3) pupils who demonstrate progress toward achieving English language literacy* were measured only at the beginning and end. USAID officials said CARE did not measure them annually because the measurement is complex and costly, and the results would not reflect meaningful change or impact on an annual basis.

However, the objective of the project audited was "Improved student achievement in basic schools through strengthened educational governance and supervision." Therefore, without performance indicators that measured student performance in a timelier manner, the mission did not have the necessary information to evaluate the effectiveness of the project and adjust it as needed. Therefore, we make the following recommendation.

**Recommendation 7.** *We recommend that USAID/Ghana revise its performance management plan for the Partnership for Accountable Governance in Education project to include performance indicators that measure intended project outcomes annually.*

**Lack of Indicator Reference Sheets With Clearly Defined Indicators.** USAID's *Performance Monitoring and Evaluation Tips Number 12: Guidelines for Indicator and Data Quality*, 1998 edition, says:

An indicator is objective if it is unambiguous about (1) what is being measured and (2) what data are being collected. Objective indicators have clear operational definitions that are independent of the person conducting the measurement . . . Performance indicators should be framed and defined in clear terms so as not to be open to broad and varied interpretation by sector specialists.

According to ADS 203.3.4.3, as part of the PMP, "Precise indicator definitions, data sources, and data collection methodologies should be captured in the Performance Indicator Reference Sheet." An indicator reference sheet includes a "precise definition" of each indicator to avoid misinterpretation. It also includes data source and collection methodology for each indicator.

However, the audit found that CARE had misinterpreted and inaccurately reported results for *Number of administrators and officials trained* and *Number of Teachers/Educators trained with USG assistance* for FY 2012.

For the first indicator, CARE initially reported that it trained 436 administrators and officials. However, during the audit CARE officials said they misinterpreted "administrators" and wanted to revise their results from 436 to 3,533. This represents a 710 percent increase. Similarly, for the second indicator the partner revised FY 2012 results from 1,461 to 2,035, representing a 39 percent change in results.

According to CARE, it was only after project officials attended a meeting with the mission in August 2012 that they realized they had misinterpreted these two key indicators. However, it still miscalculated results for FY 2012 and did not submit revised ones until November 2012.

The audit found that this problem occurred because the PMP that the mission approved did not include a complete list of indicators and reference sheets for many key indicators that the project reported to the mission, which in turn included in its annual reports to USAID/Washington. In fact, only five of the nine standard indicators were included in the PMP. Because the indicator reference sheets—which clearly defined the project’s indicators—were not included in the PMP, CARE misinterpreted the meaning of some of its indicators.

Without a complete PMP that includes clear indicator definitions, the mission may be relying on data from CARE that are not accurate or reliable, and it cannot effectively assess the progress of this program. Therefore, we are making the following recommendation.

***Recommendation 8.*** *We recommend that USAID/Ghana review the performance management plan for the Partnership for Accountable Governance in Education project to make sure all indicators are defined clearly and have reference sheets, and document the results.*

# EVALUATION OF MANAGEMENT COMMENTS

In its comments on the draft report, USAID/Ghana believes that the audit report provides a fair representation of the status of the project, and management decisions have been reached on all recommendations.

We have addressed the mission's comments in the final audit report as deemed appropriate to reflect the foundational and preparatory work that CARE performed during the delayed start-up, the scope of data tested, and the fact that teacher training was not part of the project design.

The mission gave us the attendance sheets for four of the nine items listed under the finding "Some Data Were Not Accurate, Reliable, or Supported Adequately." Although the attendance sheets for two of the four items were fully supported, we did not remove them from the finding in the final report because the supporting documents should have been available during the audit.

A detailed evaluation of management comments follows.

**Recommendation 1.** USAID/Ghana's implementer, CARE, is already reviewing the implementation work plans in conjunction with district officials, Ghana Education Services, and district assembly representatives for districts where the project is taking place to confirm that activities planned have reasonable time frames. In addition, CARE is going to establish a schedule to compare progress with the scheduled plans. The target date for the review is September 30, 2013. As a result, we acknowledge that a management decision has been reached on Recommendation 1.

**Recommendation 2.** USAID/Ghana will work with CARE to review its current project implementation management tool, which is used to manage feedback from the district offices. The mission also will work with CARE and the education service to find additional ways to obtain and manage feedback. The target date for this action is September 30, 2013. As a result, we acknowledge that a management decision has been reached on Recommendation 2.

**Recommendation 3.** USAID/Ghana has plans in place to include stronger components of data quality review in monitoring visits. It will also work with CARE to establish policies and procedures to include data verification as part of performance monitoring site visits. The target date for this action is October 30, 2013. Therefore, we acknowledge that a management decision has been reached on Recommendation 3.

**Recommendation 4.** USAID/Ghana will work with CARE to boost current monitoring and oversight processes for CARE and the Ghana Education Service to build capacity and address accountability problems throughout the project. CARE also will review its current implementation plan of its monitoring and supervision tools to find how the plan could be enhanced to make sure supervisors are using the tools they're getting in training. The target date for this action is September 30, 2013. Therefore, we acknowledge that a management decision has been reached on Recommendation 4.

**Recommendation 5.** USAID/Ghana will work with CARE to recover \$384,085 in cost-sharing

contributions. The target date for this action is October 31, 2013. Therefore, we acknowledge that a management decision has been reached on Recommendation 5.

**Recommendation 6.** USAID/Ghana will review CARE's other cost-share contributions and disallow any deemed inappropriate. It will implement a plan that requires CARE to make all of its contributions by the project end date. The target date for this action is September 30, 2013. Therefore, we acknowledge that a management decision has been reached on Recommendation 6.

**Recommendation 7.** USAID/Ghana agrees with this recommendation and will revise its PMP to include performance indicators that measure intended project outcomes. The target date for this action is October 31, 2013. Therefore, we acknowledge that a management decision has been reached on Recommendation 7.

**Recommendation 8.** USAID/Ghana has already begun a process of reviewing and consolidating mission-wide performance indicator reference sheets under its new country development cooperation strategy PMP, which will be used as a guide in working with CARE. USAID/Ghana will review the plan for the project and make sure all indicators are defined clearly and have reference sheets. The target date for this action is November 30, 2013. Therefore, we acknowledge that a management decision has been reached on Recommendation 8.

# SCOPE AND METHODOLOGY

## Scope

We conducted this audit in accordance with generally accepted government auditing standards. They require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions in accordance with our audit objective. We believe that the evidence obtained provides that reasonable basis.

The purpose of this audit was to determine whether USAID/Ghana's Partnership for Accountable Governance in Education project was on track to improve student achievements in basic schools through strengthened educational governance and supervision.

The audit focused on implementation activities in fiscal years 2011 and 2012. To implement the project, USAID/Ghana entered into a cooperative agreement with CARE for a 3-year period with an effective date of June 3, 2010, through June 2, 2013, for \$8.25 million, of which CARE agreed to provide cash and in-kind contributions of \$833,333. As of December 2012, USAID/Ghana had obligated \$7.4 million and disbursed \$4.9 million for this project. The audit tested \$4.2 million of the disbursements.

In planning and performing the audit, the audit team assessed the significant controls the mission used to manage its program and confirm that CARE was providing adequate oversight of project activities. The assessment included controls related to whether USAID had (1) reviewed progress and financial reports that CARE submitted, (2) conducted and documented periodic meetings with CARE and Ghanaian Government officials, and (3) performed documented visits to the activity sites. Additionally, the auditors examined the mission's fiscal years 2011 and 2012 annual self-assessments of management controls, which the mission is required to perform to comply with the Federal Managers' Financial Integrity Act of 1982, to determine whether the assessment cited any relevant weaknesses.

We conducted audit fieldwork from January 28 to February 15, 2013. We interviewed key staff members of the mission, CARE, Ministry of Education, and district offices. We conducted the audit at USAID/Ghana and CARE offices in Accra, and at district and municipal offices in Greater Accra, and Central and Northern Regions.

## Methodology

To answer the audit objective, we interviewed the USAID/Ghana's officials, CARE staff, and education service officials. We reviewed the funding mechanism that CARE and the education service used to fund activities in the 46 districts and reviewed CARE's cost-sharing contributions. We evaluated the mission's management and oversight, CARE's performance, and the effectiveness of the activities through interviews, site visits, and data validation detailed in the following paragraphs.

We conducted site visits in the Districts of Ga East, Ga South, Tolon-Kumbungu, Mfansteman, and Savelugu Nanton. We talked to district officials in charge of implementing activities about the project's impact on their school districts. In addition, we conducted data validation at each district's education headquarters. We traced the results reported for each district to the

supporting documents maintained at the headquarters. We also verified the funding that CARE transferred to the districts through the education service by tracing the amounts they received to the bank accounts set up for program implementation. The audit team visited schools and met with head teachers to identify the changes made in schools to improve the student achievements based on trainings received through the project. We also visited the classrooms and interacted with the students.

The results related to this testing are limited to the items tested and cannot be projected to the entire audit universe. However, we believe that our work provides a reasonable basis for our conclusions.

# MANAGEMENT COMMENTS



## MEMORANDUM

**To:** Abdoulaye Gueye, Regional Inspector General/Dakar

**From:** Cheryl Anderson Mission Director, USAID/Ghana

**Date:** June 11, 2013

**Subject:** RIG Draft Audit No. 7-641-13-00XP: Audit of USAID/Ghana's Partnership for Accountable Governance in Education Project

**REF:** RIG/Dakar Audit Report # 7-641-13-00X-P dated May 15, 2013.

This memorandum transmits USAID/Ghana's management comments to the recommendations contained in the subject Audit draft report. We take this opportunity to thank you for sharing the draft and giving us the opportunity to offer clarifications and the Mission's response. We also wish to extend our sincere appreciation for the professionalism of your audit team during the entire audit process including the field work. The exercise has provided USAID/Ghana with essential lessons that will result in significant program improvements. We greatly appreciate this opportunity to learn and share experiences to improve our PAGE project.

### I. General Comment

For the most part, the audit report provides a fair representation of the status of the project. The report documents majority of issues of which USAID/Ghana's Education Office was already aware. This refers in particular to the delays in start-up and the cost share issue. However, there are areas for which the findings could have had a more data-based analysis. This is especially in terms of the seeking different perspectives regarding activities at the district level. Also, to encourage good or better practice, the audit report could have benefitted from a more balanced analysis, providing examples of what is being done well and what should be expanded on in the project.

### II. Clarifications

In this section, the Mission provides clarifications to the general Audit Findings captured in the report.

**Project had implementation problems** – Given the delays in the signing of the MOU with the GES, mainly due to agreement on the type of district grant mechanism to be used with GES, PAGE was unable to meet the targets for the trainings for teachers and PTAs. However, there was good faith effort to get some work done (see Attachment I: *Milestones Achieved Prior to*

*District Grant Mechanism*) in terms of laying the foundational and preparatory work with regards to training of PTAs and Education administrators. Partnership with GES is one of the key foundations and milestones of PAGE. Working through GES is one of the innovative approaches to having lasting capacity development and retention within GES and to foster greater impact in education. However, the local government system has its own challenges, dynamics, complexities and bureaucracies that need studying, understanding and skillful navigation. USAID/Ghana appreciates the willingness of CARE and GES to try to accelerate some of the work after a long wait. An adjustment could have been to review and revise the project timeline at that point to account for time lost and for ensuring an adequate pace and progress of activities.

**Activities were rushed** - The process of identifying activities to be undertaken by each district and when to implement these activities, involved the participation of the districts. Districts initially developed their 15-month work plan with the participation of a 6-person team. This team comprised the District Director of Education (DDE), Head of Supervision, Accountant, Community Participation Coordinator (CPC), Budget Officer and M&E Officer from each district. During the work plan development workshop, districts outlined all activities to be conducted within the period per specific calendar quarters. The project did not prescribe the specific months and dates for district activities. The project personnel rather reminded District personnel to consider among other things, all other events (national/regional/school level events) that could affect their scheduling.

The Mission acknowledges that the 15-month district sub-grant work plans were not fully reviewed given the delay. However, the strategy has been to discuss and plan each tranche's activities with each district, for optimal implementation. (See Attachment II: *Report of Review Meeting – District and Regional*). With regards to the specific example of Tolon/Kumbungu and Ga South districts having been rushed into implementing activities against their preference, project records demonstrate funds were released to both districts on August 11, 2011, with implementation in both districts starting in October, 2011, two clear months after the receipt of funds. See Attachment III: *Bank statement for Ga South and Tolon; Activity reports*, showing when activities were started.

Regarding the audit finding that the “project doesn't allow flexibility for districts and denied request for changes to program plan without any reason,” there are project records of official communication from other districts to effect some changes to their work plans, with the exception of official communication from Ga South district.

Additionally, USAID/Ghana made several monitoring visits, including some by the new Education Office Director in October, 2011, when she visited Savegulu and Tolon districts. She held discussions with PTA and SMC members, headteachers, and the Tolon District Education Oversight Committee (DEOC). The DEOC meeting in particular shed light on the various issues the district is dealing with regarding education, what the committee is doing and there was a deep appreciation expressed by DEOC members, including the District Chief Executive, the DEOC Chair, for the efforts and in particular the flexibility and relevance of the PAGE project in that geographical region. This echoed the general sentiments communicated to USAID/Ghana from GES at central level. The views that the district personnel in the Tolon District, as documented in the audit report and during the auditor visit, were feeling pressed with no flexibility from CARE was not expressed or that impression provided at the time of the Education Office Director's visit, nor afterwards in discussions and check-ins between USAID and GES.

**Some data were not accurate, reliable or adequately supported** – The finding listing inconsistent data illustrates some issues with data, but does not provide a clear picture of the degree to which the data issues were encountered. The finding also does not provide examples of where the PAGE project did provide accurate, reliable, or adequately supported data. Were the nine examples provided a minority or a majority of the issues? Were there 20, 40, 60 examples of good or more ideal data practice as compared to these nine examples of less than ideal practice?

For some of the nine examples provided, there are specific clarifications.

See Attachment IV (multiple files):

- Bullet 2: SMC/PTA Training Ga East district took place in November 2011 and January 2012. Attached, Participant List confirming 250 participants at SMC/PTA Training in Ga East
- Bullet 3: Participant list for SMC/PTA training in Svelugu/Nanton for June 2012 and not December 2011
- Bullet 7: Participant List for Town Hall meeting in Mfantseman, confirming 216 participants
- Bullet 8: Participant list for Community Drama in Sevelugu/Nanton district. Activity took place in June 2012
- Bullet 9: The document was not clear in differentiating participants and resource persons (facilitators). A total of 127 headteachers attended the training in Mfantseman. The other nine were resource persons.

**Supervision and monitoring tools were not implemented** – The audit report (p. 8) cites the example of one headteacher claiming the monitoring and supervision training could have been more effective if the teachers had also been trained in the same rubrics. The PAGE project is not mandated to carry out teacher training, only headteacher and levels above, which are in charge of personnel supervision and monitoring. Including such training would have been cost prohibitive for the project. A challenge to development work today in Ghana is a bit of a culture of desire to attend trainings to supplement one's income or to "motivate" action. This said, the headteacher's recommendation is misplaced and inappropriate. GES would not fund such a training at such a large scale covering teachers (there are currently approximately 80,000 basic school teachers) when the training is specifically intended to reinforce headteacher and circuit supervisor personnel. This is why USAID, through the CARE PAGE project did not include direct teacher training in the design. Additionally, the Government of Ghana is providing a school level Capitation Grant to, among other things, enable headteachers to undertake such simple school based trainings.

### III. DISCUSSION

#### **RECOMMENDATION # 1**

*We recommend that USAID/Ghana require Cooperative for Assistance and Relief Everywhere to revise the implementation work plan for the districts where project implementation is taking place and ensure that activities are implemented in a logical and timely manner.*

Management Decision: Sustained

Status: CARE is already reviewing (May 14-June 11, 2013), in conjunction with district officials, GES and District Assembly representatives, the sub-grant implementation work plans for districts in which project implementation is taking place to ensure that the activities planned are along reasonable time frames, and to establish a schedule for check-ins with the districts to review progress against the scheduled plans.

Target Date:

District work plan review – September 30, 2013

#### **RECOMMENDATION # 2**

*We recommend that USAID/Ghana require Cooperative for Assistance and Relief Everywhere to implement a process to ensure that feedback from district offices provided to its officials are documented, acted upon and resolved in a timely manner.*

Management Decision: Sustained

Status: The Mission will work with CARE to review its current project implementation management tools, specifically looking for a tool that is being used to manage feedback from the district offices. The Mission will work with CARE and GES to examine and determine additional ways to capture and manage feedback from districts.

Target Date:

September 30, 2013

#### **RECOMMENDATION # 3**

*We recommend that USAID/Ghana establish policies and procedures to include data verification as part of performance monitoring site visits.*

Management Decision: Sustained

Status: USAID already has in place data verification processes as part of performance monitoring, but has plans in place to include stronger components of data and data quality review in monitoring visits. The Mission will work with CARE to establish policies and procedures to include data verification as part of performance monitoring site visits.

Target Date:

October 30, 2013

**RECOMMENDATION # 4**

*We recommend that USAID/Ghana require Cooperative for Assistance and Relief Everywhere to implement a plan to confirm that appropriate supervision and monitoring tools are implemented in schools where head teachers received supervision and monitoring training and document the results.*

Management Decision: Sustained

Status: The Mission will work with CARE to identify how to boost current monitoring and oversight processes, of both GES and the PAGE project in a way that helps build capacity and address accountability issues through the life of the project. CARE will review its current implementation plan of the monitoring and supervision tools to find areas in the plan where it might be enhanced to ensure that monitoring and supervision tools are being implemented by Circuit Supervisors.

Target Date:

September 30, 2013

**RECOMMENDATION # 5**

*We recommend that USAID/Ghana disallow and recover from Cooperative for Assistance and Relief Everywhere the amount of \$384,085 claimed in cost-sharing contributions.*

Management Decision: Sustained

Status: The Mission will work with CARE to recover the amount of \$384,085 claimed in cost-sharing contributions.

Target Date:

October 31, 2013

**RECOMMENDATION # 6**

*We recommend that USAID/Ghana review Cooperative for Assistance and Relief Everywhere's other cost share contributions and disallow any costs deemed inappropriate, and implement a plan that requires the partner to reach the life-of-project cost-sharing requirements by the project end date.*

Management Decision: Sustained

Status: USAID/Ghana will collaborate with CARE to review its other cost share contribution, disallow any costs deemed inappropriate, and implement a plan that requires the partner to reach the life-of-project cost-sharing requirements by the project end date.

Target Date:

September 30, 2013

**RECOMMENDATION # 7**

*We recommend that USAID/Ghana revise its performance management plan for the Partnership for Accountable Governance in Education project to include performance indicators that timely measure intended project outcomes.*

**Management Decision: Sustained**

**Status:** USAID/Ghana agrees with this recommendation. Since the inception of the PAGE project in 2009/2010, a variety of contextual and operational changes have occurred. Ghana's Education Sector Plan was approved in 2010 (ESP 2010-2020), USAID's Education Strategy was released in 2011 and USAID/Ghana's new Country Development Cooperation Strategy (CDCS 2013-2017) has been developed and approved. The Mission is currently updating and redesigning its PMP to conform to the new CDCS. A step in the process will be to review and update existing project PMPs, including for the PAGE project. The Mission will revise its performance management plan for PAGE to include performance indicators that timely measure intended project outcomes.

**Target Date:**

October 31, 2013

**RECOMMENDATION # 8**

*We recommend that USAID/Ghana review the performance monitoring tool for the Partnership for Accountable Governance in Education project and ensure that all indicators are clearly defined and it includes indicator reference sheets for all indicators.*

**Management Decision: Sustained**

**Status:** USAID/Ghana will communicate pertinent data indicator requirements to CARE and work with them to ensure the development of the necessary performance indicator reference sheets (PIRS). The Mission will review *the* performance monitoring tool for the PAGE project and ensure that all indicators are clearly defined and include indicator reference sheets for all indicators. The Mission has already begun a process of reviewing and consolidating Mission-wide PIRS under its new CDCS PMP and these will be used as a guide in working with CARE.

**Target Date:**

November 30, 2013

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