OFFICE OF INSPECTOR GENERAL

AUDIT OF USAID/SENEGAL’S EDUCATION PRIORITY QUALITY PROJECT

AUDIT REPORT NO. 7-685-14-002-P
JULY 9, 2014

DAKAR, SENEGAL
Office of Inspector General

July 9, 2014

MEMORANDUM

TO: USAID/Senegal Mission Director, Susan Fine

FROM: Regional Inspector General/Dakar, Abdoulaye Gueye /s/

SUBJECT: Audit of USAID/Senegal's Education Priority Quality Project (Report No. 7-685-14-002-P)

This memorandum transmits our final report on the subject audit. We have considered your comments on the draft report and included them in Appendix II.

The final report contains nine recommendations to help USAID/Senegal improve its Education Priority Quality Project. In its comments on the draft report, USAID/Senegal agreed with all nine recommendations. Having evaluated management comments, we acknowledge the mission’s management decisions on all recommendations, except Recommendation 3.

Please coordinate final action for all recommendations with the Office of Audit Performance and Compliance Division.

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

The following abbreviations appear in this report:

ADS  Automated Directives System
AOR  agreement officer’s representative
DQA  data quality assessment
FY   fiscal year
RIG  Regional Inspector General
RTI  Research Triangle Institute
SUMMARY OF RESULTS

The Government of Senegal has demonstrated a strong commitment to improving education. Its 10-year Education and Training Development Program (2001–2011) and assistance from international donors have increased access to education, partly because of rapid construction of new elementary and middle school facilities. Between 2005 and 2011, primary school enrollment rates soared from 79 percent to 93 percent, with a higher number of girls enrolling than boys. Also during this period, primary schools’ rates of in-grade retention (repeating a grade) and dropout fell, while promotion rates to middle school improved.

Despite these achievements, the quality of education in Senegalese schools remains troubling. A lack of qualified teachers leads many middle schools to rely on vacataires, or teachers lacking appropriate preservice training and professional orientation. Furthermore, Ministry of Education statistics show low levels of student achievement in the fundamentals: French and mathematics.

To help address these issues, in May 2010 USAID/Senegal awarded Research Triangle Institute (RTI) a 4.5-year, $19.8 million cooperative agreement to implement its Education Priority Quality Project.1 In September 2011, the mission increased the total estimated cost of the award by nearly $300,000 to add a component, but decreased it by approximately $4.4 million in September 2013 to $15.8 million to eliminate work planned in two geographic areas and limit planned renovation activities. The project was scheduled to end in September 2014. As of November 30, 2013, cumulative obligations totaled $12.1 million, and disbursements totaled $11.2 million.

RTI designed the project to support USAID/Senegal and the Government of Senegal’s objective of “better educated youth by improving the quality of basic education for middle school aged youth.” To reach this objective, RTI implemented its activities through five components meant to (1) revitalize and regionalize teacher preparation and professional development, (2) engage community members in school management, (3) strengthen students' basic skills in reading and math, (4) mobilize and create opportunities for youth, and (5) provide training to children with disabilities.

The Regional Inspector General/Dakar (RIG/Dakar) conducted this audit as part of its fiscal year (FY) 2013 audit plan. The audit’s objective was to determine whether the project has been successful in improving the quality of education in supported schools.

The project’s activities produced mixed results. Some activities improved the quality of middle school education in Senegal, as noted below.

Regional Training Center Decree. To make teacher training available outside Dakar, the capital, the project helped draft a presidential decree that established 14 regional training centers throughout Senegal. The decree made the centers responsible for providing preservice and continuing training to middle school teachers.

1 Although the project is commonly known as Education Priority Quality (or its French equivalent, Education Priorité Qualité), USAID/Senegal awarded the cooperative agreement under the name Improving Education Quality in Senegal.
**Teacher Performance Standards.** To create a professional development program for teachers, the project revised a set of teacher performance standards produced under a prior USAID/Senegal project. The standards outline the criteria and indicators to measure a teacher’s proficiency in six domains: fundamental knowledge; understanding that the student is at the center of the learning process; professional practice; professional development; leadership; and ethics. The Ministry of Education validated the standards.

**Gender Integration Guides.** To promote a quality education for all learners and reduce sex-based disparities in middle school education, the project developed a gender integration guide that encourages gender equality in schools. The project also incorporated gender considerations into the Ministry of Education’s guidelines for teacher transfers and developed guidance on services and incentives needed to encourage the recruitment and retention of female teachers and the promotion of women to positions of responsibility in Senegalese schools, especially in rural areas.

**School Self-Assessment and Quality Improvement Plan.** To encourage accountability for the quality of schools, the project introduced the school self-assessment process. It helps a school identify its strengths and weaknesses, and calls on community members to provide input into a quality improvement plan. Several educators praised the self-assessment and quality improvement plan processes for encouraging community members to become active in the management of schools.

**Inclusive Education Guide.** To promote a quality education for all students, including those with a disability, the project developed an inclusive education guide for educators. This guide, the first of its kind in Senegal, helps educators identify and work with students who have a range of disabilities.

**Remediation.** Students demonstrating a lack of proficiency in middle school French and mathematics participated in a remedial program. Although the audit identified weaknesses in the implementation of this program, many middle school administrators and teachers said it helped reduce grade repetition and dropout rates, and increase promotion rates.

Despite these achievements, the audit also identified weaknesses in the project and in USAID/Senegal’s management of it:

- USAID/Senegal did not comply with some substantial involvement clauses in the cooperative agreement (page 5). For example, the mission did not review and approve some project plans and reports, provide more than minimal oversight, or respond promptly to requests from the implementing partner. Further, the agreement officer’s representative (AOR) did not perform or document actions delegated under the AOR designation letter, including monitoring cost sharing.²

- RTI included ineligible costs in its cost-sharing contribution (page 7). The costs, salaries for teachers of remedial courses, were paid by the Ministry of Education and were not on the list of approved cost-sharing items.

² According to USAID’s Automated Directives System 303.3.10, “Cost share refers to the resources a recipient [of an award—i.e., the implementing partner] contributes to the total cost of an agreement.”
• Design flaws and implementation weaknesses made some activities unsustainable (page 8). Teachers were reluctant to provide remedial instruction, which they often had to do on their own time, and students were reluctant to attend without the incentive of refreshments because in many places the remedial program was not made part of the regular school day. Further, the remedial program depended on short-term grants. Teaching entrepreneurship to youth did not work because trainees were too young to be eligible for credit to start businesses. Similarly, efforts to educate students with disabilities targeted the wrong demographic and produced no discernible results.

• Six regional training centers established under the project were not operating as envisioned (page 9). The training centers did not provide preservice training to middle school teachers as required. Renovation activities were delayed, and planned construction will not be completed.

• The remedial program fell far short of its goal (page 10). Some teachers in the partner schools did not understand the program, materials were inadequate, classes were too big because the number of students needing remedial instruction was bigger than anticipated, and the program started too late in the year to be part of the school day.

• Some reported results lacked sufficient documentation and did not meet USAID data quality standards of validity, integrity, and timeliness (page 12).

To address these issues, we recommend that USAID/Senegal:

1. Implement a plan requiring its technical offices to perform necessary management responsibilities, including maintaining adequate files (page 7).

2. Implement a plan to document its quarterly review of RTI's cost-share contribution. This review should include steps to request supporting documentation for the amount reported and to verify that the reported items comply with the agreed-upon elements for the project (page 7).

3. Determine the allowability of the $251,713 in ineligible questioned costs included in the project's cost-sharing contribution, and collect from RTI any amount deemed unallowable (page 7).

4. Require its partners to include in their periodic progress reports a discussion of the sustainability of activities (page 9). This discussion should identify any obstacles to sustainability and actions to address them.

5. In coordination with RTI, implement a plan to resolve the problems impeding operations of the regional training centers (page 10).

6. Notify the Ministry of Education, in writing, of its intention not to build regional training centers in project areas (page 10).

7. In coordination with RTI, develop clear, user-friendly documents for teachers and school administrators to use in carrying out the remedial course (page 12).
8. In coordination with RTI, implement a plan to retrain teacher trainers in the proper administration of the remedial course and its accompanying tool kit (page 12). This plan should include a schedule for carrying out additional teacher-retraining sessions.

9. In coordination with RTI, implement a plan to verify that the final results reported by the project comply with USAID data quality standards (page 14).

Detailed findings appear in the following section. Appendix I contains information on the scope and methodology. Mission comments are included in Appendix II, and our evaluation of them is on page 15.
AUDIT FINDINGS

USAID/Senegal Did Not Comply With Some Substantial Involvement Clauses

USAID’s Automated Directives System (ADS) 303.3.11 states, “An AOR will substantially be involved in the administration of a cooperative agreement to help the recipient achieve the agreement objectives.” It also defines the elements of substantial involvement in a cooperative agreement and requires that a mission formally outline any such anticipated involvement during an agreement’s period of performance.

The cooperative agreement between USAID/Senegal and RTI makes several such provisions to ensure the achievement of project and mutual objectives. These provisions include:

- Ongoing, close collaboration in the implementation of project activities. The principal mechanism for this involvement will be the review and approval of quarterly reports, annual work plans, and annual reports.

- Approval of a monitoring and evaluation plan with clear benchmarks and indicators.

The AOR designation letter\(^3\) further emphasizes the AOR’s responsibility to comply with the agreement’s substantial involvement clauses. This letter also gives the AOR certain financial management responsibilities, including the monitoring of cost-sharing requirements. Additionally, it underscores the importance of establishing and maintaining adequate AOR files:

> These files are your primary tools for carrying out your duties and responsibilities as the AOR for this cooperative agreement and provide documentation of your actions. Inadequate files will impede your or your successor AOR’s ability to manage the cooperative agreement and therefore may jeopardize the program for which it was awarded. These files also help successor AORs to understand your actions as AOR and the reasons behind such actions, as well as to have adequate files for audit purposes.

As discussed below, USAID/Senegal’s education team could not provide adequate evidence of performing some of these management responsibilities.

Ongoing, Close Collaboration in the Implementation of Project Activities

- **AOR review and approval of plans and reports.** USAID/Senegal did not document its review of quarterly and annual reports. Additionally, USAID/Senegal officials provided only provisional approval of the project’s FY 2013 work plan.

- **Oversight of activities.** RTI employees said that after the first AOR left in September 2011, USAID/Senegal officials provided limited oversight. Employees said the AOR made few

\(^3\) “Agreement Officer’s Representative (AOR) Designation – Cooperative Agreement Administration, An Additional Help for ADS Chapter 303.”
visits to the project sites, and the mission did not give feedback on quarterly progress reports. Moreover, USAID/Senegal officials poorly documented meetings and communications with the project managers. As a result, USAID/Senegal has an incomplete record of its management actions and decisions for the project.

- **Responsiveness.** USAID/Senegal officials did not respond promptly to RTI’s requests for acknowledgement of reports, incremental funding, an agreement modification, and meetings.

**Approval of a Monitoring and Evaluation Plan With Clear Benchmarks and Indicators.** In October 2012, RTI revised its monitoring and evaluation plan by updating some performance targets and introducing several new indicators. However, the plan has several significant deficiencies. Some indicators do not have precise definitions or methods of calculation. Others lack clear targets and baseline data. Still, RTI was using the plan, and although USAID knew of the problems, it had not approved the plan and did not help RTI fix the problems in a timely manner.

**Monitoring of Cost-Sharing Requirements.** USAID/Senegal officials did not maintain documentation showing that they monitored RTI’s progress toward meeting its cost-sharing requirement. Instead, mission officials made RTI staff responsible for ensuring its compliance with this requirement. A USAID/Senegal official said the mission would take appropriate actions if RTI does not meet it by the end of the project.

Staffing difficulties and the Agency’s shift in its education strategy hindered the mission’s oversight of the project. After the project began in May 2010, USAID/Senegal’s education office experienced high turnover, unexpected departures, and understaffing. Consequently, four AORs had overseen the project’s implementation at the time of the audit. At times, only two mission officials managed the education portfolio.

Then in February 2011 USAID released an updated education strategy that, for Senegal, emphasized improved reading skills in primary grades. This policy shift required an adjustment to ongoing projects. As a result, a USAID/Senegal official said that AORs did not have time to carry out, much less to document, management responsibilities.

Despite these obstacles, AORs knew what they were expected to do. In accepting the AOR role, they had the responsibility to perform the duties inherent to the position. Yet these officials did not adequately oversee some aspects of project implementation.

Adequate oversight of awards is crucial to ensure that USAID/Senegal implements its projects as planned and achieves optimal results. The lack of proper oversight increases risks to project achievement and links directly to the performance problems discussed in this report. Had USAID/Senegal officials provided more oversight, these problems could have been identified and addressed earlier.

The project was to end in September 2014. Actions to rectify these issues at this late stage may not influence the project’s overall results. However, to ensure that USAID/Senegal provides adequate oversight to ongoing and future projects, we make the following recommendation.
Recommendation 1. We recommend that USAID/Senegal implement a plan to ensure that its technical offices perform necessary management responsibilities, including maintaining adequate files.

Implementing Partner Included Ineligible Costs in Its Cost-Share Contribution

Besides defining cost share as a recipient’s contribution to the agreement’s total cost, ADS 303.3.10 states: “Cost share becomes a condition of an award when it is part of the approved award budget.” ADS 303.3.10.4 requires agreement officers to “review the applicant’s proposed cost-share contributions for cost realism.” It further explains that since cost share applies throughout an agreement, an AOR should “monitor the recipient’s financial reports to ensure that the recipient is making progress toward meeting the required cost share.”

The cooperative agreement between USAID/Senegal and RTI includes a provision that “the recipient agrees to non-federal funding of an amount of not less than $594,900, which can be leveraging, funding, or in-kind contributions.”

In June 2011, USAID/Senegal and RTI agreed on several items that would make up sources of the project’s cost share. As of November 30, 2013, RTI reported that it had met 97 percent of its share. However, in its calculations, RTI deviated from the approved list by including the salaries paid by the Ministry of Education to teachers providing remedial instruction in the project schools.

The Ministry of Education pays teachers a salary based on a requirement to give 25 hours of class each week. The hours that teachers spend on remedial classes often figure into their base requirement of hours owed to the Ministry of Education. Consequently, these hours, and the accompanying salaries, should not be included in RTI’s cost-sharing contribution.

USAID/Senegal officials did not monitor RTI’s cost-sharing requirement during the course of the project’s implementation. Therefore, mission officials did not know what items RTI claimed as part of its cost-share calculation.

As of November 30, 2013, RTI included as cost sharing teacher salaries totaling $251,713. This amount represents ineligible questioned costs because salaries were not on the list of agreed-upon expenditures and because the Ministry of Education would have paid the salaries whether the remedial program operated or not.

To address this issue, we make the following recommendations.

Recommendation 2. We recommend that USAID/Senegal implement a plan to document its quarterly review of Research Triangle Institute’s cost-share contribution. This review should include steps to request supporting documentation for the amount reported and to verify that the reported items comply with the agreed-upon elements for the project.

Recommendation 3. We recommend that USAID/Senegal determine the allowability of the $251,713 in ineligible questioned costs included in the project’s cost-sharing contribution and collect from Research Triangle Institute any amount deemed unallowable.
Design and Implementation Weaknesses
Made Some Activities Unsustainable

ADS 200.6 defines sustainability as “the continuation of benefits after major assistance has been completed.” USAID’s Policy Framework 2011–2015 explains that “sustainability is about building skills, knowledge, institutions, and incentives that can make development processes self-sustaining.” To be successful, USAID must incorporate sustainability into projects from the beginning. RTI recognized the importance of sustainability and described it, in the cooperative agreement, as a measure of the project’s successful implementation.

However, the project’s remedial program, youth, and inclusive education activities had design and implementation weaknesses that threatened their continued success.

Component 3: Strengthen Students’ Basic Skills in Reading and Math. Many school administrators had difficulty convincing teachers and students to participate in the remedial program. Since many schools offered it outside the official school day, teachers sacrificed their free time. While students attended if the program provided refreshments, an incentive often financed through the project’s grant funds, the project planned to use these funds to improve teacher performance, increase provision of school materials, and improve school infrastructure. If refreshments were no longer provided, attendance rates would likely plummet. Additionally, project schools saw high turnover among teachers of remedial courses. When trained teachers were reassigned, the losing school received no guarantee the teacher would be replaced with a teacher trained to teach remedial courses. Although regional Ministry of Education personnel recognized their role in maintaining remedial activities, some had no sustainability plan and expressed concern about being able to continue.

Component 4: Mobilize and Create Opportunities for Youth. Component 4’s job skills program included a three-part course on entrepreneurship, market opportunities, and agribusiness. Through this course, youth would develop desirable and transferable skills demanded by employers and be able to create their own employment opportunities. The project targeted the wrong age group, youths aged 10 to 18, in the regions of Kédougou and Ziguinchor. Although participants reportedly developed new aptitudes and the spirit of entrepreneurship, none had successfully turned these skills into new employment opportunities. As youths, participants were ineligible to secure the credit that facilitators cited as the biggest impediment to starting a new business. Furthermore, some training facilitators and schools stopped providing the training either because they had trained the required number of individuals or because the teachers who were qualified to provide training were reassigned to other schools. In addition, although schools implementing the project’s life skills program reported high levels of satisfaction and positive behavior changes in participating students, such as working in teams and helping each other, many decided to discontinue it because it was not a required course.

Component 5: Inclusive Education. Since educators previously had no tools to assist in identifying or teaching students with disabilities, those interviewed praised the project’s inclusive education guide as being useful and pertinent. However, some educators admitted that because schools have few or no students with disabilities, they did not implement any new techniques or provide the training to other teachers. Many educators and a subawardee responsible for implementing some inclusive education activities said that few children with disabilities enroll in Senegalese schools. Those who do must first navigate elementary school. Therefore, an
important segment—elementary students and teachers—missed valuable training that could encourage the promotion of students with disabilities into middle school.

The project’s scope limited activities to middle school youth and middle school educators. However, the middle school demographic does not represent the population most suited for youth employability training or inclusive education activities.

Still, the project’s remedial program, job and life skills training, and inclusive education guide could improve the quality of basic education in Senegalese schools. However, USAID/Senegal and RTI did not ensure that authorities and educators had sufficient resources and interest for the lasting success of these activities, as discussed later in this report. Added to that, USAID/Senegal officials did not monitor the project’s implementation to ensure the sustainability of activities because of understaffing.

Because the project is entering its final months of implementation, actions to address sustainability may not have a strong impact. However, to foster sustainability in the implementation of future projects, we make the following recommendation.

**Recommendation 4.** We recommend that USAID/Senegal require its partners to include in their periodic progress reports a discussion of the sustainability of activities. This discussion should identify any obstacles to sustainability and actions to address them.

### Six Regional Training Centers Were Not Operating as Envisioned

As part of its component to “revitalize [and] regionalize teacher preparation and development,” the project planned to help establish regional teacher training centers in the six regions it worked in. The centers were to provide pre- and in-service training.

Although a 2011 presidential decree created centers throughout Senegal, they were not operating as envisioned.

**Centers Were Not Functioning as Expected.** The decree that established the centers also made them responsible for both pre- and in-service training of middle school teachers. Although the centers do provide some in-service training, RTI staff and Ministry of Education personnel cited several difficulties, including the lack of a training plan, the lack of training facilities, and management challenges, that limit their functionality. Moreover, the centers in the project’s six intervention areas had not begun to provide training to prospective teachers and were unlikely to do so by the end of the project. A September 2013 project-funded evaluation of the centers highlighted these and more challenges and concluded the centers were not functioning as expected.

According to RTI staff and Ministry of Education officials, some Ministry of Education personnel misunderstood the role of the centers, and that misunderstanding—combined with a legal challenge to the presidential decree—reduced the centers’ functionality. A mission official said

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4 According to RTI and Ministry of Education personnel, officials at the teacher training institute at the Université Cheikh Anta Diop de Dakar steadfastly opposed the decentralization of preservice training for middle school teachers. They maintained the presidential decree was incongruent with the 2008 law that established the institute and gave it the exclusive right to certify middle school teachers in Senegal.
USAID/Senegal could have addressed these policy issues, but RTI said the mission didn’t do so when RTI asked for help in May 2012.

**Center Renovation Was Delayed and Construction Will Not Be Completed.** RTI and USAID/Senegal did not clearly relate their expectations for the renovation and construction of centers to one another or to the Ministry of Education.

Although RTI recognized that the new “institutions will need attention, in terms of renovation of existing structures,” the program description did not specifically indicate the project would undertake renovation or construction activities. Mission officials said that construction activities were crucial for achieving component objectives, but the mission reviewed and approved the program description and subsequent agreement modifications without formalizing construction plans.

RTI planned to help establish the centers but did not complete its feasibility study until January 2012, approximately 1.5 years after the start of the project and several months after the presidential decree took effect. The feasibility study highlighted the dilapidated conditions of existing structures in some areas and the lack of land for new centers in other areas. The search for adequate land proved problematic, delaying construction.

The delays were significant. Renovation activities for the centers in Kolda and Tambacounda did not start until October 2013, more than 3 years into the project. RTI and the mission canceled planned construction of centers in Kédougou, Sédhiou, and Ziguinchor without informing the Ministry of Education.

Consequently, the centers were not functional. As the project enters its final months of implementation, it is unlikely that RTI will make the centers capable of providing the pre- and in-service training necessary to meet its objective. Therefore, to increase the functionality of centers and to formalize USAID/Senegal’s construction plans, we make the following recommendations.

**Recommendation 5.** We recommend that USAID/Senegal, in coordination with Research Triangle Institute, implement a plan to resolve the problems impeding operations of the regional training centers.

**Recommendation 6.** We recommend that USAID/Senegal notify the Ministry of Education, in writing, of its intention not to build regional training centers in project areas.

**Remedial Program Fell Short of Its Goal**

The project’s remedial program aimed to “strengthen students’ basic skills in reading and math” and close the gap between middle school standards and students’ demonstrated competencies through activities benefitting both teachers and students. The project also planned to create a training program and materials that would improve the pedagogical skills of middle school French and math teachers and their command of their subjects. Students weak in these disciplines would take remedial courses. These interventions would lift “the majority of students from low levels of proficiency in reading and math to satisfactorily high levels of proficiency” within an academic year.
Although many educators said that the program encouraged student achievement, schools did not implement it as intended. Educators described a number of problems that kept the program from meeting expectations.

- **Lack of communications.** RTI did not lay the necessary groundwork with educators. Because it did not fully explain how the remedial program would work, educators misunderstood, as the other examples below illustrate.

- **Insufficient tool kits distributed to partner schools.** Teachers involved in the program received guidebooks called tool kits but were told not to distribute them to students or administer tool kit exercises as traditional classroom exercises. Nonetheless, educators used the tool kits as the primary means of instruction for the course and said their schools did not receive enough tool kits to distribute one to all participating students.

- **Tests and tool kits not tailored to grade level.** The project differentiated its remedial course from tutoring or a review course by explaining that it should not focus on the activities and exercises that students see in class. However, many educators criticized the diagnostic tests and tool kits for not being tailored to subjects taught at students’ current grade levels.

- **Large class sizes.** Project materials stated that classes should have a maximum of 15 students. However, many schools lacked the classrooms and trained teachers to offer enough classes to achieve this size. Instead, classes often had 25 or more students. Large class sizes did not allow teachers to provide the individual attention vital to student success.

- **Repetition of diagnostic tests and tool kits.** Each year, all students in targeted grade levels take a diagnostic test to determine their need for remedial courses. Educators said that no changes were made to either the diagnostic tests or the tool kits from year to year; therefore, students were repeatedly tested on the same questions and taught the same exercises.

- **Late start to remedial program.** Although the project recommended that diagnostic tests be administered and scored during the second week of the school year (early October), no project school visited had administered the diagnostic tests by late November. Consequently, schools had not identified student need or begun the classes. Principals and teachers said that the late start to the classes meant that not all required competencies could be taught. Also, some principals said that the course could not be incorporated into the official school schedule; therefore, many schools administered it as an after-hours, weekend, or lunchtime program.

- **Need for instruction underestimated.** RTI staff estimated that 50 to 60 percent of students require remediation; however, testing indicated that about 75 percent of students needed it. In some schools, more than 90 percent of students participated in the program.

Lack of staff in the mission’s education office hindered oversight of the project to ensure RTI properly implemented the remedial program. A properly implemented remedial program can raise the quality of education, but improper implementation of the remedial course limits its effectiveness. A 2013 internal evaluation of the program suggested that only 15 percent of students developed proficiency through the course. Therefore, most students repeated it, at least once, before mastering the competencies covered.
Although the number of students requiring remedial instruction and the availability of classroom facilities are not within USAID/Senegal’s or the project’s control, coordination and communication with administrators and teachers are. Therefore, we make the following recommendations.

**Recommendation 7.** We recommend that USAID/Senegal, in coordination with Research Triangle Institute, develop clear and user-friendly documents for teachers and school administrators to use in carrying out the remedial course.

**Recommendation 8.** We recommend that USAID/Senegal, in coordination with Research Triangle Institute, implement a plan to retrain teacher trainers in the proper administration of the remedial course and its accompanying tool kit. This plan should include a schedule for carrying out additional teacher-retraining sessions.

Some Reported Results Lacked Sufficient Documentation and Did Not Meet Data Quality Standards

ADS 203.3.11.1 emphasizes the importance of high-quality data for decision making and outlines the quality standards that make data “useful for performance monitoring and credible for reporting.” These standards include:

1) **Validity:** Data should clearly and adequately represent the intended result;

2) **Integrity:** Data collected should have safeguards to minimize the risk of transcription error or data manipulation;

   * * * *

5) **Timeliness:** Data should be available at a useful frequency, should be current, and should be timely enough to influence management decision-making.

ADS 203.3.11.2 further explains that data quality assessments (DQAs) let USAID missions know the strengths and weaknesses of reported data. DQAs determine the “extent to which data integrity can be trusted to influence management decisions.” At least 3 years before submitting data on indicators that the Agency reports externally, USAID missions must assess the quality of the indicator data.

RTI measures the project’s results through 54 performance indicators. However, RTI lacked sufficient documentation on some of them. Therefore, reported results for many indicators could not be validated. For others, the project’s reporting did not meet the standards of validity, integrity, and timeliness.

**Validity.** In FY 2012, the project reported 14,869 for the *Number of middle school students that participate in remediation and reinforcement activities*. However, one number represents neither a clear nor an adequate result for this indicator. Partner schools provide remedial instruction in two subjects, and many students participate in both courses. However, project reporting does not differentiate the number of students participating in each course. Therefore, the reported
figure may count some students twice. The audit team verified 7,596 students enrolled in remedial French and 8,759 students enrolled in remedial mathematics, but these figures do not necessarily represent unique participants. Also, the verified total of 16,355 students does not agree with the project’s reporting. Further, RTI could not provide documentation supporting the number reported for one region.

In another example, the project reported 4,391 for the Number of manuals/didactic materials provided with USG [U.S. Government] support during the 2011-2012 academic year. However, supporting documentation for this figure included data for the following academic year. In addition, RTI could not provide the supporting documentation for two regions. Therefore, only 2,182 manuals and other materials could be verified for the period in question.

**Integrity.** The project relied on its partner schools’ self-reported enrollment data to calculate the Number of learners enrolled in USG-supported middle schools. However, many of these schools reported inaccurate information on the sex of students enrolled in each class. In addition, many transcription errors occurred during the data entry process. As shown in Table 1, these errors led to unreliable reporting.

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<th>Group</th>
<th>Reported 2011</th>
<th>Verified 2011</th>
<th>Difference %</th>
<th>Reported 2012</th>
<th>Verified 2012</th>
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<td>36,817</td>
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As shown in Table 2, the verified result for FY 2012 for the Percentage of women teachers in the regions supported by [the project] did not vary greatly from that reported. However, RTI staff did not accurately enter the data into the project’s database. The database contained errors for 54 of the 158 schools supplying information (34 percent). At the regional level, inaccuracies were more pronounced. For example, of database entries for 30 schools reporting from the Kolda region, 25 (83 percent) were incorrect.

<table>
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<th>Information</th>
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**Timeliness.** Because data from partner schools were not available until after USAID’s reporting deadline, the project estimated the results it reported for some indicators. Doing so resulted in discrepancies between some reported and verified results. For instance, in FY 2012, RTI reported that 166 of 168 (99 percent) middle schools implemented at least 50 percent of their quality improvement plan activities. However, documentation showed that only 29 partner schools (17 percent) had achieved this goal. Also in FY 2012, RTI reported that 168 partner middle schools held a community forum. However, RTI had data for only 75 schools (45 percent).

Although the project began in May 2010, USAID/Senegal did not perform a DQA until October 2013. Prior to this assessment, USAID/Senegal officials performed limited data verification, focused only on standard indicators, and acknowledged several known weaknesses with the project’s data. As part of the DQA process, USAID/Senegal reported that data were “reviewed,
cleaned, corrected and updated on the basis of what appears in the document[ation].” In addition, RTI’s lone monitoring and evaluation staff member compiled a large volume of paperwork to report on the project’s many indicators. However, a disorganized filing system contributed to the inability to verify the reported results.

Because of the problems described above, USAID/Senegal risks making programmatic decisions for the project based on data that do not meet prescribed quality standards. To address this issue, we make the following recommendation.

**Recommendation 9.** We recommend that USAID/Senegal, in coordination with Research Triangle Institute, implement a plan to verify that the final results reported by the project comply with USAID data quality standards.
EVALUATION OF MANAGEMENT COMMENTS

In response to the draft report, USAID/Senegal officials agreed with all recommendations and provided action plans and target dates for implementing them. We acknowledge the mission’s management decisions on all recommendations, except Recommendation 3.

Recommendation 1. USAID/Senegal officials agreed to implement a plan requiring technical offices to perform their management responsibilities, including maintaining adequate files. The mission conducted training courses for technical teams to emphasize the roles and responsibilities of AORs. In addition, mission officials intend to establish project-specific e-mail accounts to verify that project files and documents are maintained at the mission and do not depend on individual staff e-mail accounts. USAID/Senegal officials plan to complete this action by August 31, 2014. We acknowledge the mission’s management decision.

Recommendation 2. Mission officials agreed to review cost share for awards that use letters of credit and obtain support for cost-sharing amounts listed in program quarterly financial reports. USAID/Senegal officials set August 31, 2014, as the target date. We acknowledge the mission’s management decision.

Recommendation 3. Mission officials agreed to determine the allowability of the $251,713 in ineligible questioned costs in the project’s cost-sharing contribution plan and planned to make a determination by September 30, 2014. Thus, the mission did not make a management decision.

Recommendation 4. USAID/Senegal officials agreed to require partners to include in their periodic progress reports a discussion of the sustainability of activities. The mission planned to request that RTI include a discussion on sustainability, starting in the third quarterly report for FY 2014, due to the mission by August 31, 2014. We acknowledge the mission’s management decision.

Recommendation 5. Mission officials agreed to implement a plan to assess problems that have impeded the full operation of the regional training centers. Using results of this assessment, they planned to modify the agreement’s program description, if necessary, to reflect needed changes by August 31, 2014. We acknowledge the mission’s management decision.

Recommendation 6. USAID/Senegal officials agreed to provide the Ministry of Education written notice that no new construction of regional training centers will take place. Its target date for doing so is August 31, 2014. We acknowledge the mission’s management decision.

Recommendation 7. Mission officials agreed to have RTI coordinate with the Ministry of Education in assessing which materials can be made user-friendly. Using results of this assessment, RTI will submit a report to USAID/Senegal and take necessary action by August 31, 2014. We acknowledge the mission’s management decision on Recommendation 7.

Recommendation 8. Mission officials agreed to implement a plan to retrain teacher trainers in the proper administration of the remedial course and accompanying tool kit. USAID/Senegal intended to implement this plan by August 31, 2014. We acknowledge the mission’s management decision.
Recommendation 9. Mission officials agreed to implement a plan to verify that the final results reported by the project comply with USAID data quality standards. Officials planned to review the data quality and issue a report on it by August 31, 2014. We acknowledge the mission’s management decision on Recommendation 9.
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 audit’s objective was to determine if USAID/Senegal’s Education Priority Quality Project successfully achieved its objective of improving the quality of education in supported schools. The mission awarded a 4.5-year, approximately $19.8 million cooperative agreement with RTI in May 2010. USAID/Senegal increased this amount to $20.1 million in September 2011 to add a component and decreased it to $15.8 million in September 2013. As of November 30, 2013, USAID/Senegal had obligated $12.1 million and disbursed $11.2 million for the project. This was a performance audit, focused on program implementation rather than financial transactions; therefore, the audit did not include a financial review of project disbursements.

RTI carried out activities in six regions of Senegal. The audit covered the project’s activities, both completed and ongoing, from the start of the project in May 2010 until September 30, 2012, for validating performance data, but also examined activities through November 30, 2013, to assess additional progress.

In planning and performing the audit, we reviewed USAID/Senegal’s compliance with applicable laws, regulations, and USAID policies and procedures. We also assessed significant management controls established by USAID/Senegal and RTI for the management and oversight of project activities. These controls included USAID/Senegal’s Country Development Cooperation Strategy, the cooperative agreement and modifications, annual work plans, progress reports, site visit reports, and the project’s monitoring and evaluation plans. In addition, we reviewed USAID/Senegal’s FY 2013 annual self-assessment of management controls, which missions are required to perform to comply with the Federal Managers’ Financial Integrity Act of 1982 (as codified in 31 U.S.C. 3512).

We conducted our audit fieldwork in Senegal from August 21, 2013, to January 16, 2014, in and around the cities of Dakar, Fatick, Kédougou, Kolda, Sédhiou, Tambacounda, and Ziguinchor.

Methodology

The project has five components: (1) revitalize and regionalize teacher preparation and professional development, (2) create a whole school environment, (3) strengthen students’ basic skills in reading and math, (4) mobilize and create opportunities for youth, and (5) encourage inclusive education. We evaluated the project’s progress in all five components. We also tested data that RTI used to measure its progress against the project’s goals.

In doing so, we relied on these sources of evidence: the cooperative agreement and modifications; interviews with USAID/Senegal officials, RTI staff, officials with Synapse Center (a project subawardee), Ministry officials (the Ministry of Education and the Ministry of Youth), and other beneficiaries; and documentation kept at the mission and at the contractor’s main office.
To answer the audit objective, we conducted interviews with personnel from USAID/Senegal, RTI, subawardees, the Government of Senegal’s Ministry of Education and Ministry of Youth, and local nongovernmental organizations. We also interviewed principals, teachers, and students from partner schools throughout the project’s intervention area to obtain an understanding of the program’s activities and progress. We conducted site visits to 8 of the project’s 168 partner schools for the 2011–2012 school year to assess whether the project implemented its activities as intended. We judgmentally selected schools to visit, with assistance from RTI staff, based on accessibility from the project’s regional offices and security concerns.

Through these interviews and the review of documents described above, we evaluated USAID/Senegal’s management and oversight of the project’s activities, the performance of the implementing partner, and the effectiveness of the implemented activities. We obtained an understanding of the internal controls system put in place by RTI related to budgeting, the cost-share requirement, and grants management.

We tested project data to assess the quality of the project’s reported results. In validating program data, we judgmentally selected indicators that had reported results, had readily available supporting data, and were indicative of the program’s objectives. For FY 2011, we tested 1 of 43 indicators, and for FY 2012, we tested 20 of 54 indicators.

The results and overall conclusions related to this testing were 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.
This memorandum transmits USAID/Senegal’s management comments to the subject RIG/Dakar Draft Audit Report. Thank you for sharing the draft report and providing us the opportunity to offer clarifications and our response. We view audits as an opportunity to improve USAID programming and accountability. Before addressing the nine recommendations put forth by the subject draft report, we would like to take the opportunity to provide clarifications regarding some of the information presented in the report.

I. CLARIFICATIONS

Terms of Cooperative Agreements: Cooperative agreements bring with them some measure of flexibility to modify programs and adjust for evolving development contexts in complex environments. As an Assistance mechanism, cooperative agreements can produce impressive development results and maintain a great deal of accountability when the implementing partner project team is effective and has good leadership. In cases in which implementation meets internal challenges, the nature of cooperative agreements, as development assistance as opposed to contracting, can make it more difficult for USAID to bring about swift changes in project management, especially where staffing is concerned. USAID/Senegal believes that it is important to consider the context – opportunities and constraints – of working under cooperative agreements.

Substantial Involvement: Even though USAID/Senegal was short staffed, we had correspondence and documented meetings to demonstrate that there was substantial involvement on the part of USAID/Senegal. Due to Research Triangle Institute (RTI) being unable to fully meet the terms of the Cooperative Agreement (CA), the CA was modified and funding was reduced. The delays in approval of workplans and budgets were due to the fact...
that they did not fully comply with the CA requirements as submitted. USAID/Senegal and the Implementing Partner embarked on a series of long and detailed discussions in order to rectify the workplans and budgets submitted by RTI. Requests for improvement or clarification of workplans and budgets further support our efforts as part of substantial involvement. USAID/Senegal is fully committed to working closely with our Implementing Partners and it should be noted that USAID/Senegal spent significant time supporting and coaching the RTI Chief of Party (COP) to help her perform the requirements of the Cooperative Agreement. In addition, USAID/Senegal arranged for a seasoned COP to provide support and mentoring for the RTI COP.

**Development Context:** It is important to highlight the development context, as it effects implementation and can engender successes or setbacks. Adjustments are made to address a changing context throughout the life of any agreement. Many factors, both within and outside of USAID control, impact the use of resources and our ability to achieve the exact results as originally anticipated in an activity design. For example, the use of remedial materials destined for certain grades being used at other grade levels is not necessarily a design flaw or failure but part and parcel of the development context. In schools in which there is a shortage of any educational materials, educators are often found using whatever becomes available, even if those materials were not intended for the grades in which they may be eventually used.

**Staffing and Documentation:** USAID/Senegal recognizes that there were significant staffing shortages and gaps in staffing during the course of this agreement, due to unanticipated staff departures. USAID/Senegal also concurs that proper records were not adequately maintained throughout the life of this award, some of which is a direct result of staff departures (specifically, staff not printing emails or other correspondence that were saved on private drives prior to departure). This is not a systemic issue within the Mission or even the technical office, as other project files are satisfactory and contain required documentation. However, USAID/Senegal has taken immediate actions to ensure full compliance with all AOR responsibilities.

Interviews of key stakeholders can provide insightful and detailed contextual information in order to gain an accurate and full picture of the management of the program when performed in a timely and well-sequenced manner. Unfortunately, audit team staff turnover as well as USAID staff turnover, inhibited the consultation of a few key stakeholders during their periods of availability in country.

**II. USAID/SENEGAL RESPONSE TO THE AUDIT FINDINGS AND RECOMMENDATIONS**

**Finding:** USAID/Senegal did not comply with some Substantial Involvement clauses

**Recommendation 1:** We recommend that USAID/Senegal implement a plan to ensure that its technical offices perform necessary management responsibilities, including maintaining adequate files.
USAID/Senegal’s position on the finding and Recommendation 1: USAID/Senegal concurs with the finding that steps need to be taken to ensure adequate project files are maintained and that substantial involvement clauses in the agreement must be respected.

Action Taken/Planned:
The Regional Agreement Officer recently organized refresher courses for technical teams. These courses focused on the roles and responsibilities of CORs/AORs. Another training session was organized to provide guidance on the role of CORs/AORs as financial managers. The FY 2014 FMFIA testing will also focus on AOR and COR responsibilities to review compliance and documentation by July 31, 2014. In addition, USAID/Senegal is taking actions to use a project email account to ensure that all correspondence is maintained at the Mission level and is not dependent on individual staff email maintenance by August 31, 2014. Based upon implemented and planned actions, USAID/Senegal agrees with this recommendation and requests that a management decision be issued and Recommendation 1 will be closed (final action) upon the implementation of the above planned actions by August 31, 2014.

Finding: Implementing Partner included ineligible costs in its Cost Share Contribution

Recommendation 2: We recommend that USAID/Senegal implement a plan to document its quarterly review of RTI’s cost-share contribution. This review should include steps to request supporting documentation for the amount reported and to verify that the reported items comply with the agreed-upon elements for the project.

USAID/Senegal’s position on the finding and Recommendations 2 and 3: Per ADS 303.3.10.4, Meeting Cost Sharing Requirements applies throughout the life of an agreement, and the AOR is required to monitor the recipient's financial reports to ensure that the recipient is making progress toward meeting the required cost share.

Action Taken/Planned
USAID/Senegal OFM has implemented tracking tools to review spending, including cost share, for awards using Letters of Credit. The total cost share is compared to total budget, and if spending is not in line with the elapsed time of the agreement or in line with project spending, then additional explanation is requested. If the quarterly analysis highlights areas of concern related to spending or cost share, further documentation is requested or a financial review is performed. During the financial reviews, cost share is analyzed and audited in detail. USAID/Senegal has worked closely in coordination with RTI to analyze their cost share, and amendments have been made to include only allowable costs in the cost share calculations. RTI now has in place a new strategy for meeting their cost share requirements under the Cooperative Agreement by the end of the award period. This strategy has been reviewed and approved by the AOR and the Agreement Officer. USAID/Senegal agrees with this recommendation and plans to obtain details behind the cost share submitted quarterly. Therefore, we request that a management decision be issued and
Recommendations 2 will be closed (final action) after receiving details of the quarterly cost share incurred by August 31, 2014.

**Recommendation 3:** We recommend that USAID/Senegal determine the allowability of the $251,713 in ineligible questioned costs included in the project’s cost-sharing contribution and collect from Research Triangle Institute any amount deemed unallowable.

**Action Taken/Planned**
To address this recommendation, USAID will review RTI resubmitted cost share to identify other allowable components of EPQ cost share which includes tracking the contribution of the schools/communities where the project has been working. These communities have conducted a significant amount of mobilization/construction activities as a result of their school improvement plans (an EPQ activity). These include providing food and refreshments for students staying after school to participate in the remediation program, cleaning up and putting up fences around the school, even sometimes building additional classrooms or connecting local electricity. Therefore, USAID/Senegal agrees with this recommendation and will request a management decision be issued upon the Agreement Officer’s determination of the allowability of cost share totaling $251,713 by September 30, 2014.

**Finding: Design flaws made some activities unsustainable**

**Recommendation 4:** We recommend that USAID/Senegal require its partners to include in their periodic progress reports a discussion of the sustainability of activities. This discussion should identify any obstacles to sustainability and actions to address them.

USAID/Senegal’s position on the finding and Recommendation 4: USAID/Senegal concurs that sustainability is essential. As such, RTI included in its program description (p.72 of the Cooperative Agreement) a narrative about their plans to build sustainability from the very start of the activity. Rather than identifying sustainability as a separate point of intervention, the program description focuses on integrating the engagement of local partner institutions and stakeholders, identification of synergies, and harmonization with other education development partners throughout implementation.

**Action Taken/Planned**
The project has developed a sustainability and capitalization plan that was shared with the Ministry of Education (MOE) during a workshop held by RTI in February 2014. The purpose of the workshop was to identify with the MOE those elements of the project that will be sustained by the MOE after the close of EPQ and to develop a transition plan accordingly. In regards to reporting, it must be recognized that while sustainability is not a new focus in USAID, there is considerably more emphasis on sustainability under the new Project Design Guidance that was released in December 2011. New projects awarded under this guidance meet mandatory requirements for addressing issues of sustainability.

USAID will plans to request that RTI includes a discussion on sustainability in the last two quarterly reports. Therefore, USAID/Senegal agrees with recommendation and requests...
that a management decision be issued and Recommendation 4 will be closed (final action) upon receipt of the FY 14 3rd quarter progress report from RTI by August 31, 2014.

Finding: Six regional training centers were not operating as envisioned

Recommendation 5: We recommend that USAID/Senegal, in coordination with Research Triangle Institute, implement a plan to resolve the problems impeding operations of the regional training centers.

USAID/Senegal’s position on the finding and Recommendations 5 and 6: The operation of the regional teacher training centers, as mandated by a 2011 presidential decree, was not realized due to high level political disagreement between the Ministry of Education and the Ministry of Higher Education. This means that to date there has been no agreement within the Government of Senegal about the transition of middle school pre-service teacher training activities to these regional centers. Discussions occurred during official meetings, such as steering committees, joint portfolio reviews, and political dialogues between USAID and MOE officials over a couple of years. Despite efforts to bring this debate to some resolution, no solution was found or implemented by the Government of Senegal. As a result, the pre-service training of middle school teachers, envisaged under the EPQ activity, did not occur. USAID/Senegal remained in close communication with the MOE regarding this issue, as well as the construction or renovation of regional training centers. The construction of new regional teacher training centers was likewise not realized due to related political disagreement. USAID and RTI finally agreed that the only infrastructure intervention within the manageable interest of the project was to complete renovation work at two regional centers, which will be completed before the end of the award period.

Action Taken/Planned
USAID/Senegal will implement a plan to assess problems that have impeded the full operation of the regional training centers, as was envisaged in the original program design. Based on the conclusions identified by this assessment, USAID will modify the cooperative agreement, as necessary, to reflect changes in the program description. Therefore, USAID/Senegal requests that a management decision be issued and Recommendation 5 will be closed (final action) upon submission of the assessment document and execution of any recommended modification to the award document by August 31, 2014.

Recommendation 6: We recommend that USAID/Senegal notify the Ministry of Education, in writing, of its intention not to build regional training centers in project areas.

Action Taken/Planned
USAID/Senegal is currently drafting a letter to the MOE that will provide written confirmation of the fact that no new construction of regional training centers will take place, however, per previous discussions, the renovation of two centers will be completed under EPQ before the close out of the activity as part of the final year workplan. Therefore, USAID/Senegal agrees with this recommendation and requests that a management
decision be issued and Recommendations 6 will be closed (final action) upon issuance of the letter to the MOE planned by August 31, 2014.

Finding: Remedial Program Fell Short of Its Goal

**Recommendation 7:** We recommend that USAID/Senegal, in coordination with Research Triangle Institute, develop clear and user-friendly documents for teachers and school administrators to use in carrying out the remedial course.

USAID/Senegal’s position on the finding and Recommendations 7 and 8:
USAID/Senegal is surprised by this finding as the Mission has received positive feedback from the MOE, teachers and administrators regarding the remediation materials. The fact that they have value seems to be evidenced by the fact that teachers have turned to them for use in their classes and that the MOE has committed to taking over the further development and use of these materials after the close of the EPQ activity. With only a few months remaining in the cooperative agreement and now at the end of the academic year, it is not feasible or practical to pursue development of new materials or retrain teachers.

**Action Taken/Planned**
Under the sustainability strategy and transition plan developed by RTI and the MOE for the close out of this activity, the MOE will continue to build on and improve the French and Math remediation tool kits developed under EPQ, as well as the remediation management tools used by teachers in the classroom. RTI will also review the findings of this recommendation including grade appropriate use and classroom size in coordination with MOE to identify any areas where the materials can be made user friendly. RTI will submit a report on the outcome of this meeting and any actions taken. Therefore, USAID/Senegal agrees with this recommendation and requests that a management decision be issued, and Recommendation 7 will be closed (final action) upon submission of the RTI report planned for August 31, 2014.

**Recommendation 8:** We recommend that USAID/Senegal, in coordination with Research Triangle Institute, implement a plan to retrain teacher trainers in the proper administration of the remedial course and its accompanying tool kit. This plan should include a schedule for carrying out additional teacher-retraining sessions.

**Action Taken/Planned**
RTI will develop and implement a plan for the re-training of trainers in the proper administration of the remediation course and accompanying tool kits, with an emphasis on grade-appropriate use of the materials. These trainers will then be positioned to carrying out additional training of teachers, even after the close of the EPQ activity, per the sustainability/transition plan that was developed with EPQ and has been adopted by the MOE. Therefore, USAID/Senegal agrees with this recommendation and requests that a management decision be issued, and Recommendation 8 will be closed (final action) upon submission of documentation that the training was planned and implemented by August 31, 2014.
Finding: Some reported results lacked sufficient documentation and did not meet data quality standards

Recommendation 9: We recommend that USAID/Senegal, in coordination with Research Triangle Institute, implement a plan to verify that the final results reported by the project comply with USAID data quality standards.

USAID/Senegal’s position on the finding and Recommendation 9: USAID/Senegal wholly supports efforts to ensure data quality standards under all of its projects, working closely with all its implementing partners. The Mission follows guidance provided in ADS 203 and 597 regarding the implementation, use and timing of DQAs, which are required at least every three years. USAID/Senegal recognizes that DQAs for EPQ should have been conducted earlier in the activity’s implementation.

Action Taken/Planned
Data Quality Assessments were conducted by USAID/Senegal for EPQ in October 2013. The findings of those assessments were addressed with RTI and resolutions identified to any questions or issues. USAID/Senegal education and monitoring and evaluation specialists continue to work with RTI on data quality, and no additional issues are expected to this regard in the final months of the activity. Therefore, USAID/Senegal agrees with this recommendation and requests that a management decision be issued and Recommendation 9 will be closed (final action) when USAID reviews the data quality and issues a report by August 31, 2014.