



# OFFICE OF INSPECTOR GENERAL

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## AUDIT OF THE MILLENNIUM CHALLENGE CORPORATION- FUNDED FRUIT TREE PRODUCTIVITY PROJECT IN MOROCCO

AUDIT REPORT NO. M-000-12-005-P  
JUNE 15, 2012

WASHINGTON, D.C.



*Office of Inspector General*

June 15, 2012

Mr. Patrick Fine  
Vice President, Department of Compact Operations  
Millennium Challenge Corporation  
875 15th Street, NW  
Washington, DC 20005

Dear Mr. Fine:

This letter transmits the Office of Inspector General's report on the "Audit of the Millennium Challenge Corporation-Funded Fruit Tree Productivity Project in Morocco." In finalizing the report, we considered your written comments on our draft report and included those comments in their entirety in Appendix II of this report.

The report contains six recommendations to strengthen the Millennium Challenge Corporation's policies and procedures. We consider that management decisions have been reached on all six recommendations.

I appreciate the cooperation and courtesy extended to my staff during this audit.

Sincerely,

/s/

Richard J. Taylor  
Deputy Assistant Inspector General  
for Audit  
Millennium Challenge Corporation

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# SUMMARY OF RESULTS

The Millennium Challenge Corporation (MCC) signed a 5-year, \$697.5 million compact with the Government of the Kingdom of Morocco in August 2007. The compact aims to stimulate economic growth through investments in five projects. At nearly \$329 million,<sup>1</sup> the largest of the projects is the Fruit Tree Productivity Project. It focuses on:

- Rehabilitating and expanding olive, almond, and fig tree orchards in rain-fed areas (\$143 million).<sup>2</sup> The rehabilitation activity involves training farmers in techniques designed to increase production in existing orchards. The expansion activity involves planting new trees in areas previously planted with lower-value cereal crops.
- Improving the irrigation of olive and date trees (\$141 million). The activity upgrades existing irrigation canals and helps farmers increase production.
- Conducting sector services activities (\$20 million). This includes activities such as market research that support the overall project goals.
- Awarding grants for building olive oil processing facilities (\$21 million).

The Millennium Challenge Account-Morocco (MCA-M) is the host-government entity charged with implementing the terms of the compact. The compact entered into force in September 2008 and is scheduled to end in September 2013. As of September 2011, MCA-M had committed nearly \$500 million of the Morocco compact.

The objective of this audit was to determine whether the rain-fed rehabilitation and expansion activity within the MCC-Funded Fruit Tree Productivity Project was achieving its project activity goals.

The Office of Inspector General (OIG) found that the activity was not achieving its goals as stated in the compact. In particular, MCC and MCA-M re-scoped the project in October 2010 to reduce the expansion activity by nearly 50 percent. Originally the compact called for planting approximately 120,000 hectares of new olive, almond, and fig trees. However, during the project's implementation, MCC and MCA-M determined that the project faced a serious budget shortfall. MCC officials said the shortfall arose because contractors' bids were higher than expected due to rising prices and the contractors' concerns about meeting MCC's stringent requirements, like requiring a high survival rate for the newly planted seedlings. As a result of the shortfall, MCC and MCA-M reduced the amount of hectares to be planted to approximately 62,000, and the number of beneficiaries from approximately 63,000 farm households to approximately 34,000.

The original scope of the expansion activity also included planting approximately 5,000 hectares of fig trees. However, MCC officials said MCA-M determined that the project's resources were better used to support the larger amount of olive and almond trees, so they eliminated the

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<sup>1</sup> This amount includes \$3.67 million for project management.

<sup>2</sup> Rain-fed agricultural areas typically receive enough water from rainfall and do not need regular irrigation.

relatively small number of fig trees. MCC and MCA-M expect to achieve the revised goal for the expansion activity and the original goal for the rehabilitation activity.

Subsequent to MCC and MCA-M's re-scoping of the Fruit Tree Productivity Project, the Moroccan Government provided \$35 million to plant 22,000 of the hectares that had been eliminated from the project. Some of the planning and oversight funding for these hectares was provided by the compact.

The audit also found the following:

- The sustainability of olive trees was at risk because they may receive less maintenance than intended in the project's design (page 3).
- MCA-M's oversight of the training contractor was limited. MCA-M relies heavily on the contractor to report that the training is being provided (page 4).
- The contractor trained underage youth (page 4).
- Reported training may be inaccurate because the definition of one of the indicators measured is unclear (page 5).
- MCA-M cars were not marked to identify their affiliation with MCA-M (page 5).

To address these concerns, the report recommends that MCC's Vice President, Department of Compact Operations:

1. Direct MCA-M to develop and implement a written plan for mitigating the risk that certain trees may be adversely affected if they receive less maintenance than intended, either from contractors or farmers (page 3).
2. Direct MCA-M to develop and implement a written plan for strengthening oversight of the contractor responsible for providing training to farmers and youth in the rain-fed rehabilitation activity (page 4).
3. Direct MCA-M to clarify in writing the contract for training in the rain-fed rehabilitation activity to specify 15 as the minimum age for training participants (page 5).
4. Review and clarify the definition of the "farmers trained" indicator in the monitoring and evaluation plan for the rain-fed rehabilitation activity (page 5).
5. Verify that the data reported for the "farmers trained" indicator in the rain-fed rehabilitation activity is accurate and document the verification (page 5).
6. Direct MCA-M to comply or justify its noncompliance with MCC's branding guidance regarding the marking of material visible to a significant portion of the population (page 6).

Detailed findings appear in the following section. Appendix I describes the audit scope and methodology. Appendix II presents MCC's comments. Our evaluation of management comments is on page 8.

# AUDIT FINDINGS

## Sustainability of Olive Trees Is At Risk

The rain-fed expansion activity aims to increase farmers' incomes by planting new trees that eventually will produce fruit. However, the sustainability of certain trees is at risk because they may receive less maintenance than intended in the project's design.

According to MCC and MCA-M officials, the olive tree contractors for the rain-fed expansion activity are required to plant the trees, return three times to monitor and maintain them over the course of the 2-year contracts, and make sure that all are viable when the contracts end. Maintenance may include providing fertilizer, for example, to help the trees grow and survive. Once the contractors have completed their work, the farmers will be responsible for maintaining the trees.

However, because development of the technical details for planting the trees took longer than MCA-M anticipated, some of the planting was delayed, and that reduced the time available for maintenance by the contractors. As a result, some of the contractors will not have time within the scope of their 2-year contracts to conduct the maintenance as intended. MCA-M officials said trees on 15,000 hectares, or roughly 25 percent of the total planted, may not receive the maintenance originally intended.

Furthermore, some farmers may not be able to properly maintain the trees once the contractors have finished. Contractors, government officials, and farmers expressed concern that while the farmers may understand what is needed, they may have limited resources, such as fertilizer, pesticides, and occasional irrigation, for the trees until they reach maturity at approximately 5 years.

MCC officials said they chose 2-year contracts because the trees are viable after 2 years even though they do not come to fruition for 5 years. MCC and MCA-M officials said they were not concerned about the trees' survival because the farmers should be able to maintain the trees themselves, along with the help of the farmer cooperatives to which most farmers belong and the assistance of the local government officials who have been involved with the project.

However, the farmers' incomes will increase only if the trees survive and begin producing olives. If the trees are not properly maintained and therefore do not survive, the success of the project will be at risk. To address this concern, this audit makes the following recommendation.

**Recommendation 1.** *We recommend that the Millennium Challenge Corporation's Vice President, Department of Compact Operations, direct the Millennium Challenge Account-Morocco to develop and implement a written plan for mitigating the risk that certain trees may be adversely affected if they receive less maintenance than intended, either from contractors or farmers.*

## **Millennium Challenge Account–Morocco Conducted Limited Oversight of Training Contractor**

*Standards for Internal Control in the Federal Government* states that qualified, continuous supervision of contractors is necessary to be sure objectives are achieved. However, MCA-M conducted limited oversight of the contractor providing training for the rain-fed rehabilitation activity. The contractor was responsible for providing training to more than 30,000 farmers and youth to help them learn techniques like pruning that would increase olive production and ultimately increase the farmers' incomes.

MCA-M relies heavily on the contractor to report on the training for the rehabilitation activity. MCA-M does not have procedures in place for documenting its review of the contractor's performance to confirm that training has taken place and that payment to the contractor is justified.

MCA-M officials told OIG that the contractor sends monthly progress reports and meets with MCA-M at the contractor's office. Officials from other Moroccan government agencies also help provide oversight. MCA-M officials said that they and the other government officials conduct periodic field visits to monitor the contractor's work, but because of the project's large geographical scope, field visits are not always possible.

MCA-M's limited oversight increases the risk that the training will not be provided to farmers and youth as intended. Without proper training, they will not learn the techniques necessary for increasing production and their incomes, thus jeopardizing the project's objectives. In addition, without proper oversight and documentation, MCA-M risks making improper payments to the contractor. To address this concern, this audit makes the following recommendation.

***Recommendation 2.*** *We recommend that the Millennium Challenge Corporation's Vice President, Department of Compact Operations, direct the Millennium Challenge Account-Morocco to develop and implement a written plan for strengthening oversight of the contractor responsible for providing training to farmers and youth in the rain-fed rehabilitation activity.*

## **Training Provided to Underage Youth**

According to MCC, the training provided to farmers in the rehabilitation activity should target people between 15 and 40 years old, in accordance with generally accepted standards of professional practice and Moroccan law. In our review of training attendance records, however, OIG found that some participants were younger than 15. MCC officials said the training contract did not specify a minimum age for participants, but MCA-M was developing additional guidance to make sure the minimum age of 15 was respected.

Training youth younger than 15 would conflict with generally accepted standards of professional practice in Morocco and could interfere with school attendance. To address this concern, this audit makes the following recommendation.

**Recommendation 3.** *We recommend that the Millennium Challenge Corporation’s Vice President, Department of Compact Operations, direct the Millennium Challenge Account-Morocco to clarify in writing the contract for training in the rain-fed rehabilitation activity to specify 15 as the minimum age for training participants.*

## **Training Reported May Be Inaccurate**

MCC’s Monitoring and Evaluation Policy states that the definition of an indicator should be operationally precise with no ambiguity about what is being measured or how to interpret the results. Further, the policy states that quality data are essential to ensuring a high level of confidence in decisions made using that data.

The monitoring and evaluation plan for Morocco does not clearly define “farmers trained,” one of the indicators for the rain-fed rehabilitation activity. Within that activity, farmers receive training on techniques designed to increase production. Training sessions take place over 4 days, and farmers are required to sign in each day. MCA-M officials said they had originally intended to count farmers as trained once a farmer had attended all four sessions, but in practice many farmers attend fewer than four sessions. Consequently, MCA-M reviews attendance records for the four sessions and reports the highest attendance figure. As a result, the number of farmers reported as trained may be inaccurate. To address this concern, this audit makes the following recommendations.

**Recommendation 4.** *We recommend that the Millennium Challenge Corporation’s Vice President, Department of Compact Operations, review and clarify the definition of the “farmers trained” indicator in the monitoring and evaluation plan for the rain-fed rehabilitation activity.*

**Recommendation 5.** *We recommend that the Millennium Challenge Corporation’s Vice President, Department of Compact Operations, verify that the data reported for the “farmers trained” indicator in the rain-fed rehabilitation activity is accurate and document the verification.*

## **Millennium Challenge Account–Morocco Cars Were Not Marked**

MCC requires that the MCA logo or signature be placed on any material paid for with MCC funds that is visible to a significant portion of the population.

MCA-M cars were not marked to identify their affiliation with MCA-M. MCC and MCA-M officials were uncertain exactly why the cars were not marked, but said the MCC branding guidance was very broad and open to interpretation. The officials also speculated that the cars might not be marked because of security concerns in the region.

Decisions made regarding branding should be considered and justified appropriately to be sure that the MCC project maximizes outreach. To address this concern, this audit makes the following recommendation.



**Recommendation 6.** *We recommend that the Millennium Challenge Corporation's Vice President, Department of Compact Operations, direct the Millennium Challenge Account-Morocco to comply or justify its noncompliance with the Millennium Challenge Corporation's branding guidance regarding the marking of material visible to a significant portion of the population.*

# OTHER MATTERS

## **Catalyst Fund Activity Faces Tight Time Frames**

The success of the rain-fed rehabilitation and expansion activity depends largely on the availability of processing facilities to accommodate the increased olive production.

MCC and MCA-M officials said that when they designed the Fruit Tree Productivity Project, they included technical assistance for olive oil processors and expected that private investors would build additional processing facilities to meet the increased demand. However, private investment did not occur. As a result, when compact funds became available because of a reduction in the Artisan and Fez Medina Project, MCC and MCA-M used them to establish the Catalyst Fund Activity within the Fruit Tree Productivity Project in August 2011.

The Catalyst Fund was designed to award grants—cofinanced by Morocco's primary agricultural bank—for building olive oil processing facilities. However, because the fund began late in the compact's implementation, the activity faces tight time frames. The grantees need to complete several tasks, such as securing land, awarding a construction contract, and completing the processing facilities, by November 2012 in order to process olives at least once before the compact ends. If the processing facilities are not built by then, MCC will lose its ability to evaluate the facilities' effectiveness because the compact will have ended before the facilities are used. Further, if the processing facilities are not constructed, farmers might not have sufficient support for their increased olive production.

While the Catalyst Fund activity faces tight time frames, MCC has taken steps to support the activity's success. As a result, OIG is not making a recommendation on this issue.

## **Web Site Was Not Current**

The MCA-M Web site makes current information about compact activities available to the public. Until March 2012, the site stated that the rain-fed activity would target 120,000 hectares. However MCC and MCA-M reduced that number to 62,000 hectares in October 2010.

In addition, until May 2012 the MCA-M Web site suggested that the expansion activity would include fig trees, but those trees had been eliminated. Without current information, the MCA-M Web site presented an inaccurate view of the compact activities. However, because MCA-M corrected the Web site when the inaccuracies were brought to its attention by OIG, OIG is not making a recommendation on this issue.

# EVALUATION OF MANAGEMENT COMMENTS

MCC provided written comments on the draft report that are included in their entirety in Appendix II of this report. MCC agreed with all six recommendations. Management decisions have been reached on all six recommendations.

MCC agreed with Recommendation 1, to direct MCA-M to develop and implement a written plan for mitigating the risk that certain trees may be affected adversely if they receive less maintenance than intended, either from contractors or farmers. MCC will ask MCA-M to develop and implement such a plan. In addition, MCC will prepare a closure plan for the project that will serve as MCC's recommended written plan for mitigating the risk mentioned above. The project will also prepare a report for the Moroccan Government that summarizes its accomplishments and lessons learned. OIG considers that a management decision has been reached on this recommendation. Final action will occur when MCC receives MCA-M's written plan.

MCC agreed with Recommendation 2, to direct MCA-M to develop and implement a written plan for strengthening oversight of the contractor responsible for providing training to farmers and youth in the rain-fed rehabilitation activity. MCC will ask MCA-M to develop and implement such a plan, which MCC expects to receive no later than December 31, 2012. OIG considers that a management decision has been reached on this recommendation. Final action will occur when MCC receives MCA-M's plan.

MCC agreed with Recommendation 3, to direct MCA-M to clarify in writing the contract for training in the rain-fed rehabilitation activity that 15 is the minimum age for training participants. MCC will ask MCA-M to issue a notice to contractors that Moroccan law states clearly that (1) 15 is the minimum age for training participants in the rain-fed rehabilitation activity and (2) contracts as currently written require them to adhere to all current Moroccan laws and regulations. MCC expects MCA-M to convey this message to contractors by December 31, 2012. OIG considers that a management decision has been reached on this recommendation. Final action will occur when MCC issues the notice to contractors.

MCC agreed with Recommendation 4, to review and clarify the definition of the "farmers trained" indicator in the monitoring and evaluation plan for the rain-fed rehabilitation activity. MCC will review and clarify the definition of the "farmers trained" indicator. MCC currently is revising the plan and expects to complete the revision no later than December 31, 2012. OIG considers that a management decision has been reached on this recommendation. Final action will occur when the plan is revised to include the clarification.

MCC agreed with Recommendation 5, to verify that the data reported for the "farmers trained" indicator in the rain-fed rehabilitation activity is accurate and document the verification. MCC will verify the data and document the verification. MCC will provide documented verification that the data is accurate no later than December 31, 2012. OIG considers that a management decision has been reached on this recommendation. Final action will occur when MCC provides documented verification that the data is accurate.

MCC agreed with Recommendation 6, to direct MCA-M to comply or justify its noncompliance with the MCC branding guidance regarding the marking of material visible to a significant portion of the population. MCC will ask MCA-M to justify the decision not to mark MCA-M vehicles. MCC expects the justification no later than December 31, 2012. Final action will occur when MCC receives the justification.

# SCOPE AND METHODOLOGY

## Scope

OIG conducted this audit of the MCC-funded Fruit Tree Productivity Project in Morocco in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions in accordance with our audit objective. We believe that the evidence obtained provides that reasonable basis.

MCC signed a compact with the Government of the Kingdom of Morocco for \$697.5 million that entered into force in September 2008. This audit focused on the Fruit Tree Productivity Project's \$143 million rain-fed expansion and rehabilitation activity.

We conducted our fieldwork from December 7, 2011, to April 11, 2012, at MCC headquarters in Washington, D.C., and visited MCA-M in Rabat from January 23 to February 10, 2012. In Morocco, we visited five expansion and three rehabilitation sites. The project's large geographical scope prevented the team from visiting additional sites during the time available.

To answer the audit objective, we met with MCC officials to gain an understanding of compact activities. We visited Morocco to observe ongoing activities and interview MCA-M staff, contractors, and program beneficiaries. We analyzed documents and reports to identify concerns. Some documents, especially procurement documents, were excluded from our review because they were in French, and the audit team did not have the time or resources to translate all of them.

We examined the internal control environment by identifying and assessing the relevant controls in the expansion and rehabilitation activity. We tested the controls in place for monitoring the contractors involved with this activity. In particular, we reviewed MCA-M's process for inspecting contractors' work, documenting the inspections, and using the documentation to verify contractor invoices.

## Methodology

The audit team met with MCC staff in Morocco and in Washington, D.C. In addition, we met with MCA-M staff, contractors, and beneficiaries in Morocco.

To answer the audit objective, we established audit steps to determine whether MCC and MCA-M were achieving the project activity goals. Specifically, we performed the following:

- Interviewed MCC and MCA-M officials to gain an understanding of the project activities.
- Interviewed contractors, Moroccan Government officials, other donors, and project beneficiaries to gain their perspectives on the risks facing the project.
- Reviewed documents supporting the project activities, including the compact, due diligence documents, the monitoring and evaluation plan, contracts, and progress reports.

- Selected a random sample of billing documents from 7 of 30 contractors in the rain-fed expansion activity and traced them to supporting source documents.

# MANAGEMENT COMMENTS



## Memorandum

May 17, 2012

**To:** Richard Taylor  
Assistant Inspector General  
Office of Inspector General  
U.S. Agency for International Development

**From:** Jonathan Bloom /s/  
Deputy Vice President of Compact Operations  
Millennium Challenge Corporation

**Subject:** Millennium Challenge Corporation Response to the Draft  
*Audit of the Millennium Challenge Corporation-Funded Fruit Tree Productivity Project in Morocco*

Dear Mr. Taylor:

The Millennium Challenge Corporation (MCC) appreciates the opportunity to respond to the Office of Inspector General's (OIG) draft report entitled "Audit of the Millennium Challenge Corporation-Funded Fruit Tree Productivity Project in Morocco. MCC's response to the OIG's audit recommendations are given below:

**Recommendation 1.** We recommend that the Millennium Challenge Corporation's Vice President, Department of Compact Operations, direct the Millennium Challenge Account-Morocco to develop and implement a written plan for mitigating the risk that certain trees may be adversely affected if they receive less maintenance than intended, either from contractors or farmers.

**Management Response:** MCC agrees with the recommendation and will request that Millennium Challenge Account-Morocco develop and implement a written plan for mitigating the risk that certain trees may be adversely affected if they receive less maintenance than intended, either from contractors or farmers. MCC, however, would like to emphasize that

important elements of a plan for tree maintenance are already in place. Local Ministry of Agriculture officials, many of whom received training from the Fruit Tree Productivity Project, will continue to work with farmer cooperatives after the end of the Compact to ensure the viability and sustainability of their trees. In addition, contracts for rain-fed expansion tree planting require 100% viability of trees at reception. The reception process requires the approval of the beneficiaries, the Provincial Department of Agriculture (DPA), the design and supervision consultant, the project management unit and MCA-Morocco. Almost all of the planting funded by the Compact has been completed and the reception process is underway for the first expansion contract. The Closure Plan for the Project will serve as MCC's recommended written plan for mitigating the above-mentioned risk and will include a perimeter-by-perimeter schedule for the reception of all expansion perimeters, which MCC will use to monitor this process through the end of the Compact. MCC anticipates that the Closure Plan will be approved by MCC by September 30, 2012. In addition, as part of closure activities, by August 31, 2013 the Project will prepare a report for *Maroc Plan Vert*, the country's long-term strategy for development of the agricultural sector, summarizing its accomplishments and lessons learned in rain-fed perimeters. In general, *Plan Maroc Vert* constitutes a set of actions and commitments to supporting agricultural development for a large part of the country – and the Government will be able to build on the investments made by the MCC for those areas included in the Compact. This constitutes MCC's Management Decision on this recommendation.

**Recommendation 2.** We recommend that the Millennium Challenge Corporation's Vice President, Department of Compact Operations, direct the Millennium Challenge Account-Morocco to develop and implement a written plan for strengthening oversight of the contractor responsible for providing training to farmers and youth in the rain-fed rehabilitation activity.

**Management Response:** MCC agrees with the recommendation and will request Millennium Challenge Account-Morocco to develop and implement a written plan for strengthening oversight of the contractor responsible for providing training to farmers and youth in the rain-fed rehabilitation activity. MCC, however, would like to emphasize that there are already multiple layers of oversight in place to monitor progress of training. In particular, the Project Management Unit of the Ministry of Agriculture, which works closely with MCA-Morocco to implement the Fruit Tree Productivity Project, plays a crucial role in oversight of the training contractor, making regular site visits and closely monitoring progress. We expect MCA-Morocco to develop their plan no later than December 31, 2012. This constitutes MCC's Management Decision on this recommendation.

**Recommendation 3.** We recommend that the Millennium Challenge Corporation's Vice President, Department of Compact Operations, direct the Millennium Challenge Account-Morocco to clarify in writing the contract for training in the rain-fed rehabilitation activity to specify 15 as the minimum age for training participants.



**Management Response:** MCC agrees with the recommendation and will request that Millennium Challenge Account-Morocco issue a notice to contractors that Moroccan law states clearly that (i) 15 is the minimum age for training participants in the rain-fed rehabilitation activity and (ii) contracts as currently written require them to adhere to all current Moroccan laws and regulations. We expect that Millennium Challenge Account-Morocco will convey this message to all relevant contractors via the Supervisory Engineer (TC-1A) no later than December 31, 2012. This constitutes MCC's Management Decision on this recommendation.

**Recommendation 4.** We recommend that the Millennium Challenge Corporation's Vice President, Department of Compact Operations, review and clarify the definition of the farmers trained indicator in the Monitoring and Evaluation Plan for the rain-fed rehabilitation activity.

**Management Response:** MCC agrees with the recommendation and will review and clarify the definition of the farmers trained indicator in the Monitoring and Evaluation Plan for the rain-fed rehabilitation activity. MCC is currently working to revise the Monitoring and Evaluation Plan and expects that this will be complete no later than December 31, 2012. This constitutes MCC's Management Decision on this recommendation.

**Recommendation 5.** We recommend that the Millennium Challenge Corporation's Vice President, Department of Compact Operations, verify that the data reported for the farmers trained indicator in the rain-fed rehabilitation activity is accurate and document the verification.

**Management Response:** MCC agrees with the recommendation and will verify that the data reported for the farmers trained indicator in the rain-fed rehabilitation activity is accurate and document the verification. MCC will provide documented verification that the data is accurate no later than December 31, 2012. This constitutes MCC's Management Decision on this recommendation.

**Recommendation 6.** We recommend that the Millennium Challenge Corporation's Vice President, Department of Compact Operations, direct the Millennium Challenge Account-Morocco to comply or justify its noncompliance with the Millennium Challenge Corporation's branding guidance regarding the marking of material visible to a significant portion of the population.

**Management Response:** MCC agrees with the recommendation and will request that Millennium Challenge Account-Morocco justify the decision not to mark MCA vehicles. Upon consultation with other U.S. Government agencies in Morocco, including USAID, vehicles are often not branded due to security concerns. We expect that Millennium Challenge Account-Morocco will submit their justification no later than December 31, 2012. This constitutes MCC's Management Decision on this recommendation.

If you have any questions, comments or concerns please feel free to contact me at 202.521.3894.

CC: IG/MCC, Lisa Banks  
MCC/A&F, Aleta Johnson  
MCC/A&F/FMD, Arlene McDonald

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