USAID’s RISE Program in the Sahel Aligned With Resilience Policies but Lacked Robust Monitoring
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MEMORANDUM

DATE: September 25, 2021

TO: Bureau for Humanitarian Assistance, Assistant Administrator, Sarah Charles
    USAID Senegal/Sahel Regional Office, Mission Director, Peter Trenchard

FROM: USAID OIG Africa Regional Office Director, Rob Mason /s/

SUBJECT: USAID's RISE Program in the Sahel Aligned With Resilience Policies but Lacked Robust Monitoring (4-000-21-003-P)

This memorandum transmits the final report on our audit of USAID’s Resilience in the Sahel Enhanced (RISE) initiative. Our audit objectives were to assess the extent to which USAID (1) designed RISE I activities to align with its resilience policy goals, (2) monitored the implementation of RISE I to ensure the accomplishment of its resilience goals, and (3) incorporated lessons learned from RISE I into RISE II. In finalizing the report, we considered your comments on the draft and included them in their entirety in Appendix B.

The report contains two recommendations to improve USAID’s monitoring of the RISE activities, and USAID agreed with both of them. After reviewing information you provided in response to the draft report, we consider both recommendations resolved but open pending completion of planned actions.

For recommendations 1 and 2, please provide evidence of final action to the Audit Performance and Compliance Division.

We appreciate the assistance you and your staff provided to us during this audit.
INTRODUCTION

Over 90 million people live in countries with extreme poverty and chronic food insecurity due to environmental and security-related factors in the Sahel—a broad ecological transition zone between the Sahara Desert and the African savannah. Harsh environmental conditions and violent extremism in the region have led to recurring crises, exacerbating these factors. These recurrent crises have required frequent interventions by USAID and other donors to provide extensive emergency relief.

According to USAID, shocks and stressors in the Sahel are expected to become even more severe in the future. The Agency also believes climate change may lead to reduced rainfall that, in turn, will increase the frequency and intensity of major droughts as average temperatures in the Sahel increase. The region also faces the challenge of rapid population growth as well as increased conflict and instability.

In recent years, USAID has focused on resilience, which the Agency defined in 2012 as “the ability of people, households, communities, countries, and systems to mitigate, adapt to, and recover from shocks and stresses in a manner that reduces chronic vulnerability and facilitates inclusive growth.” Specifically, USAID’s policy provided guidance to missions as they developed new programs to support resilience in vulnerable areas like the Sahel. This policy outlined three main goals: increased adaptive capacity, improved ability to address and reduce risk, and improved social and economic conditions of vulnerable populations. In line with this, USAID developed a new approach that seeks to build greater resilience among targeted populations in the Sahel, specifically within Burkina Faso and Niger. The Resilience in the Sahel Enhanced (RISE) initiative has been a multidimensional effort to address the region’s extreme poverty and chronic food insecurity.

The initial effort, RISE I, was a 5-year effort initiated in 2014 that received $348 million in USAID funding. A follow-on project, RISE II, continues the same operational approach to assisting rural populations in Burkina Faso and Niger, with planned USAID funding of $446.3 million through fiscal year 2023.

USAID OIG conducted this audit to assess the extent to which USAID (1) designed RISE I activities to align with its resilience policy goals, (2) monitored the implementation of RISE I to ensure the accomplishment of its resilience goals, and (3) incorporated lessons learned from RISE I into RISE II.

To conduct our work, we focused on four judgmentally selected development activities out of seven that were implemented under RISE I, and all RISE II activities that had been solicited or awarded as of May 2020 (10 solicitations and 11 awards). The total value of these RISE I and RISE II awards was approximately $625 million. We interviewed USAID officials; reviewed USAID policies, monitoring activities and evaluations, and pertinent internal controls; traced USAID policies through selected RISE I solicitation and award

documents; and mapped the lessons learned from RISE I assessments into RISE II solicitations and awards. We conducted our work in accordance with generally accepted government auditing standards. Appendix A provides more detail on our scope and methodology.

SUMMARY

USAID designed its RISE I activities to align with its resilience policy goals. We examined four of the seven development activities included in the RISE I core program and verified that key resilience principles contained in USAID’s policy had been incorporated into the scopes of work for the selected activities. For example, one of the key resilience principles states that activities should be carefully planned and implemented by layering, integrating, and sequencing humanitarian and development activities. For RISE I, Food for Peace (FFP) activities in Burkina Faso and Niger represented the first layer, targeting geographic areas where the marginalized and most vulnerable lived and where chronic poverty intersected with shocks and stresses, as required by the key principles of the resilience policy. These efforts were then given additional support through the next layer of RISE I activities sponsored by USAID’s Sahel Regional Office (SRO).

However, USAID did not fully implement its monitoring and evaluation activities as planned to verify that RISE I activities were on track to achieve their broad program indicator targets and, in turn, the Agency’s resilience goals. Specifically, USAID’s monitoring and evaluation (M&E) contractor, which was expected to provide important M&E support for RISE I, did not complete all of the required work on time or to the extent planned. For example, the contractor did not complete a timely impact evaluation of RISE I as part of the Sahel Resilience Learning Project (SAREL) that would have allowed a broad assessment of RISE I’s progress. While the contractor completed a midline impact survey, it was completed late, which limited USAID’s ability to incorporate needed adjustments to existing RISE I programming and ensure the accomplishment of resilience goals. Furthermore, USAID did not take all appropriate steps to ensure that all RISE I performance indicators were useful and could be used to make appropriate course corrections. Although USAID supplemented its ongoing monitoring with additional activity-level performance evaluations, the recommendations from these studies were not always tracked to resolution as required by USAID policy.

While planning RISE II, USAID undertook a structured effort to ensure that lessons learned from RISE I implementation were collected and incorporated into the follow-on activities. Starting with a planning conference in March 2017, USAID gathered input from stakeholders regarding what had worked well and what needed adjustment during RISE II. These efforts resulted in a list of six key lessons learned that were included in

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2 In June 2020, USAID’s Bureau for Humanitarian Assistance became operational, and it consolidated and merged the Offices of U.S. Foreign Disaster Assistance (OFDA) and FFP. Prior to this change, and during the scope of this audit, OFDA and FFP resided as separate offices in the Bureau for Democracy, Conflict, and Humanitarian Assistance.

3 SRO resides at the USAID mission in Dakar, Senegal, and provides regional coverage to programs operating across the Sahel.
follow-on planning documents for both FFP and SRO. Our analysis of the resulting solicitations and awards showed that these lessons from RISE I implementation had been adequately incorporated into RISE II. For example, stakeholders had identified the need to address underlying drivers of vulnerability, such as water scarcity, high birth rates, low literacy rates, and a lack of secure land access. USAID ensured that RISE II programming planned to address each of these key areas. However, while USAID addressed the lessons learned regarding implementation, the following monitoring weaknesses identified during RISE I were not addressed and may persist during RISE II:

- evaluations were not always completed on time,
- USAID did not establish targets for intermediate-results indicators, and
- actions taken in response to evaluation recommendations were not always tracked and verified.

We are making two recommendations to better ensure that monitoring weaknesses identified in RISE I do not persist in RISE II. USAID agreed with both recommendations.

**BACKGROUND**

According to USAID, an estimated $180 billion was spent on humanitarian assistance worldwide by donor countries during the first decade of the 21st century, and half of that was spent in only 9 countries. By 2012, USAID recognized the importance of building resilient societies rather than relying on humanitarian assistance year after year.

In December 2012, USAID developed a policy document to provide guidance to missions as they developed new programs to support resilience in vulnerable areas. This policy outlined three main goals: (1) increased adaptive capacity, (2) improved ability to address and reduce risk, and (3) improved social and economic conditions of vulnerable populations. The shocks and stresses that the resilience policy targets are particularly severe in the Sahel, which is home to some of the poorest and most fragile countries in the world; Burkina Faso and Niger sat at the bottom of the U.N. Development Programme’s Human Development Index for 2012, the year before RISE I was initiated. The Sahel region covers the broad ecological transition zone between the Sahara Desert and the African savannah and includes the RISE Initiative’s geographic focus areas in Burkina Faso and Niger as shown in Figure 1.

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5 Adaptive capacity is the ability to respond to new circumstances quickly and effectively. This includes ensuring that adequate social systems, governance structures, and economic opportunities are in place.
Under RISE I, USAID implemented seven development activities in Burkina Faso and Niger managed by FFP and SRO. RISE I’s primary development activities focused on longer term efforts to increase sustainable economic well-being, strengthen institutions and governance, and improve health and nutrition.

FFP managed five RISE I development activities—two in Burkina Faso and three in Niger. These FFP activities were the first layer of activities and worked to address the underlying causes of malnutrition among vulnerable rural populations.

SRO managed two RISE I development activities implemented in both Burkina Faso and Niger:
• **Resilience and Economic Growth in the Sahel: Enhanced Resilience (REGIS-ER),** which aimed to increase economic well-being by boosting food production and expanding access to water and finance, strengthen governance, and improve health and nutrition.

• **Resilience and Economic Growth in the Sahel: Accelerated Growth (REGIS-AG),** an activity to increase the incomes of vulnerable populations through improved performance of agricultural value chains.

Table 1 lists RISE I’s seven development activities in the Sahel.

### Table 1. RISE I Development Activities in the Sahel

<table>
<thead>
<tr>
<th>Food for Peace (FFP) Activities</th>
<th>Estimated Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Families Achieving Sustainable Outcomes (FASO) – Burkina Faso</td>
<td>$56,920,065</td>
</tr>
<tr>
<td>Victory Against Malnutrition – Burkina Faso</td>
<td>$36,184,463</td>
</tr>
<tr>
<td>Livelihoods, Agriculture and Health Interventions in Action – Niger</td>
<td>$32,476,613</td>
</tr>
<tr>
<td>Sawki Development Food Aid Program – Niger</td>
<td>$29,999,553</td>
</tr>
<tr>
<td>Household Food Security Support Program (Programme d’Appui à la Sécurité Alimentaire des Ménages, PASAM-TAI) – Niger</td>
<td>$44,807,004</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sahel Regional Office (SRO) Activities</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Resilience and Economic Growth in the Sahel: Enhanced Resilience (REGIS-ER)</td>
<td>$76,645,520</td>
</tr>
<tr>
<td>Resilience and Economic Growth in the Sahel: Accelerated Growth (REGIS-AG)</td>
<td>$34,390,909</td>
</tr>
</tbody>
</table>

| Total                                                                      | $311,424,127*   |

* There was also $37 million in additional support funding, which was not part of the audit.

Source: USAID Sahel Regional Office and USAID FFP. Amounts not audited.

In February 2017, SRO initiated planning for a follow-on program, RISE II. RISE II was expected to be implemented in a similar but smaller area than RISE I. RISE II was designed based on the premise that “building the resilience of people, households, communities and systems in the Sahel requires a long-term commitment to addressing structural and systemic issues that undermine the ability of vulnerable populations in the Sahel to recover from recurrent and protracted shocks and stresses.”

As with RISE I, the RISE II initiative consists of both FFP and SRO activities. FFP issued a solicitation in May 2018 for activities in Burkina Faso and Niger to support the RISE II initiative. This resulted in four new awards issued in August-September 2018 at an estimated cost of $192.4 million over 5 years.

SRO began issuing solicitations in late 2018 for follow-on activities to support the RISE II objectives. As of May 2020, SRO had issued nine solicitations and issued seven awards.

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for RISE II to address such project components as water security, healthcare, improved governance, and land reform in the targeted areas of Burkina Faso and Niger.

USAID DESIGNED RISE I TO ALIGN WITH ITS RESILIENCE POLICY GOALS

We found that USAID had incorporated resilience policy principles into the design and scopes of work of the four activities reviewed. By applying these resilience policy principles, FFP and SRO ensured that RISE I would also align with the Agency’s resilience policy goals: (1) increased adaptive capacity, (2) improved ability to address and reduce risk, and (3) improved social and economic conditions of vulnerable populations.

To evaluate USAID’s adherence to the resilience policy during RISE I, we identified key principles necessary in the design and planning of activities to align with the resilience policy goals.7 We reviewed these principles against four awards we selected from RISE I: FASO, PASAM-TAI, REGIS-ER, and REGIS-AG (see Table 1).8 We then examined the four awards to assess whether SRO and FFP integrated resilience policy principles into the design of individual RISE I activities.9

The key principles from the resilience policy that we identified included important planning concepts and considerations for project design as well as solicitation and award processes. For example, in developing resilience activities, USAID planners should have:

- Selected areas for activities where chronic poverty intersected with shocks and stresses.
- Emphasized activities to improve social and economic conditions of vulnerable populations.
- Layered, integrated, and sequenced activities that were coordinated with each other to achieve optimal results.

Our evaluation verified that principles from the resilience policy were incorporated into RISE I’s Project Design Plan (PDP) or equivalent, the Project Appraisal Document (PAD) or equivalent, and the award documents for the four judgmentally selected activities.10 For example, we verified that USAID’s implementation of RISE I reflected the

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7 See Appendix A for more details on how we identified these principles and Appendix C for a full list of the principles.
8 We judgmentally selected a sample of four of the seven development assistance awards valued at $213 million (68 percent of RISE I’s total of $311.4 million) based on: (1) total estimated cost, (2) USAID funding and managing office, and (3) breadth of representation across Burkina Faso and Niger.
9 According to Automated Directives System (ADS) Chapter 201, “Program Cycle Operational Policy,” missions should ensure that USAID policies are followed when projects are designed. The ADS contains the organization and functions of USAID, along with the policies and procedures that guide the Agency’s programs and operations.
10 The PDP is a USAID planning document that defines the key result to be achieved by the project and includes an estimate of the total USAID funding. The PAD is a planning document that describes how USAID intends to work directly or indirectly to influence desired changes.
resilience policy’s emphasis on layering, integrating, and sequencing assistance activities to maximize long-term impact. The FFP activities—FASO and PASAM-TAI—were already in place when RISE I was initiated and thus served as the first layer of RISE I activities to be built on. These activities targeted geographic areas where the marginalized and most vulnerable people were and where chronic poverty intersected with shocks and stresses. For example:

- FASO planned to address food insecurity through improved agricultural production, provided households with the tools to prevent malnutrition in children under 5, and supported girls’ education.
- PASAM-TAI planned to reduce food insecurity and malnutrition by increasing food production, raising incomes, and improving disaster risk management.
- SRO designed REGIS-ER and REGIS-AG to build upon the five FFP activities and to strategically integrate their activities with one another. As such, REGIS-ER worked in the same vulnerable communities and households as FFP but focused on strengthening local governments in resilience planning and coordination in the areas of land and natural resources management, food security, disaster risk reduction, climate adaptation, and conflict mitigation so that they could better serve their communities.
- REGIS-AG was designed to expand and improve on agricultural production in conjunction with the FFP activities by focusing on getting products to market. Since communities in the selected RISE I areas were extremely poor and had limited access to land and water, REGIS-AG promoted products that did not require substantial land or resources, were available and accessible, and were more drought resistant.

In this way, the RISE I assistance activities used a logical, strategic sequence to maximize long-term impact.

Other principles from USAID’s resilience policy that we identified as being incorporated into RISE I planning documents included:

- Use of both quantitative and qualitative data to measure and evaluate the highly complex undertakings of resilience-building efforts. We found evidence of measuring and evaluating the activities with quantitative and qualitative data. For example, FASO required the use of 16 quantitative studies and “Qualitative Studies for Learning” over the course of the activities, while PASAM-TAI required “a quantitative endline survey to measure achievement of planned performance targets, as well as a qualitative evaluation, measuring the overall success, best practices, and lessons learned.”

- Humanitarian and development activities that mutually inform each other’s project designs and procurements. We found evidence of mutually informed designs where development activities incorporated aspects of humanitarian activities. For example, REGIS-ER was designed with the ability to address a humanitarian crisis if needed by

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11 See Appendix C, #27.
channeling relief resources without disrupting ongoing development activities. REGIS-AG was designed to be cognizant of the fragility of the West Africa region and how development activities can impact local economies, social networks, and livelihoods and aimed to avoid exacerbating existing or potential future tensions, which could necessitate humanitarian responses.\textsuperscript{12}

In summary, we found that FFP and SRO incorporated resilience principles into the design of RISE I for the four activities we reviewed to ensure alignment with the Agency’s resilience policy goals.

**SHORTFALLS IN MONITORING HINDERED USAID’S ABILITY TO MANAGE RISE I PERFORMANCE AND ASSESS PROGRESS TOWARD ACHIEVING ITS RESILIENCE POLICY GOALS**

USAID did not fully manage its monitoring and evaluation activities as planned to verify that RISE I activities were on track to achieve their broad program indicator targets and, in turn, the Agency’s resilience goals. Specifically, USAID did not complete a timely impact evaluation of RISE I that would have shown if resilience targets had been achieved. While USAID completed baseline and midline data surveys for the impact evaluation, these surveys were completed late, limiting opportunities to make needed adjustments to existing RISE I programming, ensure the accomplishment of resilience goals, and inform prospective RISE II activities. Furthermore, USAID did not take all appropriate steps to ensure that all RISE I performance indicators were useful and could be used to make appropriate course corrections. Finally, while USAID supplemented its ongoing monitoring with additional activity-level performance evaluations, the recommendations from these evaluations were not always tracked to resolution as required by USAID policy.

**Monitoring Deliverables Were Not Completed or Were Delayed, Including the Impact Evaluation**

USAID used a contractor to carry out many RISE I monitoring and evaluation functions under the Sahel Resilience Learning Project (SAREL) contract. The Agency expected SAREL to be “a foundational monitoring and evaluation tool to the RISE initiative” and to provide monitoring deliverables such as a baseline assessment, a knowledge database, a collaborative learning database, activity midterm and final evaluations, and an impact evaluation (which entails baseline, midline, and endline surveys for data collection).

However, USAID did not ensure that the contractor completed all of the monitoring and evaluation deliverables anticipated in the contract completely and on time. For example, while SAREL ultimately created a knowledge management database and the Collaborating, Learning, and Adapting Portal as required, they were nearly a year late.

\textsuperscript{12} See Appendix C, #18.
Additionally, there were also various implementation delays throughout the life of the contract related to staffing, piloting, and rolling out the systems and capacity building for the local monitoring organization. SAREL had not completed other specified work deliverables, such as the unannounced collection and verification of data reported by REGIS-ER and REGIS-AG activity indicators. Moreover, the contractor did not conduct the midterm or final evaluations for the REGIS-ER and REGIS-AG activities, which had to be done by another contractor.

Most critically, USAID did not ensure that the contractor completed a timely impact evaluation of the RISE activities. According to the RISE I Performance Management Plan (PMP), the impact evaluation would measure household and community resilience to determine which interventions worked best to meet the resilience goals and could be expanded in future resilience projects. Further, the impact evaluation could measure the changes in development impact outcomes that could be directly attributable to the overall RISE initiative. A baseline survey—a necessary initial part of an impact evaluation—would create a comparative database of respondents within the zone covered by the RISE initiative as well as control zones outside the initiative’s areas, providing a basis for assessing the impact of RISE over time. Ultimately, the impact evaluation would monitor and assess progress that RISE interventions contributed toward RISE’s broad program performance indicators including: (1) sustained reduction in malnutrition rates, (2) reduced poverty among poor households, and (3) reduced prevalence of severely or moderately hungry households. Each indicator had a specific life-of-project target. By surveying households at the start of RISE, at the midline, and at the initiative’s completion, USAID planned to track progress and measure the impact of the RISE initiative.

SAREL did not complete the surveys required for the impact evaluation within the planned timeframes, and these delays impeded USAID’s ability to monitor and evaluate achievement of the Agency’s resilience goals on time. Specifically:

- The baseline survey was completed 2 years late (in 2016 instead of 2014).
- The midline survey was completed 1 year late (in 2018 instead of 2017).
- The endline survey was started in 2020, though it was scheduled for 2019. The data were not available as of February 2021.

These delays meant that midline survey data were not available for decision making until the FFP awards were in their last year. While useful data were available from other sources, including the individual activity-level evaluations, the impact evaluation was intended to provide specific feedback on how RISE activities were leading to the accomplishment of resilience policy goals. Consequently, any needed adjustments arising from the impact evaluation could not be incorporated into existing RISE I programming to ensure the accomplishment of USAID’s resilience goals or inform prospective RISE II activities.

Early on, SRO had raised concerns with the contractor about delays and the quality of work. SRO raised these concerns directly with the contractor in early 2015 and
instructed it to develop a remediation plan for the deficiencies, which SRO reviewed and approved.

Despite this early intervention, SRO continued to have concerns about SAREL’s performance. As an additional mitigation step, SRO requested an evaluation of SAREL’s performance from an independent firm in 2017 to determine, among other things, whether SAREL had the appropriate resources to achieve the objectives of the contract. The evaluation report verified the lack of progress, noting that SAREL’s routine monitoring had been sidelined due to the need to focus on other tasks. The assessment concluded that the contractor’s work demonstrated a lack of field visits, monitoring, validation, and analysis. Additionally, SAREL’s activities were limited to conducting data quality assessments (DQAs) and reviewing M&E plans.

SAREL was designed to strengthen key stakeholders’ capacity to promote best practices for resilience in the region. However, the evaluation report further noted that it was not clear how much strengthening could realistically be done in SAREL’s final year of operations. In particular, the external review found that the activity had not strengthened the institutional capacity of the local monitoring organization to allow it to take over SAREL’s role as the primary monitoring contractor. The report noted that there was “minimal evidence of any substantial M&E skill transfers or M&E outreach” to implementers.

The evaluation report stated that SAREL’s staff were seen as overwhelmed with the volume of work contained in the contract, and that SAREL found it difficult to hire qualified local staff. It also concluded that SAREL had an untenable scope of work from the start that greatly limited the contractor’s ability to accomplish the assigned tasks. Following this report, SRO eliminated the final impact evaluation deliverable from the SAREL contract in advance of the planned completion date.

**RISE I Performance Indicators Were of Limited Value in Monitoring Progress Toward USAID’s Resilience Goals**

USAID did not take all appropriate steps to ensure that RISE I performance indicators were useful and could be used to make appropriate course corrections.

ADS Chapter 201 states that missions should determine which indicators are appropriate and useful for measuring progress. According to ADS 201, the comparison of actual results achieved against initial targets is critical for determining the progress made in achieving expected results. Therefore, PMPs were required to document the definition, purpose, and methodology of the indicator to ensure all parties collecting and using the indicator have the same understanding of its content. Approved PMPs were also required to include performance indicators for intermediate results with end-of-project targets. These indicators would allow USAID to track progress toward its higher level goals and targets. For example, for RISE I, USAID established an intermediate-results indicator to track the value of savings accumulated by project beneficiaries, which would help show progress toward the broad program goal of reducing the level of poverty.
Furthermore, ADS 201 requires that a DQA be performed on indicators reported externally before the initial reporting of data and every 3 years after the initial DQA period. Operating units could use DQAs to identify the strengths and weaknesses of indicator data and determine whether data are of sufficient quality to help management make good decisions.

Although USAID defined numerous intermediate-results indicators necessary to assess RISE I’s progress toward accomplishing the Agency’s resilience goals, these indicators proved to be of limited value. In particular:

- USAID did not establish annual or end-of-program targets for its intermediate-results indicators as required by its own policy, thereby reducing the activity indicators’ value as a tool for tracking progress toward accomplishment of resilience goals or understanding why targets were not being met.

- USAID did not complete the required DQAs for all indicators pertaining to the FASO activity, which lasted almost 8 years.

Though USAID officials stated that while targets for high-level indicators had been established, targets were not established for lower-level indicators because targets might change at any time, this justification is inconsistent with ADS Chapter 201 requirements. According to ADS 201, missions are “accountable for assessing progress against their targets.” The lack of initial targets and timely DQAs made it difficult for mission personnel to assess the progress of RISE I in accomplishing resilience goals and could have hampered the ability of USAID to make any needed programmatic adjustments.

Issues Identified in Activity-Level Performance Evaluations Were Not Always Tracked to Resolution

In addition to the impact evaluation for the RISE I initiative as a whole, the PMP indicated that performance evaluations for individual RISE activities would also be completed. While USAID completed activity-level performance evaluations—such as midterm evaluations of the REGIS-ER, REGIS-AG, and FASO activities—the tracking of evaluation recommendations was not always documented as required by USAID policy.

ADS 201 states that missions and operating units must develop an action plan upon completion of an evaluation to help ensure that institutional learning takes place and evaluation findings are used to improve development outcomes. These plans should list the actions needed in response to the evaluation findings and should also track and document completed actions. According to Mission Order 203-4-2.1, SRO would lead relevant mission staff through the process of developing a post-evaluation action plan.

USAID’s evaluations included numerous recommendations to improve RISE I implementation, but neither SRO nor FFP developed post-evaluation action plans as required. For example, the evaluation of FFP’s FASO activity contained 60 recommendations to improve activity implementation. Recommendations included items identified as priority recommendations, which “focused on modifying approaches to
create greater impact and addressing threats to sustaining the impact that the program is achieving.” The evaluation recommended that the implementer devote significant attention to improving the record-keeping and warehousing of commodities in the school-feeding component to avoid extraordinary losses or misappropriation of commodities. The report also recommended that management give immediate attention to updating all indicators to conform with the current approved strategy of RISE and ensuring that the definitions of the indicators were current and accurate.

Similarly, the REGIS-AG midline activity-level evaluation recommended that the implementer determine the impact of activities on household income and resilience to inform the next generation of RISE programming.

There was little evidence that these and other recommendations were tracked or that appropriate actions were taken to make programmatic adjustments to ensure the accomplishment of USAID’s resilience goals. Although SRO provided some evidence of working with implementers to address evaluation findings, the outcomes were not well documented.

These problems combined to limit the amount and quality of data available for management decisions. USAID officials explained that they did not develop and document post-evaluation action plans because activity-level evaluation findings were disseminated to staff who could take needed actions on an ad hoc basis to modify activities. However, USAID officials did not provide evidence of centralized action plans that are periodically monitored to hold staff accountable for following up on evaluation recommendations.

By not following mission policy to track the status of recommendations made during evaluations, USAID may have missed opportunities to improve RISE I results and allowed identified deficiencies to persist. Because the impact evaluation’s surveys were delayed, USAID may have missed additional opportunities for results-based learning and adaptation. Had the results of these surveys been available when originally scheduled, USAID would have had valuable information available regarding program results to better understand and improve the effectiveness and efficiency of RISE II programming.

USAID INCORPORATED OPERATIONAL LESSONS LEARNED FROM RISE I IMPLEMENTATION INTO RISE II’S DESIGN, BUT MONITORING SHORTFALLS HAVE NOT BEEN FULLY ADDRESSED

As USAID began to develop plans for RISE II, it adopted a structured approach to identifying lessons learned during implementation. SRO and FFP subsequently worked to ensure that these lessons learned were incorporated into their RISE II solicitations and awards. Although USAID identified and addressed some of the monitoring weaknesses that occurred during RISE I, other problems have persisted and could weaken RISE II monitoring efforts.
USAID policy guidance stresses the importance of utilizing lessons learned to improve Agency activities and operations, including USAID’s resilience activities. ADS 201 states that strategic planning is an iterative process that should be informed by many sources, including lessons learned from implementation. USAID’s technical offices should ensure that programs are built on contextual knowledge and are updated as new knowledge is gained. Furthermore, USAID’s resilience policy states that robust monitoring, evaluation, and learning agendas must accompany resilience efforts to identify lessons learned related to the employment of new approaches.

USAID held a RISE II planning conference in March 2017 that brought together numerous stakeholders to discuss lessons learned, aspects of RISE that worked well, and aspects that needed to be strengthened. The various discussion points were then distilled into 17 lessons learned and 19 resulting recommendations, which were presented at a RISE II design conference in August 2017. These lessons were further refined by USAID planners, resulting in six overarching lessons included in the May 2018 RISE II project design document issued by SRO. These lessons were to:

- Address key areas including improved water access, health services, enhanced agriculture, and access to finance, as well as underlying drivers of vulnerability including water scarcity, high birth rates, early marriage, low literacy rates, the extended lean season, migration, lack of secure land access, and the large youth population.
- Include a comprehensive approach to risk management and shock response by including the capacity to respond to severe local shocks in awards.
- Address women’s empowerment and other fundamental behavioral components in a culturally sensitive manner.
- Ensure greater engagement on governance and with state institutions to build sustainability of results, with a focus on local capacity to manage and coordinate donor support and transparent expenditures to address locally identified development priorities.
- Add sector interventions in health services provision, comprehensive water management and water service delivery, risk management, government institutional performance, and markets and finance.
- Enhance collaboration between implementers with complementary strengths and mandates by clarifying division of labor and identifying “nodes of collaboration”—intervention areas that require collaboration to achieve a higher goal.

Based on our review of all RISE II solicitations and activity awards made through May 31, 2020 (10 solicitations and 11 awards), USAID demonstrated an ability to adapt and learn based on operational experience and planned RISE II activities, appropriately reflecting the lessons learned during RISE I implementation.

FFP included all six lessons learned in solicitation documentation issued for RISE II. FFP made these lessons learned available to all interested bidders, allowing potential FFP implementers to understand the areas of improvement the specific adjustments needed.
In making the awards, FFP, like SRO, consistently ensured that the lessons learned were adequately reflected in the final proposed scopes of work. For example, to address identified concerns regarding water access, FFP’s Victory Against Malnutrition Plus activity plans to construct or rehabilitate water systems for the 31 most water-scarce villages during RISE II. Similarly, to address the lessons learned regarding risk management and shock response, FFP’s Girma activity added shock assumptions to its activity planning with the intention of making communities more resilient through integrated approaches to risk management. The proposal included planned mitigation strategies such as environmental protection, food preservation, and livelihood diversification.

Likewise, SRO also ensured that their new activities designed for RISE II reflected the lessons learned during RISE I. For example, to address identified underlying drivers of vulnerability, RISE II developed solicitations for specific activities targeting the delivery of health services, water security, markets and nutrition, and the needs of youth.

In addition to these lessons regarding the implementation of resilience activities, USAID also took some steps to identify and adjust to lessons learned related to the monitoring and evaluation process. For example, USAID hired additional local staff to provide M&E support to the RISE II program. Also, to address the weaknesses identified with the broad scope of SAREL, USAID awarded a separate contract to support learning and coordination among RISE II implementers; monitoring and evaluation for RISE II will be performed under a different contract. In addition, SRO has drafted a Project Monitoring, Evaluation, and Learning Plan for RISE II that includes monitoring improvements. For example, the plan includes specific requirements for timely DQAs and identifies the mission M&E specialist as the person responsible for monitoring DQA efforts to ensure that data comply with quality standards.

However, while the Project Monitoring, Evaluation, and Learning Plan clarifies the importance of developing evaluation action plans and tracking the implementation of evaluation recommendations, the plan does not identify the personnel responsible for ensuring that these tasks are completed. Regarding baseline, midline, and final impact evaluations for RISE II, the plan does not provide a schedule or statement of responsibilities that would ensure that these critical evaluations will be completed on time. Furthermore, as with the RISE I PMP, the RISE II plan does not include intermediate-results indicator targets, which would preclude USAID from making the critical comparison of planned results versus actual progress achieved. These missing details suggest that the problems that we identified with RISE I may persist during RISE II.

13 A Project Monitoring, Evaluation, and Learning Plan is an annex to a Project Appraisal Document that provides guidance to USAID staff over the life of a project. According to USAID/SRO officials, the Project Monitoring, Learning and Evaluation Plan for RISE II replaces the PMP but contains similar elements.
CONCLUSION

USAID’s RISE I and RISE II activities represent a significant effort to enhance resilience in areas of extreme poverty and chronic food insecurity. SRO and FFP helped advance this effort by aligning RISE I activities with the Agency’s resilience policy goals. USAID also showed a commitment to learning, as reflected in its efforts to identify lessons learned from RISE I. This has allowed SRO and FFP to better tailor RISE II activities to meet the needs of the beneficiary populations in Burkina Faso and Niger. However, monitoring shortfalls prevented USAID from fully utilizing results data to improve RISE I implementation and refine RISE II activities with clear and specific data, while deficiencies in evaluation follow-up may have limited the impact of recommended operational improvements. Although planned monitoring and evaluation processes were improved based on lessons learned, additional attention to monitoring procedures would allow USAID to better track activity progress toward higher level goals and evaluate the specific impact of RISE II activities.

RECOMMENDATIONS

We recommend that USAID’s Sahel Regional Office:

1. Include procedures within the Resilience in the Sahel Enhanced II’s Project Monitoring, Evaluation, and Learning Plan to (a) verify that any planned impact evaluations and surveys are conducted in a timely manner, and (b) establish targets for intermediate-results indicators to optimize the use of indicator data to make programmatic corrections.

We recommend that USAID’s Bureau for Humanitarian Assistance and Sahel Regional Office:

2. Implement procedures under Resilience in the Sahel Enhanced II to strengthen compliance with existing policies regarding the tracking of evaluation recommendations and the documentation of completed actions.

OIG RESPONSE TO AGENCY COMMENTS

We provided our draft report to USAID on August 10, 2021, and received its response on September 14, 2021, which is included as Appendix B. The report included two recommendations, and we acknowledge management decisions on both of them. We consider recommendations 1 and 2 resolved but open, pending completion of planned actions.
APPENDIX A. SCOPE AND METHODOLOGY

We conducted our work from October 2019 through August 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We conducted this audit to assess the extent to which USAID (1) designed RISE I activities to align with its resilience policy goals, (2) monitored the implementation of RISE I to ensure the accomplishment of its resilience goals, and (3) incorporated lessons learned from RISE I into RISE II. The audit focused primarily on activity awards under RISE I and RISE II that were planned or implemented from November 2013 through May 2020, because this period encompassed the entirety of RISE I and the planning, solicitation, and initial awards for RISE II. The core development activities of RISE I included five Food for Peace (FFP) activities implemented in targeted zones in Burkina Faso and Niger and two additional Sahel Regional Office (SRO) activities—Resilience and Economic Growth in Sahel – Enhanced Resilience (REGIS-ER) and Resilience and Economic Growth in Sahel – Accelerated Growth (REGIS-AG)—which collectively totaled about $311 million in USAID programming. FFP programs were country specific, while REGIS-ER and REGIS-AG were implemented in both Burkina Faso and Niger. The primary office responsible for monitoring implementation RISE I and II is SRO in Dakar, Senegal.

To address the audit objectives, we first reviewed USAID information on the RISE I and RISE II programs and interviewed USAID officials to obtain an understanding of the activities. We reviewed, analyzed, and summarized criteria and background information including laws, ADS policies, guidance, media articles, and various reports related to the RISE activities.

We obtained a list of all RISE I and RISE II development activities from SRO and FFP that were awarded and solicited between fiscal year 2013 and May 2020. During this period, there were 7 RISE I and 11 RISE II activities valued at approximately $625 million. The total USAID project and FFP funding for RISE I and RISE II is expected to reach $794 million though fiscal year 2023. To facilitate our work, we judgmentally selected a sample of four out of seven RISE I development activities valued at approximately $213 million based on (1) total estimated cost, (2) USAID funding and managing office, and (3) breadth of representation across Burkina Faso and Niger. The four development activities selected were (1) Families Achieving Sustainable Outcomes, (2) Programme d’Appui à la Sécurité Alimentaire des Ménages, (3) REGIS-ER, and (4) REGIS-AG.

This approach allowed us to closely examine more than half of RISE I development activities representing 68 percent of total development activity funding ($213 million of $311 million). The results from this sample cannot be used to make inferences about the population. However, we believe that our method for selecting these four activities were appropriate for our audit objectives and that this selection would generate valid,
reliable evidence to support our findings and conclusions. We conducted audit procedures; interviewed USAID personnel in Dakar, Senegal; and interviewed staff and officials from USAID based in Washington, DC.

To answer the first objective, we interviewed officials from USAID’s Center for Resilience and reviewed USAID’s resilience policy as well as ADS 201 to identify key steps, processes, or principles that are necessary in the design and planning of resilience activities. This resulted in the identification of 33 principles, which can be found in Appendix C. Next, we traced those principles to USAID planning and design documents, such as the Project Appraisal Documents (PADs), and the solicitation and award documents for RISE I activities from our sample to verify that they were incorporated. The results of our testing using the 33 principles cannot be used to make inferences about steps, processes, or principles necessary in the design and planning of resilience activities. However, we determined that our method for selecting these principles was appropriate for our audit objectives and that the selection would generate valid, reliable evidence to support our findings and conclusions.

In addition, we traced the identified principles to the broad program indicators and verified that the indicators were aligned with USAID’s resilience policy goals. Furthermore, to verify that USAID incorporated the principles into its design of RISE, we did the following:

- Traced the principles for achieving resilience policy goals to the planned activities and outputs contained in awards.
- Analyzed these results to determine if, and how, USAID incorporated the principles into RISE I planning and design.
- Conducted interviews and reviewed documents to identify relevant control activities and whether they were followed.
- Reviewed documented instances where lack of coordination may have impeded program success.

To answer the second objective, we reviewed monitoring activities and evaluations done both at the individual award level and at the broad program level for the four judgmentally selected RISE I activities. Particularly, we reviewed mission orders on performance monitoring, portfolio reviews, and evaluations as key criteria for assessing the mission’s monitoring of RISE I activities, along with ADS 201 relating to program cycle, operational policy, and internal controls. We documented and reviewed the internal controls that were significant in the context of our audit objectives and relevant to monitoring, evaluation, and data reporting. This included reviewing implementer annual reports, site visit reports, evaluations, Performance Plan and Report submissions, Data Quality Assessments (DQA), Portfolio Reviews, and financial reviews. This also included verifying whether issues and challenges noted in the reports as well as significant findings related to indicators were followed up and included in the contracting/agreement officer’s representative files.
To answer the third objective, we reviewed criteria for utilizing lessons learned based on USAID policy guidance. We then identified the general criteria for testing the incorporation of lessons learned from RISE I into follow-on awards.

Specifically, we documented USAID’s assessments of RISE I, reviewed the RISE II planning documents, and extracted the sections identified as or related to lessons learned. We assessed how well USAID incorporated these lessons learned into RISE II planning documents, solicitations, and awards and mapped the lessons learned from RISE I, as determined by the Agency, to the RISE II planning documents such as the RISE II Technical Approach and RISE II Project Appraisal Document. Our mapping included all solicitations and awards made under RISE II through May 1, 2020 (10 solicitations and 11 awards totaling $314 million). This mapping allowed us to determine the extent to which lessons learned from RISE I were incorporated into the RISE II program.

In planning and performing the audit, we gained an understanding and assessed internal controls that were significant to the audit objectives. Specifically, we designed and conducted procedures under four of the five components of internal control as defined by the U.S. Government Accountability Office (GAO). These included the Control Environment, Risk Assessment, Control Activities, and Monitoring. Furthermore, we assessed controls that were significant in the context of our audit objectives, which included a review of the USAID fiscal year 2019 evaluations of internal controls required by the Federal Managers’ Financial Integrity Act of 1982 from USAID/Senegal. We also made inquiries and reviewed relevant documents regarding monitoring and performance evaluations.

In addressing these objectives, our audit techniques were limited to interviews and review and analysis of USAID reports, processes, and policies. We did not seek to determine whether USAID’s implementation of RISE I or II activities was successful. We did not rely on computer-processed data to determine audit findings, results, or conclusions. Instead, we relied largely on documentary evidence along with testimonial evidence from USAID officials to support our findings, results, and conclusions.

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14 GAO’s Standards for Internal Control in the Federal Government (GAO-14-704G), September 2014.
APPENDIX B. AGENCY COMMENTS

MEMORANDUM

TO: Rob Mason, USAID OIG Africa Regional Office Director
FROM: Peter Trenchard, Mission Director, USAID/Senegal /s/
       Matthew Nims, Deputy Assistant to the Administrator, Bureau for Humanitarian Assistance /s/
DATE: September 13, 2021

SUBJECT: Management Comments to Respond to the Draft Audit Report Produced by the Office of Inspector General (OIG) titled, “USAID’s RISE Program in the Sahel Aligned With Resilience Policies but Lacked Robust Monitoring” (4-000-21-00X-P)

The U.S. Agency for International Development Senegal Mission (USAID/Senegal) and USAID Bureau for Humanitarian Assistance (BHA) would like to thank the Office of Inspector General (OIG) for the opportunity to provide comments on the subject draft report. We agree with the recommendations, and herein report on significant progress we have made to implement them.

USAID/Senegal and USAID/BHA are committed to ensuring optimal compliance with Agency policy and global best practice related to design of activities that: (1) align with Agency resilience policy goals; (2) monitor the implementation of activities and programs to measure contributions toward accomplishment of their resilience goals; and (3) incorporate lessons learned from programs such as RISE I into the next generation activities under RISE II.

USAID expresses its thanks to the OIG for its comprehensive report and looks forward to continuing to implement measures to strengthen and enhance USAID’s RISE II consistent with the recommendations made below.
Please find below the management comments from the U.S. Agency for International Development (USAID) on the draft report produced by the Office of the USAID Inspector General (OIG), which contains two recommendations for USAID:

**Recommendation 1:** We recommend that USAID’s Sahel Regional Office: Include procedures within the Resilience in the Sahel Enhanced II’s Project Monitoring, Evaluation, and Learning Plan to (a) verify that any planned impact evaluations and surveys are conducted in a timely manner, and (b) establish targets for intermediate-results indicators to optimize the use of indicator data to make programmatic corrections.

- **Management Comments: 1(a)** USAID/Senegal/Sahel Regional Office (SRO) agrees with this recommendation. SRO, along with multiple RISE II stakeholders, has designed a comprehensive RISE II impact evaluation plan that encapsulates data points from the recently completed RISE I endline. In addition, the RISE II impact evaluation will include recurrent monitoring surveys (RMS) that will collect and report out real-time data on changes in household resilience capacities, recovery and food security outcomes in the face of shocks, and inform timing and targeting of crisis modifiers and early action, management adaptations, and/or programmatic responses. The use of RMS data provides an assurance that quantitatively verifiable data will be available for management decisions even if conditions on the ground (ongoing insecurity dangers or COVID restrictions) result in future delays in delivery of impact evaluations and surveys.

In addition, to mitigate possible delays for planned RISE II impact evaluations and surveys, SRO has bolstered the RISE II Project Monitoring, Evaluation and Learning Plan (PMELP) by adding a management section that clearly defines roles and responsibilities for the distinct evaluations and surveys.

Finally, SRO will maintain full management control for future evaluations and surveys, which will help reduce the complex management layers that exist in a multi-stakeholder evaluation approach and allow for quicker remedial action in the future should avoidable delays eventuate.

- **1(b):** USAID/Senegal/SRO agrees with this recommendation. Under RISE II, SRO will establish provisional targets for all intermediate-results indicators by September 9, 2021. These targets are being established through consultation with all relevant activity stakeholders and by using activity level data for some indicators as well as RISE I endline data for others. The recently completed RISE I endline IE survey provides an opportunity to update indicator targets based on
new data points. In addition, the utilization of activity level indicator data should allow for more opportunities to make programmatic corrections in a timely manner. In line with ADS 201 requirements, if subsequent indicator target data revisions are needed, all adjustments will be duly documented by the SRO M&E team as required.

- **Target Completion Date:** October 29, 2021.

**Recommendation 2:** We recommend that USAID’s Bureau for Humanitarian Assistance and Sahel Regional Office: Implement procedures under Resilience in the Sahel Enhanced II to strengthen compliance with existing policies regarding the tracking of evaluation recommendations and the documentation of completed actions.

- **Management Comments:** USAID/Senegal/SRO and BHA agree with this recommendation, and SRO and BHA have already taken action to strengthen compliance with existing policies regarding the tracking of evaluation recommendations. BHA has published updated technical guidance for the monitoring and evaluation of resilience food security activities that establishes specific guidelines and a template for tracking of evaluation recommendations. The guidance states that within 45 days of BHA's approval of the midterm evaluation (MTE) report, or after BHA and the partner come to agreement on the recommendations, the partner must develop an action plan to apply the MTE recommendations and submit it for Agreement Officer’s Representative (AOR) and USAID Mission approval. Once BHA and the partner agree to follow-up actions, they should establish a timeframe and a means of measuring progress and achievement for each action and assign responsibility for each action, and the implementing partner should describe progress in subsequent annual results reports.

In addition, BHA and SRO have taken steps to improve the consistency and completeness of documentation in AOR files, including the adoption of ASIST filing requirements (for both BHA and SRO) and the use of the Abacus award tracking system (specific to BHA). Based on lessons learned from SAREL, the Sahel Collaboration and Communication (SCC) activity was designed to serve as a central knowledge management hub for RISE II. As such, SCC currently has a robust learning agenda that captures data from evaluations, assessments, and surveys performed by RISE II partners and other stakeholders, and then actively shares those lessons learned with the wider community to allow for more rapid and efficient programmatic adaptation. BHA has completed all actions to address the OIG’s recommendation. SRO’s Program Office will incorporate an evaluation

tracker in the PMELP and, in collaboration with relevant AORs/CORs, will ensure that evaluation findings and recommendations are regularly followed up to conclusion.

- **Target Completion Date**: October 29, 2021.

In view of the above, we request that the OIG inform USAID when it agrees or disagrees with the management comments to allow for adequate time in preparing and formalizing the next steps.
APPENDIX C. RESILIENCE PRINCIPLES

1. Was building resilience to recurrent crises established as a common objective across both development and humanitarian actors for the strategy process?

2. Were joint problem, cross-sectoral analysis, and objective setting done with an integrated team of humanitarian and development experts?

3. Did the analysis build on existing knowledge and evidence and include consideration of science, technology, and innovation?

4. Did other relevant stakeholders (other U.S. government agencies, other donors, and host countries) participate or were they consulted during this strategic planning?

5. Was the host country government consulted to coordinate and complement their resources and activities with U.S. government efforts to ensure that all efforts were consistent with and were supported by national and regional policies, strategies, and institutions?

6. Were the underlying causes of recurrent crises addressed with an understanding of risks, including thoroughly considering how to layer, integrate, and sequence humanitarian assistance with the longer term focus of development assistance?

7. Did the approach to building resilience aim to be sustainable and effective over the long run, focusing on continued progress and achieving short-term milestones along the way?

8. a. Is there a common results framework and problem statement for the Project Appraisal Document (PAD)?

    b. Does the PAD include reference to activities that are part of the approach but not authorized under the PAD?

9. Is relevant monitoring, evaluation, and learning data from previous and/or similar programming used to inform the PAD?

10. Were approaches and interventions coordinated and complementary (promoting the strategic division of labor among the partners to improve harmonization and avoid the duplication of effort)?

11. Does the PAD provide for common language for all authorized activities?

12. a. Is there a coordinated approach for layering, integrating, and sequencing USAID’s development and humanitarian across activities?

    b. Is there sufficient flexibility across the portfolio and individual awards to respond to shocks?

13. Does the approach proposed respond to lessons learned and the underlying causes of recurrent crises?

14. Is the work of other relevant stakeholders (other U.S. government agencies, other donors, and host countries) incorporated into design?
15. Is the role of the activity in a layered, integrated, and sequenced resilience approach with other actors clear in the award documents?

16. Do the award documents aim to target geographic areas where chronic poverty intersects with shocks and stresses?

17. Do the award documents aim to target the marginalized and most vulnerable?

18. Is there evidence of the integration of humanitarian objectives into development assistance objectives and vice versa?

19. Did the awards include flexible language and finding that allow for “surge efforts,” such as crisis modifiers to react better to crises, and class waivers for source, nationality, and restricted goods?

20. Did the award include efforts to empower women and reduce gaps between males and females?

21. Did the award include efforts to build functioning institutions of good governance and democratic accountability that hold themselves accountable for results?

22. Did the award require the implementer to work closely with other U.S. government agencies, international donors, multilateral organizations, or other partners?

23. Will the appropriate vertical linkages between the different levels (community, commune, Federal) be formed?

24. Were the community’s needs responded to or used to inform award activities?

25. Do the award documents emphasize monitoring, evaluation, and learning?

26. Were appropriate indicators developed?

27. Was there a requirement for both quantitative and qualitative data and indicators at multiple levels, (including the resilience of people, households, communities, countries, and systems)?

28. Was “increased adaptive capacity” used as a proxy for resilience itself in the event that no shocks hit during the period of collection (indicators such as the diversity of livelihood strategies, assets, and social networks; propensity for household savings; and financial opportunities may, as part of a set, provide insight into “increased adaptive capacity”)?

29. Were versions of “income, food security, and nutrition” (traditional development indicators) that reflect the distinct nature of resilience investments used for measuring outcomes?

30. Were gender-sensitive indicators used to measure the change in the roles for household decision making around dry lands production, access to productive capital, income, leadership roles within the community, and labor time allocations?

31. Did the monitoring and evaluation component enhance the award activities’ capacity to adapt resilience programs to real conditions?

32. Did the M&E effort build on what works while eliminating what does not in order for midcourse corrections to be made?
33. Is there evidence that lessons learned from the models of layering, integrating, and sequencing humanitarian and development efforts that yield the greatest resilience gains will be shared for future efforts?
APPENDIX D. MAJOR CONTRIBUTORS TO THIS REPORT

The following people were major contributors to this report: Rob Mason, audit director; Louis Duncan, Jr., audit assistant director; Jon Chasson, lead auditor; Michelle Diouf, auditor; Colette Konate, auditor; Ryan Truxton, auditor; Saifuddin Kalolwala, legal counsel; and Cathy Trujillo, referencer.