



OFFICE OF INSPECTOR GENERAL

AUDIT OF USAID/COLOMBIA'S CONSOLIDATION AND ENHANCED LIVELIHOOD INITIATIVE—CENTRAL REGION

AUDIT REPORT NO. 1-514-14-004-P
JANUARY 16, 2014

SAN SALVADOR, EL SALVADOR



Office of Inspector General

January 16, 2014

MEMORANDUM

TO: USAID/Colombia Mission Director, Peter Natiello

FROM: Regional Inspector General/San Salvador, Jon Chasson /s/

SUBJECT: Audit of USAID/Colombia's Consolidation and Enhanced Livelihood Initiative—
Central Region (Report No. 1-514-14-004-P)

This memorandum transmits our final report on the subject audit. In finalizing the audit report, we considered your comments on the draft report and included them in their entirety in Appendix II.

This report includes two recommendations. Your written comments in response to the draft report indicate that you have made a management decision on one and taken final action on the other. Please provide the Audit Performance and Compliance Division in the USAID Office of the Chief Financial Officer with the necessary documentation to achieve final action.

Thank you and your staff for the cooperation and assistance extended to us during this audit.

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Abbreviations

The following abbreviations appear in this report:

| | |
|-------|--|
| CELI | Consolidation and Enhanced Livelihood Initiative |
| COR | contracting officer’s representative |
| CSDI | Colombia Strategic Development Initiative |
| C-TIP | counter-trafficking in persons |
| FY | fiscal year |
| RIG | Regional Inspector General |
| UACT | Unidad Administrativa de Consolidación Territorial (Administrative Unit for Territorial Consolidation) |

SUMMARY OF RESULTS

According to the U.S. State Department, endemic violence and social inequities, combined with limited government presence, led to the expansion of illicit drug cultivation and an illicit economy in large areas of Colombia. To address these problems, the Colombian Government unveiled Plan Colombia in 1999 as a comprehensive strategy to promote peace, combat the narcotics industry, revive the national economy, improve respect for human rights, and strengthen Colombian democratic and social institutions.

It was not until 2004 that the Colombian Government was able to establish, for the first time in recent history, a presence in all the country's municipalities. As summarized by USAID, the National Territorial Consolidation Plan announced in 2007 seeks to "consolidate military, law enforcement, and social gains by building state presence and growing the licit economy in previously ungoverned regions, integrating them into Colombia's broader political, economic, and institutional fabric."¹ To support this effort, USAID initiated the Consolidation and Enhanced Livelihood Initiative—Central Region (CELI-Central) on April 20, 2011. USAID/Colombia selected ARD Inc. (which has been acquired by Tetra Tech) to implement the 5-year, \$115 million initiative; Tetra Tech focused its efforts on 20 municipalities in the departments of Caquetá, Cauca, Meta, Tolima, and Valle del Cauca, shown in the map in Appendix III.

When it entered the municipalities, Tetra Tech implemented rapid-response activities to build trust. These activities included small infrastructure projects such as building school bathrooms, cafeterias, and playgrounds, as well as paving roads and equipping libraries and other community gathering places. Later, Tetra Tech focused on grant making. Most of CELI-Central's budget provides grants for training, short-term technical assistance, and procurement in support of community-led activities. As of September 30, 2013, \$49 million had been obligated, and \$36 million had been spent.

The Regional Inspector General/San Salvador (RIG) conducted this audit to determine whether USAID/Colombia was achieving its main goal of helping the Colombian Government become a sustainable presence in target municipalities.

The audit determined that the mission has made limited progress towards achieving its main goal. During the first 2 years of operations, the initiative did not achieve all of its expected results, often because initial targets were too ambitious. In addition, some activities started or finished late, and Tetra Tech had turnover problems (page 3).

Despite this, through the initiative the mission successfully implemented a number of activities designed to help communities gain confidence in the government. Some examples include.

- CELI-Central approved 581 activities primarily in the areas of infrastructure, land ownership, economic development, good governance, and social development; as of September 30, 2013, 423 activities had been completed, 138 were being implemented, and 20 were about

¹ USAID fact sheet, "Colombia Program at-a-Glance," accessed on January 8, 2013, at http://www.usaid.gov/sites/default/files/Colombia%20Country%20Fact%20Sheet%20Augst%202013_U_S_A_I_D_at_a_Glance.pdf.

to begin. CELI-Central's commitment of \$38 million was able to mobilize \$114 million from public sources and \$17 million from private sources as counterpart contributions.

- The initiative used funds in response to urgent priorities. For example, after an interethnic conflict in Cauca was in the national news, the Colombian Government asked Tetra Tech to undertake activities in that region. The implementer responded by opening an office within 90 days. One of the initial activities supported the identification of suitable land that the government could buy in order to settle land ownership disputes, which was at the root of the conflict. The initiative provided topographic surveys and technical assistance to expedite the process.
- In response to a request from the government, CELI-Central started working with municipal administrations to design investment projects using profits from oil, gas, and mineral development in Colombia. This process required close coordination and planning with various stakeholders, including community leaders, government officials, and civic associations—a cultural and organizational shift for the public institutions leading the process, which had been accustomed to working independently. Tetra Tech organized a series of workshops to train public officials in doing financial analysis and writing proposals. This important capacity-building initiative should allow municipal officials to tap new sources of funds and strengthen their planning and management skills.
- CELI-Central assisted the formation of 36 productive alliances under the supervision of the Ministry of Agriculture and Rural Development. Tetra Tech developed these alliances through a competitive grant program that provided technical assistance to farmer and producer associations seeking to improve their businesses through partnerships with distributors.

In addition, Tetra Tech successfully implemented an information system for monitoring its numerous activities. This management tool registers nearly all transactions. For example, it keeps track of paid advances and contains digital copies of supporting documentation. A typical activity record could contain activity approval documents, minutes from meetings, attendance lists, subcontracts, expected results, required deliverables, invoices, and information on counterparts' contributions. The system is Web-based, allowing Tetra Tech to share information instantaneously with USAID and Tetra Tech's home office in Vermont, as well as with its five offices in Colombia.

The audit also found that the mission had not provided counter-trafficking in persons training to implementers (page 7).

To improve the effectiveness of the initiative and mission operations, the audit recommends that USAID/Colombia:

1. Work with Tetra Tech to modify the overall budget and work plan to take into account the low level of spending during the initiative's first 2 years and changes in the budgets of each regional office (page 6).
2. Issue to all its implementers the USAID *Counter-Trafficking in Persons Field Guide*, which includes guidance for reporting suspected cases of trafficking through the Office of Inspector General Hotline (page 7).

Detailed findings follow. Appendix I describes the audit scope and methodology. The mission's comments appear in Appendix II, and our evaluation of the mission's comments is on page 8.

AUDIT FINDINGS

Initiative Did Not Achieve Expected Results

Automated Directives System 203.3.2 states that USAID analyzes performance by comparing actual results achieved with targets set at the beginning of a project. This analysis is critical in determining the progress made in achieving the impacts and outcomes. Missions should use this to confirm or refute the stated assumptions and hypotheses so they can adapt projects and objectives as necessary.

Despite poor early results in fiscal year (FY) 2011 and FY 2012, the mission has not yet formally adapted its plans and budgets since Modification 3, signed on June 22, 2012. As of August 2013, CELI-Central's performance management plan included 27 contractual indicators. Only 16 were relevant at the time of our audit, and 12 (or 75 percent) of those reported results were lower than the corresponding targets. The table below shows each indicator, its cumulative target, and its reported result as of September 30, 2013.

Indicators, Targets, and Results as of September 30, 2013 (Audited)

| Indicator | Cumulative Target | Reported Result | Percent of Target Reached |
|---|-------------------|-----------------|---------------------------|
| 1. Public funds leveraged in Colombia Strategic Development Initiative (CSDI) zones attributable to U.S. Government interventions | 36,000,000 | 19,817,747 | 55 |
| 2. Number of rapid impact projects implemented by U.S. Government implementers | 125 | 211 | 169 |
| 3. Number of strategic national social programs implemented in CSDI municipalities | 11 | 4 | 36 |
| 4. Number and percentage of people benefitted by national social programs implemented in CSDI municipalities | 24,000 | 17,913 | 75 |
| 5. Number of beneficiaries receiving improved services through infrastructure | 70,000 | 85,048 | 122 |
| 6. Number of civil society organization members supported by U.S. Government assistance | 1,850 | 542 | 29 |
| 7. Change in index of organizational capacity of civil society organizations supported by U.S. Government assistance | 43 percent | none | 0 |
| 8. Value of incremental sales of key supported products in CSDI zones | 5 percent | none | 0 |
| 9. Number of strategic rural and economic development programs with territorial approach implemented in CSDI municipalities | 7 | 2 | 29 |

| Indicator | Cumulative Target | Reported Result | Percent of Target Reached |
|---|-------------------|-----------------|---------------------------|
| 10. Number and percentage of people benefitted by strategic rural and economic development programs with territorial approach, implemented in CSDI municipalities | 25,000 | 77 | 0 |
| 11. Private sector funds leveraged in CSDI zones attributable to U.S. Government interventions | 15,000,000 | 1,859,075 | 12 |
| 12. Number of private-public alliances formed | 10 | 16 | 160 |
| 13. Number of rural households benefiting directly from U.S. Government interventions | 8,750 | 2,841 | 32 |
| 14. Number of people with a financial product from a local financial institution | 3,423 | none | 0 |
| 15. Total value of CSDI projects approved | 73,500,000 | 162,691,350 | 221 |
| 16. Total value of CSDI projects completed | 54,600,000 | 33,836,250 | 62 |

Sources: Tetra Tech's information system and performance management plan, and USAID/Colombia's contracting officer's representative (COR).

USAID/Colombia and Tetra Tech officials offered the following reasons for the limited progress.

Indicator Targets Were Too Ambitious in Fiscal Years 2012 and 2013. USAID/Colombia was unable to meet indicator targets because it underestimated the time and effort necessary to lay the groundwork for a demand-driven, sustainable methodology built on community ownership. Tetra Tech spent a disproportionate amount of time conducting orientation workshops while engaging municipal, departmental, and national institutions in parallel efforts to foster partnerships for successful planning and implementation. USAID/Colombia spent too much time on these initial activities and did not start medium- and long-term activities that were to contribute to the selected indicators.

Intermediate Indicators Were Lacking. The program's indicators measure outcomes such as sustainable livelihoods, the stabilization and reintegration or return of conflict-affected populations, improved governance, and increased access to justice. The results will not be known until the longer-term interventions are closed and results are reconciled. Therefore, indicator results for FYs 2012 and 2013 did not reflect CELI-Central's intermediate achievements. Most of these indicators were inappropriate, and targets for these years were not realistic.

Other Stakeholders Caused Delays in Activity Start-Up and Completion. The COR explained that CELI-Central's success depends on negotiating constructive relationships with key stakeholders, including a new government agency—Unidad Administrativa de Consolidación Territorial (UACT)—designed to assist with development activities in the municipalities and communities.

Although interinstitutional efforts to guarantee that the Colombian Government had a presence throughout the country and to reduce illegal crops date back to 2004, this objective was not really carried out until UACT was created on November 3, 2011—7 months after CELI-Central

began. Because the initiative's strategy required close interaction with UACT, the delays in establishing this unit postponed the start of numerous activities.

In addition, the municipal and departmental elections of 2011 brought new governors and mayors into office in January 2012. Because their support was critical to the success of the consolidation strategy, Tetra Tech had to delay the introduction of activities so the newly elected officials could learn about and support the process.

Security Concerns Limited Access. Consolidation activities cannot start until the Colombian military and security forces have guaranteed that the area is free of armed groups. The security situation is beyond the control of Tetra Tech, and it has not improved as much as anticipated in a few areas because combatants have shifted from open armed combat to low-intensity hostilities. The security situation in the initiative's targeted areas changes regularly; in some cases, violence, strikes, or the threat of them have delayed activities or completely prohibited Tetra Tech from having access to the area.

Inclement Weather Caused Problems. Tetra Tech postponed three activities because of poor weather conditions. Colombia had an extended rainy season, which prevented the construction team from completing work and caused significant damage.

Tetra Tech Had Staff Problems. Tetra Tech had trouble keeping some of its important positions filled. For example, it already has replaced the chief of party, one of two deputy chiefs, and directors in the Villavicencio and Florencia field offices. In the Ibagué office, Tetra Tech was seeking a replacement after its second field office director left. These regional offices are located in less desirable locations, making them harder to staff.

In addition, Tetra Tech has not yet adjusted its budget to reflect changes in office sites and openings. The locations of two regional offices differed from what was in the contract, Tetra Tech opened four regional offices instead of six, and some of those started later than anticipated. The office locations were changed based on the demands of the Colombian Government.

The situations described above contributed not only to slow progress, but also to delays in Tetra Tech's completion of deliverables and milestones. For example, the first strategic review, annual work plan, and performance management plan were submitted several weeks or months late, as detailed in Appendix IV.

The slower-than-anticipated pace of implementation also had implications for the CELI-Central budget. As the initiative approached its midpoint in September 30, 2013, only 31.3 percent of the funds budgeted had been spent. Specifically, the expenses for program management amounted to 51 percent of its budgeted amount, while only 24 percent of the \$74 million activity fund had been spent. USAID/Colombia officials emphasized the need for more rapid use of the activity fund.

Despite the delays in implementation and the failure to make significant progress toward intended results, USAID and Tetra Tech had not yet adapted their work plans and budget to reflect the need for more aggressive spending in future years. USAID/Colombia and Tetra Tech officials were optimistic about the initiative's remaining months and felt that only minor changes needed to be made.

Unless the mission updates work plans and budgets to reflect the initiative's limited initial results, the implementer will be at increased risk of not achieving all intended objectives. To ensure the timely completion of this process, we make the following recommendation.

Recommendation 1. We recommend that USAID/Colombia work with Tetra Tech to modify the overall budget and work plan to take into account the low level of spending during the initiative's first 2 years and the necessary changes in the budgets of each regional office.

Agency Does Not Have Counter-Trafficking in Persons Training for Implementers

USAID has identified human trafficking as a massive development problem affecting millions of men, women, and children. According to the *Counter-Trafficking in Persons and Contractor/Recipient Compliance: Agency-Wide Standard Operating Procedure*, USAID is reinvigorating its counter-trafficking in persons (C-TIP) efforts and demonstrating a renewed commitment to being a leader in C-TIP. The standard operating procedure states that USAID must train its employees so they know how to recognize, report, and address human trafficking offenses. Although the guidance focuses on C-TIP training for new USAID employees, annual ethics training, and the availability of training for acquisitions personnel, it does not address training implementers. In the 2012 *Counter-Trafficking in Persons Policy*, USAID highlights the five primary objectives relating to trafficking, one of which is to combat trafficking through training and coordination.

A recent OIG review of USAID's C-TIP program found that C-TIP coordinators in overseas missions did not know what their responsibilities were in terms of providing training or guidance to implementing partners.² Coordinators did not receive training on their responsibilities, including training implementing partners. Lacking that training and specific direction from Washington, USAID/Colombia has not provided training to its implementers on C-TIP or disseminated the Agency's April 2013 *Counter-Trafficking in Persons Field Guide* to implementers.

While USAID/Colombia staff may occasionally visit field operations, implementers are in the field observing the daily activities of the Agency's subawardees and beneficiaries. The implementers therefore are most likely to observe any instances of trafficking. Yet by not training them on how to identify potential trafficking, USAID/Colombia is not taking advantage of implementers' presence in the field.

According to a United Nations Office on Drugs and Crime report, Colombia's endemic violence and internal armed conflict, together with the production of narcotics and illicit crops, have made the country vulnerable to trafficking in persons. Therefore, USAID/Colombia should use all available resources to detect and report potential trafficking. USAID has not yet determined if or how it will train implementers. Until this matter is resolved, the mission can at least provide implementers with C-TIP guidance as it becomes available. We therefore make the following recommendation.

² *Review of USAID's New Counter-Trafficking in Persons Program*, Report No. 9-000-14-001-S, November 27, 2013.

Recommendation 2. *We recommend that USAID/Colombia issue to all its implementers the USAID Counter-Trafficking in Persons Field Guide, which includes guidance on how to report suspected cases of trafficking through the Office of Inspector General Hotline.*

EVALUATION OF MANAGEMENT COMMENTS

USAID/Colombia agreed with Recommendations 1 and 2. The mission made a management decision on the first and took final action on the other. Our evaluation of management comments follows.

Recommendation 1. USAID/Colombia agreed and has prepared a 2014 work plan that increases the monthly rate of spending budgeted funds by an average of 35 percent. The COR and the contracting officer approved the work plan.

The mission modified indicators to reflect the initiative's current activities and progress and modified targets to align with the Government of Colombia's pace on consolidation activities. The mission also cut the number of indicators from 35 to 27.

The mission's acquisition officials, the CELI-Central COR, and the implementer were discussing a budget realignment to reflect that CELI-Central's work in four regions instead of the six planned in the award. USAID/Colombia expected to complete the budget realignment by mid-January.

We acknowledge the mission's management decision to take these actions on the recommendation.

Recommendation 2. USAID/Colombia agreed and has distributed the C-TIP Field Guide to all implementing partners. Furthermore, the USAID/Colombia Regional Legal Advisor presented the C-TIP code of conduct and implementing partner obligations at a recent meeting of implementing partners, issuing a summary of the requirements to each participant. The mission's documented corrective steps constitute final action on this recommendation.

SCOPE AND METHODOLOGY

Scope

RIG/San Salvador conducted this performance audit 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 in accordance with our audit objective. We believe that the evidence obtained provides that reasonable basis.

The purpose of this audit was to determine whether USAID/Colombia's CELI-Central was achieving its main goal of helping the Colombian Government become a sustainable presence in target municipalities.

The mission awarded Tetra Tech a cost-plus-fixed-fee completion contract for approximately \$115 million from April 20, 2011, to April 19, 2016. As of September 30, 2013, cumulative obligations for the initiative totaled \$49 million, and expenditures were \$36 million. We tested the amount spent.

The audit covered activities that occurred from the start of the contract on April 20, 2011, through September 30, 2013; we reviewed a portion of the hundreds of Tetra Tech grant activities worth \$2.7 million.

In planning the audit, the auditors identified relevant controls that USAID/Colombia used to manage the program and oversee its activities. These controls consisted of the review of Tetra Tech's quarterly and annual performance reports, approval of annual work plans, holding meetings with Tetra Tech to obtain updates on the status of activities and discuss any implementation issues, and conducting field visits to talk to stakeholders. In addition, the auditors examined the mission's portfolio review notes and its FY 2013 annual self-assessment of management controls, which missions are required to perform to comply with the Federal Managers' Financial Integrity Act of 1982, to determine whether the assessment cited any relevant weaknesses.

The audit team conducted fieldwork from September 3 through September 20, 2013, in Bogotá and the departments of Cauca, Meta, and Tolima. We visited USAID/Colombia and Tetra Tech's offices in Bogotá and three of the project's four regional offices (Ibagué, Popayan, and Villavicencio). These offices cover activities in the departments of Cauca, Meta, Tolima, and Valle del Cauca. Because of security restrictions, we canceled plans to visit the fourth regional office in Florencia in the department of Caquetá, and the municipalities where activities were being implemented.

Methodology

To answer the audit objective, we interviewed USAID/Colombia's COR, contracts specialist, monitoring and evaluation adviser, and gender and trafficking-in-persons advisers. We reviewed the contract and its modifications, work plans, the performance management plan, monthly and quarterly progress reports, financial reports, and other documents.

We interviewed Tetra Tech's chief of party, deputy chief of party for programming, monitoring and evaluation specialist, contracts specialist, and staff from three of the four regional offices. We reviewed Tetra Tech's policies and procedures for monitoring and evaluation and for grants management. Finally, we interviewed dozens of CELI-Central beneficiaries, including government officials and farmers.

We used a statistical sample and selected 15 activities (2 closed, 7 ongoing, and 6 in closeout) out of 574 for field visits. The sampled activities amounted to \$2.7 million or 2 percent of the total of \$115 million. We selected the sample randomly from the sites approved by USAID/Colombia's security office for travel. The final itinerary was refined through discussions with USAID/Colombia and Tetra Tech staff. Site visits were conducted in three of the four regions where the initiative was being implemented. Field visits were used to validate the use of funds and to document aspects of monitoring, reporting, and compliance with environmental requirements. Since the statistical sample was drawn from an approved selection and not from the universe of activities, the sample results cannot be projected to the entire population.

MANAGEMENT COMMENTS



December 10, 2013

MEMORANDUM

TO: Regional Inspector General / San Salvador, Jon Chasson

FROM: USAID / Colombia Mission Director, Peter Natiello

SUBJECT: Audit of USAID/Colombia's Consolidation and Enhanced Livelihood Initiative (CELI) Central Region (Report No. 1-514-14-OXX-P)

This memorandum transmits our comments and responses on the draft report for the recent audit of Consolidation and Enhanced Livelihoods Initiative Central Region (Report No. 1-514-14-OXX-P).

Recommendation 1: We recommend that USAID/Colombia work with Tetra Tech to modify the overall budget and work plan to take into account the low level of spending during the initiative's first 2 years and the necessary changes in the budgets of each regional office.

USAID/Colombia agrees with the recommendation and we are taking the following corrective actions:

- The FY 2014 work plan is reflective of a program that is entering its peak phase of implementation. The planned number of activities and their dollar value is significantly higher than in previous years therefore projected monthly burn rates will increase by an average of 35 percent in FY 2014. The work plan has been approved by the Contracting Officer's Representative (COR) and by the Contracting Officer.
- On December 9, 2013, CELI Central submitted a budget realignment request that is currently under discussion between the Office of Acquisition and Assistance (OAA), the COR and CELI Central. The contract modification that will formalize this request will reflect the fact that CELI Central is operating in four geographical regions rather than the six originally contemplated at the time of award. USAID/Colombia's OAA expects to have the budget realignment modification completed by mid-January.
- The total number of project indicators has been reduced from 35 to 27. The modified project indicators are more reflective of current project activities and more within the control of CELI Central to effect. In addition, targets are being

adjusted downward in some cases to reflect the fact that Government of Colombia (GOC) counterpart funding for some activities has been slow to materialize. Furthermore, and as noted in the audit report, CELI Central's principal counterpart, the Consolidation Unit, did not become fully operational until several months after the project was awarded. Given that Consolidation is a GOC led initiative, the pace at which CELI Central can implement programs is largely dependent upon the government.

Recommendation 2: We recommend that USAID/Colombia issue to all its implementers the USAID Counter-Trafficking in Persons Field Guide, which includes guidance on how to report suspected cases of trafficking through the Office of Inspector General Hotline.

USAID/Colombia agrees with the recommendation and has taken the following corrective actions:

- The USAID/Colombia Regional Legal Advisor gave a presentation to all of USAID/Colombia's implementing partners on the Trafficking in Persons Code of Conduct and implementing partner obligations at our implementing partners meeting on October 21, 2013. In addition, the implementing partners each received a one page summary of the requirements (attached).
- USAID/Colombia's OAA e-mailed the C-TIP Field Guide to all implementing partners on December 4, 2013.

Sincerely,

Peter Natiello,
USAID/Colombia
Mission Director

Attachment(s):

1. One page summary of C-TIP Field Guide

Map of Regions Covered by the Initiative



Source: Tetra Tech.

Deliverables Submitted Late

USAID's contract with Tetra Tech established dates for completing required deliverables or milestones. The table below shows that several were not submitted and approved on time.

Completion Dates for Contract Deliverables or Milestones

| Deliverable or Milestone in Contract | Due Date Per Contract | Submission/ Start Date | COR Approval Date | Days Late* |
|--|------------------------------|-------------------------------|--------------------------|-------------------|
| Start-up conference | 4/25/11 | 5/23/11 | N/A | 28 |
| Start-up work plan | 4/29/11 | 6/15/11 | 6/23/2011 | 47 |
| Grants management plan | 5/20/11 | 5/28/11 | 6/16/2011 | 8 |
| Field procurement guide | 5/20/11 | 6/17/11 | 7/5/2011 | 28 |
| Communications, emergency, and information security plan | 6/19/11 | 6/22/11 | 9/5/2011 | 3 |
| First annual work plan | 6/19/11 | 7/31/11 | 7/25/2012 | 42 |
| Initial performance management plan | 6/19/11 | 9/15/11 | N/A | 88 |
| First quarterly strategy review | 7/19/11 | 12/13/11 | N/A | 147 |
| Buenaventura office operational | 5/15/11 | Never opened | N/A | N/A |
| Villavicencio office operational | 5/15/11 | 7/8/11 | N/A | 54 |
| Chaparral office operational (office was opened in Ibague instead) | 5/15/11 | 10/18/11 | N/A | 156 |

Source: Tetra Tech.

* These are based on the submission date. The COR approval date may occur several days or weeks afterward.

The challenges described earlier in the report hampered Tetra Tech's ability to complete deliverables and reach milestones as planned. In the cases of the performance management plan and first annual work plan, USAID/Colombia explained that the documents initially submitted needed to be revised.

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