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Non-Federal Audit of The Burkina Faso Foundation Seed Production Project (686-0245)

Audit Report No. 7-686-87-02-N

December 11,1986

UNITED STATES OF AMERICA
AGENCY FOR INTERNATIONAL DEVELOPMENT
OFFICE OF THE REGIONAL INSPECTOR GENERAL FOR WEST AFRICA

UNITED STATES ADDRESS
RIG / DAKAR
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DEVELOPMENT
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INTERNATIONAL ADDRESS
RIG / DAKAR
C/o AMERICAN EMBASSY
B.P. 49 DAKAR, SENEGAL
WEST AFRICA

December 11, 1986

MEMORANDUM FOR: Director, USAID/Burkina Faso, Herbert N. Miller

From: RIG/A/WA, John P. Competello

Subject: Audit Report No. 7-686-87-02-N, Non-Federal Audit of the Burkina Faso Foundation Seed Project (Project No. 686-0245)

Attached is a copy of the report on subject audit. The certified public accounting firm of Price Waterhouse, Dakar, Senegal, prepared the report, dated November 28, 1986.

The principal objectives of the financial and compliance audit were: determine if the grantee complied with the grant agreement, ensure that charges to the USAID-funded project were appropriate, and ensure that the project's accounting and internal control systems were in accordance with the grant agreement and implementation letters.

The audit found that almost $120,000 in disbursements were unrelated to project objectives and outside the scope of the grant agreement. An additional amount of more than $56,000 lacked proper supporting documentation. At the time of the audit, more than $4,000 in advances had been outstanding for almost six months, without liquidation. And finally, the audit found a number of internal control deficiencies regarding inventory and stock records, seed sales documentation, obtaining USAID approval for inter-fund transfers, and vehicle usage.

The auditors identified 10 specific recommendations which we consolidated into 2 for inclusion in the Office of the Inspector General audit recommendation follow-up system:

Recommendation No.1

We recommend that the Director, USAID/Burkina Faso, issue three Bills of Collection to Government of Burkina Faso for:

(a) disallowed project expenditures of USAID funds amounting to FCFA 40,774,735 (approximately $120,000);

(b) unaccounted for project expenditure of USAID funds amounting to FCFA 19,171,709 (approximately $56,000); and

(c) non-liquidated advances, as of December 31, 1985, amounting to FCFA 1,440,345 (approximately $4,000).

Recommendation No. 2

We recommend that the Director, USAID/Burkina Faso: (1) ensure that AID funds, provided to the Foundation Seed Production Project, are adequately accounted for, and (2) establish proper internal controls, by performing the following:

(a) prepare stock record cards and install a periodic physical inventory system for seeds and spare parts;

(b) conduct periodic reconciliations for seed stock records of the National Seed Service and seed multiplier agents;

(c) establish procedures to transmit seed sales documents from the seed multiplier agent to the National Seed Service;

(d) establish procedures to obtain prior USAID approval for, and to properly account for inter-fund transfers; and

(e) prepare a vehicle log book system to ensure the proper use of vehicles and petroleum.

Mission comments (see Appendix 11) on the draft report have been fully considered. USAID/Burkina Faso felt several recommendations could be combined, reducing the total number; and that there was not enough documentation to support proposed Bills of Collection.

In response, the non-federal auditors' 10 recommendations have been consolidated into 2. As well, the report now contains sufficient back-up documentation in its appendices to enable USAID/Burkina Faso to either issue the proposed Bills of Collections as recommended, or reduce the bills if the reduction can be documented with records not available during the audit.

Because of planned corrective actions, the recommendations are considered resolved. The recommendations will be closed upon completion of the corrective actions.

Please advise this office within 30 days of actions taken or planned to close the audit recommendations.

65, rue Carnot
BP 1081
Dakar
Sénégal

Telephone 21 07 77
27 66 66
Telex 3310 PRICE SG

Price Waterhouse

Dakar, November 28, 1986

Mr. John P. Competello
Regional Inspector General
USAID/RIG

DAKAR

Dear Sir,

FOUNDATION SEED PRODUCTION PROJECT - BURKINA-FASO

As promised in my letter dated November 26, 1986, please find herewith enclosed the original copy of my final report on the Foundation Seed Production Project - Burkina Faso for the period ending December 31, 1985 and starting January 1st, 1983.

Please do not hesitate to contact me if you need any further information.

Yours sincerely,

Mayoro WADE

MW/am/1444

FOUNDATION SEED PRODUCTION PROJECT
685-RIG-C-00-5089-00

REPORT ON FINANCIAL STATEMENTS AT DECEMBER 31, 1985

Dakar, September 4, 1986

Regional Inspector General / Audit
USAID/Dakar
c/o US Embassy
DAKAR

Dear sirs,

FOUNDATION SEED PRODUCTION BURKINA FASO - USAID FINANCED PROJECT 686-0245

The following report is the result of a financial and compliance audit of the financial reports and system of internal control of the Foundation Seed Production project from January 1, 1983 to December 31, 1985 as instructed under the contract 685-RIG-C-00-5089-00 dated March 28, 1986 amended on June 13, 1986.

The scope of our work is described in Section 2 of this report although reference should be made to the explanatory notes in Section 2, which precede the scope presentation.

We should like to take this opportunity to express our gratitude to the project staff and USAID officials in Burkina Faso and Senegal for the co-operation we received during the assignment.

Yours faithfully,

Rée Wolfinbarger.

FOUNDATION SEED PRODUCTION PROJECT

REPORT ON FINANCIAL STATEMENTS
AT DECEMBER 31, 1985

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FOUNDATION SEED PRODUCTION PROJECT

SECTION I

BACKGROUND OF THE PROJECT

BACKGROUND OF THE PROJECT

I. Project Background and History

The Foundation Seed Production is a USAID financed project (number 686-0245) implemented through a grant agreement signed on May 29, 1981 with the Government of BURKINA FASO.

The current project is the second phase of the project (number 686-0202) the main goal of which was "to increase domestic food production and improve the quality of life of rural families" in the grantee country.

The current project, which came into being as a result of a project paper approved on May 7, 1981, was intended to move toward this goal by further development of a national seed program which would :

- provide improved coordination and an expanded capacity of the Government of Burkina-Faso through the "Service National des Semences".

- "establish a national seed multiplication, marketing and quality control program capable of increasing the quantity of seed of genetically superior varieties of the largest food crops into quantities sufficient to assure widespread availability and use of such seed".

The total costs financed under the grant were not to exceed US dollars 1 600 000 which amount could be used to finance the cost of construction, commodities, technical assistance, training and other expenses divided into :

- foreign exchange costs ; and
- local currency costs not exceeding the equivalent of US dollars 611 000.

As its contribution to the Project, the Government of Burkina Faso agreed to provide additional funds and resources to a value of not less than the equivalent ofUS dollars 350 000.

The "Project Assistance Completion Date" which was May 31, 1984 had been extended to May 30, 1987, but the amount of the project funding remained US dollars 1 600 000.

II. Organisation and Management

The organisation and the management of the project are the responsibility of the Ministry of Agriculture and Livestock. The Director of Agricultural Services is the senior official assigned directly to supervise the project operations.

III. Accounting

The basic accounting and reporting procedures were set out through the project implementation letter number 11 dated March 17, 1982.

This basic framework was expanded and improved by the USAID financed Sahel Region Financial Management Project (S.R.F.M.P).

For the execution of the project, three interest bearing bank accounts are maintained :

- operating costs fund ;
- counterpart fund which should record Burkina-Faso Government financed expenses ; this account also recorded funds received from USAID to finance salaries and allowances ;
- marketing fund through which seed purchases and sales are recorded.

A set of reports are issued on a regular basis for each fund in th format implemented by the S.R.F.M.P.

A full time accountant was appointed in 1982 and is assisted by tw employees whose salaries and allowances are financed by the operating fund and the counterpart fund respectively.

FOUNDATION SEED PRODUCTION PROJECT

SECTION 2

SCOPE OF THE REPORT

SCOPE OF THE REPORT

The assignment as stated on the contract number 685-RIG-C-00-5089-00 dated March 28, 1986 amended on June 13, 1986 covers the period from January 1, 1983 to December 31, 1985. Because operations during December 1982 had not been separated fro January 1983 we have also applied the audit procedures set out in the statement of work summarised below to the month of December 1982.

The statement of work can be summarised as follows :

1. OBJECTIVES

The objectives of our examination stated in Appendix 9 and summarised below were :

- to determine whether the grantee had complied with the terms of the grant agreement ;

- to assure the propriety and allowability of charges to A.I.D ; and ;

- to assure that the system of accounting and internal control of the project will provide adequate identification of United States Government funds in accordance with the grant agreement and project implementation letters.

The audit was made in accordance with generally accepted auditing standards including (Standards) established by the Comptroller General of United States (GAO Standards) for financial and compliance audits and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary under the circumtances.

2. AUDIT STRATEGY

Our examination was carried out by performing the following steps

- Review of the grant agreement, project implementation letters (PIL) and reports to gain knowledge and understanding of the project activities ;

- Discussions with USAID officials in Ouagadougou (Office of Agriculture, Office of Financial Management, Sahel Regional Financial Management Project) and the Project staff ;

- Analysis of project expenditures and identification of expenditures which have a greater risk of containing unauthorized use of funds ; and

- Review and evaluation of the accounting system and controls.

Based upon the above-mentioned steps, we prepared an audit planni memorandum which was submitted to the representative of the Regional Inspector General/Audit and proceeded accordingly.

3. SCOPE LIMITATION

We were unable to verify that the local Government had provided i full contribution of not less than the equivalent of US dollars 350 000 as per the grant agreement.

FOUNDATION SEED PRODUCTION PROJECT

SECTION 3

SUMMARY OF AUDIT WORK PERFORMED

FOUNDATION SEED PRODUCTION PROJECT

(686-0245)

SUMMARY OF AUDIT WORK PERFORMED

I. WORK PERFORMED

1. OPERATING COSTS FUND

1.1 Budget

We have compared the amount as it appears on the financial reports at December 31, 1985 to the successive project implementation letters issued by USAID ensuring that all the amendments required were properly reflected in the financial reports.

1.2 Expenditure

We performed a preliminary review in order to determine the main areas of risk. Our work included the following steps :

- From the financial reports and the project records, we obtained the cumulative obligations and expenditures at December 31, 1985 ;

- We analysed the movements of obligations and expenditures per month in order to determine the amounts relating to 1985 and those relating to the period up to December 31, 1984 ;

- We compared the obligations with the authorised budget per categories ;

- We traced the movements of funds to the financial report of the period ;

- We determined the amounts of unliquidated obligations of the period and compared it with the financial reports issued ;

- We determined the excess of expenses compared to budget ;

- We determined the percentage of expenses per budget categories (i.e. commodities etc) ;

- We discussed with the mission and RIG representatives the questionnable expenses ;

- We combined the results of the meeting with the mission

and the percentages established above to prepare a general approach in order to obtain satisfactory audit coverage ;

- We reviewed in detail the grant agreement in order to determine the allowability of expenses and to summarize the obligations with which the grantee has to comply ;

- We reviewed all the Project implementation letters to assess changes of budgeted amounts included in obligations ;

1.2.2 General audit tests

We have tested for the following :

- authorization at a proper level ;
- adequate documentation ;
- the validity and appropriateness with regard to the application of funds included in the grant agreement and to the budget approved by USAID and project implementation letters issued ; and

- the physical existence of assets where applicable.

1.2.3 Specific audit tests

Specific audit tests were carried out for certain types of expenditure as follows :

1.2.3.1 Petrol and oil purchases

All the expenses charged to this caption were verified with supporting documentation.

A general reconciliation of purchases and tickets issued for 1985 was performed and a schedule of purchases for 1984 was prepared.

1.2.3.2 Salaries

We have checked the authorization and reviewed the tax computation on salaries paid and checked the payment of taxes withheld.

1.3 Unliquidated obligations

We have reconstituted the balance of the major categories as follows :

	F CFA	%
Storage supplies	10 720 000	30
Construction - Cold room	10 614 063	29
Spare parts	7 876 361	21
Total checked	29 210 424	80
Other categories not checked	7 396 531	20
	36 606 955	100

Subsequently the following audit tests were performed :

- the proper authorization of the order issued was checked ;
- the validity and appropriateness with regard to the project goals was considered ;
- the physical existence, if applicable, of the assets purchased was verified and ;
- the subsequent liquidation.

1.4 Non budgeted outlays

Based on our pre-audit survey, the main attention in this category was put on advances between fund. The following steps were performed :

- The breakdown of non-budgeted items per funds covering the life of the Project was obtained ;
- The accuracy of account descriptions was checked ;
- From the supporting documents a search for advances between funds booked as expenses rather than as non-budgeted items was conducted ;
- Advances from funds to the bank account of the receiving funds were traced ;
- Non-budgeted items were cross-referenced by bank account with the reconciliation of total payments made.

1.5 Interest paid to USAID

We have checked the detail of the balance shown on the financial reports with the bank statements ensuring the completeness of the amounts paid.

1.6 Reimbursable expenses

We have obtained the breakdown of this category, checked the completeness and documentation and reviewed collectibility of such advances.

1.7 Advances from USAID

We have reconciled the balance on the financial reports with records kept by the USAID Office of Financial Ma agement.

1.8 Expenditure accepted and in process

We have performed a reconciliation between :

- total expenditure ; and
- expenses accepted and in process.

We have also reconciled :

- the total payments ; with
- the total expenditure.

1.9 Differences with 1034 forms

We have checked the differences and discussed with the USAID Offic of Financial Management staff the treatment of such differences.

2. COUNTERPART FUND

2.1 Budget

The same audit work as described above (paragraph 1.1) was performed.

2.2 Expenditure

As expenditures incurred under this fund consists of salaries paid to employees, we have performed the specific tests described above (paragraph 1.2.3.2).

2.3 Other captions

The other captions :

- unliquidated obligations ;
- non budgeted outlays ;
- advances from USAID ; and
- expenses in process.

have the same content as for the operating costs funds. Accordingl we have performed the same work as stated above (paragraphs 1.3,

1.4, 1.8 and 1.9).

3. MARKETING FUND

3.1 Budget

The same audit work as described above (paragraph 1.1) was performed.

3.2 Advances

- We checked whether advances made were properly documentated and fully collectible.

- We sent confirmation request to the seed multiplier agents.

3.3 Unliquidated obligations and non budgeted outlays

We performed the same audit work as described above for the operating costs fund.

3.4 Other tests

- We carried out an exhaustive physical count of seeds stocks, details of which are shown in Appendix 8. Those counts have been compared with the stock cards maintained by the seed multiplier agents. Stock cards were not available in the Service National des Semences, therefore, we have not been able to reconcile our counts with their book inventory.

II. GENERAL AUDIT COVERAGE

In our examination, emphasis was given to the main captions which our pre-audit survey identified as expenditure categories where there was a greater likelihood of errors occurring.

We have covered the following percentages :

2.1 OPERATING COST FUNDS

	AMOUNTS PER FINANCIAL REPORT	AMOUNTS COVERED PER AUDIT	PERCENTAG COVERED
	CUMULATIVE 31.12.1985	CUMULATIVE 31.12.1985	
BUDGETED ITEMS			
Expenditure			
61 Commodities	95 118 433	93 303 450	98 %
62 Other costs	274 190	274 190	100 %
63 Training	14 331 844	6 074 505	42 %
64 Construction	26 337 786	21 373 760	81 %
65 Salaries and travel	57 315 171	4 639 179	8 %
	193 377 424	125 665 084	
Unliquidated obligations			
61 Commodities	25 388 568	22 797 207	90 %
64 Construction	10 963 230	10 954 733	99 %
65 Salaries	255 157		
	36 606 955	33 751 940	
NON BUDGETED ITEMS			
Non budgeted outlays	(17 741 811)	(17 741 811)	100 %
Interest paid to USAID	(873 173)	(873 173)	100 %
Reimbursable expenses	(22 000)		
Disallowable expenses	(320 322)		
	(18 957 306)	(18 614 984)	

2.2 COUNTERPART FUNDS

	AMOUNTS PER FINANCIAL REPORT	AMOUNTS COVERED PER AUDIT	PERCENTAGE COVERED
	CUMULATIVE 31.12.1984	CUMULATIVE 31.12.1985	
BUDGETED ITEMS			
Expenditure	5 399 935	5 399 935	100 %
Unliquidated obligations	190 254		
	5 590 189	5 399 935	
NON BUDGETED ITEMS			
Non budgeted outlays	(1 321 484)	(1 321 484)	100 %
	(1 321 484)	(1 321 484)	

2.3 MARKETING FUND

	AMOUNTS PER FINANCIAL REPORT	AMOUNT COVERED PER AUDIT	PERCENTAGE COVERED
	CUMULATIVE UP TO 1984	CUMULATIVE UP TO 1984	CUMULATIVE
BUDGETED ITEMS			
Expenditure	76 271 397	40 263 485	53 %
Unliquidated obligations	31 922 404	31 922 404	100 %
	108 193 801	72 185 889	
NON BUDGETED ITEMS			
Non budgeted outlays	38 132 270	34 953 894	92 %

FOUNDATION SEED PRODUCTION PROJECT

SECTION 4

FINDINGS ARISING OUT OF THE AUDIT OF THE FINANCIAL REPORTS AT DECEMBER 31, 1985

FINDINGS ARISING OUT OF THE AUDIT OF THE FINANCIAL REPORTS AT DECEMBER 31, 1985

1. OPERATING COST FUND

A significant amount of expenses were charged to the Project which were neither project-related nor documented.

The disallowable expenses amounting to CFA F 40 774 735 are listed in Appendix 1. The non documented expenses amounting to CFA F 19 171 709 are listed in Appendix 2. These disallowed and non-documented expenditures have either been accepted or are being processed by USAID.

In addition, we found that there were advances from USAID which were not liquidated as of December 31, 1985 amounting to CFA F 1 440 345 listed in Appendix 2 A.

The appropriateness of expenses was evaluated against the grant agreement, project implementation letters and project activities and goals.

RECOMMENDATION N° 1

USAID Burkina-Faso should take the proper actions to collect the above amounts from the Project.

DISCUSSION

The significant categories of disallowable and non-documented expenditures are as follows :

1. Petrol and oil

The evaluation of these expenses was performed in detail and was very time consuming.

- In Appendix 3 the quantities of Petrol and Oil purchased for the period from January 1 to December 31, 1985 are stated ;

- In Appendix 4 the quantities of petrol and oil purchased for the period from January 1 to December 31, 1984 are stated ;

- Appendix 5 shows the summary of petrol and oil consumption in 1985 obtained from the vouchers issued. The difference between the petrol and oil consumption and purchases was considered by us as non documented expenses. This is based on the facts that all petrol and oil tickets purchased during

the month are used in the same period and that the project was unable to provide evidence of the existence of any remaining tickets at December 31, 1985. The amount concerned is CFA F 5 183 900.

- Appendix 6 summarises the in quantity of disallowable expenses. Those disallowable expenses of CFA F 7 305 840 concern:

  . Vouchers issued to the staff ;
  . Vouchers given as gifts ; and
  . Vouchers issued to another donor.

- For the year ending December 31, 1984 due to pressure of time were unable to prepare the summary of oil consumption. This could easily be done by the mission itself.

The total of non-documented and disallowable P.O.L. expenses are included in 1.1 above.

2. INTER FUND TRANSFERS

Despite of the prohibition of the grant agreement, inter-fund transfers were made by the Project. These included transfers between the three funds.

Some of the transfers were booked in non-budgeted items. However, in one case a transfer from operating fund to the marketing fund amounting to CFA F 13 460 000 was claimed as a project expenditure. USAID should disallow this item because it is not a valid expenditure.

We have extended our audit scope to reconcile movements of funds with bank accounts.

The appropriateness of those expenses was covered in our general test in expenses.

Details of inter-funds transfers are provided in Appendix 7.

The consequence of this situation is to weaken the budgetary control system and this could be a source of misappropriation of funds.

In our reconciliation of movements between operating and marketing funds a difference of CFA F 107 807 still exists. The project management should be asked to provide adequate explanations.

We recommend that a closer control be exercised by the mission to overcome the above matters.

3. COUNTERPART FUND

The expenses charged to this account for 1985 exceed the budget by CFA F 1 635 035.

The Project Implementation letter n° 22 states that the counterpart fund should finance the salary and allowances of staff not paid through operating cost fund for the period starting July 1, 1984 to June 30, 1985.

The salaries were paid up to December 31, 1985. Therefore, the disallowable expenses are as follows :

	Authorized budget July 1,1984 to June 30, 1985	Salaries paid up to 31/12/85	Disallowable expenses
	F CFA	F CFA	F CFA
Drivers	1 090 216	1 659 137	568 921
Messengers	334 730	516 252	181 522
Labourers	754 991	1 206 079	451 088
Guards	344 231	516 205	171 974
Social charges	580 732	722 262	141 530
Allowances to accountants	660 000	780 000	120 000
	3 764 900	5 399 935	1 635 035
Unexplained difference	(14 000)	-	-
	3 750 900	5 399 935	1 635 035

4. RECONCILIATION OF FINANCIAL REPORTS

The reconciliation of financial reports as described in section 4 (paragraph 1.2.1) revealed the following :

The amount of F CFA 44 181 324 reclassified under the heading "Expenditure from June 1, 1981 to May 31, 1984" represents the total expenses from June 1, 1981 to May 31, 1982.

The expenses incurred from June 1, 1982 to May 31, 1983 amounting to F CFA 39,698,536 were not included in the financial reports as of December 31, 1985.

The amount of F CFA 149 196 100 appearing under the heading

"Expenditure from June 1, 1984 to December 31, 1985" represents the expenses for the period starting June 1, 1983 ending December 31, 1985.

Accordingly the total expenses from June 1, 1981 to December 31, 1985 are as follows :

	F CFA
From June 1, 1981 to May 31, 1982	44 181 324
From June 1, 1982 to November 30, 1982	19 517 544
From December 1, 1982 to December 31, 1985	169 538 025
	233 236 893

1.1.6 The budget covering the period starting June 1, 1982 to May 31, 1983 was not included in the financial reports at December 31, 1985. This budget amounting to F CFA 59 972 000 had been approved through PIL number 14 dated September 21, 1982.

1.1.7 The following adjustments required by USAID in the 1983/1984 budget were not reflected in the financial reports :

Caption	Approved F CFA	Posted F CFA	Difference F CFA
P. O. L.	19 338 000	19 188 000	150 000
Mobylettes	600 000	750 000	(150 000)

As those differences had no effect on the categorisation, and the two captions are included in the same budget heading, we do not propose any reclassification.

5. MARKETING FUNDS

Weaknesses in the accountability and internal controls for the commodities in the Marketing Fund are discussed in the control section.

6. COMPLIANCE

As a result of our audit, we confirm that, with the exception of inter-fund transfers and accountability for the marketing fund, the items tested were in compliance with applicable laws and regulations and the project grant agreement. In addition nothing came to our attention to cause us to believe that the items not tested were not in compliance.

FOUNDATION SEED PRODUCTION PROJECT

SECTION 5

INTERNAL CONTROL RECOMMENDATIONS

FOUNDATION SEED PRODUCTION PROJECT

INTERNAL CONTROL RECOMMENDATIONS

As part of our examination of the **FOUNDATION SEED PRODUCTION PROJECT** financial reports at December 31, 1985, we reviewed and tested the project's system of internal accounting control and reporting procedures to the extent we considered necessary to evaluate the system as required by generally accepted auditing standards.

Under these standards the purpose of such an evaluation of internal accounting control and reporting procedures is to establish a basis for reliance thereon in determining the nature, timing and extent of other auditing procedures that are necessary for expressing an opinion on the financial statements.

The objective of internal accounting control is to provide reasonable, but not absolute, assurance as to the safeguarding of assets against loss from unauthorized use or disposition, and the reliability of financial records for preparing the financial statements and maintaining accountability for assets. The concept of reasonable assurance recognizes that the costs of a system of internal accounting control should not exceed the benefits derived and also recognizes that the evaluation of these factors necessarily requires estimates and judgments by management.

It should be recognized, there are inherent limitations that should be recognized in considering the potential effectiveness of any system of internal accounting control. In the performance of most control procedures, errors can result from misunderstanding of instructions, mistakes of judgment, carelessness, or other personal factors. Control procedures whose effectiveness depends upon segregation of duties can be circumvented by collusion. Similarly, control procedures can be circumvented intentionally by management with respect either to the execution and recording of transactions or with respect to the estimates and judgments required in the preparation of financial statements. Further projection of any evaluation of internal accounting control to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions and that the degree of compliance with the procedures may deteriorate.

Our study and evaluation of the system of internal accounting control for the year ending December 31, 1985, was made for the purpose of determining the extent of auditing procedures necessary to express an opinion on the accountability for AID FUNDS. These recommendations do not include all possible recommendations which a study and evaluation made to report on the system of internal accounting control taken as a whole might disclose but only those important areas of potential improvement which came to our attention during our examination of the financial statements.

The project under review is not of a size whereby a sophisticated system of internal control can be expected to be operated. However, our evaluation of the system has revealed that, with the exceptions reported, the system as defined is adequate. However, due to inadequate implementation of effective monitoring and supervision of the system of internal accounting control there exists the possibility of serious breakdown and misuse of project assets and funds as its consequence.

I. MARKETING FUNDS

1. Stock cards should be maintained by the "Service National des Semences" for each kind of seed

Our work has revealed that stock cards are not maintained by the "Service National des Semences" neither for the seeds held by the Project nor for the seeds held by the different seed multiplier agents.

Consequently, in the present situation control by the "Service National des Semences" is non-existent and they are unable to report seed quantities at a given point in time without performing a physical inventory.

RECOMMENDATION N° 2

We recommend that based on the inventories we performed in June 1986, which are enclosed with this report, stock cards be maintained at the "Service National des Semences" for all seeds and updated from the date of our inventories.

2. Stock cards maintained by the "Service National des Semences" and relating to seeds held by the seed multiplier agents should be reconciled regularly with stock cards maintained by the seed multiplier agents

Following establishment of stock cards by the "Service National des Semences" and taking account of the complexity of the delivery system (the vouchers are prepared by the SNS but the deliveries are made by the seed multiplier agents), it will be necessary for control purposes to reconcile on a periodic basis the separate records of movements of seeds.

RECOMMENDATION N° 3

Therefore we recommend that the two sets of stock cards be reconciled at least every two months.

3. A copy of the delivery slips relating to sales made directly by the seed multiplier agents on behalf of the "Service National des Semences" (SNS) should be sent periodically to SNS for accounting purposes

Currently there are no formal procedures for the transmission of delivery slips and related documents in respect of sales made directly by the seed multiplier agents to SNS for accounting control and follow up.

RECOMMENDATION N° 4

Since these documents are needed for inventory and to prepare cash records, we recommend that the copies of the delivery slips and related documents be transmitted to SNS at the end of each month.

II. COUNTERPART FUND

1. Withholding taxes should be computed in accordance with legal requirements

Our work on salaries and withholding taxes has revealed discrepancies between the taxes withheld by the Project and the amounts required by the "barême".

For the month of March 1985 for example :

	IUTS per fiscal table	IUTS per payroll	Difference
Compaor Idrissa	1 520	1 307	213
Oualy Jean Yves	1 520	1 338	182
Ilbaido François	1 520	1 246	274
Kabore Simon	1 320	1 162	158
Ouedraogo Salif	1 320	1 030	290
Kafando Ambroise	685	562	123

RECOMMENDATION N° 5

We recommend that closer attention be paid to the computation of withholding taxes in order to comply with local requirements.

III. NON BUDGETISED ITEMS

1. A proper authorisation should be obtained from the authorised mission officials prior to any inter-fund transfers

We noticed that inter-funds transfers are made without any authorisation from the mission.

Example : See mission letter dated April 1, 1985 and relating to P.I.L. 21.

This practice is against the terms of agreement and has as its consequence the circumvention of the budgetary control system : one of the main features of the Project funds control system.

RECOMMENDATION N° 6

We recommend that proper authorisation be obtained prior to any inter-funds transfers.

2. Authorised inter-fund transfers should be correctly booked

Our work on non-budgeted items has revealed that inter-fund transfers have been deducted directly from the expenses of the receiving funds and not entered as a bank receipt in the bank account.

This practice makes it difficult to track movements between funds accurately.

RECOMMENDATION N° 7

We recommend that inter-fund transfers be booked to the debit of the bank account of the receiving fund and to the credit of the bank account of the paying fund using an inter-fund transfer account and vice-versa.

3. Advances made by USAID should be made according to the approved budget

We noticed that while the approved budget for the counterpart fund was CFA F 3 750 900 the advances made by USAID are CFA F 6 725 896.

RECOMMENDATION N° 8

We recommend that a close comparison between advances requested and the approved budget be made in order to avoid any budget-actual overspends.

IV. OPERATING COST FUNDS

1. No stock cards are maintained for vehicle spare parts

Presently adequate control is not exercised on vehicle spare parts movements.

Therefore it is difficult to ascertain movements of spare parts and to establish their proper use for Project purposes.

RECOMMENDATION N° 9

We recommend stock cards for spare parts be implemented and that a stock count be performed quarterly.

2. Each project car should carry a vehicle mileage register to control the use of petrol and oil products

Due to the absence of any type of vehicle log book with each vehicle, we were unable to ascertain that the use of the vehicles and the consumption of petrol and oil was for the Project's purposes according to established policy.

RECOMMENDATION N° 10

We recommend that a system of vehicle log books be established to incorporate the following information :

- The identity of the driver,
- The date,
- Distance run,
- Reason for the trip, including the identity of passengers,
- Time of departure and time of arrival,
- The mileage before and after the trip,
- The signature of the driver/passenger.

FOUNDATION SEED PRODUCTION PROJECT

SECTION 6

FINANCIAL REPORTS AT DECEMBER 31, 1985 AND EXPLANATORY NOTES

FOUNDATION SEED PRODUCTION PROJECT

OPERATING COSTS FUND

FOUNDATION SEED PRODUCTION PROJECT
(686-0245)

FINANCIAL REPORTS OF THE SERVICE NATIONAL DES SEMENCES AT
DECEMBER 31, 1985
OPERATING COSTS FUND
(Expressed in F CFA)

REPORT N° 1 : SUMMARY

	NOTE	F CFA
A. Budgeted Items		
Budget	1	221 752 157
Expenditure	2	(193 377 424)
Unliquidated obligations	3	(36 606 955)
Budget shortage		(8 232 222)
B. Non-Budgeted Items		
Non budgeted outlays	4	(17 741 811)
Interest paid to USAID	5	(873 173)
Reimbursable expenses	6	(22 000)
Disallowable expenses	7	(320 322)
Total of non-budgeted items		(18 957 306)

The accompanying notes 1 to 10 form an integral part of the financial reports.

FOUNDATION SEED PRODUCTION PROJECT
(686-0245)
FINANCIAL REPORTS OF THE SERVICE NATIONAL DES SEMENCES AT
DECEMBER 31, 1985
OPERATING COSTS FUND
(Expressed in F CFA)

REPORT N° 2 : RECONCILIATION OF ADVANCES

	NOTE	F CFA
Advances from USAID	8	193 583 372
Expenses accepted by USAID	9	(79 490 293)
Differences with 1034 forms	10	19 857 899
Expenses in process	9	(133 745 030)
Disallowable expenses	7	(320 322)
Due to USAID		(114 374)

The accompanying notes 1 to 10 form an integral part of the financial reports.

FOUNDATION SEED PRODUCTIOON PROJECT
(686-0245)

OPERATING COSTS FUND
NOTES TO FINANCIAL REPORTS

The operating costs fund reports we examined do not include any disclosures or notes. Based on our audit, the following explanatory notes provide details of each caption of the financial reports prepared by the Project.

1. Budget

The budget as it appears on the financial reports as at December 31, 1985 is broken down as follows :

	F CFA
From June 1, 1981 to May 31, 1984	60 965 000
From June 1, 1984 to May 31, 1985	157 861 000
Salary of an assistant accountant	844 313
Salary of an administrative assistant	2 081 844
	221 752 157

The amount of F CFA 60 965 000 appearing under the heading "Budget for the period : June 1, 1981 to May 31, 1984" represents the 1981/1982 budget approved by PIL number 8 dated January 19, 1982. The amount of F CFA 157 861 000 shown as 1984/1985 budget is broken down as follows :

	F CFA
1983/1984 budget	81 177 000
1984/1985 budget	76 684 000
	157 861 000

The 1983/1984 budget covering the year commencing June 1, 1983 was approved by PIL number 16 dated September 12, 1983 subsequently amended by PIL number 17 dated March 21, 1984 which had reallocated the amount available for the last quarter to the main budget captions without any increase in the total budget.

The 1984/1985 budget covering the year starting June 1, 1985 and approved through PIL number 19 dated June 1, 1984 covers expenditure incurred until May 31, 1985. For the period starting June 1, 1985 to December 31, 1985, no budget was approved by USAID; however, PIL N° 20 dated November 5, 1985 had extended

the 1984/1985 budget to the month of June 1985 without any budget increase.

The salary of the assistant accountant was approved through PIL number 23 dated July 1, 1985 and covers the period from September 15, 1984 to June 30, 1985.

The salary of the administrative assistant was approved through PIL number 24 dated August 20, 1985 for a period of one year.

2. Expenditure

The total expenditure of F CFA 193 377 424 appearing on Report 1 is analysed as follows :

	F CFA
From June 1, 1981 to May 31, 1984	44 181 324
From June 1, 1984 to Dec. 31, 1985	149 196 100
	193 377 424

The amount of F CFA 44 181 324 was not divided into the budget captions.

The amount of F CFA 149 196 100 is composed of the following captions :

	F CFA	%
Commodities	95 118 433	64
Other expenses	274 190	-
Training costs	14 331 844	9
Constructions	26 337 786	18
Salaries and per diem	13 133 847	9
	149 196 100	100

3. Unliquidated obligations

This heading on the financial report includes the value of orders issued for which no payment or partial payments were made.

The balance of F CFA 36 606 955 comprises the following :

	F CFA
Commodities	25 388 568
Construction	10 963 230
Salaries and per diems	255 157
	36 606 955

4. Non-budgeted outlays

This heading on the financial report includes the following captions :

	F CFA
Advance on purchases	17 960 000
Advance from marketing fund	(1 400 673)
Advance from counterpart fund	(600 356)
Advance to suppliers	(1 490 000)
Other	3 272 840
	17 741 811

5. Interest paid to USAID

In accordance with the PIL number 7 dated December 18, 1981, an interest bearing account was opened. The interest earned on this account was refunded to USAID.

6. Reimbursable expenses

This caption includes outlays which are project receivables.

7. Disallowable expenses

The total balance of F CFA 320 332 represents expenses already disallowed by the office of Financial Management of USAID when processing the financial statements.

8. Advances from USAID

The balance of F CFA 193 583 372 represents the total advances received by the project from USAID.

9. Expenditure

The two captions :

- Expenses accepted by USAID amounting F CFA 79 490 293 ; and
- Expenses in process amounting F CFA 133 745 030

represent respectively :

- Expenses incurred by the project and submitted to USAID which had reimbursed them or which had deducted them from advances already made.
- Expenses incurred by the project which were in process with USAID for reimbursement.

10. Differences with 1034 forms

The 1034 form is used by USAID for reimbursing expenses incurred by the project. A reconciliation between expenses incurred and reimbursements prepared by USAID revealed differences which were posted into this caption and should be cleared. These differences are as follows :

Period	Bank account	Per 1034 Form	Payment	Difference
June-August 82	C N C A		765 452	
July-August 82	BIV-029		101 816	
		953 787	867 268	86 519
Sept.-Nov. 82	BIV-029		2 511 399	
	BIV-104		14 451 455	
		17 418 287	16 962 854	455 433
Sept.-Nov. 82		36 352 394	17 036 447	19 315 947
				19 857 899

FOUNDATION SEED PRODUCTION PROJECT

COUNTERPART FUND

FOUNDATION SEED PRODUCTION PROJECT
(686 - 0245)
FINANCIAL REPORTS OF THE SERVICE NATIONAL DES SEMENCES AT
DECEMBER 31, 1985
COUNTERPART FUND

(Expressed in F CFA)

REPORT N° 1 : SUMMARY - USAID FUND

	NOTE	F CFA
A. Budgeted Items		
Budget	1	3 750 900
Expenditure	2	(5 399 935)
Unliquidated obligations	3	(190 254)
Budget shortage		(1 839 289)
B. Non Budgeted Items		
Non budgeted outlays	4	(1 321 484)

The accompanying notes 1 to 5 form an integral part of the financial reports.

FOUNDATION SEED PRODUCTION PROJECT
(686-0245)
FINANCIAL REPORTS OF THE SERVICE NATIONAL DES SEMENCES AT
DECEMBER 31, 1985
COUNTERAPRT FUND

(Expressed in F CFA)

REPORT N° 2 : RECONCILIATION OF ADVANCES

	NOTE	F CFA
Advances from USAID	5	6 725 896
Expenses in process	2	(5 399 935)
Due to USAID		1 325 961

The accompanying notes 1 to 5 form an integral part of the financial reports.

FOUNDATION SEED PRODUCTION PROJECT
(686-0245)
COUNTERPART FUND
NOTES TO FINANCIAL REPORTS

The counterpart fund reports we examined do not include any disclosures or notes. Based on our audit, the following explanatory notes provide details of each caption of the financial reports prepared by the Project.

1. Budget

The budget of F CFA 3 750 900 approved through PIL number 22 dated June 24, 1985 was to finance the following salaries from July 1984 to June 1985 :

	F CFA
Drivers	1 090 216
Messenger	334 730
Labourers	754 991
Guard	344 231
Social charges	580 732
Allowances to accountants	660 000
Total	3 764 900
Difference not explained	(14 000)
	3 750 900

2. Expenditure

The amount of F CFA 5,399,935 represents total salaries paid and is analysed as follows :

	F CFA
Drivers	1 659 137
Messengers	516 252
Labourers	1 206 079
Guards	516 205
Social charges	722 262
Allowances to accountants	780 000
	5 399 935

3. Unliquidated obligations

The balance of F CFA 190 254 represents salaries for December 1985 unpaid at the year end.

4. Non budgeted outlays

The balance of F CFA 1 321 484 is analysed as follows :

	F CFA
Advance to operating costs fund	1 384 806
Advances on salaries	125 050
Advance from marketing fund	(188 670)
Overpayment of income taxes withheld	298
	1 321 484

5. Advances from USAID

The amount of F CFA 6 725 896 represents total advances received from USAID from which the expenses incurred under the counterpart fund were deducted at December 31, 1985. The balance of advances outstanding is therefore F CFA 1 325 961.

FOUNDATION SEED PRODUCTION PROJECT

MARKETING FUND

FOUNDATION SEED PRODUCTION PROJECT
(686-0245)
FINANCIAL REPORTS OF THE SERVICE NATIONALE DES SEMENCES AT
DECEMBER 31, 1985
MARKETING FUND

(Expressed in F CFA)

SUMMARY

	Note	F CFA
A. Budgeted Items		
Budget	1	60 084 772
Advances	2	(76 271 397)
Unliquidated obligations	3	(31 922 404)
Budget shortage		(48 109 029)
B. Non-Budgeted Items		
Non-budgeted outlays	4	(38 132 270)

The accompanying notes 1 to 4 form an integral part of the financial reports.

FOUNDATION SEED PRODUCTION PROJECT
(686 - 0245)
MARKETING FUND
NOTES TO FINANCIAL REPORTS

The marketing fund reports we examined do not include any disclosures or notes. Based on our audit the following explanatory notes provide details of each caption of the financial reports prepared by the Project.

1. Budget

The amount of F CFA 60 084 772 appearing under the budget caption at December 31, 1985 is analysed as follows :

	F CFA
From June 1, 1981 to May 31, 1984	26 275 272
From June 1, 1984 to May 31, 1985	33 809 500
	60 084 772

2. Advances

The advances at December 31, 1985 are analysed as follows :

	F CFA
Advances in kind	5 257 320
Cash advances	71 014 077
	76 271 397

The advances shown above were made to the seed producers and should be deducted from the value of their production.

2.I Advances in kind

The balance of F CFA 5 257 320 comprises the following items :

	F CFA
Advances during the campaign 84/85	446 820
Advances during the campaign 85/86	4 810 500
	5 257 320

2.2 Cash advances

The balance of F CFA 71 014 077 comprises the following items :

	F CFA
Up to May 31, 1984	26 081 272
From June 1, 1984 to May 31, 1985	18 031 442
From June 1, 1985 to December 31, 1985	26 901 363
	71 014 077

3. Unliquidated obligations

The balance of F CFA 31 922 404 is explained as follows :

	F CFA
Estimate of production	108 193 801
Advances	(76 271 397)
Unliquidated obligations	31 922 404

The amount of F CFA 108 193 801 represents the value of estimated production as set out in the contracts with the producers.

4. Non-budgeted outlays

The non budgeted outlays include :

	F CFA
Advance to operating fund	30 474 902
Advance to counterpart fund	3 478 992
Other outlays	4 178 376
	38 132 270

APPENDICES

APPENDIX 1
THROUGH
APPENDIX 10

THESE APPENDICES CONTAIN DETAILS WHICH ARE EXCLUSIVELY OF INTEREST TO USAID/BURKINA FASO AND FOR THAT REASON HAVE BEEN OMITTED FROM THE GENERAL DISTRIBUTION LIST OF THIS REPORT

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E.O. 12356:N/A
SUBJECT: MISSION COMMENTS ON DRAFT NON FEDERAL AUDIT REPORT - FOUNDATION SEED PRODUCTION PROJECT

REF: DAKAR 11731

1. USAID/BURKINA HAS REVIEWED THE SUBJECT DRAFT REPORT AND IS IN PROCESS OF TRANSLATING SAME FOR REVIEW BY THE FOUNDATION SEED SERVICE DIRECTOR. INASMUCH AS THE SIGNIFICANT FINDINGS ARE FINANCIAL IN NATURE, WE WILL RESPOND HEREIN PRIOR TO THE COMMENTS OF THE PROJECT DIRECTOR WHICH UNDOUBTEDLY WILL FOCUS ON THE SAME ISSUES.

2. WHILE WE FEEL THAT THE REPORT IS ACCEPTABLE, WE NEVERTHELESS HAVE SEVERAL COMMENTS RELATING TO THE VARIOUS RECOMMENDATIONS. FIRST, WE ARE CONCERNED THAT RECOMMENDATION NO. 1 IS TOO RIGID IN TERMS OF RESOLUTION. WE FEEL THE REPORT NEITHER ADDRESSES NOR EXPLAINS THE BASIS FOR THE DISALLOWANCES OR UNDOCUMENTED AMOUNTS RECOMMENDED FOR COLLECTION BY USAID. ADMITTEDLY, EACH ITEM OF DISALLOWANCE IS DETAILED IN APPENDIX 1, HOWEVER THE REASON FOR SUCH DISALLOWANCE IS NOT CITED. THUS IN ORDER FOR USAID/BURKINA TO ACCEPT SUCH FINDINGS, WE FEEL FURTHER ANALYSIS IS REQUIRED, PRINCIPALLY IN FOLLOWING THROUGH EACH ITEM CITED TO DETERMINE WHY SUCH IS NOT ALLOWABLE, OR IN FACT IF SUCH WAS ALLOWABLE DURING FY 1986 OR CAN BE ALLOWABLE BASED ON SUBSEQUENT DOCUMENTS OR EVENTS INVOLVED. THIS SAME REASONING HOLDS TRUE FOR UNLIQUIDATED ADVANCES AS OF DEC. 31, 1985. THE REPORT DOES NOT SPECIFY NOR ADDRESS ADVANCES SUBSEQUENTLY LIQUIDATED. AGAIN, WE FEEL THE AUDIT REPORT SHOULD HAVE FOCUSED NOT ONLY ON IDENTIFICATION OF THE ITEMS NOTED AS DISALLOWED, BUT ALSO UPON THE REASON FOR EACH DISALLOWANCE AS WELL AS MORE FOLLOW-UP IN TERMS OF WHAT ALTERNATIVE ACTIONS COULD BE TAKEN TO RESOLVE ANY OF THE ITEMS QUESTIONED. IN ESSENCE WE FEEL THAT ADDITIONAL WORK MUST BE UNDERTAKEN TO FURTHER SOLIDIFY THE AUDIT FINDINGS.

AT THIS JUNCTURE WE SUGGEST THAT RECOMMENDATION NO. 1 NARRATIVE BE REVISED TO PROVIDE MORE FLEXIBILITY IN TERMS OF AMOUNTS TO BE COLLECTED OR RESOLVED. PERHAPS NARRATIVE TO THE EFFECT THAT USAID/BURKINA SHOULD TAKE THE PROPER

ACTIONS TO RESOLVE OR COLLECT THE ABOVE AMOUNTS FROM THE PROJECT WOULD PROVIDE THIS FLEXIBILITY. SECONDLY, USAID/BURKINA, IN CONJUNCTION WITH THE SRFMP FINANCIAL ANALYST ARE PREPARED TO COMPLETE SUCH A REVIEW AND FOLLOW UP WITH SPECIFIC AMOUNTS ACCEPTABLE OR COLLECTIBLE, HOWEVER WE DO NOT WISH TO IMPAIR THE INTEGRITY OF THE AUDIT BY OUR INVOLVEMENT TO DETERMINE ABSOLUTE AMOUNTS, SHOULD RIG/A/WA FEEL THIS INVOLVEMENT WILL NOT IMPAIR THE AUDIT INTEGRITY, WE WILL UNDERTAKE SUCH REVIEW IMMEDIATELY. IN THIS CONTEXT IT SHOULD BE NOTED THAT A SIGNIFICANT AMOUNT OF THE ITEMS CITED FOR DISALLOWANCE MAY OR MAY NOT BE ALLOWABLE COSTS, THUS WE ARE FAIRLY CERTAIN THAT RESOLUTION OF MANY OF THE ITEMS MAY BE FORTHCOMING WHICH WILL ALTER THE SPECIFIC AMOUNTS CITED FOR COLLECTION IN RECOMMENDATION NO. 1.

3. WHILE THE ABOVE IS THE ONLY SIGNIFICANT ISSUE NOTED, WE DO HAVE SEVERAL SUGGESTIONS RELATING TO THE BALANCE OF THE REPORT WHICH MAY CONSOLIDATE THE FINDINGS. INASMUCH AS RECOMMENDATION NOS. 2 AND 3 ARE INTERRELATED, WE WOULD SUGGEST THAT THESE BE COMBINED INTO ONE RECOMMENDATION FOR CLARITY AND IMPROVED PRESENTATION. WHILE WE CAN APPRECIATE RECOMMENDATION NO. 5, WE WOULD QUESTION THE MATERIALITY OF SUCH IN TERMS OF DESERVING A RECOMMENDATION EXPLICITY FOR THIS ONE ITEM. THE REPORT DOES NOT INDICATE IF SUCH COMPUTATIONS AS NOTED IN RECOMMENDATION NO. 5 ARE RECONCILED ON AN ANNUAL BASIS, WHICH MAY OR MAY NOT REFLECT THE MINOR MONTHLY DISCREPANCY RECONCILIATION. WE WOULD SUGGEST THAT RECOMMENDATION NO. 5 BE DELETED AS A RECOMMENDATION AND RATHER INCLUDE SAME, IF DETERMINED, MATERIAL, IN THE NARRATIVE OF THE REPORT. AGAIN, WE WOULD SUGGEST THAT RECOMMENDATIONS NO. 6 AND 7 BE MERGED INTO ONE RECOMMENDATION FOR SIMPLICITY AND CLARITY OF REPORT PRESENTATION.

4. WE AGREE IN PRINCIPAL WITH THE INTENT OF RECOMMENDATION NO. 8, HOWEVER WE CANNOT RECONCILE OURSELVES TO THE BASIS UPON WHICH SUCH DETERMINATION WAS MADE, OR IN FACT IF SUCH STATEMENT ON PAGE 33 ITEM 3 IS CORRECT. IT DOES APPEAR THAT THERE MAY HAVE BEEN SOME CONFUSION IN DETERMINATION OF ADVANCES MADE AND WHETHER SUCH WERE TO THE COUNTERPART, MARKETING, OR OPERATING FUND. IN ANY EVENT WE ARE CURRENTLY IN PROCESS OF SEGREGATING THE THREE DIFFERENT FUNDS AND RECONSTRUCTING

ADVANCES THERETO IN ORDER TO RESOLVE WHAT ADVANCES SHOULD BE RECORDED WHERE, THUS IN ESSENCE SUCH RECOMMENDATION WILL BE RESOLVED WHETHER CORRECT OR NOT. WE SUGGEST THAT THIS RECOMMENDATION BE CONVERTED TO THE NARRATIVE SECTION OF THE AUDIT REPORT WITH REFERENCE TO USAID/BURKINA'S CURRENT RECONCILIATION OF ALL THREE FUNDS.

5. OTHER THAN THE ABOVE, WE FOUND THE REPORT PARTICULARLY DIFFICULT TO FOLLOW IN TERMS OF ADEQUATELY EXPLAINING THE BASIS UPON WHICH SOME OF THE STATEMENTS AND FIGURES WERE NOTED. FURTHER, ADEQUATE EXPLANATION APPEARED TO BE LACKING IN TERMS OF RATIONALE BEHIND VARIOUS DISALLOWANCES. OUR CONCLUSION IS THAT THE REPORT, WHILE ACCEPTABLE, WILL REQUIRE FURTHER ANALYSIS TO EFFECTIVELY RESOLVE THE AUDIT REPORT RECOMMENDATIONS , PARTICULARLY RECOMMENDATION NO. 1. AS PREVIOUSLY NOTED, USAID/BURKINA IS PREPARED TO UNDERTAKE THIS FUNCTION IMMEDIATELY, HOWEVER IF SUCH INVOLVEMENT IS DEEMED INAPPROPRIATE, THEN RIG/A/WA OR P.W. SHOULD PLAN TO CARRY OUT SUCH AS SOON AS POSSIBLE. WE WOULD APPRECIATE YOUR THOUGHTS ON THIS.
NEHER
BT
#8178

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APPENDIX 12

Foundation Seed Production Project

Report Distribution

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