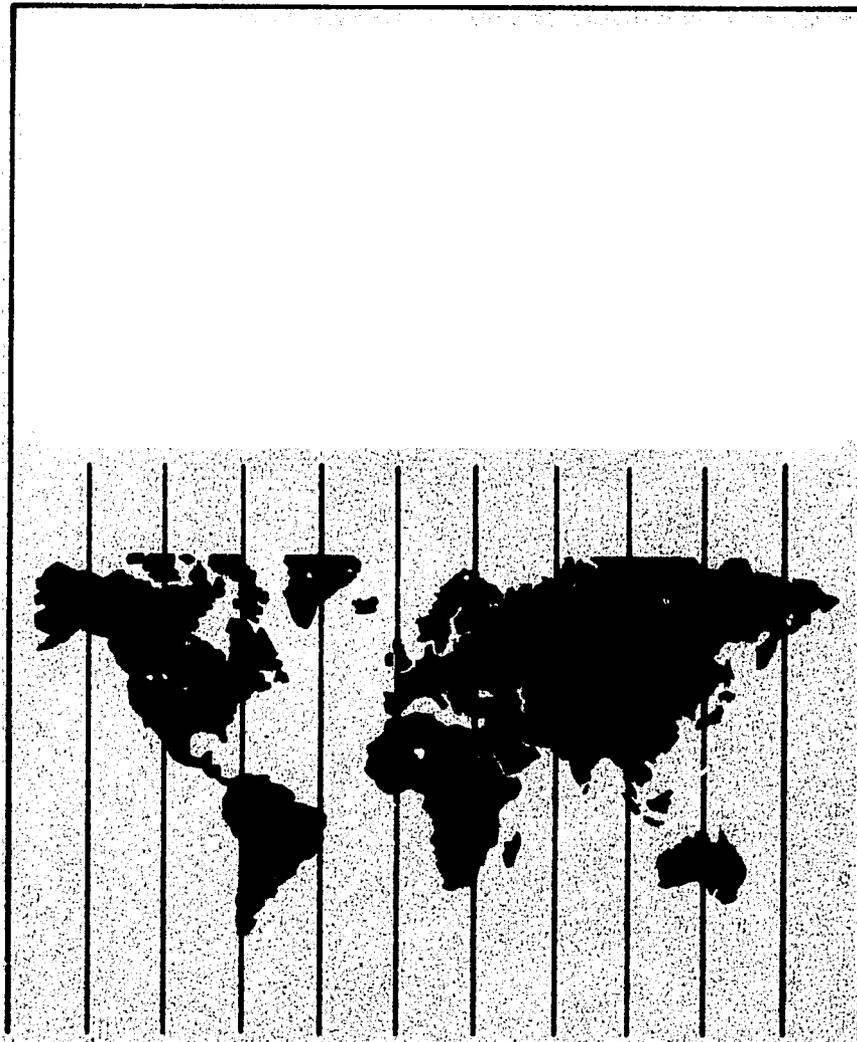


UNITED STATES
AGENCY FOR INTERNATIONAL DEVELOPMENT

THE
INSPECTOR
GENERAL



Regional Inspector General for Audit
TEGUCIGALPA

PD-ABC-022
ISA 12805

LIMITED PRE-AWARD
SURVEY OF THE CREDIT COMPONENT OF
THE EARTHQUAKE RECONSTRUCTION PROJECT
WITH BANCO MERCANTIL, S.A.
USAID/EL SALVADOR PROJECT NO. 519-0333

Audit Report No. 1-519-89-20-N
January 9, 1989

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RIG/T
APO MIAMI 34022

AGENCY FOR INTERNATIONAL DEVELOPMENT
OFFICE OF THE REGIONAL INSPECTOR GENERAL
AMERICAN EMBASSY
TEGUCIGALPA - HONDURAS

TELEPHONES:
32-9987
also 32-3120 EXT. 2701-2703

January 9, 1989

MEMORANDUM

TO : D/USAID/El Salvador, Henry H. Bassford
FROM : RIG/A/T, *Colin N. Gothard*
Coinage N. Gothard, Jr.
SUBJECT: Audit Report No. 1-519-89-20-N, "Limited Pre-award Survey of the Credit Component of the Earthquake Reconstruction Project with Banco Mercantil, S.A. in El Salvador"

This report presents the results of a non-Federal limited pre-award survey requested by your Mission of the Credit Component of the Earthquake Reconstruction Project, USAID/El Salvador Project No. 519-0333, with Banco Mercantil, S.A. in El Salvador. The certified public accounting firm of Price Waterhouse in El Salvador prepared the report, which is dated December 12, 1988.

The purpose of this limited pre-award survey was to determine whether: (1) Banco Mercantil, S.A.'s accounting system contains sufficient capacity to accurately capture accounting data under the project and the internal accounting and administrative controls are adequate for USAID/El Salvador purposes, and (2) Banco Mercantil, S.A. has the financial capability and administrative capacity for performing the proposed work.

In the opinion of Price Waterhouse, Banco Mercantil, S.A.'s accounting system and internal controls, its financial capability, and its management capability are adequate for undertaking the project.

The Price Waterhouse report contains 4 recommendations concerning Banco Mercantil, S.A.'s management capability and its accounting system and internal controls. We believe the findings have merit and the recommendations should be implemented as follows:

Recommendation No. 1

We recommend that USAID/El Salvador require Banco Mercantil, S.A. to implement, as soon as possible, the 4 recommendations concerning its management capability and its accounting system and internal controls contained in the Price Waterhouse report dated December 12, 1988.

This report is advisory only, since it is our policy not to include pre-award survey recommendations in the Office of the Inspector General's audit recommendation follow-up system unless the recommendations involve potential savings or cost avoidance.

LIMITED PRE-AWARD SURVEY OF THE CREDIT COMPONENT
OF THE EARTHQUAKE RECONSTRUCTION PROJECT
WITH BANCO MERCANTIL, SOCIEDAD ANONIMA
USAID/EL SALVADOR PROJECT NO. 519-0333

* * *

DECEMBER 12, 1988

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LIMITED PRE-AWARD SURVEY OF THE CREDIT COMPONENT
OF THE EARTHQUAKE RECONSTRUCTION PROJECT
WITH BANCO MERCANTIL, SOCIEDAD ANONIMA
USAID/EL SALVADOR PROJECT NO. 519-0333

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Price Waterhouse

December 12, 1988

Mr. Coinage N. Gothard
Regional Inspector General for Audit
U.S. Agency for International Development
Tegucigalpa, Honduras, C. A.

Dear Mr. Gothard:

This report presents the results of our limited pre-award survey of the credit component of the Earthquake Reconstruction Project assigned to Banco Mercantil, Sociedad Anónima, USAID/El Salvador Project No. 519-0333.

BACKGROUND -

Banco Mercantil, S. A. was organized on November 9, 1978 for the purpose of receiving funds from the general public and using them in credit and investment activities. Authority rests with the stockholders' assembly, which delegates management to the Board of Directors, which in turn has delegated general supervision and coordination of the entity's activities to its chairman.

The Earthquake Reconstruction Project, USAID/El Salvador Project No. 519-0333, will provide \$75 million over a 36 month period through September 30, 1990 to assist El Salvador to restore the standard of living for Salvadorans affected by the October 10, 1986 earthquake. The project will immediately follow the \$50 million Earthquake Recovery Program, USAID/El Salvador Project No. 519-0331 and will strive to provide a long-term solution to the destruction caused by the earthquake. The initial project provided immediate and intermediate solutions over an approximate one year period.

The project purpose is to assist the Government of El Salvador and the private sector to repair and reconstruct homes, businesses, basic services, and infrastructure in metropolitan zones most seriously affected by the earthquake. The project includes two major components: credit and non-credit activities.

The credit component's aim is to provide housing loans for repair and reconstruction of individual houses; reconstruction and rehabilitation of hosteleries for rental housing; and construction of new, low cost, condominium type apartments to replace hosteleries. The credit component's aim is to also provide business credit for private health services, private schools, and small business establishments.

The non-credit component will provide direct financing for construction of public schools, repair of municipal markets, highways reconstruction, repair of the ANDA water system, repair and reconstruction of health facilities, and development of relocation sites for families. Also, Private Voluntary Organizations (PVO) activities will be directly funded by USAID/El Salvador to provide housing assistance to low income families affected by the earthquake who have not been able to marshal the resources necessary to repair or replace their shelters.

The credit activities component includes housing credit and business credit. The housing credit will be administered by way of discount credit lines with the Central Bank of Reserve (Banco Central de Reserva - BCR), which will provide local currency to the National Housing Financier (Financiera Nacional de la Vivienda - FNV), which will in-turn provide funding to seven savings and loan associations in El Salvador, as needed, to provide loans for housing repair and reconstruction activities. The seven savings and loan associations involved are:

- (1) Crece, S. A.
- (2) APRISA, S. A. (Ahorro, Préstamos, Inversiones, S. A.)
- (3) Atlacatl, S. A.
- (4) AHORROMET (Ahorros Metropolitanos, S. A.)
- (5) CASA (Construcción y Ahorro, S. A.)
- (6) CREDISIA (Crédito Inmobiliario, S. A.)
- (7) La Central de Ahorros, S. A.

The business credit will be administered as a rediscount credit line by the Central Bank of Reserve (BCR) to nine commercial banks, Banco Hipotecario - a private mortgage bank, Fondo de Financiamiento y Garantía para la Pequeña Empresa (FIGAPE) - a GOES financial institution, and Banco Nacional de Fomento Industrial (BANAFI) - a GOES bank. The nine commercial banks involved are:

- (1) Banco Agrícola Comercial
- (2) Banco Capitalizador
- (3) Banco de Comercio
- (4) Banco de Crédito Popular
- (5) Banco Cuscatlán
- (6) Banco de Desarrollo e Inversión
- (7) Banco Financiero

- (8) Banco Mercantil
- (9) Banco Salvadoreño

AUDIT OBJECTIVES AND SCOPE -

The specific objectives of our limited pre-award survey were to determine whether:

1. Banco Mercantil, S. A.'s accounting system contains sufficient capacity to accurately capture accounting data under the project and the internal accounting and administrative controls are adequate for USAID/El Salvador purposes, and
2. Banco Mercantil, S. A. has financial and administrative capability for performing the proposed work.

The survey was performed in accordance with generally accepted auditing standards and with the U.S. Comptroller General's "Standards for Audit of Governmental Organizations, Programs, Activities, and Functions" (1981 Revision) and accordingly included such tests as considered necessary in the circumstances.

The scope of our work consisted of:

1. Reviewing Banco Mercantil, S. A.'s accounting system. This review included the evaluation of:
 - a. Internal accounting controls.
 - b. Policies for the management of funds and loans.
 - c. Procedures to request project funding, promote and receive credit applications, approve and disburse credits, and prepare periodic reports on credit lines.
2. Evaluating Banco Mercantil, S. A.'s financial and administrative capability for performing the proposed work.

This task included:

- a. Evaluation of past performance in administering similar credit lines.
- b. Ascertaining that current assets on hand are sufficient for Banco Mercantil, S. A. to function until USAID/El Salvador funding is received.

During our work, we were alert to situations or transactions that could be indicative of fraud, abuse and illegal expenditures and acts.

RESULTS OF AUDIT -

Financial Capability

Banco Mercantil, S. A. appears to have sufficient financial capability for undertaking the business credit component of the Earthquake Reconstruction Project No. 519-0333, under the system of fund requests submitted to Banco Central de Reserva (BCR), which administers the corresponding credit line by way of rediscounts to recover the loans granted.

Management Capability

Banco Mercantil, S. A. appears to have the management capability for undertaking the business credit component of the Earthquake Reconstruction Project No. 519-0333, except that:

- The credit line standards and regulations for the project have not been communicated to its execution and control departments;
- The organization and administrative procedures manual applicable to credit activities was not current;
- Project related operations budget and cash flows have not been prepared.

Accounting System and Internal Accounting Controls

At present, Banco Mercantil, S. A.'s accounting system appears to be adequate and its internal controls are deemed to be sufficient for recording, identifying and controlling data and operations related to the business credit component operations of the Earthquake Reconstruction Project No. 519-0333, except that its chart of accounts did not include specific accounts to record project credit line subcomponents and beneficiaries.

MANAGEMENT COMMENTS:

On November 3, 1988, Price Waterhouse delivered the pre-award survey draft report to bank management. The transmittal letter requested management comments not later than November 11, 1988, pointing out that if no comments or response was delivered to Price Waterhouse, it would be understood that such draft report was accepted. At the date of this report the bank had not responded to Price Waterhouse.

Price Waterhouse

* * *

Price Waterhouse

BANCO MERCANTIL, SOCIEDAD ANONIMA
CREDIT COMPONENT OF THE EARTHQUAKE RECONSTRUCTION PROJECT
USAID/EL SALVADOR PROJECT No. 519-0333

REPORT ON FINANCIAL CAPABILITY

AUDITOR'S OPINION

We have performed a limited pre-award survey of Banco Mercantil, S. A.'s financial capability to manage the credit component of the Earthquake Reconstruction Project, USAID/El Salvador Project No. 519-0333. The survey was performed pursuant to the statement of work for the limited pre-award survey in accordance with the United States Comptroller General's "Standards for Audit of Governmental Organizations, Programs, Activities, and Functions" (1981 Revision). Our work included, to the extent we considered necessary, a review of audited financial statements as of December 31, 1987, unaudited financial statements as of June 30, 1988 and the operating budget for 1988.

Based on our review, as described in the first paragraph above, we believe that at present Banco Mercantil, S. A. has the financial capability for undertaking the business credit component of the Earthquake Reconstruction Project No. 519-0333, under the system of fund requests submitted to Banco Central de Reserva (BCR) to cover the approved loans. The BCR administers the credit line by way of subsequent rediscounts to recover the loans granted.

This report is intended solely for the use of Banco Mercantil, S. A. and the United States Agency for International Development. This restriction is not intended to limit distribution of this report which, upon acceptance by the Office of the Inspector General, is a matter of public record.

Price Waterhouse

July 30, 1988
El Salvador, C. A.

Price Waterhouse

BANCO MERCANTIL, SO' EDAD ANONIMA
CREDIT COMPONENT OF THE EARTHQUAKE RECONSTRUCTION PROJECT
USAID/EL SALVADOR PROJECT No. 519-0333

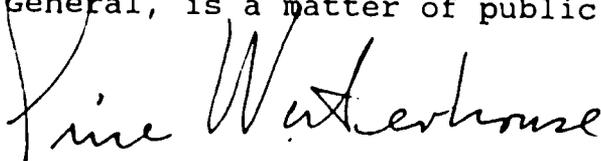
REPORT ON MANAGEMENT CAPABILITY

AUDITOR'S OPINION

We have performed a limited pre-award survey of Banco Mercantil, S. A.'s capability for managing the credit component of the Earthquake Reconstruction Project, USAID/El Salvador Project No. 519-0333. The survey covered those areas we considered relevant to the criteria established by the statement of work for the limited pre-award survey. Our work was performed in accordance with the United States Comptroller General's "Standards for Audit of Governmental Organizations, Programs, Activities, and Functions" (1981 Revision).

Based on our study and our understanding of the criteria included in the statement of work mentioned in the preceding paragraph, we believe that at present Banco Mercantil, S. A. has the management capability for undertaking the business credit component of the Earthquake Reconstruction Project No. 519-0333, except for findings 1, 2, and 3 described in the following pages.

This report is intended solely for the use of Banco Mercantil, S. A. and the United States Agency for International Development. This restriction is not intended to limit distribution of this report which, upon acceptance by the Office of the Inspector General, is a matter of public record.



July 30, 1988
El Salvador, C. A.

BANCO MERCANTIL, SOCIEDAD ANONIMA
CREDIT COMPONENT OF THE EARTHQUAKE RECONSTRUCTION PROJECT
USAID/EL SALVADOR PROJECT No. 519-0333

REPORT ON MANAGEMENT CAPABILITY

FINDINGS

1. Instructions for Handling the Business Credit Component of Project No. 519-0333 Have Not Been Adequately Communicated to Its Execution and Control Departments.

Condition:

Adequate communication of the documentation related to the credit line administrative mechanisms has not been made to execution departments, specifically to the support and control functions, such as accounting, loan department and internal audit.

Criterion:

To attain the project objectives, Banco Mercantil, S. A. should inform all of its departments involved in execution, control, and support of project No. 519-0333 of the project's standards and regulations required by the agreement.

Cause:

Banco Mercantil, S. A. has not yet defined its participation in project No. 519-0333 and therefore has not deemed it necessary to communicate project related standards and regulations to its execution and control departments.

Effect:

Lack of a clear understanding of the project's standards and regulations could negatively affect the application of eligibility criteria by the support and control departments and result in non-compliance with agreement terms.

Recommendation:

USAID/El Salvador should require Banco Mercantil, S. A. to communicate project information including standards and regulations to its execution and control departments in order for them to be prepared to properly carry-out the project in accordance with agreement terms.

BANCO MERCANTIL, SOCIEDAD ANONIMA
CREDIT COMPONENT OF THE EARTHQUAKE RECONSTRUCTION PROJECT
USAID/EL SALVADOR PROJECT No. 519-0333

REPORT ON MANAGEMENT CAPABILITY

FINDINGS

2. The Organization Manual was not Current and Procedures for Administration of Credit Only Envisage Reviewing 75% of Loans.

Condition:

The internal structure of Banco Mercantil, S. A. had sustained some changes not currently reflected in its organization manual. Credit department administrative procedures to be implemented in project execution do not envisage a 100% review of all loans.

Criterion:

The organization manual should be kept current and 100% review of all loans should be considered by the credit department.

Cause:

The organization manual was in the process of revision, and its completion was expected shortly. Loan review limit (75% review) is an internal policy of the bank. However, prior to using project funds it intends to adopt a loan review policy in accordance with project requirements.

Effect:

Lack of a current organization manual and administrative procedures could affect credit line administration, since all position functions and responsibilities are not adequately defined. A limited review of loans could possibly result in some loans being granted to ineligible parties and not being detected.

Recommendation:

USAID/El Salvador should require Banco Mercantil, S. A., prior to using project No. 519-0333 credit line funds, to update its organization manual and adopt its administrative procedures in accordance with project requirements. All loans should be reviewed as a control function for prevention of ineligible loans.

BANCO MERCANTIL, SOCIEDAD ANONIMA
CREDIT COMPONENT OF THE EARTHQUAKE RECONSTRUCTION PROJECT
USAID/EL SALVADOR PROJECT No. 519-0333

REPORT ON MANAGEMENT CAPABILITY

FINDINGS

3. Project Related Budgets and Cash Flows Had not Been Prepared

Condition:

Banco Mercantil, S. A. had not prepared specific budgets and cash flows to execute project related operations and had not considered them in its general operation plans.

Criterion:

Banco Mercantil, S. A. should include project related budgets and cash flows into its general operation plans.

Cause:

Preparation of project budgets and cash flows or their inclusion in Banco Mercantil, S. A.'s own plans had not been done because project related credit applications had not yet been received.

Effect:

Exclusion of project credit lines from plans and budgets could limit promotion of the project and result in lost opportunities for potential users.

Recommendation:

USAID/El Salvador should require, Banco Mercantil, S. A. to prepare, approve and include project operations in its plans, budgets, and cash flows, in order to adequately promote project related benefits.

Price Waterhouse

BANCO MERCANTIL, SOCIEDAD ANONIMA
CREDIT COMPONENT OF THE EARTHQUAKE RECONSTRUCTION PROJECT
USAID/EL SALVADOR PROJECT No. 519-0333

REPORT ON THE ACCOUNTING SYSTEM AND INTERNAL ACCOUNTING CONTROLS

AUDITOR'S OPINION

We have performed a study and evaluation of the internal accounting and administrative control systems of Banco Mercantil S. A. in connection with the limited pre-award survey of the credit component of the Earthquake Reconstruction Project, USAID/El Salvador Project No. 519-0333. The purpose of our study and evaluation was to determine the adequacy of the control systems to record transactions under the agreement. Our study and evaluation was performed in accordance with the United States Comptroller General's "Standards for Audit of Governmental Organizations, Programs, Activities, and Functions" (1981 Revision) and pursuant to the criteria set forth in the statement of work for the limited pre-award survey. Our work was limited to an evaluation of the key controls over the procedures used to request project funding, promote and receive credit applications, approve and disburse credits, prepare periodic reports on credit lines and the record-keeping of such transactions.

The management of Banco Mercantil, S. A. is responsible for establishing and maintaining adequate internal control systems in areas of significance to the project covered by the above mentioned agreement. In fulfilling that responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of control procedures. The objectives of internal control systems are to provide management with reasonable, but not absolute, assurance that assets are safeguarded against waste, loss, and misuse; that resources are properly used and in compliance with established policies and procedures and applicable laws and regulations; and that reliable data are obtained, maintained, and fairly disclosed in management reports.

Because of inherent limitations in any system of internal accounting and administrative controls, errors or irregularities may occur and not be detected. Also, projection of any evaluation of the systems to future periods is subject to the risk that procedures may become inadequate because of changes in conditions, or that the degree of compliance with the procedures may deteriorate.

Price Waterhouse

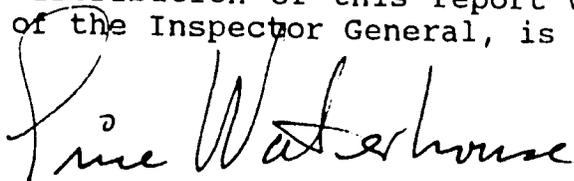
BANCO MERCANTIL, SOCIEDAD ANONIMA
CREDIT COMPONENT OF THE EARTHQUAKE RECONSTRUCTION PROJECT
USAID/EL SALVADOR PROJECT No. 519-0333

REPORT ON THE ACCOUNTING SYSTEM AND INTERNAL ACCOUNTING CONTROLS

AUDITOR'S OPINION

Based on our study and the criteria referred to in the first paragraph of this report, we believe that at present, Banco Mercantil, S. A.'s accounting system appears to be adequate and its internal controls are deemed to be sufficient for recording, identifying and controlling data and operations related to the business credit component of the Earthquake Reconstruction Project No. 519-0333, except for finding No. 1 described in the following page.

This report is intended solely for the use of Banco Mercantil, S. A., and the United States Agency for International Development. This restriction is not intended to limit distribution of this report which, upon acceptance by the Office of the Inspector General, is a matter of public record.



July 30, 1988
El Salvador, C. A.

BANCO MERCANTIL, SOCIEDAD ANONIMA
CREDIT COMPONENT OF THE EARTHQUAKE RECONSTRUCTION PROJECT
USAID/EL SALVADOR PROJECT No. 519-0333

REPORT ON THE ACCOUNTING SYSTEM AND INTERNAL ACCOUNTING CONTROLS

FINDING

1. The Chart of Accounts of Banco Mercantil, S. A. Did Not Include Project Credit Line General Ledger Accounts and Subsidiary Accounts to Record and Control Project Operations.

Condition:

Banco Mercantil, S. A. had not defined, approved and included in its chart of accounts specific general ledger accounts and subsidiary accounts to record, identify and control the subcomponents and beneficiaries of the business credit component of project No. 519-0333.

Criterion:

According to Section B.5 (b) of Annex II to the agreement, the fund administrator should establish adequate accounting records to control separately specific project operations.

Cause:

The above mentioned specific general ledger accounts and subsidiary accounts had not been defined because project operations had not yet begun.

Effect:

Lack of specific general ledger accounts to identify project related operations could result in inadequate recording of project operations and unreliable financial data concerning project operations.

Recommendation:

USAID/El Salvador should require Banco Mercantil, S. A. to define and approve specific general ledger accounts and subsidiary accounts to identify, record and control project operations by subcomponent and credit beneficiaries.

BANCO MERCANTIL, SOCIEDAD ANONIMA
CREDIT COMPONENT OF THE EARTHQUAKE RECONSTRUCTION PROJECT
USAID/EL SALVADOR PROJECT No. 519-0333

LIST OF REPORT RECOMMENDATIONS

Management Capability

Recommendation No. 1:

USAID/El Salvador should require Banco Mercantil, S. A. to communicate project information including standards and regulations to its execution and control departments in order for them to be prepared to properly carry-out the project in accordance with agreement terms.

Recommendation No. 2:

USAID/El Salvador should require Banco Mercantil, S. A., prior to using project No. 519-0333 credit line funds, to update its organization manual and adopt its administrative procedures in accordance with project requirements. All loans should be reviewed as a control function for prevention of ineligible loans.

Recommendation No. 3:

USAID/El Salvador should require, Banco Mercantil, S. A. to prepare, approve and include project operations in its plans, budgets, and cash flows, in order to adequately promote project related benefits.

Accounting System and
Internal Accounting Controls -

Recommendation No. 1:

USAID/El Salvador should require Banco Mercantil, S. A. to define and approve specific general ledger accounts and subsidiary accounts to identify, record and control project operations by subcomponent and credit beneficiaries.

APPENDIX 1

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