

UNITED STATES  
DEPARTMENT OF COMMERCE  
INSPECTOR  
GENERAL



Regional Inspector General for Audit

LATIN AMERICA

P.L. 480, TITLE II FOOD PROGRAM  
THREE PVOs: CARE, CWS, SAWS  
USAID/HAITI  
AUDIT REPORT NO. 1-521-83-9  
APRIL 29, 1983

An average of 412,000 individuals were reportedly assisted by annual programs of \$6.7 million managed by three PVOs during FY 1980 through 1982. While several studies have been made, no overall comprehensive technical evaluation of the program had been made. Thus, it was not known whether the program was achieving its goals of improved nutrition and enhanced general development process.

The PVOs were making efforts to carry out the program in an efficient manner. However, problems were evident and improvements were needed. Commodities were being sold in the market, distribution centers had inadequate records, more end-use visits were needed and increased publicity should be provided. Six recommendations are made for improvements.

## TABLE OF CONTENTS

	<u>Page No.</u>
EXECUTIVE SUMMARY	i
BACKGROUND	1
General	1
The CARE Program	1
The CWS Program	2
The SAWS Program	2
Follow-Up of Prior Audit	3
Scope of Audit	3
AUDIT FINDINGS, CONCLUSIONS AND RECOMMENDATIONS	4
Overall Assessment of Program Implementation and Achievements	4
Internal Controls Over Commodity Issuance Were Inadequate	5
Sale of Commodities	6
Visits to Distribution Centers	6
Size of Mission Staff	8
CWS Had Not Conducted Internal Reviews as Required by AID Regulations	9
CWS Warehouse on La Gonave Island was Inadequate	10
Insufficient Publicity of P.L. 480, Title II Program	10
EXHIBIT A - Schedule Showing the Volume and Value of Commodities and Number of Recipients	12
APPENDIX A - List of Recommendations	13
APPENDIX B - List of Report Recipients	14

**P.L. 480, TITLE II FOOD PROGRAM**

**THREE PVOs: CARE, CWS, SAWS**

**USAID/HAITI**

**EXECUTIVE SUMMARY**

The objective of the P.L. 480, Title II Program in Haiti is to provide supplemental foods to improve the nutritional status of the people who may be malnourished and to enhance the general development process. P.L. 480, Title II foods are distributed primarily in three areas: School Feeding, Food-for-Work (FFW), and Maternal Child Health (MCH) programs.

P.L. 480, Title II commodities are distributed in Haiti by four Private Voluntary Organizations (PVOs): the Cooperative for American Relief Everywhere, Inc. (CARE), the Catholic Relief Services (CRS), the Church World Services (CWS), and the Seventh Day Adventist Service (SAWS). Each voluntary organization has a School Feeding program, a Maternal Child Health program, and a Food-for-Work program. This report covers the activities of CARE, CWS, and SAWS. The activities of CRS are covered in a separate report (A/R No. 1-521-83-10, dated April 29, 1983).

The audit was made to determine whether the Program was being carried out in accordance with AID policy and regulations, and whether they were being implemented, managed, and monitored in an efficient, economical, and coordinated manner. In brief, our conclusions are:

- (a) While various studies had been made of selected P.L. 480, Title II activities, a comprehensive technical evaluation, as required by AID Handbook 9, Chapter 13, had never been made. As a result, little information was available on what impact the supplemental feeding program has had on the target group in Haiti or to what extent planned objectives have been achieved (Page 4).
- (b) From an operational point-of-view, the three PVOs (CARE, CWS, and SAWS) were making efforts to implement their programs in an effective manner. They were properly accounting for the receipt and storage of commodities up to the central warehouse level. However, improvements must be made in the accounting for commodities at the distribution level (page 5).
- (c) Adequate internal controls were either not in place or were not being implemented to assure proper accountability over commodities issued to distribution centers. We found that (1) the distribution centers were not maintaining adequate records; (2) CWS was not making sufficient number of end-use checks; and (3) the Mission did not have adequate staff to effectively monitor the program. In our opinion, these deficiencies contributed to the large quantities of P.L. 480, Title II commodities being sold in markets we visited (Page 5).

- (d) CWS was not providing an adequate warehouse on the Island of La Gonave and significant quantities of damaged containers and contaminated or spoiled commodities were noted during our visit (Page 10).
- (e) Insufficient publicity was being given to the source of P.L. 480, Title II commodities. Generally, recipients were not aware that the Title II food was being donated by the people of the United States. (Page 10).

The contents of this report were reviewed by USAID/Haiti and AID/W/FFP. Their comments were considered in preparing the final audit report.

## BACKGROUND

General The objective of the P.L. 480, Title II Program in Haiti is to provide supplemental foods of high nutrient value to improve the nutritional status of the people who may be malnourished and to enhance the general development process through the provision of a nutritional incentive. Title II foods are directed primarily toward three programs: School Feeding, Food-for-Work (FFW), and Maternal Child Health (MCH).

With the population in Haiti having an illiteracy rate of 80 percent, special emphasis was placed on the School Feeding program. It accounted for 70 percent of all Title II food distributed in Haiti during fiscal years 1980 and 1982. Almost 50 percent of all primary level schools in Haiti participated in the program, and it is estimated that close to 70 percent of all primary school children benefited. In addition to providing a much needed nutritional supplement to the diets of school children, it serves as an important incentive to regular school attendance.

Food-for-Work projects provided nutritional benefits as well as support to self-help activities. The FFW Program supported small, community-oriented, self-help projects inspired by community members themselves. These included the construction of schools, clinics, roads, and reforestation projects. Food was provided as wages "in-kind", thus augmenting severely limited incomes while encouraging commitment to community development.

The Maternal Child Health program was designed to provide food to the most vulnerable group, i.e., the high-risk category of women of child bearing age and their children under the age of five, with emphasis on children up to the age of three. Unlike other P.L. 480 Title II programs, trained private voluntary organization staff were normally available at final distribution sites to ensure that the foods were distributed to those most in need. These sites maintained records for each recipient which showed the health and nutritional status of the individuals at the first visit and progress made over time.

P.L. 480, Title II commodities were distributed in Haiti by four U.S. PVO's: the Cooperative for American Relief Everywhere, Inc. (CARE), the Catholic Relief Services (CRS), the Church World Services (CWS), and the Seventh Day Adventist Service (SAWS). Each voluntary organization has a School Feeding program, a Maternal Child Health program, and a Food-for-Work program. This report covers the activities of CARE, CWS, and SAWS. The activities of CRS are covered in a separate report.

The CARE Program CARE operates in Haiti under a basic agreement with the Government of Haiti (GOH) which was signed on February 14, 1959, and amended on July 9, 1971. Annual letters of agreement between the GOH and CARE were signed for the continuance of the food program. The annual letters of agreement set forth the conditions for continuing the food distribution and include information on the type and quantity of commodities to be distributed, the categories and corresponding number of beneficiaries, and

the GOH's contribution to the program. In fiscal year 1982, the GOH agreed to provide inputs valued at \$244,895 in support of program costs.

CARE's Maternal Child Health program stressed nutritional improvement through child feeding with basic nutritional education for mothers. One of the primary objectives of the program is the formation of institutions capable of meeting the nutritional and developmental need of Haiti when the programs are institutionalized on a national level. As a concrete step towards achieving this objective, CARE, in cooperation with the GOH's Rural Education Program, was in the process of establishing 96 Community Integrated Nutrition Education Centers (CINEC) alongside 96 rural schools being constructed by the GOH with a \$5.5 million loan from the World Bank. Staffed by a home economics teacher and supervised by an auxiliary nutritionist, each CINEC centers will provide a supplementary feeding program for 250 children, ages 1 to 5, and to conduct training courses in home economics, nutrition, agriculture, health, sanitation, and family planning. This project, which began in 1978, is scheduled for completion in 1983. CARE reported that during fiscal year 1982, the agency distributed food to 292,000 persons and plans in fiscal year 1983 to provide supplementary food to 326,500 beneficiaries.

The CWS Program CWS operates in Haiti under an agreement between the GOH, CWS and the Service Chretien d'Haiti which was signed in June 1972. Under the terms of the agreement, the GOH provided \$12,000 annually to defray inland freight expense and up to a maximum of \$8,500 annually towards wharfage and handling charges. CWS was primarily responsible for the overall planning and execution of the food program while Service Chretien d'Haiti was responsible for warehousing and distributing the food to beneficiaries.

The CWS Program was concentrated in the Central and Southeast part of the country and on the Island of La Gonave. CWS believes that local resources should be concentrated on expanding the present educational system to an adequate level rather than being asked to take over the existing feeding programs in the near future. CWS reported that during fiscal year 1982, the agency distributed food to 83,000 persons and planned to distribute commodities to 80,000 persons in fiscal year 1983.

The SAWS Program SAWS started distributing food in Haiti in 1979 based on an agreement between the GOH and SAWS dated October 14, 1978. The agreement permitted SAWS to distribute food, medicines and other articles of basic necessity to needy people. The food and other items were exempt from duties and taxes. Under the terms of the agreement, SAWS was responsible for maintenance, storage, and transportation expenses relating to the P.L. 480, Title II Program.

SAWS long-term goals were to work with the Ministry of Health to carry out an effective program to reach a greater number of needy people and emphasize nutritional education to recipients. During fiscal year 1982, SAWS distributed P.L. 480, Title II commodities to about 73,500 beneficiaries throughout Haiti. For fiscal year 1983, SAWS planned to distribute commodities to 69,300 recipients.

## Follow-Up of Prior Audit

One previous audit of the P.L. 480, Title II program of Haiti was made in 1979 and Audit Report No. 1-521-80-4 was issued on March 27, 1980. The report contained ten recommendations. All of the recommendations were closed after corrective action was reportedly taken. However, our current review showed that recommendations made in two areas -- program evaluations and publicity -- were not implemented in an effective manner and the conditions were found to still exist.

## Scope of Audit

Our current review of the P.L. 480, Title II Program in Haiti covered the period from January 1, 1980, to September 30, 1982. The purposes of our audit were to:

- Determine the effectiveness of implementation and management of the program;
- Examine accountability and physical control of the commodities;
- Verify compliance with applicable laws and regulations;
- Determine the adequacy of AID's monitoring of the program; and,
- Identify and report on significant problem areas.

We reviewed USAID/Haiti and the voluntary agencies' records, reports, and correspondence, and held discussions with USAID/Haiti and voluntary agencies' officials. In addition, shipment, receipt and distribution records and related reporting requirements were examined. To observe food program operations, we visited selected warehouses, schools, Maternal Child Health centers, Food-for-Work projects, and public markets.

Our review was made between September and December 1982. The comments of USAID/Haiti and voluntary agencies officials were considered in preparing this report.

## AUDIT FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

### Overall Assessment of Program Implementation and Achievements

The P.L. 480, Title II Program has been in existence in Haiti since 1958. As shown on Exhibit A, the value of commodities distributed by the three PVO's averaged \$6.7 million per year and the Program reportedly reached an average of about 412,000 recipients per year.

Several studies have been made of selected activities of the P.L. 480, Title II Program in Haiti. In addition, a recent in-depth evaluation was made of the School Feeding program. However, little action was taken to implement the recommendations. Also, a comprehensive technical evaluation has never been carried out in accordance with AID Handbook 9, Chapter 13. As a result, there is currently no reliable information to measure what impact the Program has had on the target group in Haiti or to what extent planned accomplishments and objectives have been achieved. For this reason, we cannot express an opinion on whether there was improvement in the nutritional status of the people or if the general development process had been enhanced.

According to AID Handbook 9, Chapter 13, evaluations of P.L. 480, Title II programs are necessary in order to respond to the legislative mandate for comparative cross-country studies of these programs. These evaluations are to enable the AID/Washington program office and other concerned entities to assess the extent to which the P.L. 480, Title II programs are effectively designed and implemented. In general, the evaluations are to provide the necessary information to: (1) make informed program decisions, and (2) measure performance against expectations agreed upon and finally planned program objectives.

Several of the feeding programs being implemented in Haiti had been studied either by or for USAID/Haiti. As reported in our previous audit report (1-521-80-4 issued March 27, 1980), a consultant made a preliminary evaluation of the Maternal Child Health program and a team of three researchers reviewed Food-for-Work activities. However, little action was taken by the Mission to implement the recommendations or suggestions contained in these reports.

Since our previous audit, USAID/Haiti undertook an in-depth evaluation of the P.L. 480, Title II School Feeding program. This evaluation was to be made in two parts. The first phase was to evaluate the operational effectiveness of the program and to obtain baseline data for the second phase. The second phase was to measure the actual impact of the program. A draft report on the first phase was completed in February 1982. However, the report was never finalized and issued. This draft report included baseline data for the second phase, but the baseline data was not analyzed. Consequently, the second phase of the evaluation addressing program impact was not accomplished.

The P.L. 480, Title II Program has been operating in Haiti since 1958; however, USAID/Haiti has never made a comprehensive technical evaluation of the program to determine what impact it has had on the target groups. In the meantime, the food distribution program has continued to operate basically as a welfare program without clearly defined objectives or evidence of impact.

We believe that a comprehensive technical evaluation of the Maternal Child Health and Food-for-Work programs needs to be scheduled and performed in order to:

- clarify current objectives of the voluntary agencies' P.L. 480, Title II programs;
- review and evaluate these programs in terms of their contribution to planned accomplishments and objectives;
- confirm the validity of programs objectives at both the implementation and impact level; and,
- recommend any changes in program direction or implementation.

Assistance for conducting this evaluation should be sought, if needed, from the Bureau for Food-for-Peace and Voluntary Assistance, Office of Foodfor-Peace (FVA/FFP). In addition, the Mission should take immediate action to finalize the evaluation report on the operational effectiveness of P.L. 480, Title II School Feeding program and complete the second phase of the evaluation addressing program impact.

In response to a draft of this report, FVA/FFP stated that a decision would be made by June 1983 on a full-scale evaluation and technical assistance activities.

#### Recommendation No. 1

USAID/Haiti, in conjunction with the FVA/FFP Office, should schedule and conduct a comprehensive technical evaluation of P.L. 480, Title II Maternal Child Health and Food-for-Work programs in Haiti.

#### Recommendation No. 2

USAID/Haiti should take immediate action to finalize the evaluation report on the operational effectiveness of P.L. 480, Title II School Feeding program and complete the second phase of the evaluation addressing program impact.

#### Internal Controls Over Commodity Issuance Were Inadequate

Adequate internal controls were either not in place or were not being implemented to assure proper accountability over commodities issued to the distribution centers. We found that (a) the distribution centers were not maintaining adequate records; (b) CWS was not making sufficient number of

end-use checks; and (c) the Mission did not have adequate staff to effectively monitor the program. In our opinion, these deficiencies contributed to the large quantities of P.L. 480, Title II commodities being sold on the open markets:

Sale of Commodities During our visits to seven public markets, we found that P.L. 480, Title II commodities were being sold at six of the market areas:

- Significant amounts of food were available for sale at the Croix des Bassales market in Port-Au-Prince. We visited this market on two occasions and found P.L. 480, Title II food being sold in the market and large quantities stored in five depots along the perimeter of the market. These depots also contained food donated under the World Food Program of the United Nations. During our first visit, we identified a substantial amount of CARE food (corn, soy and milk - CSM) being stored in three depots. The proprietors of these depots would not allow us to count the number of bags. However, we estimate that there were between 300-500 bags of CSM in these depots. In our second visit, we found CSM food in two additional depots. The quantity was substantially less than the quantity found during our first visit. According to our estimate, there were over 100 bags in these depots. The bags had CARE and SAWS markings. We found another depot which was completely full of World Food Program food.
- In our visits to the other six market areas, we identified only small quantities of P.L. 480, Title II food being sold in five of the markets. We found some bags belonging to each of the voluntary agencies. In no instance; however, did we find more than twelve bags in any one market. In most instances, the food was being sold from open bags. At one market area, we found no P.L. 480, Title II food being sold.

We queried several vendors at the market places about the source of the bags of food. The vendors generally refused to furnish any information. One vendor told us that she purchased the food from a truck that came by selling it.

In our opinion, P.L. 480, Title II commodities have ended up in the public market places because, in large part, adequate internal controls were not being administered to assure proper accountability over commodities issued to distribution centers.

Visits to Distribution Centers We visited 22 distribution centers and found a variety of problems. In most instances, the records maintained were not adequate to assure proper accountability and control over commodities received and used.

At one school (Ecole Peres Salesiens), which received P.L. 480, Title II commodities from CARE, the only record maintained was a register showing the quantity of commodities used each day. Upon our examination of the register

and questioning of the record keeper, we determined that the entries were "plugged" figures which were based upon the quantity of commodities received divided by the total number of days that the food was to last. No records were maintained on actual school attendance. At other distribution centers, no records on food distributions were maintained. This was the case at one of the schools (Ecole Adventist de Rasier) provided P.L. 480, Title II food by CWS and one of the Maternal Child Health care centers (Center de Mahanaim) provided food by SAWS.

At two schools, (Adventiste Caradeux and Ban Samaritan Source Cayeau), P.L. 480, Title II food provided under SAWS program was used to pay drivers and cooks. In addition, at five distribution centers, we noted a disparity between the number of recipients being fed per the centers' records and the voluntary agencies records. For example, at one school (Kenscoff) CWS had been supplying food for 500 recipients, but the center reported feeding only about 325 individuals.

During the past three years, CWS inspectors visited on the average only 21 percent of its distribution centers per year. Since the inspection function serves as the primary source of management's control by the voluntary agencies over the distribution center, we believe that prudent managerial practices would dictate the inspection of all centers at least once a year to insure adequate control over the receipt, storage and use of commodities.

CWS did not achieve this level of end-use checks for any of its programs during the past three years. The following is a summary of the end-use checks made:

<u>Activity</u>	<u>Year</u>	<u>INSPECTION</u>	
		<u>Number</u>	<u>Percent of Coverage</u>
School Feeding (196 schools)	1982	66	33
	1981	36	18
	1980	67	34
Maternal Child Health (119 Centers)	1982	19	15
	1981	1	1
	1980	34	28
Food-for-Work (40-60 Projects)	1982	9	18
	1981	1	2
	1980	2	4

We believe that CWS needs to significantly increase the number of field inspections it makes to the centers under its jurisdiction.

In response to a draft of this report, we were advised that CWS' staff estimated that each of its centers was visited at least twice per year, and in some cases more often. This estimate was not supported by data we received. USAID/Haiti stated it would ask CWS to substantiate its site visit estimate.

Size of Mission Staff It is the responsibility of the Mission Office of Private Voluntary Development (OPVD) to monitor the overall implementation of the P.L. 480, Title II Program in Haiti. At the time of our audit, the OPVD had two U.S. direct hires providing part-time support to the P.L. 480, Title II program. One Haitian was assigned full-time.

As indicated elsewhere in this report, there are four PVOs (CARE, CRS, CWS, and SAWS) which are carrying out food distribution programs in Haiti. In accordance with AID Handbook 9, Chapter 7M, cooperating sponsors are responsible for the efficient operation of the program. It is their responsibility to provide adequate supervision and management controls over the distribution of commodities. However, this report has shown the inadequacy of the internal controls with the consequent effect that large amounts of commodities are available for sale in the open market.

Considering the size of the P.L. 480, Title II program in Haiti and the number of problems which were noted by our audit -- as reflected in this report and our report on the CRS program -- the size of the staff may not be adequate to ensure that the program is being properly implemented by the voluntary agencies. Accordingly, we believe that consideration must be given to increasing the direct hire staff or obtaining the services of another individual under some contract arrangement. This additional individual should be assigned full-time to the P.L. 480, Title II Program to ensure that adequate controls are being implemented and to assure proper use of P.L. 480, Title II commodities. This person would have responsibility for inspecting, evaluating, assessing and making recommendations for improvement of the program.

In response to our draft report, USAID/Haiti advised us that it had contracted two full-time individuals to manage and monitor the P.L. 480, Title II program. A logistics (program monitor) person will be responsible for field inspections of distribution sites and warehouse facilities, and a P.L. 480, Title II manager will be responsible for reviewing voluntary agencies' reports, planning and monitoring program activities, preparing analytical reports, providing technical and managerial guidance on program-  
ing commodities, making recommendations on policy guidelines, and coordinating program evaluations. Accordingly, we have deleted from the final report our recommendation that USAID/Haiti hire additional staff to monitor the P.L. 480, Title II program.

Recommendation No. 3

USAID/Haiti should obtain a plan of action from the voluntary agencies to institute proper controls and procedures to ensure that commodities are fully accounted for at the distribution center level.

Recommendation No. 4

USAID/Haiti should require CWS to increase the number of field inspections to a level whereby each distribution center is visited at least once a year or to reduce the program to a level that can be adequately inspected.

CWS Had Not Conducted Internal Reviews as Required by AID Regulations

CWS had not complied with the requirements and guidelines for conducting internal reviews established in AID Handbook 9, Chapter 14. In our opinion, these reviews should be an integral part of the internal control system and the neglect of this control could lead to serious problems.

In accordance with AID Handbook 9, Chapter 14:

"Voluntary agencies are required by AID Regulation 11, Section 211-5(c)(1), to schedule internal reviews at intervals mutually agreed upon, in writing, by the AID Mission, or Diplomatic Post, and to conduct or arrange to have conducted comprehensive internal reviews or a series of examinations which, when combined will cover a complete review of their Title II program".

The last internal review by CWS was conducted in November and December 1979 and covered the period through fiscal year 1979. USAID/Haiti issued a memorandum in March 1982 to the voluntary agencies requiring them to review their P.L. 480, Title II program operations each fiscal year and to submit a report by November 15. In early December 1982, when we concluded our field work, CWS had not complied with this requirement.

In response to our draft report, USAID/Haiti advised us that CWS conducted an internal review as required and a report was received by the Mission on December 21, 1982. The report was reviewed and found to be in compliance with AID Handbook 9, Chapter 14 guidelines. Accordingly, we have deleted our recommendation.

### CWS Warehouse on La Gonave Island was Inadequate

The three PVOs (CARE, CWS, and SAWS) had six warehouses to store P.L. 480, Title II commodities. Five of the warehouses were adequate. All of these voluntary agencies had new warehouses in the Port-au-Prince area which were built with AID Outreach Grants. They were all immaculate facilities.

However, the CWS warehouse on the island of La Gonave was not adequate. This warehouse had a number of problems. It was not properly ventilated. It did not have screens. It was infested by insects and rodents. It was not large enough. And, there was insufficient space around stacked bags. As a result, commodities could not be issued on a first-in first-out method and there were significant quantities of damaged containers and contaminated or spoiled commodities.

CWS had no plans to improve or replace the warehouse in La Gonave Island. In order to ensure against increased internal losses and contamination of food, it is our opinion that either a new warehouse should be built or other facilities acquired.

In its response, USAID/Haiti advised us that CWS was considering including a request for funds to construct a warehouse in a grant amendment. The request will be reviewed when it is received.

#### Recommendation No. 5

USAID/Haiti should require CWS to acquire adequate warehouse facilities for the storage of P.L. 480, Title II commodities on the Island of La Gonave.

### Insufficient Publicity of P.L. 480, Title II Program

During our review, we noted that insufficient publicity was being given to the source of P.L. 480, Title II commodities. Generally, recipients did not know that the Title II food was being donated by the people of the United States. As a result, the U.S. was not receiving credit or acknowledgement for the commodities given to the people of Haiti.

We found that cooperating sponsors generally did not display banners, posters, or other media at distribution centers to show the information that is prescribed by Section 211.5(g) of Regulation 11, regarding the source and use of the food provided.

We queried students, mothers, and Food-for-Work recipients about the source of the food. We received many different responses, but in most instances, the recipients were not aware the commodities were furnished by the people of the United States.

The voluntary agencies need to strengthen their publicity program to make recipients aware the food received was donated by the people of the United States of America.

Recommendation No. 6

USAID/Haiti should require the voluntary agencies to establish and implement a publicity program that will comply with Section 211.5(9) of AID Regulation II, Handbook 9.

P.L. 480, TITLE II - HAITI  
CARE, CWS, AND SAWS

SCHEDULE SHOWING THE VOLUME AND VALUE OF  
COMMODITIES AND NUMBER OF RECIPIENTS

	<u>Quantity of</u> <u>Commodities Rec'd.</u> <u>(M.T.)</u>	<u>Value of</u> <u>Food Rec'd.</u> <u>(\$000)</u>	<u>No. of</u> <u>Recipients</u> <u>(000)</u>
<b>Fiscal Year 1980</b>			
CARE	12.0	\$4,131	254.0
CWS	3.3	1,212	71.8
SAWS	3.7	1,301	50.0
Total	<u>19.0</u>	<u>\$6,644</u>	<u>375.8</u>
<b>Fiscal 1981</b>			
CARE	13.2	\$4,875	275.0
CWS	3.3	1,251	71.8
SAWS	3.3	1,261	66.0
Total	<u>19.8</u>	<u>\$7,387</u>	<u>412.8</u>
<b>Fiscal Year 1982</b>			
CARE	12.2	\$3,880	292.0
CWS	2.9	935	83.0
SAWS	4.2	1,339	73.5
Total	<u>19.3</u>	<u>\$6,154</u>	<u>448.5</u>
<b><u>Summary For Three Years</u></b>			
CARE	37.4	\$12,886	821.0
CWS	9.5	3,398	226.6
SAWS	11.2	3,901	189.5
Total	<u>58.1</u>	<u>\$20,185</u>	<u>1,237.1</u>

LIST OF RECOMMENDATIONS

Recommendation No. 1

Page 5

USAID/Haiti, in conjunction with the FVA/FFP Office, should schedule and conduct a comprehensive technical evaluation of P.L. 480, Title II Maternal Child Health and Food-for-Work programs in Haiti.

Recommendation No. 2

Page 5

USAID/Haiti should take immediate action to finalize the evaluation report on the operational effectiveness of P.L. 480, Title II School Feeding program and complete the second phase of the evaluation addressing program impact.

Recommendation No. 3

Page 9

USAID/Haiti should obtain a plan of action from the voluntary agencies to institute proper controls and procedures to ensure that commodities are fully accounted for at the distribution center level.

Recommendation No. 4

Page 9

USAID/Haiti should require CWS to increase the number of field inspections to a level whereby each distribution center is visited at least once a year or to reduce the program to a level that can be adequately inspected.

Recommendation No. 5

Page 10

USAID/Haiti should require CWS to acquire adequate warehouse facilities for the storage of P.L. 480, Title II commodities on the Island of La Gonave.

Recommendation No. 6

Page 11

USAID/Haiti should require the voluntary agencies to establish and implement a publicity program that will comply with Section 211.5(9) of AID Regulation II, Handbook 9.

APPENDIX B

LIST OF REPORT RECIPIENTS

No. of Copies

Assistant Administrator - Bureau for Latin America and the Caribbean (AA/LAC)	5
Mission Director, USAID/Haiti	5
Director, Office of Legislative Affairs	1
Assistant to the Administrator for Management (AA/M)	1
Office of Financial Management - (M/FM/ASD)	3
Deputy Assistant to the Administrator for Management (M/DAA/SER)	1
Coordinator, Office of Food for Peace (FVA/FFP)	3
General Counsel (GC)	1
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