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FINAL PROJECT EVALUATION

REPORT

FOR

AFGHAN CIVILIAN ASSISTANCE PROGRAM (ACAP)

March 1-April 13, 2010

This evaluation report was produced for review by the United States Agency for International Development (USAID). The report was prepared by Belquis Ahmadi (Team Leader), Terry Leary, Abdul Saboor Samadi, and Mustafa Kamal Hanoon under contract with CHECCHI and Company Consulting Inc.

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DISCLAIMER:
The views expressed in this report do not necessarily reflect the views of the United States Agency for International Development or the United States Government.

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LIST OF ACRONYMS

ACAP	Afghanistan Civilian Assistance Program
ACBAR	Agency Coordinating Body for Afghan Relief
AFs	Afghani (Afghan currency)
AIS	Activity Information Sheet
AGE	Anti Government Entities
ANA	Afghanistan National Army
ANDS	Afghan National Development Strategy
ANP	Afghanistan National Police
ANSO	Afghan National Security Office
AOG	Afghan Opposition Groups
AOTR	Agreement Officers Technical Representative
ASF	Afghan Security Forces
ATI	Afghanistan Transition Initiative
CAT	Comprehensive Approach Team
CIMIC Team	Civil-Military Co-operation Team
CJTF	Combined Joint Task Force
COIN	Counter Insurgency
CTG	Christian Thomas Group
DA	Development Assistance
FPO	Field Program Officer
GIRoA	Government of the Islamic Republic of Afghanistan
IDP	Internally Displaced Persons
IG	Inspector General
IED	Improvised Explosive Device
IMF	International Military Forces
IDA	International Disaster Assistance
IOM	International Organization for Migration
IEE	Initial Environment Examination
ICRC	International Committee of the Red Cross
ISAF	International Security Assistance Force
MOD	Ministry of Defense
MOI	Ministry of Interior
MOLSAMD	Ministry of Labor, Social Affairs, Martyr and Disabled
MRRD	Ministry of Rural Rehabilitation and Development
NGO	Non Governmental Organization
PNF	Project Nomination Form
PRT	Provincial Reconstruction Team
RC	Regional Command
Rs.	Pakistani Rupees
TISA	Transitional Islamic State of Afghanistan
SCA	Swedish Committee for Afghanistan
SO	Sub Office
SOW	Scope of Work
UNDSS	United Nations Department of Safety and Security
USAID	United States Agency for International Development
USG	United States Government
UXO	Unexploded Ordnance

1. EXECUTIVE SUMMARY

The United States Agency for International Development (USAID) scheduled a final evaluation of the Afghanistan Civilian Assistance Program (ACAP) implemented by the International Organization for Migration, (IOM). The Leahy Initiative, through USAID, funds ACAP. The ACAP cooperative agreement began on April 1, 2007 and was expected to end on April 30, 2010; the total budget was $27 million. In December 2009, USAID extended the grant by seven months (until November 30, 2010) and increased the budget from $27 million to $54 million. The evaluation was conducted by Checchi and Company Consulting under contract No. 306-A-00-07-00516-00 on behalf of USAID from March 1 to April 14, 2010 (Annex1).

1.1. Purpose of the Evaluation

The purpose of the evaluation is to review and assess the extent to which 1) ACAP is being implemented according to plan; and 2) achieving the stated objectives. The evaluation team was tasked to determine if there are issues related to resource allocation, overall implementation, and assistance distribution.

The team was also tasked to get information regarding beneficiary and community feedback on the program – whether beneficiaries are aware that ACAP assistance is provided by USAID; whether they were satisfied with the assistance received and the timeliness of the assistance; and whether the assistance was provided in a transparent manner through appropriate mechanisms. Another area that was identified as an issue was the program coordination and relations with local government authorities and other key stakeholders, including Government of the Islamic Republic of Afghanistan (GIRoA), military actors at the ISAF HQ, Regional Command, and Provincial Reconstruction Team (PRT), USAID Field Program Officers, and relevant United Nations agencies.

1.2. Methodology

The evaluation team included two international and two Afghan national consultants. There were several informational meetings with USAID and IOM. A work plan was submitted to USAID and approved (Annex 2). The evaluation team collected extensive literature, reports, and evaluations on the ACAP, for the list of documents reviewed see (Annex 3). Four questionnaires were developed for the different groups involved with the program: beneficiaries, stakeholders, ACAP staff, and USAID (Annex 4). The team then conducted interviews, face-to-face, in four provinces and by telephone with the ACAP staff and beneficiaries in eight provinces. Interviews were also conducted with international and national stakeholders including, PRT, Field Program Officers (FPO), United Nations Assistance Mission to Afghanistan (UNAMA), Afghanistan Independent Human Rights Commission (AIHRC), and local and national government authorities.

A database was created to analyze the questionnaires. Interviews based on the questionnaires were conducted in person, through telephone and email contact. The security restrictions proved challenging for personal interviews, and on several occasions the evaluation team had to modify their travel schedule. For example, the team was en route to Assadabad, Kunar when we encountered angry demonstrators and had to turn back and cancel the visit. The site visit to Kapisa province was also cut short because of safety reasons. In Kapisa, the team only met with Ghazi Usman High School authorities who repeatedly reminded the team that the area was not safe. When three Taliban walked into our meeting, the school authorities introduced them to us as the area Taliban. When the Taliban arrived the environment changed, school authorities did not want to discuss the project. The team left shortly after and returned to Kabul, continuing interviews with the beneficiaries who had previously been selected for in-person interviews via telephone. The team conducted 42 telephone interviews and 39 personal interviews with beneficiaries in Kabul, Nangarhar, Kapisa, Herat, Wardak, Paktia, Helmand, and Kandahar.

1.3. Key Findings

Objective One: Ensure that Afghan civilians suffering losses from military operations against the insurgents and the Taliban receive appropriate assistance to restore and continue their lives.

Program Impact: As of March 29, 2010, ACAP has awarded 525 grants and has assisted approximately 3,554 direct beneficiaries and 24,878 indirect family members. According to data submitted by ACAP the number of eligible beneficiaries is 11,172. Additionally, 48 community grants have been awarded since the beginning of the program. The data received from ACAP does not indicate the number of beneficiaries for community grants. It was difficult to gather information to understand if the program has met its objective both qualitatively and quantitatively. Direct beneficiaries are considered to be those who received grants, indirect beneficiaries are family members of the direct beneficiaries. This method of assistance is different from many other programs. First, it gives assistance directly to people affected by the war. The program contacts the beneficiaries directly to ask what they need. This is very respectful of the people and culture, allowing people to receive assistance with dignity and not feel like beggars.

Overall, ninety percent of beneficiaries interviewed stated they are generally satisfied with ACAP, and expressed how the program has been very positive and has assisted them to continue with their lives in a dignified way. Most beneficiaries are not aware of what assistance is available to them. This assistance is not sought after by the beneficiaries but given to them and they are pleased to receive any type of support. There are two types of assistance available through ACAP. The first is individual packages that include small business start up, vocational and literacy trainings, kits (home, school, livestock, agriculture, graduation), home repair and limited medical assistance (transportation and food in lieu of drugs). The second form of assistance is directed to communities in the form of small infrastructure projects, and can include repairing and rebuilding shelters, schools, bridges and other community projects. Beneficiaries' reaction to the relevance

of assistance varies. In some cases the assistance has targeted the beneficiaries' needs; in other cases the ACAP staff decided what would be given, independent of the beneficiary. Only four percent of the eighty-one beneficiaries interviewed by the evaluation team had received vocational training. Ten percent of the beneficiaries interviewed received literacy training. The quality and the duration of the training was not satisfactory to the beneficiaries.

Recommendation: Beneficiaries should be fully informed about the types of material assistance, and vocational and literacy training that is available to them. Material assistance is to help address beneficiaries' immediate needs, while the vocational training can benefit them in the long term, help them to become self-sufficient, and is more sustainable. The vocational training should correspond to the beneficiaries' ability, experience and motivation. This could also have a positive impact on the larger community, as beneficiaries will put their acquired skills to use by opening small businesses, providing employment for others, transferring their skills and therefore stimulating the local economy. Additionally, if more literacy training is implemented, the program will need higher quality control and the involvement of professional literacy training institutions.

Timeliness of the Assistance: ACAP has often been slow in responding after incidents. Even after the grants have been signed it can be up to a year before assistance is delivered. This results in beneficiaries' vulnerability when their primary source of support for their families is injured or killed. Families affected in this way by the war go to great lengths to survive. They are often faced with the decision to sell their land and valuables, and incur debts, creating a long-term instability situation. ACAP acknowledges this problem and explained that it was due to issues of verifying older cases, staffing, and purchasing of goods for each individual family. However, this does not adequately explain why high profile cases in relatively secure areas have also waited or are waiting for assistance for up to a year after their nomination. While the pace of delivery has improved during the past six months, there are more opportunities to streamline systems and procedures as identified under Conclusions and Recommendations in section 4.

Recommendation: ACAP should expedite the delivery of assistance to beneficiaries by enacting procedures to allow ACAP's field officer and PRT representatives to approve nominations for grants rather than requiring approval from headquarters and USAID Kabul.

Transparency*:* IOM conducted an internal review in Nangarhar province, in October 2009, which cited fraud and abuse (Annex 5). As the IOM sub office review, reports "the level of risk and corruption in the sub office is high as the recruited staff members in the sub office with key positions and who are involved in procurements for the ACAP…." IOM has not shared this report with USAID. There are few checks and balances in place to minimize fraud and abuse. Although the internal sub office review recommends that the headquarters call each beneficiary to ensure the beneficiary received all the

assistance, ACAP headquarters had not contacted any of the 81 beneficiaries the evaluation team interviewed.
Ninety percent of beneficiaries interviewed report that ACAP staff did not provide them with sufficient information about the type of assistance they may be eligible to receive. This does not allow the beneficiaries to take full advantage of the assistance.

The evaluation team found cases in which beneficiaries receive more than one benefit package in response to a single incident. ACAP staff members also reported cases of false beneficiaries. For example, a beneficiary in Gardez who received assistance to open a bakery never owned the bakery. The beneficiary's brother, who worked in the bakery, was photographed as the beneficiary by ACAP staff during the delivery of assistance. ACAP staff monitored the grant on three occasions, but the monitoring reports failed to mention the beneficiary never owned the bakery (Annex 6).

In the ACAP Manual, February 2010, it states "determine the estimated budgetary requirement for the Business and collect quotations from at least three vendors." Now the beneficiaries are asked to get the quotations for the cost of livestock or building materials. While it might be helpful to have the beneficiaries gather quotes, it was confusing to the evaluation team because the process is not explained in the "Field Manual." Field staff were asked about the procurement procedures, and all reported that the beneficiaries submitted three quotes from different vendors.

Recommendation: ACAP should provide standard information about the types of assistance that may be available to beneficiaries and the items contained in the assistance packages. Additionally, due to the numerous irregularities a full financial audit must be undertaken.

Women Beneficiaries: Potential women beneficiaries are the most likely to be overlooked by ACAP. They are also the most vulnerable; as they are often not allowed to voice their needs, nor are they informed or consulted about what assistance their male representatives have chosen for them and their families. The evaluation team interviewed a total of eight women in Kabul, Nangarhar and Herat. Only one of these women was officially considered a beneficiary, five others were eligible to be beneficiaries, but were not named so because ACAP male staff were not allowed to speak with them directly. Based on the interviews with these women, they did not feel included in the process. In cases where women are the beneficiaries, the lack of female ACAP staff to conduct the family assessment results in either male neighbors or relatives selecting someone to represent the woman, in most cases without her knowledge or consent). On occasion, the woman is allowed to nominate a male family member as her representative. This repressive situation leaves women unaware of opportunities to become self-sufficient, as male family members tend to not share information with the their female family members.

Recommendation: As in most parts of the country it is culturally inappropriate for women to interact with men outside their families, and are often excluded from decision making. Due to this repression, women do not always trust their own judgment, as their ideas

have not been fostered. When asked what type of assistance they needed, they responded that they would have to ask their husbands. If a female ACAP member would sit down with the female beneficiaries, they would have an opportunity to explore the women's ability and skills to tailor assistance that is appropriate. It is important that ACAP takes specific measures to address women's needs adequately. ACAP female field assistants can ensure that women are made aware of the types of assistance ACAP offers and they have the right to be a beneficiary. ACAP staff members must ensure that women beneficiaries are aware of the vocational and literacy trainings available to them. These trainings should be female-friendly in the more conservative areas of the country to encourage women to attend trainings. Trainings should be conducted in the homes of women and other interested women in the family or neighbors should be invited. Women are often isolated and this would help to promote their interaction with others.

Documentation: ACAP quarterly reports have improved since the Inspector General's investigation into the program in 2009. However, documentation of the ACAP activities and initiatives is incomplete and the documentation process seems overly burdensome. At the same time, reports and statistical data are incompatible. Many documents do not include dates. Additionally, beneficiary records and files contain numerous errors, including incorrect or missing contact details (i.e. wrong phone numbers and/or wrong beneficiary name), and wrong information on the skills and needs of beneficiaries. Many of the program documents have conflicting figures regarding number of grants, direct and indirect beneficiaries. The database programs being used now are difficult at best to understand and overly complex and cumbersome to use, as stated by the ACAP program manager. ACAP staff stated that they are in the process of developing a new database to resolve these issues and make the data more understandable and accessible. The new database is scheduled for launch sometime in April this year.

The data is inconsistent from one report or document to another and it is difficult to understand both the beneficiary numbers and the number of grants. The information continues to be perplexing. For example, the quarterly report of January –March 2008 lists 77 incidents but the ACAP Performance Records dated 4 March 2010 list 57 incidents for the same period (January to March 2008). Additionally, many of the documents are not dated or titled, which is confusing.

Recommendation: ACAP should put quality control measures in place to ensure clarity, consistency, accuracy of information in reports and data regarding the program. It would be helpful for ACAP to establish a standardized database to make sure that data collection and storage is consistent and coherent in field offices across the country. USAID and ACAP should work together to ensure ACAP is recording the data needed.

***Staffing*:** During the first two years of the program ACAP has been drastically understaffed. Although staffing has tripled since the Inspector General's report in 2009, there remains a need for additional staff, including international staff and Afghan female staff. Little has been done to address the issue of gender balance. While there are six Afghan women employed at headquarters, none of those are field staff. There is one Afghan woman in the Eastern region, hired in January 2010. In the Southeast, there is

one Afghan woman who is a reporting assistant. There are two women in the South, one being a field assistant. There are two female reporting assistants in Herat office, all hired in March 2010. ACAP has not put forward the requisite effort to hire and deploy enough female staff members to work directly with female beneficiaries. While it may be arguable that in a few, more remote, locations hiring women to work in the field may not be an option, there is no justification for the low level of female staff working in ACAP's Kabul office.

Women field staff would facilitate the ability of widows and other women to have a full voice regarding the assistance being offered. According to ACAP, advertisements for women through the Agency Coordinating Body for Afghan Relief (ACBAR) and postings outside IOM's office, and by word of mouth did not result in applications of qualified women.

Until May 2009, there were no international staff in ACAP field offices. ACAP operated with the belief that the project could be managed primarily by headquarters staff from Kabul. ACAP is a large, complex program, set in a difficult environment, dealing with sensitive political issues and is labor intensive. While there has been some improvement, local staff after almost three years still needs extensive training as evidenced by headquarters policies routinely not being followed along with inconsistently applied program policies and procedures depending on location.

Recommendation: The evaluation team recommends that a complete field operations manual is created, and a training/monitoring unit established to ensure all staff are fully informed and trained about all phases of the program. Regular in-service training workshops, team building exercises, and systematic, regular monitoring of field projects will also be the responsibility of this unit. The evaluation team believes that more can be done to recruit women by approaching universities, the Ministry of Women's Affairs, the Ministry of Labor and Social Affairs, the Afghan Women's Network and other civil society networks. There should be one international staff in each field office with an Afghan counterpart.

Beneficiaries' Knowledge of the Source of Assistance: Beneficiaries remain unaware that ACAP assistance is provided and funded by USAID, although generally they believe the assistance is offered by a foreign government or IOM/UN sources. The beneficiaries link the assistance with the military incident that affected their families.

Recommendation: Decision on whether beneficiaries should know the source of funding should be left up to the field offices judgment as they understand the local conditions.

Objective Two: Establish a liaison network among key stakeholders on the international, national and provincial level.

Program Coordination: ACAP quarterly reports state there is regular coordination with the Afghan Independent Human Rights Commission (AIHRC); however the evaluation team found a significant disconnection between ACAP and AIHRC. According to field

staff and AIHRC there is little communication between the offices. The AIHRC has a special investigation team that also investigates civilian casualty incidents. The AIHRC reported they are unaware of ACAP work and that little coordination has taken place. This information was verified when the team visited offices of both ACAP and AIHRC in Kabul, Nangarhar and Herat provinces.

Communication with Relevant Stakeholders, Including Local Authorities: Communication with stakeholders varies from region to region and from organization to organization. While there seems to be a good communication system between ACAP and UNAMA in Nangarhar, Herat and the Central Region, as mentioned there is virtually no communication with most AIHRC offices. In Herat province, AIHRC was unaware of ACAP. While most FPOs are aware of ACAP, there is no systematic communication and information sharing between them. In Herat the Senior Development Officer and Deputy Field Officer stated they have seen a drastic improvement in communications with ACAP since the international field officer was hired in December 2009. Communication with PRTs and ISAF is on an as needed basis, usually for incident verification. ACAP has limited communication and information sharing with stakeholders except UNAMA.

Consistent	**Intermittent**	**Non-existent**	**Varies**	**Little relationship**
UNAMA	Local Authorities	AIHRC	PRT FPOs ISAF	Other Organization

Recommendation: Require monthly meetings with field staff and stakeholders. Develop a newsletter in Dari, Pashto, and English, and distribute through the field office and Internet. Formalize the relationship with AIHRC by signing the MOU. ACAP field officers and PRT members approve the nomination of incidents, this will ensure the PRTs and field officers are working together and speed up the process.

Objective Three: Gather and disseminate information among stakeholders at the international, national and provincial level.

Dissemination of Information:
Information sharing with stakeholders on regular basis does not exist except with UNAMA. The relationship with the stakeholders, including local government authorities, does not seem to be formalized but rather stakeholders are contacted on an *ad hoc* basis as needed. Local authorities in Nangarhar and Herat said that they are only contacted for incident verification.

IOM is in the process of developing a two-page electronic newsletter in English that provides an update on ACAP's activities and success stories. The recipient of the newsletter, according to ACAP, will be USAID. While this is a good idea, this electronic newsletter is quite slow to download because it contains too many graphics. The

evaluation team has seen the draft of the newsletter. It is lacking important information by not disclosing the number of open grants in each community.

Recommendation: ACAP is encouraged to consider establishing a Public Relations (PR) unit to ensure coordination and communication with humanitarian and development organizations, as well as key stakeholders on a regular basis. The PR unit's primary objective would be to establish a working relationship between ACAP and relevant stakeholders, share information about ACAP programs and updates, and find ways to coordinate activities where other organizations which may be able to provide additional assistance to beneficiaries. Develop a newsletter in Dari, Pashto, and English, and distribute through the field office and internet. Develop a website via which USAID and the military could actually nominate incidents.

USAID Management: Since the beginning of ACAP activities in October 2007, there have been seven different USAID staff overseeing the program. This does not benefit USAID, ACAP, or the beneficiaries due to lack of oversight and guidance. USAID did not provide sufficient guidance to run the program efficiently, or to deliver oversight to ensure objectives are being met. Insufficient site monitoring by USAID has allowed the program to continue with problems that included lack of transparency, accountability, and improper delivery of assistance. Objectives two and three of USAID results framework for ACAP were neglected due to lack of oversight by USAID.

The Inspector General made specific recommendations to both USAID and ACAP in June 2009; these recommendations have made a difference in the way the program is now operating. (Annex 7) In mid July 2009, USAID made plans to assign a dedicated AOTR managing ACAP. This has positively impacted the quality of reporting, and has helped set targets and priorities. The USAID AOTR office has conducted one site visit on March 6-9, 2010 in Nangarhar province. The AOTR now holds regular meetings with ACAP managers and is substantively involved in overseeing the implementation of ACAP. This has given ACAP more direction and focus. There is an increase in spending and nomination and grants are approved in a timelier manner.

Recommendation: It is recommended that USAID's local field staff conduct regular monitoring and evaluations by meeting with beneficiaries, local authorities, Shura members, and ACAP staff. Although there are some improvements in the overall process, prompt and transparent delivery of assistance meeting beneficiary needs continues to be an issue that needs to be closely supervised by USAID.

2. INTRODUCTION AND BACKGROUND

2.1. Program Background

In order to better understand the Afghan Civilian Assistance Program (ACAP), it is worth giving a brief description of the Afghan Transition Initiative (ATI), the precursor to ACAP, as well as some background information on the Leahy Initiative. Both the Office of Transition Initiatives (OTI/USAID) and the Leahy Initiative funded ATI, in 2003.

In 2002 Senator Patrick Leahy of Vermont proposed a program to provide humanitarian and reconstruction assistance "…for families and communities that have suffered losses as a result of the military operation against the Taliban and insurgents." The Leahy Initiative was authorized by the Consolidated Appropriations Resolution of 2003 (Public Law 108-7).

In March 2002, OTI/USAID launched the Afghan Transition Initiative (ATI). ACAP stated that from 2005 to 2007 IOM implemented the ATI program until ACAP was born in 2007. The initial objectives of ATI were to increase the Afghan government's capacity to respond to citizen's needs, increase citizens' awareness of and/or participation in democratic processes, and increase the capacity of the Afghan women.

ACAP headquarters stated that the program inherited almost 5,000 old incidents from ATI, the incident dates went back to 2001. This complicated and handicapped the smooth start of the new ACAP program.

The main goal for the first three phases (March 2002-March 2003) was to highlight the benefits of the Post-Taliban government (ATI) of the Transitional Islamic State of Afghanistan (TISA) through quick-impact, high-visibility projects. The objective was for the Afghan government to build its credibility by showing its ability to provide services to those in need in a timely manner. In the next phase, the program set out to target women and improve their quality of life by integrating gender into all grants. From March 2003 through June 2004, new funding for small grants supporting women and girls allowed ATI to dramatically increase its civic education programming. In the last phase from July 2004 through April 2005, ATI focused on public awareness, political participation and improving Afghan media capacity.

From the start of the program until the end (July 2005), ATI reported having faced many challenges. The most significant challenge was the lack of security, which hampered ATI's efforts in implementing the program, traveling to sites in order to monitor progress, and disseminating information. This problem was addressed by hiring Afghan NGOs to perform the monitoring. However, many projects remained unfinished. ATI continued until OTI left in 2005 and IOM sustained the program until 2007, when a new program design was established which ACAP, working with families became. Four of ACAP's current staff, including one international and three local members have also worked on OTI's ATI programs.

The table below illustrates ACAP milestone since the beginning of the program. The table highlights grants awarded, budgetary reform and staffing.

Figure (1) illustrates the milestones in ACAP from 2007 through February 2010

		Milestone			Milestone
2007	JAN		2008	JAN	
	FEB			FEB	
	MAR			MAR	64 Grants Awarded 1 Grant Closed Total Grants 107
	APR	$27 Million Awarded to ACAP 11 Staff Employed		APR	
	MAY			MAY	ACAP Budget Revised
	JUN			JUN	22 Grants approved 1 Grants Closed Total grant 129
	JUL			JUL	
	AUG	IOM Develops Recovery Plan (Annex 8)		AUG	ACAP Staff Increased to 29
	SEP			SEP	43 Grants Approved 3 Grants Closed Total Grants 172 ACAP Budget revised
	OCT			OCT	USAID & ACAP agree on first targets
	NOV			NOV	
	DEC	43 Grants Approved		DEC	50 Grants Approved 2 Grants Closed Total Grants 222
		Milestone			Milestone
2009	JAN	Inspector General Begins Audit ACAP Staff Increased to 69	2010	JAN	ACAP Starts to Develop New Family Assessment Form Introduced All Beneficiaries' to Receive Home Kit
	FEB			FEB	ACAP Final Evaluation Begins
	MAR	71 Grants Approved 10 Grants Closed Total Grant 291 ACAP Staff Increased to 69		MAR	$24 Millions Spent 51 Grants Closed Total Grants 525 ACAP Staff Increased to 157 USAID Monitors the Program for the First Time in Nangarhar
	APR	ACAP Revised Procurement Policy to Pre-order Kits for Beneficiaries		APR	MOU with AIHRC Still Pending Kits are Only pre-positioned in a Kunar
	MAY	Budget Revised Int. Staff Hired for Some Field Offices		MAY	
	JUN	46 Grants Approved 10 Grants Closed Total Grants 337 MOU with AIHRC Drafted by IOM		JUN	
	JUL	First USAID AOTR Dedicated		JUL	
	AUG	AIHRC Shares Comments on MOU with IOM		AUG	
	SEP	15 Grants Approved 10 Grants Closed Total Grants 352 ACAP Staff Increased to 127 New Policy on Grants (6 months rather than 1 year) Budget Revised		SEP	
	OCT	IOM Conducts Internal Audit of Nangarhar Office		OCT	
	NOV	USAID Extends ACAP Grant to Nov 2010. Adds $27 Million		NOV	ACAP Cooperative Agreements Ends
	DEC	24 Grants Approved 7 Grants Closed Total Grants 376		DEC	

ACAP provides support for Afghan civilian families and communities that have suffered losses as a result of military operations between international coalition forces and insurgents, (ACAP does not assist those civilians who are victims of fighting between Afghan security forces and the insurgents). It also does not support Afghan National Police (ANP) and Afghan National Army (ANA) personnel who are injured or killed as a result of an International Military Forces (IMF) incident.

Responding to the needs of families and communities is expected to contribute to the overall stabilization of Afghanistan and addresses potential causes of disorderly migration. IOM has been implementing ACAP since April 2007, but IOM was also the main implementing partner for OTI/ATI from 2003. ACAP is significantly different from the previous ATI program. The ATI program focused on communities and women's programs. The ACAP is primarily concerned with assisting war-affected families directly. Little effort has been put in to establishing and maintaining relationships and communicating with stakeholders.

The ACAP cooperative agreement began on April 1, 2007 and was expected to end on April 30, 2010; the total budget was $27 million. In December 2009 USAID extended the grant by seven months (until November 30, 2010) and increased the budget from $27 million to $54 million. According to the Statement of Work, ACAP is not a compensation or emergency program, nor is it intended to provide condolence payments. Rather, it is designed to provide sustainable assistance to the beneficiaries in an effort to assist them in rebuilding their lives. Examples of ACAP assistance include, but are not limited to:

- Vocational and business training for family members who have lost a main income earner, or have experienced loss of income;
- Support for the establishment of small business opportunities;
- Children's education support;
- Housing repair and reconstruction;
- Medical assistance for the injured, either in-country, or through a referral system outside Afghanistan;
- Restoration of livelihood sources, such as livestock, orchards, etc; and
- Rebuilding vital community infrastructure and essential buildings.

Note: The evaluation team does not believe that the design of this program allows for its sustainability, despite the goals and objectives stated; that the program would contribute to sustainability.

ACAP's Goal and Objectives are as follows:

***GOAL*:** Strengthen the US Government's efforts to provide assistance for Afghan families and communities that have suffered losses as a result of military operations against insurgents and the Taliban, thereby contributing to overall stabilization efforts in Afghanistan and pre-emptively addressing potential causes of renewed disorderly migration.

OBJECTIVES

1. Ensure that Afghan civilians suffering losses from military operations against the insurgents and the Taliban receive appropriate assistance to restore and continue their lives.
2. Establish and maintain a liaison network among key stakeholders on the international, national and provincial level.
3. Gather and disseminate information related to the ACAP among stakeholders at the international, national and provincial level.

To date ACAP activities have been implemented in 30 of Afghanistan's 34 provinces to date (except for Panjshir, Bamyan, Sar-e-Pul and Samangan). ACAP has a total of 157 field staff, including 17 women both Afghan and International based in 14 provinces.

Figure (2) ACAP Coverage by Province

3. FINDINGS

3.1. Administrative processes

The program has undergone two reviews since last year; one by IG's office in January 2009 and one internal review by IOM in October 2009. Each review made recommendations to improve performance, including methods to reduce or limit corruption opportunities, and to expeditiously distribute assistance kits. ACAP openly welcomed the evaluation and recommendations. ACAP responded to the recommendation of assistance kit distribution on April 22, 2009, with their revised policy on pre-ordering and pre-positioning standard form of assistance. To date this is being implemented in only few field offices. While ACAP seeks to comply with recommendations, the UN procurement policies slow down the process, as it requires authorization in different countries, including Afghanistan, Manila, and Geneva.

Lack of clear policies and procedures in the ACAP [Field Operation] Manual further creates confusion and misguidance in the way the program is carried out. This exacerbates an already inconsistent and incoherent state of affairs in many field offices. For example, forms in the field offices are in Dari, Pashto, and English. The vast majority of beneficiaries are illiterate and cannot verify or confirm the information included in the field forms. Furthermore, the receipt form lists the items delivered only in English. Thus when the beneficiaries give a thumbprint to acknowledge the assistance they received, in most cases they have no idea what they have signed for. This leaves ACAP open to many corruption opportunities.

3.2. Personnel Management

The ACAP has been understaffed until late 2009. This was highlighted by the IG's December 2009 report. This staffing shortage severely impacted ACAP's program capability. On November 1, 2006 IOM signed a service agreement with Christian Thomas Group (CTG) to handle the hiring of field staff for ACAP nationwide. CTG is a small-scale human resource management firm that delivers HR services such as hiring, advertising, and handling contracts and payroll for ACAP staff. CTG hires both local and international staff for ACAP. As of the writing of this report CTG has contracts with 147 Afghan staff, including 8 women and 4 international staff, and reported plans to hire 2 more international staff in the near future. The group is not involved in staff training, management, or operation of the program. Currently 3 out of 5 ACAP international staff members are employed by CTG. The remaining 2 international field officers are IOM employees. IOM has removed its international field officer from Kandahar due to security concerns and have replaced him with a CTG international staff. Lack of international ACAP staff in regional offices limits the interaction with PRTs, ISAF and the military, as these groups are reluctant to provide information to Afghan staff.

CTG is not aligned with the UN, therefore, not subject to UN security regulations. CTG international staff have little support in terms of office space, equipment, living quarters, and security instructions or access to security information. None of the CTG international field officers feel that they are a part of a cohesive team. CTG staff do not have guards and they hire small local vehicles. While this does keep the staff low profile,

it also contributes to staff feeling remote from the ACAP organization and adds to security risks. The difference in organizational culture and lack of communication between CTG and IOM contributes to the feeling of isolation in the field. IOM is closely aligned with the UN, and is frequently housed in the same compound. ACAP adheres to all security rules and regulations and follows many UN management policies.

It would be almost impossible for IOM alone to implement this program in the field as it follows strict UN security procedures that hinders staff movement, program monitoring and therefore proper delivery of assistance. It is imperative for IOM-ACAP to use a vehicle partner organization for hiring field staff to implement the program. CTG-hired staff expressed frustration with the bureaucratic procedures and intermittent communications. There are significant differences between IOM and CTG local staff salaries and employment benefits. CTG staff are in the field and face more danger so the benefits are higher. CTG bundles the benefits into the salary. CTG international field staff reported that their insurance is inadequate citing it only pays for death and injury, not illness. CTG staff also discussed the lack of support in equipment, office space and communication, which has caused tension and seems to impede IOM and CTG working as a team. The solution would be to have one organization working as a team to implement this project.

Until recently ACAP employed a very small staff. In January 2009, there were 56 staff members throughout the country. This made executing the program very difficult and affected the overall implementation of the program. However, ACAP has recently taken measures to increase the staff; nearly tripling it to 157. This creates new challenges to quickly train and effectively manage the large influx of newly hired staff. Although the number of staff increased significantly, the number of female staff still remains slow, only 17. Without sufficient female staff, ACAP loses significant opportunities to assist women beneficiaries because, as it is culturally and traditionally unacceptable for women to interact with men outside their families.

In addition, many seasoned ACAP staff reported their doubts regarding the technical and operational capacity of the newly hired national staff. The new staff members have often come to the program with little experience working with victims or in a similar type of program, and it is both labor- and time-intensive to raise their capacity level to international standards.

3.3. Procurement Procedure

Much of ACAP procurement is the responsibility of field staff. Lack of clear instruction and guidance on procurement has caused inconsistency and confusion in the field as every office handles procurement differently. Nangarhar and Kunar offices change US Dollars to Afghan currency, and then to Pakistani Rupees for purchasing kits, whereas Herat office uses only US dollars.

In many programs, end-user beneficiaries generally are not included in the procurement process. However, under ACAP, beneficiaries are asked to submit three quotations for

the goods they want to purchase for their assistance. ACAP manual dated February 2010, states that "…sub offices shall collect quotations from at least three vendors." This implies that the field staff in the field does not follow the instruction to get independent quotations.

Initially it was stated that the bulk purchasing would be done in the field. This would allow beneficiaries to pick up their goods from local vendors, stimulating the local economy. However, ACAP is in the process of finalizing contracts for bulk purchasing in Kabul, and then trucked to regions of implementation. This has caused concern among all CTG international and field officers, as they are worried that the goods and transport vehicles will not be safe on the road, transportation costs will be higher, and if there is a problem with the procurements, beneficiaries won't be able to exchange them.

Because of the slow implementation of the program, over the years tremendous pressure is put on staff to spend money and meet monthly targets. This pressure, combined with lack of clear procedures and policies, can lead to inequities towards beneficiaries.

3.4. Grant Management

Grants are managed through ACAP headquarters with the assistance of field office staff. There is no comprehensive operations manual to guide the field staff in grant policies and procedures. Staff are not clear on what assistance is mandatory and what should be delivered based on the family needs; in Herat, the ACAP field assistant was of the view that all beneficiaries who owned undeveloped land would receive $6,900 in addition to other individual assistance. An IOM internal investigation in October 2009, in Nangarhar province recommended "the roles of Nomination Assistants, Field Assistants and Monitoring Assistants should be well defined and ACAP staff members in the sub offices should be informed of the responsibilities an individual has and if possible Procurement Assistants should be different than those who do the family assessment and eventually does the monitoring." However, the evaluation team found that in most instances the person who conducts the family assessment, purchasing, delivering of goods, and monitoring is the same person.

As of the writing of this report, in many field offices the distinction is not made between field staff responsibilities. From an updated staff list that the team received on April 1, 2010, there are no Procurements Assistants. In some of the offices there are no staff dedicated to monitoring and nominations. The evaluation team found it confusing and difficult to understand the data provided on grant numbers, as the number of grants does not correspond to direct beneficiaries. The data lacks consistency, accuracy, and identifying dates and names (Annex 9).

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3.5. Timelines and Delivery Schedule of the Program

The program is very slow in responding to incidents and in delivering assistance. The average time between incident and verification is 17.9 weeks. An additional 28.4 weeks after verification lapses before grant approval and delivery of assistance. The evaluation team was unable to verify time between delivery of assistance and the grant closing. A total of 51 grants out of 525 are reported closed. Most of the beneficiaries interviewed

complained that they received assistance several months to a year after the first interview or visit by an ACAP representative. In some cases, even though grants were signed, the delivery of assistance to the victims and their families was up to a year behind schedule. This was explained by IOM/ACAP to be a problem with verification of old cases, staffing issues and purchasing for each individual families.

Figure (3) ACAP Timeline

2007 Data				
Quarter	Average time between Incident and Verification	Average time between Verification and Grant Approval	Average time between Grant Approval and Delivery of Assistance	Average time between Delivery of Assistance and Grant Closing
Oct- Dec	12 weeks	25 weeks	3 weeks	

2008 Data				
Quarter	Average time between Incident and Verification	Average time between Verification and Grant Approval	Average time between Grant Approval and Delivery of Assistance	Average time between Delivery of Assistance and Grant Closing
Jan-Mar	20 weeks	26 weeks	12 weeks	
Apr-Jun	19 weeks	21 weeks	11 weeks	17 weeks
Jul-Sep	23 weeks	20 weeks	16 weeks	5 weeks
Oct-Dec	21 weeks	20 weeks	10 weeks	

2009 Data				
Quarter	Average time between Incident and Verification	Average time between Verification and Grant Approval	Average time between Grant Approval and Delivery of Assistance	Average time between Delivery of Assistance and Grant Closing
Jan-Mar	12 weeks	20 weeks	10 weeks	
Apr-Jun	15 weeks	17 weeks	9 weeks	
Jul-Sep	15 weeks	18 weeks	9 weeks	
Oct-Dec	25 weeks	18 weeks	8 weeks	

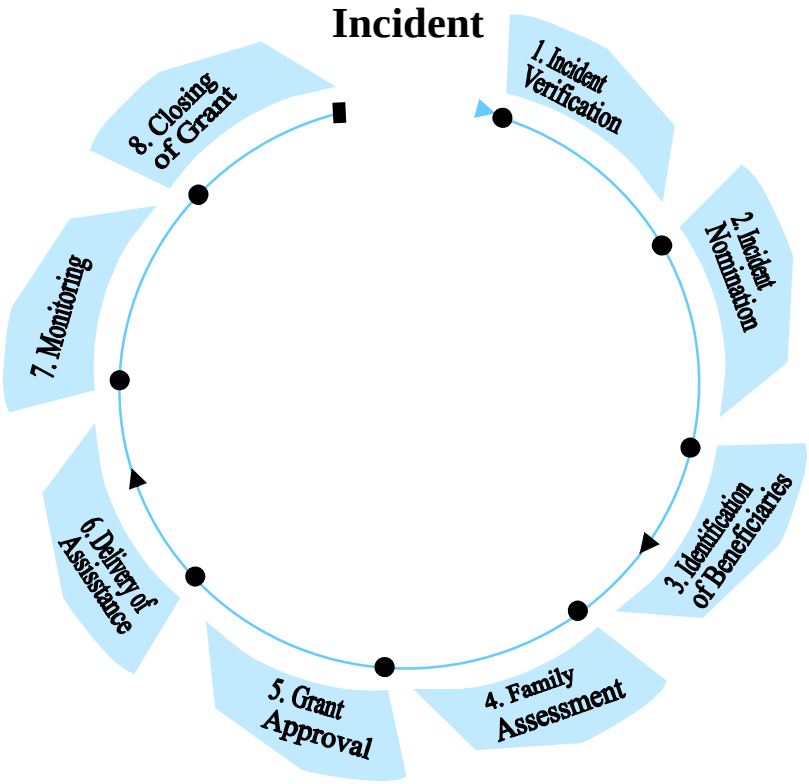
2010 Data				
Quarter	Average time between Incident and Verification	Average time between Verification and Grant Approval	Average time between Grant Approval and Delivery of Assistance	Average time between Delivery of Assistance and Grant Closing
Jan-Mar	17 weeks	10 weeks	4 weeks	

As indicated in the above chart, ACAP has improved its timeline from incident to delivery, from an average of forty-six weeks at the end of 2009 to thirty-one weeks in March 2010.

The sequencing of the delivery of goods is considered to be problematic. The evaluation team observed that in most cases livestock was delivered before beneficiaries received livestock kits or training. Some beneficiaries were uneducated in raising livestock, however, were given cows. This caused distress regarding the care and feeding of such valuable animals.

The evaluation team interviewed the Mayor of Bati Kot in Nangarhar, The Mayor reported that there was a night raid incident one year ago in which two houses were damaged, twenty-five persons (mostly women) injured, two persons died and the total cost of damage was estimated to be around $22,000. Soon after the incident, ACAP recorded the information about the potential beneficiaries but the community has not heard anything from ACAP regarding the progress of the assistance. The Mayor said he has called ACAP numerous times, but he was told the paperwork is in Kabul. The Mayor and the District Governor were frustrated that there was no communication regarding this nomination. This case impacts negatively on ACAP's credibility. They said, after this incident the people were grumbling that their houses are destroyed and family members dead and injured and wondering out loud why they should support the government when they receive no support from the government. The Governor said he spent 90,000 AFs from his small budget to help the people and ensure they did not turn away from the government. He said he has never been thanked or acknowledged by anyone for the assistance he provided. People still want to know what happened to their paperwork and when the assistance will arrive.

Figure (4) ACAP Project Cycle



Description of the ACAP Project Cycle

1. **Incident Verification**: ACAP identifies an incident by monitoring national & international media, confirming the incident with the military, UNAMA, the PRT, local authorities, and AIHRC. According to ACAP, two sources including one international are needed to confirm an incident. The incident verification process takes an average 17.9 weeks. The smaller the incident, the more difficult it is to verify. Incidents involving Special Forces also take longer to verify, as usually there are few witnesses and it is more difficult to obtain international verification.

2. **Nomination of Incidents**: Verified incidents that fall within the scope of ACAP are put into a Nomination Form accompanied by supporting documentation, and signed by a Shura or relevant Afghan authority. This process takes between four weeks to several months. The process itself is problematic because small flaws (i.e. faulty dates, conflicting reports on an incident, etc.) in the documentation can hold up approval. When there are mistakes or missing supporting documentation, the field

staff are often not made aware of this by headquarters personnel for weeks or months, further delaying delivery of assistance.

3. **Identification of Beneficiaries**: According to ACAP's implementing plan, potential beneficiaries are identified by field staff, in close cooperation with community leaders, local government representatives, and other relevant stakeholders on the ground, such as AIHRC and UNAMA. However, the evaluation team has observed that in most instances only local authorities and ACAP staff identify beneficiaries. UNAMA has been consulted to verify incidents in Herat, Nangarhar, and Kabul. This process is labor intensive and may take longer if beneficiaries are scattered throughout different villages. It also depends on the number of beneficiaries affected by the incident. The first meeting with family is brief.

4. **Family Assessment**: ACAP staff meets individually with affected families or communities to assess their needs. This is a long interview, which works with the families to establish their skills and resources to determine their individual assistance package. ACAP fills out a Family Assessment Form and is expected to provide information about the assistance package. For community beneficiaries, ACAP fills out the Community Assessment Form in consultation with shura members and relevant government authorities. The evaluation team did not meet any beneficiaries who were given a copy of the ACAP brochure (Annex 10). All the beneficiaries interviewed were unaware of the exact assistance they were going to receive until the assistance arrived. In many instances ACAP field staff decided on what assistance the beneficiary would receive rather than the tailored assistance program is designed around.

5. **Grant Approval**: Once assistance needed or requested has been finalized with the families and communities, the information is put into a database. Family members who have been affected by the same incident are included in the same grant, with a maximum of ten families per grant, which is then signed by the ACAP manager at Kabul HQ. Before January 2010 the process took an average of 20 weeks. In 2010 the process takes an average of 10 weeks.

6. **Delivery of Assistance**: ACAP literature states that ACAP develops the assistance package in consultation with the beneficiaries, in accordance to their needs. Examples of assistance include: a) vocational training, b) establishment of small businesses with combined micro-credit opportunities, c) medical assistance in the form of food for medicine, literacy program, education support to school-age children, provision of livestock, provision of building materials, assistance in restoring livelihood sources, and rebuilding community infrastructure. The average time between approval of grant and deliver of assistance is 9.2 weeks.

   The evaluation team found that not all items in the assistance packages were being delivered to beneficiaries. Thirty percent of the beneficiaries interviewed did not receive the complete kits. The level of assistance varies greatly, and in many cases beneficiaries did not choose the assistance.

7. **Monitoring**: In September 2009, a new policy was introduced to keep the grants open for six months rather than one year, as suggested by the IG's report. Until this time grants were monitored by the field staff two to three times during the life of the grant. ACAP works with the beneficiaries six months from the beginning of delivery of assistance. The field staff conduct regular monitoring visits to check on the progress and write a monitoring report. During these visits, beneficiaries have the chance to bring up any issues or problems that they may be facing. ACAP field staff will review the assistance being provided and recommend changes as appropriate in a grant amendment. ACAP field staff conduct monitoring once during the two to three months during the six- month timeline. As mentioned earlier, the same staff that does family assessments, procurement, and delivery of good also monitors the assistance; thus individuals are monitoring their own work.

8. **Closing of Grant**: Upon completion of the grant ACAP visits the beneficiary for the final time and writes the final report. As most grants include multiple beneficiaries sometimes one family can hold up closing of grant. Field staff provide all the documentation to close the grants, photos, final monitoring report, all vouchers and signed documents and the headquarters, after receipt of this information, closes the grant.

Sometimes grant closing is delayed by several reasons, one of which is the requirement to attach one last photo of the beneficiary and the small business. ACAP field staff expressed that in some cases the actual beneficiary is out of town or even out of the country. Unless a picture is included in the final evaluation report the grant cannot be closed. Staff reported that one beneficiary who had received supplies for a shop was out of the country during the final evaluation, under pressure from headquarters; the staff had to request the family to ask the beneficiary to return to his village for a photo shot.

Between October 2007 and March 28, 2010, approximately 525 individual grants and 48 community grants have been approved. A total of 51 grants have been closed, this includes 48 individual grants and 3 community grants.

3.6. Factors Affecting Delivery of Assistance

There are several factors that hinder the delivery of assistance. This includes, security, administrative factors, and interference by government authorities, cultural norms and lack of trained staff.

Security is a primary concern in the implementation of this program as ACP works in volatile areas. Field visits by staff to verify incidents, interview beneficiaries, deliver and monitor assistance is influenced by the fluid security situation.

There is a lack of clear direction from headquarters regarding communication with PRTs and the military to identify smaller incidents, and this has slowed the beneficiary nomination process and delayed the delivery of assistance.

Lack of sufficient equipment in the field slows the delivery of assistance. In Nangarhar, eight field staff members had four cameras to share, resulting in staff members postponing field visits. As all documents (forms, photos and supporting documents) must be sent to the headquarters for approval, staff spends hours trying to scan and then email the documents to Kabul. CTG staff struggle under the constraints of slow Internet service that makes sending attachments a very time-consuming process.

In Kunar, the Program Manager requested from ACAP a printer and copy machine, equipment necessary to run an office efficiently. Without this office equipment, staff is obliged to travel to the bazaar to copy documents branded with the USAID logo, putting both the staff and program at risk. The Kunar office did received a printer and copier, five months after the initial request. One staff member reported that he had requested a larger-capacity chip for the office camera five months ago (if bought locally the cost is $10) and he is still awaiting approval by headquarters.

Many times ACAP staff are pressured by elders and local government authorities to provide benefits to them. ACAP staff feels uncomfortable and prefer not to have regular meetings with local representatives for this very reason. In some instances Shura members and local government authorities nominate ineligible beneficiaries, which impacts ACAP. In these situations ACAP allocates more time to clarify who is eligible as a beneficiary with provincial authorities and other sources.

It has also been brought to the attention of the evaluation team that sometimes beneficiaries offer "gifts" to garner assistance. This traps ACAP representatives; in Afghan culture, to refuse an offering is considered disrespectful, yet to accept it is considered a bribe. Another factor that hampers the proper implementation and monitoring of the program is little oversight by IOM due to security restrictions. IOM follows the UN security policies that strictly monitors and limits staff movement.

Project for which approvals are made in headquarters, as opposed to field offices prolong the delivery process. Although the process is currently under improvement, procurement procedures entail staff members purchasing items individually for beneficiaries. Other delays are due to inefficient communication between field offices and headquarters in Kabul, which has resulted in field offices not receiving feedback regarding pending cases.

3.7. Adequacy of IOM's Field Assessment in Program Delivery

There is a standard procedure on how family assessments are conducted. The evaluation team observed that the procedures are not followed. The evaluation team learned that one hundred percent of beneficiaries interviewed in Nangarhar were unaware of vocational and literacy training.

The evaluation team interviewed a widow whose husband was killed in a suicide bombing attack in Kabul. She reported that two months after her husband's death ACAP approached the community representative to identify beneficiaries. As a mother

of six children, she expressed her frustration that no ACAP member had asked her about her needs or skills, and that her father-in-law was chosen as the beneficiary. She said she is a tailor, but she needs training, and a sewing machine to be able to make a living and become self-sufficient. In her case ACAP interviewed the victim's father (the widow's father-in-law) to inquire about the family's need. The victim's widow was never interviewed or named as the beneficiary. (The father-in-law has his own family and is not fully responsible for his daughter-in-law's needs.) The father-in-law and the deceased son owned a small business in the past. The family received $2,000 from the Karazi Fund, which immediately went into repairing and restocking the small business. The father in-law decided that the best way to assist the family would be to buy more goods for the shop with the assistance from ACAP with no regard to the needs of the widow. The widow feels that she was left out of the process and equally as vulnerable as before.

In our evaluation of the ACAP, we observed the troubling effects of its flawed design. The ACAP design does not consider women's special needs and circumstances, resulting in the exclusion of many women from decisions regarding their assistance. The importance of employing female staff members can be noted in the fact that when the beneficiary is a woman, a male family member is chosen to represent her. In most parts of the country, it is culturally unacceptable for an outside male to interact with women. However, had the ACAP field assistant been female, women/widows would have been more likely to communicate their needs and concerns and would have chosen to represent themselves.

A widow whose husband was killed by a suicide bomber attack in Kabul was provided with four cows. Other neighbors affected by the same incident decided to choose livestock as their assistance by ACAP. The neighbors received 6 cows each. The decision for the female beneficiary to receive cows was made by ACAP in consultation with the male neighbors. This woman, who was already struggling to feed her six children, now has to feed four cows and does not know how to maintain the cows. She had to take her 12-year old son out of school to tend the livestock. This also addresses the issue of transparency, why did she receive four cows and others in the village received six? She did not get the quotes, as she did not even know she was getting cows until they arrived at her house.

Sometimes armed conflict can be a time of empowerment for some women, as they can take over roles that are traditionally performed by men. It can allow women to develop new skills.

Female beneficiaries in Herat have taken advantage of the literacy and vocational training. The quality and duration of training was not sufficient to master reading and writing skills. The beneficiaries also reported that sewing machines broke after two months, the quality of the fabric was unacceptable to the beneficiaries.

3.8. Communication and Coordination with Other Agencies and Stakeholders

ACAP has neglected the importance of communication and coordination with stakeholders. ACAP and, more importantly, beneficiaries would benefit if assistance and activities were coordinated more effectively by identifying incidents and beneficiaries that meet the eligibility criteria. Coordinating with NGOs working in the regions could stimulate a referral network. For example:

The Swedish Committee for Afghanistan (SCA) provides support to improve basic living conditions for people in rural areas. SCA is working to support reconstruction, peace and stability in Afghanistan. Three long-term development programs are implemented in 16 provinces of the country, in the fields of primary education, healthcare and disability.

CARE implements several programs to develop civil society, education, infrastructure, gender equality, income generation and good governance. CARE provides training and support for community projects in remote rural areas, helping widows to earn a sustainable livelihood, promoting women's savings and loans groups and improving Afghanistan's limited educational system.

Oxfam works with communities to develop local institutions and increase the participation of women. Oxfam also focus on increasing access to health and education, and improving people's livelihoods.

Save the Children works to improve the lives of Afghan children and their families through programs in health, education and child protection.

The International Committee of the Red Cross (ICRC) provides support for selected hospitals, including Mirwais hospital in Kandahar, and for six physical rehabilitation centers in Kabul, Nangarhar, Balkh and Herat provides.

Additionally, local and national authorities could be of tremendous assistance in implementing ACAP. For example, the Ministry of Labor, Social Affairs, Martyrs and Disabled also provides assistance, though minimal, to families of martyrs. The Ministry was unaware of ACAP’s existence and expressed dismay that IOM has not approached them to coordinate activities.

Communication and coordination with agencies/stakeholders needs much improvement. Emphasis should be made on creating an efficient and workable standard communication system. Inadequate communication causes weak coordination and information sharing between agencies, which delays delivery of assistance to beneficiaries. In those cases where ACAP is in touch with the local government authorities, information is not fully shared about the type of assistance; and authorities are only contacted to verify incidents and/or nominate or approve beneficiaries.

Moreover, there is little communication with AIHRC, an entity that has been mentioned in almost all IOM reports and implementation, monitoring plans. AIHRC is a reputable

national entity that has a special investigative team that probe incidents conducted by military and insurgents. We have observed that AIHRC shows little interest in ACAP. According to AIHRC, a Memorandum of Understanding (MOU) was drafted by IOM in June 2009. The commission sent their comments to IOM via email in August 2009. According to ACAP headquarters, the MOU is pending final decision/clarification by IOM's legal department on the official language in case of a dispute. Neither party has followed through with formalizing their relationship. A commissioner with AIHRC said "that usually we do not require an MOU with organizations except when we feel we are working with a difficult organization".

In Jalalabad, contact with AIHRC has been mostly through email and AIHRC reports that there has not been any contact with the AIHRC for the past nine months. The ACAP office in Nangarhar and Kunar reported that AIHRC is not responsive and sometimes it takes weeks to get feedback. In Herat, the AIHRC Regional Program Manager stated he is unaware of ACAP. There has been minimal attempt by ACAP to improve the relationship between the offices. Although the offices are in close proximity; the officers and relevant staff members have not met in person.

As reported by ACAP field staff, the PRT in Kunar has not shown interest in communicating with ACAP. ACAP has stated that it is difficult for them to meet with the PRT because of security considerations. In Herat there is more communication since December 2009. The PRT in Herat is eager to assist ACAP in any way.

In the Eastern Region, UNAMA Human Rights Officers said they have seen a major improvement in ACAP in the past 5 months; "they are more responsive, proactive and communicate regularly by telephone, email and personal meetings." Information is exchanged on an ad hoc basis only. UNAMA has submitted nominations in the past and reported that it is satisfied with their relationship with ACAP. In Herat the UNAMA office and IOM/ACAP are located on the same compound. Since the international field officer has started working in this location communication has improved. They communicate on regular basis.

The District Governor in Bati Kot said he has had contact with ACAP but only before nomination; after that, he feels his office is irrelevant. He expressed that he would like to be more involved, and believes ACAP can assist improve the local government's image in the community by interacting with them on matters related to their communities. He said that he sees the current situation as a crucial time, and that people may choose to give up on the government and the international forces, especially when civilians are killed or injured by the military. He indicated that Anti Government Entities (AGE) has an opportunity to attract supporters. The district governor said it is important that beneficiaries know about the source of the assistance, as it will help to build relations.

Lack of cooperation by the military to verify incidents, is another challenge that affects the implementation of the program. A number of stakeholders thought that one of the main reasons the military may be hesitant to communicate with ACAP is that they believe one of ACAP's functions is to assess blame in addition to assisting the victims.

ACAP is reluctant to be seen working with the military as it may compromise their position with the beneficiaries.

Unfortunately, USAID spent little time on the program until the IG inspection in January 2009. The initial program targets were not agreed upon by ACAP and USAID until October 2008. Furthermore, USAID was not substantively involved in the program and carried out sporadic and insufficient follow-up on the activities reported by ACAP. From April 2007 to December 2009, there have been seven different AOTRs, with the current AOTR assigned in mid December 2009.

3.9. Transparency in ACAP

Lack of transparency has been identified as a possible threat to proper delivery of assistance. Inconsistency in the type and quantity of assistance was noticed in all areas where the evaluation team conducted interviews. The team interviewed several beneficiaries who thought they could only receive one type of assistance. The signed grant form indicates that these beneficiaries were scheduled to receive a sewing kit including the machine, and/or household kits, and/or education kits. The beneficiaries were not aware that they were approved for this assistance and did not receive the items.

ACAP stated that it never gives out cash except to repair homes and in these cases the cash is given in two instalments. Yet the team interviewed nine beneficiaries who received cash payments for non-housing repair assistance. The evaluation team interviewed three beneficiaries in Kapisa who had received cash ranging from $1000 to $3,000 not related to home repair. Two beneficiaries in Nangarhar have received cash in the amount of Rs.2000 and $3,500, again not related to home repair.

Beneficiaries reported that they sometimes receive only one item from a kit such as an iron or a sewing machine, without the rest of the items. The iron and sewing machine are part of a tailoring kit. The beneficiaries did not receive the complete kit. Beneficiaries did not know they were supposed to receive several items in the kit. In some of the villages, they received electric appliances, but there is no electricity in the village. The limited information provided to beneficiaries concerning what benefits they should expect to receive offers the opportunity for unauthorized exploitation of benefits by non-beneficiary parties.

The opportunity for mismanagement of funds during the time when money is exchanged is problematic. Field staff are given dollars to exchange in to other currencies. Different offices use different systems in changing money and use various currencies.

From 2007 to 2009 there was an Afghan Regional Director for ACAP responsible for 4 provinces, Nangarhar, Laghman, Kunar and Nuristan. During this time no one had ever visited Nuristan because ACAP did not have any staff from that region. ACAP would call potential beneficiaries and have them come to Kunar or Jalalabad for the first interview. There was no monitoring of the program but the reports would indicate that it was being done. The Regional Director also hired family members as staff. In October 14, 2009,

IOM/ACAP conducted an internal review of Nangarhar field office, which uncovered fraud and abuse by the regional director and other staff.

The ACAP is aware and concerned about the rate of spending. When so much pressure is on the program to spend money there is the opportunity that the money will not be spent in the most beneficial or transparent way. The Regional Director for the East received an award from headquarters for spending the most money two years in a row and was later discharged for mismanagement. After interviewing twenty-five beneficiaries in ten villages in the Eastern Region, it is apparent there is a problem with transparency of grants prior to 2010. Since the beginning of the year, there has been a difference in that transparency. This is due to additional and international staff, and to the new procurement procedures (Eastern Region). Another factor contributing to increased transparency is the added involvement of USAID in recent months.

The evaluation team was told by ACAP headquarters that each beneficiary received a brochure describing the program and also included a phone number to call if they felt there was any fraud or abuse; we did not find one beneficiary who has seen the brochure. After receiving and reviewing a copy of the brochure it contains a glaring mistake stating, "Make sure you receive all the types of assistance that you requested." The brochure did not list the types of assistance available. Without the proper checks and balances in place to ensure proper delivery, there continues to be the opportunity to steal from this program. There is a phone number on the brochure to call if there are problems with the assistance. The evaluation team tried to call the numbers several times, but there was no answer.

According to the new family assistance form all eligible families will receive a home kit. It is the understanding of the staff in Herat that all beneficiaries will now receive $6,900 if they own undeveloped property. We have not heard of this in any other province. This speaks to inequality of assistance; poor families that do not own land are not eligible for that benefit. Many beneficiaries interviewed received an average of $4,000 worth of assistance, while some of the new grants reviewed are receiving over $14,000 worth of assistance. This policy seems inequitable and the evaluation team questioned the logic behind this policy. In Herat three family members living in he same compound received three separate grants. This is not allowed according to ACAP criteria

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3.10. Relevance and Effectiveness of Assistance

The contents and quantity of school kits provided to families vary from place to place. In Nangarhar, for example, a school kit includes notebooks, pens, whiteboard, markers, English dictionary, English books, and fabric for boys' school uniform; and copies of the Quran (USAID procurement policy prohibits the purchase of religious materials). The evaluation team noted that the quantity of material is different in the school kit in each region. Although the list of items for school kits provided by Kabul does not include copies of the Quran, beneficiaries in Nangarhar and Kapisa have received copies of the Quran. In some families not all school-age children have received school kits. While boys receive fabric for a school uniform, girls do not receive fabric; in some areas girls were not given school kits at all, while all the boys in the family received them.

None of the beneficiaries interviewed in two districts in Kabul and ten villages in Nangarhar had received either livestock kits or farming tools. Only nine livestock kits have been distributed in the life of the program according to ACAP Performance Records, March 2010.

Some beneficiaries have expressed a desire to sell some of the livestock in order to cover current expenses or to repay loans. Feeding and maintaining livestock is expensive. ACAP staff has told them that they could not sell any of the assistance for at least 6 months; some were told they could not sell or exchange the assistance for a period of time ranging from one to three years. The message regarding the sales of the assistance is inconsistent; while someone who is starting a shop can sell the merchandise immediately, the families that are dealing in livestock are told they have to keep the cows for a period of time.

One beneficiary in Herat received goods to open a new shop. This man had been earning his living with a handcart, moving commodities for others. It was reported on the family assessment form that he had shop experience, however the beneficiary told ACAP he did not have shop experience. ACAP provided assistance to open a shop. Within 6 months the shop failed and he currently is again pushing a handcart. This shows that the ACAP staff did not consider the beneficiary's need and skills.

On the medical support side of the program, ACAP cannot supply drugs to the beneficiaries due to the rules of USAID assistance. ACAP does provide money for transportation to medical facilities and also gives food items equal to the value of drugs.
In many cases, the existing medical support the victims receive does not correspond to their needs. For example a family received cows and their daughter is paraplegic due to the military incident, or another person who has lost both legs from a military bombing receives goods for a shop. This neglects the immediate and long term medical needs of those injured in military incidents.

ACAP management in March 2010 decided to:

> Standardize the only assistance component that can be standardized: the kits. This way nowadays the ACAP provides 1 home kit; 3 tailoring kits; 4 education support kits and 1 agricultural kit to all families (not incurring into treating different beneficiaries from different areas in a different way). The standardization has respected 1 home kit, and 1 agricultural kit (same amount as before); and has done an average from previously delivered kits to come up with the figures of 3 tailoring kits and 4 education support kits (for those cases where families have no women or children in school age, if the family rejects the kits, the ACAP will not impose it on the families).

The evaluation team questions the relevance of three tailoring kits and one agriculture for all beneficiaries.

ACAP is very focused on the nomination and grant approval side of the projects, while substantive monitoring and systems are lacking for transparent implementation. The cooperation with other stakeholders seems very low on the priority list.

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3.11. Best Practices

ACAP reaches out to war affected families who are almost always in dire need of assistance. Perhaps the best aspect of ACAP's assistance to beneficiaries is the way in which they provide it in a dignified way. ACAP reaches out to victims and their families; they do not have to ask or feel that they are begging for assistance. Forty-five out of eighty-one beneficiaries interviewed reported that the small business assistance has made a significant difference in their family income.

One of the factors that help ACAP is their broad reach throughout the country, working in thirty of the thirty-four provinces, that allows them to reach many victims that would otherwise be left to struggle on their own.

4. CONCLUSIONS AND RECOMMENDATIONS

ACAP is a very necessary and crucial ingredient to help bring stability to victims of military incidents. It is a unique program in Afghanistan, offering innocent victims of war, assistance to rebuild their lives and future. As continually stressed by the stakeholders, the war is not over in Afghanistan and until there are no more incidents it is imperative that a program like this addresses the need of this population.

After careful consideration and extensive review of the program's documentation; interviews with beneficiaries, stakeholders, USAID, and IOM/ACAP, the evaluation team concludes:

- The 81 beneficiaries interviewed by the evaluation team found that ACAP has made a positive contribution to victims and their families.
- All the 81 beneficiaries interviewed appreciated the assistance and felt it had improved their income.
- Delivery of assistance has been consistently slow throughout the program, from 2007-2009 verification to delivery took 46.6 weeks, however, since January 2010, it has improved to 36 weeks.
- The program is also plagued by a number of issues that negatively impact its mission; ranging from lack of sufficiently trained staff, to incidents of corrupt practices, to slow identification of beneficiaries, barriers to the timely delivery of assistance, and quality monitoring.

The evaluation team proposes several reforms to directly address these issues. The evaluation team has categorized recommendations in to near-term and long-term. The near-term recommendations apply to long-term.

4.1. Program Recommendations

Near-term Recommendations

Management

- Incidents should be categorized and prioritized in order to better allocate resources and speed delivery of assistance.
- All vendors should be paid through a bank, and when it is absolutely necessary for staff to handle money, it should be in Afghanis.
- A monetary ceiling should be put on the grant package.
- ACAP should conduct a full program review to solidify policies and procedures.

Administration

- Complete the operations manual.
- ACAP should ensure that all beneficiaries, especially women are correctly informed about the types of assistance available and decisions should be made in consultation with them as to what kind of assistance best fits their needs.
- ACAP allows field staff to purchase equipment in the field for $200 or less.
- ACAP should put in place measures to inspect the kits in Kabul and after it arrives in the field to ensure the kits are complete.
- To the extent possible, bulk purchasing in the field should be instituted as quickly as possible to standardize assistance commodities. This would also have the added benefit of reducing the field offices' procurement responsibilities.
- Ensure beneficiaries are fully informed regarding the type of assistance they may be eligible to receive (a pictorial brochure listing items in each kit).
- Encourage and support beneficiaries to enroll in vocational trainings so that they can become self-sufficient.
- Upon nomination each beneficiary should have a separate file.
- At the time of Family Assessment beneficiaries should be informed about the type of assistance recommended for the grant; both the beneficiary and the ACAP staff should sign the document.
- A delivery form should be developed with multiple carbon pages listing all items delivered to the beneficiaries written in Dari, Pashto and English. . If all items are not delivered or received at the same time, the beneficiary will sign only for items received.
- The most-affected member of the beneficiary family should be identified; for example, when there is no female ACAP staff member to interview the female beneficiary the ACAP male staff should ensure that the representative is the woman's choice rather than a representative chosen's for her.
- ACAP should develop an acknowledgement form with multiple carbon pages that contains information regarding the program and types of assistance ACAP offers. To better ensure beneficiary understanding of their options, the field staff will be instructed to read it to the beneficiaries and both the beneficiary and the ACAP

field staff sign the form. One copy will stay with the beneficiary; another kept in the beneficiary's file and the third sent to the headquarters.

Personnel

- Proper training of staff is imperative so that all staff are adequately trained on different aspects of the program to improve consistency.
- ACAP must engage with entities such as the Ministry of Women's Affairs, which has a department that helps women find jobs, Ministry of Labor and Social Affairs, the Universities and women/civil society networks in identifying qualified female staff.
- ACAP management should ensure that there are nomination, monitoring and procurement officers in every field office with clear job descriptions outlining their responsibilities.
- Field supervisors should ensure that the staff member who completes the family assessment form does not deliver the assistance or monitor the program. Separation of responsibilities would make the process more transparent.
- To facilitate adequate mobility in the field by female staff members, consider hiring couples or providing an incentive to a male relative of the female ACAP staff where and when she is required to be accompanied by a family member.
- Ensure that staff in the field has proper accommodation, reasonable security standards, and all the necessary equipment to carry out their duties.
- All international field staff should have access to a daily security update.
- Improve the responsiveness and communication with the field and answer to their needs in timely manner.

Coordination and Relations with Stakeholders

- Nominations should be completed in the field, and signed by the field office head and a representative of the PRT. This system should be implemented immediately as it would ensure the two organizations have the same information and it will begin the process of closer/cooperative working ties.
- A newsletter (Dari and Pashto) should be regularly disseminate to provide updates to stakeholders, including the local government authorities, the military and other interested parties.
- ACAP should begin holding monthly (at least) meetings with stakeholders at the field office level. Promote better understanding and coordination between civil and military.
- USAID brief ACAP on all USAID programs related to community and economic development to help ACAP create synergy.

Long-term Recommendations

Management

- ACAP is in need of a full financial audit conducted by an internationally respected audit organization.
- Other donors should contribute to the program or different phases of the program.
- ACAP should liaise with other medical organizations to assist in referrals.
- In coordination with other institutions, implement a literacy program for adults that have standard and measureable results.
- A third party should conduct the monitoring of the assistance.
- There is a need for basic marketing and book-keeping training for new shopkeepers. In coordination with other specialized organizations, other skills such as carpentry, painting, masonry, stone or brickwork, basic mechanical skills should be included in the list of vocational training to beneficiaries.
- It is imperative that in future programs women are consulted and engaged in the planning/design and decision-making process. This will serve as a way to counter the discriminatory social and economic practices that exist and substantially improve women's lives in Afghanistan.
- In addition to the tailoring kit, the following additional types of kits - including materials - should be offered to women beneficiaries: knitting, first aid, wool weaving, cheese making, jam making, embroidery (*Charma Doozi*/ special designs on traditional Afghan female clothes), bead work, and poultry farming.
- Design kits that correspond to the needs of urban and rural beneficiaries.

Personnel

- All staff contracts need to be standardized in order to ensure equal benefits and treatments.
- Rotate posts every few months for International field officers to fully understand different environments.

Coordination and Relations with Stakeholders

- ACAP should establish a public relations unit. This unit would work with USAID to provide timely updates about ACAP activities in the different regions to stakeholders, the military and other organizations about ACAP activities and scope of assistance operations.
- Use international NGOs to verify incidents that cannot be verified by other stakeholders.
- ACAP field offices can work to identify what other programs are implemented in their regions. ACAP can partner with these organizations to facilitate beneficiary referrals to relevant programs.
- Establish contacts with other relevant government entities such as the Ministry of Rural Rehabilitation and Development, Ministry of Labor, Social Affairs, Martyr and Disabled.

- An MOU with AIHRC, a critical stakeholder, should be finalized and signed. This would greatly improve the needed cooperative relationship between the two organizations. In addition, regular meetings should be held both at Kabul and at the field offices where AIHRC is present.

5. ANNEXES

5.1. ANNEX 1: Statement of Work
5.2. ANNEX 2: Evaluation Work Plan and Schedule
5.3. ANNEX 3: List of Reference Materials
5.4. ANNEX 4: Questionnaires
5.5. ANNEX 5: ACAP Field Trip Report (January-February 2010)
5.6. ANNEX 6: IOM internal Audit of Nangarhar (October 2009)
5.7. ANNEX 7: Inspector General's Audit (January 2009)
5.8. ANNEX 8: ACAP Recovery Plan (2009)
5.9. ANNEX 9: ACAP Assistance Data
5.10. ANNEX 10: ACAP Brochure
5.11. ANNEX 11: Meetings list
5.12. ANNEX 12: List of interviewees

FINAL PROJECT EVALUATION

ANNEXES

FOR

AFGHAN CIVILIAN ASSISTANCE PROGRAM (ACAP)

March 1-April 13, 2010