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Auditor General

IMPROVEMENTS NEEDED IN MANAGEMENT OF AID/W PROJECTS

The Administrator has recently emphasized the importance of project implementation and directed actions to improve it. We identified significant problems in management of AID/W funded projects during this review. Prior AG and GAO reports have pointed out problems with project management and monitoring overseas and in AID/W, but no lasting improvement seems to have been made. We believe more management attention needs to be given to solving project implementation and monitoring problems. This report describes the problems we found and suggests some actions that would help solve them.

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EXECUTIVE SUMMARY

Introduction

AID's policy is to designate a Project Officer to be responsible for all activities relating to a project from planning to completion, whether the activities are performed by him/her or by others. Projects are the primary means by which Foreign Assistance is provided and the Agency's objectives are achieved. Thus, the Project Officer is a key person in the Agency's program management system. The success or failure of the Agency's programs depends to a large extent on how well that function is performed.

Problems with project planning and implementation have been pointed out in many AG audit reports, GAO reports, and evaluations over the years. Greater focus of these reports on project implementation within the past two years has highlighted these problems. The Administrator has emphasized the importance of project implementation and directed actions to improve it. This report suggests specific actions the Administrator might want to take to further improve project implementation and monitoring.

Purpose and Scope of Review

This review grew out of an AA/SER request that we conduct an audit of the degree to which AID's Project Officers are fulfilling their responsibilities with respect to contractor oversight. Due to limitations on time, staff, and funds, we have only considered Project Officer management of AID/W funded projects. A separate review focusing on problems of overseas project management is under consideration.

This review included a detailed examination of project design, contract or grant statements of work, reporting requirements, types of agreements used, contractor performance evaluations, project evaluations, files, and trip reports on twelve AID/W projects. Other projects were reviewed in less detail and discussions were held with interested Agency officials in various bureaus and offices. It also included a review of recent audit reports which identified monitoring problems for AID/W projects.

Project Implementation and Monitoring Needs Continuing Emphasis

There are many requirements placed upon a Project Officer by AID Handbooks, Bureau guidance, other Agency directives, procedural documents, and management officials. Project monitoring is only one of the many responsibilities a Project Officer may have. We believe one of the

major problems is that the importance of project monitoring has not been adequately stressed in the past. On May 22, 1980, the Administrator emphasized the need to improve project implementation planning and monitoring to the Executive Staff. He stressed that it is imperative for AID management to use the tools available. He also emphasized his intention to give project implementation his personal attention and asked that others do so too. This new emphasis needs to be followed up by action on the part of responsible Agency officials.

Some actions to improve project monitoring and implementation are currently underway. Handbook 3 on project design and implementation, is being revised and greatly expanded. A new guidebook for Project Officers for management of direct AID contracts, grants and cooperative agreements has been published and one for host country contracts and grants is planned. An integrated training program is being developed for Project Officers to improve their skills. These changes will help, but more can be done. In addition to better guidance and training, project implementation should be given higher priority and planned and controlled better in the operating bureaus. We suggest that a monitoring plan for each project be required and implementation of the plan assured by Bureau management officials. This plan would allow management to control the level of monitoring and assure that they are informed of problems in project implementation as they develop. We also suggest that the Project Officer be evaluated at least in part on how well he/she performs the monitoring functions.

Project Management Problems Require Continuing Attention

A number of problems which affect project implementation were identified in this review. Most of them have been identified and reported on in prior AG and GAO reports. The Agency has taken action in some cases; however, the problems persist. We believe more management attention must be given to solving these problems on a continuing basis. The more significant problems identified were:

- Project designs were incomplete or weak in some of the project papers we reviewed. The project paper forms the basis for monitoring. A well designed project normally has fewer implementation problems and requires less monitoring. Poor project design results in implementation problems and makes monitoring time consuming and difficult. We believe project papers must be more critically reviewed to assure that they are practical, realistic, and can be implemented within the resources and time allotted.

- Quantifiable goals are frequently contained in the project papers, especially the logical frameworks, but are not included in contracts or grants. Inclusion of quantifiable goals in contracts and grants would give the recipient more specific direction as to AID's expectations and would make monitoring easier.
- Some contracts and grants continue to be written with weak, vague statements of work, although Agency guidance stresses the importance of their being detailed and definitive. The statements of work frequently do not make clear what the recipient is to do. Poorly defined statements of work make monitoring more difficult and evaluation almost impossible. A number of reasons were given as to why statements of work are not more specific, but they could be improved if responsible management officials reviewed them adequately.
- Some projects require little if any on-site review, while others may need frequent field visits. Whether a trip is made is a judgment usually left to the Project Officer and his/her supervisor. Field trips should be based on an identified need, planned in advance, and documented by adequate trip reports. These conditions were frequently not met, and Project Officers need more direction from management to use trips to the best advantage. Management officials should assure that a need is identified and documented before a trip and reports of results of the trip submitted and reviewed.
- Contract and grant agreements frequently do not indicate what data should be included in progress reports. As a result, some progress reports include information of no value to monitoring the project, and often do not include information that would be vital to monitoring. We believe progress report formats including the specific data required from the contractor or grantee should be provided. To help Project Officers in specifying reporting requirements, Agency guidelines for preparing them should be promulgated.
- Some project files are well organized and easily retrievable but some are in shambles. Poorly maintained files hamper project monitoring and implementation. The monitoring information needed is sometimes not readily available and in other cases cannot even be located. We believe project files should be brought into conformance with Agency standards.

The Contractor Performance Evaluation, Reporting System is Not Working

The GAO and AG have previously found that this system is not working and recommended enforcement. We found that Project Officers still generally do not prepare contractor performance evaluation reports as required by AID regulations and do not use the report files. Only 20% of the contractor performance reports that should have been prepared for our sample were in the report files. No reports were prepared on over half of the sample. While some negative ratings were made, many were not supported as required. Apparently little management attention has previously been given to this activity. There is no follow-up if the Project Officer does not prepare the required reports. The location of this function in the Office of Small and Disadvantaged Business Utilization should also be reconsidered.

We believe evaluation reports should be prepared on grantees and host country contractors, but they are not now required. In our opinion, the contractor performance evaluation system should be revised to include work orders under IQCs, host country contracts, and grants; should be enforced by an appropriate office within SER/CM; and the files properly maintained. The Administrator has asked AA/SER to study this system and recommend improvements.

The Proper Legal Instrument is Not Always Used

The AG has pointed out in other reports and found again in this review that the Agency is not always using contracts, grants, and cooperative agreements in accordance with Public Law 95-224, "Federal Grant and Cooperative Agreement Act of 1977." The impact of AID's intended involvement in the activity being financed, the purpose to be served, and other criteria should determine the type of agreement used. The Agency needs to develop procedures for review and approval to assure that the proper legal instrument is used.

Project Evaluation Receiving Management Attention

Fewer than 50% of evaluations planned are being made, and many of these are not adequate. AID's project evaluation system is still not uniformly understood or applied. Planning for evaluation is not adequate when the project is designed or when the evaluation is made. Baseline data is frequently not available and linkages to show that the project will accomplish the stated goals are sometimes absent. There is no Agency follow-up system to assure that regular evaluations are made as planned and there is little evidence that those actually made are being seriously reviewed. We believe a more realistic project evaluation system should be developed. The Administrator approved on June 6, 1980, establishment of a task force to advise him on what the Agency's evaluation system should be.

Management Comments

No single bureau has responsibility for all the activities examined by this functional review nor ultimately for implementing improvements. All the bureaus and offices involved were asked to provide comments on the draft report and most responded. About thirty pages of both broad and specific comments were received - all pertinent, but understandably with sometimes conflicting viewpoints. A listing of the responses received is at Exhibit II. The comments were reviewed in detail and significant changes made to the report as a result. However, the thrust of the report remains the same - widespread problems in implementation and monitoring of AID/W projects were identified. Many of these same problems have also been previously identified, but they still exist. This basic situation was not brought into question by the management comments.

While, in our judgment, we were able to satisfy most objections by appropriate changes in the report, some comments could not be accommodated. The main ones are summarized here.

- Some bureaus thought the sections on contractor/grantee reporting requirements, use of proper legal instruments, the contractor performance evaluation reporting system, and the evaluation system were not related to project monitoring and should not be part of this report. We believe they are closely related and have retained them.
- Several bureaus mentioned that staffing constraints may be the cause of many of the problems identified. We did not examine that issue and cannot confirm or deny that staffing is a problem.
- Several bureaus objected to recommendations relating to all projects when the study only covered AID/W projects. We have accepted this comment where feasible, but some policy guidance indicated as necessary should apply to all projects.
- Several comments indicated that contractors or grantees must have the means to achieve quantified goals to make them contractable. We continue to believe more can be done to include quantifiable objectives.
- Some responses asked us to identify examples to specific projects, but the purpose of a functional review is to point out general problems in the system, not to make improvements in a specific project. When that is done, others tend to ignore problems not identified specifically to them.

- Several comments pointed out that the current project review system is both thorough and critical. Reviews by many specialists are made and the Project Review Committees are demanding in their requirements. We do not dispute that, but we still found that project designs were frequently not in enough detail or realistic.

- The approach of providing more management review of work statement and other project actions to bring about improvements was questioned because management officials do not have time, nor sometimes the skills, to bring about improvements. We continue to believe that management officials have the responsibility for corrective action to improve the deficiencies we found.

BACKGROUND

Introduction

In 1979 AA/SER requested AG to conduct an audit on the degree to which AID's Project Officers are fulfilling their responsibilities with respect to contractor oversight. In May 1980 the Administrator wrote to the Executive Staff to emphasize that the Agency can and must improve its performance in project implementation planning and monitoring. He listed a number of actions underway to do that and set deadlines for them. He stated that he intended to give project implementation his personal attention and asked that AID's management officials throughout the Agency do so too. We found that our audit responding to Mr. MacDonald's request also fell within the interest expressed by the Administration.

Our current review was limited to implementation and monitoring of AID/W managed projects. Other reports, however, including the recent GAO report, "AID Slow in Dealing with Project Planning and Implementation Problems," indicate that similar problems exist in field implemented projects.

It became clear during our review that many of the problems we were finding with AID/W Project Officers' fulfilling their responsibility had been pointed out before. When it came to recommending action that would effectively solve these problems, we found our options limited. In our opinion, the key to providing solutions to some of these intractable problems is, in fact, to have the Administrator's support in focusing the attention of responsible officials on finding solutions. We, therefore, are not making recommendations in this report, but are providing suggestions to the Administrator for his consideration. We also believe, and have recommended to the Administrator, that a task force on project implementation and monitoring should be established to assist him in solving the problems which clearly exist in this area.

General

In 1964, the Agency adopted as a management concept, the assignment of responsibility for project monitoring to a single AID officer, usually called a Project Officer. This management principle has been reaffirmed several times since then. Circular airgram (AIDTO CIRC2) of January 1976 states: "For each field of AID/W project, a single individual (Project

Officer) must be designated who will be responsible for all activities relating to that project, from planning through implementation and evaluation, whether he/she personally performs any or all of these activities or enlists the support of other staff resources..."

Recognizing that the Project Officer's duties are broad, and fluctuate from one project to another, we have restricted our review to those tasks which we believe are common and necessary to monitoring all projects. We have eliminated from this review the Project Officer's participation in the process of selecting the Contractor or Grantee because of a recent audit report, No. 79-58, entitled, "Review of AID/Washington's Practices and Procedures for Competitive Procurement of Technical Services," which deals with this subject.

The Project Officer's tasks we reviewed were: (1) project design as it relates to implementation and monitoring, (2) statements of work in contracts and grants which implement project activities, (3) reporting requirements contained in implementation agreements designed to monitor project activities, (4) selection and use of the type of agreement as set forth in the Federal Grant and Cooperative Agreement Act of 1977, (5) preparation of contractor performance evaluation reports, (6) field trips designed to review and monitor project activities, (7) design and implementation of an effective evaluation plan, and (8) organization and maintenance of project files. These are basic and important elements over which the Project Officer has major input and/or control.

Purpose and Scope of Review

We conducted this review to identify problems in management of AID/W funded projects. Because they are the focus of responsibility for individual projects, Project Officers were also the focus of our review. Our examination included a detailed review of project design, contract statements of work, reporting requirements, files, types of agreements used, contractor performance evaluations, project evaluations, and trip reports on twelve AID/W projects located in the Near East, Development support, and Private and Development Cooperation Bureaus. We also reviewed other projects in less detail and had discussions with Bureau officials, Project

Officers, Contracting Officers, and other concerned personnel. Our examination included a review of prior GAO and AG audit reports identifying Project Officer monitoring problems and such other auditing procedures as we considered necessary in the circumstances.

This review was limited to projects funded and managed by AID/W bureaus. While we could find no specific listing which would clearly identify such projects, we used project listings available and asked bureaus to identify such projects. The following is our estimate of the number of projects funded and managed in AID/W by bureau:

DS	-	226
PDC	-	62
LAC	-	30
PPC	-	21
Asia	-	17
NE	-	15
Africa	-	<u>9</u>
		380

Prior Audit Reports

We reviewed ten prior AG audit reports for fiscal years 1979 and 80, selected because they were operational audits and might contain deficiencies related to Project Officer activities. While these reports were of contractors, grantees and not specifically to identify implementation problems, they revealed a number of monitoring weaknesses. The weaknesses found in the ten reports and the percentage of times the weaknesses were identified are summarized below (see Exhibit I for list of reports):

- (1) project papers did not address and/or define important project issues (40%),
- (2) progress reports were not adequate (50%),
- (3) progress report format and content were not specified by AID (20%),
- (4) evaluations were not made frequently enough or as planned (40%),

- (5) not enough field trips were made (30%),
- (6) the type of funding or AID involvement did not support the type of agreement used (20%),
- (7) field missions were not aware of centrally funded projects being implemented in their countries (20%)
- (8) project paper and/or implementation agreements did not have verifiable indicators when such were practical (40%),
- (9) Project Officer monitoring was not adequate (50%).

In addition to the project related audit reports, we have identified seven AG functional audit reports relating to Project Officer monitoring since 1973. The findings contained in these reports are summarized as follows (see Exhibit I for list of reports):

- (1) contractor performance evaluations were not prepared as required,
- (2) trip reports were not prepared,
- (3) project evaluations were not made as required or planned,
- (4) field trips were not made to project sites,
- (5) project monitoring was not adequate,
- (6) evaluation system needs to be expanded and improved,
- (7) contractor performance evaluation reporting system needs to be reexamined for form and content.

There were also several General Accounting Office (GAO) reports issued since 1978 which point out implementation and monitoring deficiencies. These are listed in Exhibit I.

The fact that so many of the problems identified in this review were pointed out by prior AG and GAO reports is of extreme significance in our view. In each case recommendations were made and actions taken by AID offices to clear these recommendations. The determination by this report that these problems still exist throws into doubt the efficacy of the actions taken on these prior audit reports.

FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

The Monitoring Function Needs More Emphasis

The requirements for monitoring have, in the past, received inadequate attention among the competing demands on the Project Officer's time. If improvements are to be made and institutionalized, more planning of monitoring requirements is necessary and Project Officers must be evaluated on how well they achieve monitoring objectives as well as other job factors. On May 22, 1980 the Administrator emphasized the need to improve project implementation planning and monitoring to the Executive Staff. He set specific deadlines for improvement actions currently underway, but, more importantly, stressed that it is imperative for AID management, both in AID/W and the USAIDs, to use the tools available. He emphasized his intention to give project implementation his personal attention and asked that others do so too.

AID policy for many years has been to assign a Project Officer to each activity (project) financed by AID to see that the activity is carried out according to the project plan. As AID has shifted from project implementation by direct hire technicians to implementation by contractors and grantees, the role of the Project Officer has become more important.

Despite the relatively long time that AID has used Project Officers, the function has not previously been well defined. References to the function are to be found scattered throughout the AID Handbooks and other procedural documents. The Bureau for Program and Policy Coordination (PPC) has been working on a revision to Handbook 3 which will incorporate a section on Project Officer monitoring and during the last year the Bureau for Program and Management Services (SER) hired a contractor to prepare a guidebook covering the Project Officer's responsibilities in monitoring direct AID contracts and grants. These efforts will help clarify the Project Officer's responsibilities.

While these guides will help, the most important elements of project monitoring are difficult to define and reduce to written procedures. The Agency can prepare guidelines on what a good contract statement of work should contain, what a progress report should include, and what the elements of a good field trip are, but, to develop procedures and controls which ensure that Project Officers organize their time and systematically use these guidelines in their work is more difficult and complex. More and better training of project officers in the requisite tasks of their job is one essential element. Better management guidance by his/her superiors is another.

If the Project Officer does not exercise good judgment in his/her use of information, his/her monitoring effort will be largely ineffective, no matter how carefully he/she has collected progress reports, visited the project site and generally kept him/herself informed of the project's progress. The crux of the problem is to ensure that the Project Officer follows up and coordinates important activities, deals with implementation problems, and does the monitoring required for prudent management of the government's funds. When there are problems or the project is not progressing according to plan, the Project Officer needs to have guidance from appropriate management officials as to when to involve them. For example, AG audit report 80-95 dated August 15, 1980 found that DS Bureau procedures for monitoring the status of projects were not adequate to resolved project implementation problems in a timely manner.

Monitoring weaknesses will be addressed by (1) revisions of Handbook 3 to include guidance on project implementation, (2) new guidebooks for Project Officers, and (3) an integrated training program. These changes will help to improve project monitoring and implementation, but the fact remains that the Project Officer's monitoring effectiveness will still depend on his/her administrative ability, judgment, and the organization of his/her time. To some extent these skills can be developed by improved training.

In our opinion, if project monitoring is to improve, in addition to providing better guidance and training, it will have to be given high priority and there will have to be more planning and control. The Administrator's May 22 memorandum clearly indicates that he intends to give project implementation and monitoring increased priority. This increased emphasis is timely and appropriate, because our review indicates that in the past Agency monitoring appears to have been more reactionary than systematic. Monitoring has been done only when there was time or when a need came to the Project Officer's attention. As a result, problems that may have been prevented by a systematic review of project activities were frequently not detected and corrective action taken.

Monitoring activities should be documented in the files to provide a permanent record of the monitoring activities related to the key elements of the project. Documentation of monitoring activities also provides subsequent Project Officers with a record of what was done and records the resolution of monitoring problems.

Conclusions

In order to assure adequate monitoring, a monitoring plan should be developed as a part of project implementation planning. Use of a monitoring plan would allow management to review and approve the level of monitoring and provide an overview of monitoring.

In addition to increasing control over monitoring activities, the Agency needs to give more emphasis to project monitoring in evaluating Project Officers' performance. This should be done as part of the annual performance evaluation. Monitoring responsibilities should be part of the Project Officer's description of major duties in the PER. We suggest that:

1. Plans to establish critical monitoring activities be required for each project, and procedures for documenting those monitoring activities be developed as a part of implementation planning.
2. Operating managers be required to assure that project monitoring responsibilities are considered in evaluating the performance of Project Officers.

Project Designs Need More Critical Review

The project document that establishes the basis for AID action is the project paper. The project paper, among other things, should provide a self-sufficient basis for action, a detailed description of the project, a clear definition of the responsibilities of AID and the other project participants, and an implementation plan. The project paper contains the basic design of the project.

Project designs were incomplete or weak in some of the project papers we reviewed. For example, three projects did not describe or establish relationships between the parties. Three project papers did not provide quantifiable indicators with which to measure progress. One project contained three phases, but provided no criteria or accomplishments necessary to proceed from one phase to the next. Two projects provided no parameters within which the Private Voluntary Organization should work, e.g., they did not restrict assistance to underdeveloped countries or to projects that conform to AID's requirements.

As a general observation, we believe that some project papers are overly optimistic about what can be done within the time frame established or the funds budgeted. The pressure to obligate funds results in project designs which are not always candid or realistic. Many project papers do not recognize the degree of risk inherent in development related projects. Some underestimate the difficulty in coordinating the activities of several institutions involved with implementation. Such projects often result in delays, shortfalls, and implementation problems. With a more realistic appraisal of the project, better contingency plans could be made for dealing with the problems that come up during implementation.

The project paper forms the basis for the Project Officer's monitoring activities. A well designed project normally has fewer implementation problems and requires less monitoring. On the other hand, a vague, broadly designed project requires considerable effort just to obtain a consensus as to what needs to be done. On one project we reviewed, considerable time was lost while the Project Officer and the contractor came to an agreement on what was to be done.

Conclusion

We conclude that poor project implementation is frequently a direct result of inadequate project design and makes project monitoring time consuming and difficult. It requires the project officer to make more judgments and decisions on where the project is going. Several recent audit reports have been critical of project monitoring because additional responsibility has been placed on the Project Officer by weak or unrealistic project designs. We believe project papers must be more critically reviewed from the standpoint of being practical, realistic and capable of being implemented within the project period. Several responses indicated that the project review process is both thorough and critical. Reviews are made by many specialists and the Project Review Committees are demanding in their requirements. While we do not dispute that, we still found that project designs were frequently not in enough detail or were unrealistic. We suggest that:

3. More emphasis be placed by bureau management officials on critically reviewing project designs for reasonableness and adequacy of detail.

Quantifiable Targets in Project Papers Should be Included in Contract and Grant Agreements

Project Officers frequently are not putting quantifiable targets identified in project papers and usually included in logical frameworks into the contract or grant agreements as performance targets. Normally, the project paper has a section which describes what the project will accomplish and a logical framework which quantifies the accomplishments. In the sample we reviewed, these quantifiable targets were not always included in the narrative part of the project papers. Normally, the program summary is incorporated into or becomes the statement of work in the contract or grant agreement, but the quantifiable indicators included in the logical framework are generally not incorporated into the agreement.

For example, the project summary in one project paper stated, "Increase membership of PVO's...." The logical framework stated as an objectively verifiable indicator "150-200 PVO's as members." Instead of an agreement which stated, "...the Grantee shall carry out the following activities with funds provided...increasing membership of PVO's...", the grant should include as a target, "increasing the membership of PVO's by 150-200..." This would provide a more definitive agreement against which performance could be measured because the quantifiable goals would be part of the agreement.

By having quantifiable targets, the requirements of OMB Circular No. A-110 can be better implemented. The Circular indicates the recipient shall report a comparison of actual accomplishments with goals established for the period. Unless the targets are part of the agreement, there is no obligation to meet them and no basis for measurement. An agreement which merely states "increase" can be met by an increase of one.

AG audit report 80-39 dated March 25, 1980 found that quantifiable goals were not being included in a DSB managed grant, although they were contained in the project paper. The report recommended corrective action, but no action has yet been taken on the recommendation.

Conclusion

Quantifiable indicators included in project papers and logical frameworks should be incorporated into contract and grant agreements as targets whenever possible to establish measurable levels of achievement for the contractor and grantee. Some responses to the draft of this report indicated

that including quantifiable indicators in the scopes of work of contracts or grants would have legal implications that we did not consider and would make getting a contractor more difficult. The contractor or grantee must control the means of achieving quantified goals to make them contractable. We continue to believe that more can be done to include quantifiable objectives and suggest that:

4. More emphasis be placed on including quantified targets in contract and grant agreements.

Contract and Grant Statements of Work Need to be More Specific

Although the Agency continues to stress the importance of detailed, definitive statements of work, some contracts and grants continue to be written with weak, vague statements. AID regulations state, "The most essential part of a contract is the statement of work or services to be performed. It is the statement of work which constitutes the essence of the agreement between the parties on what is to be done...it is the statement of work which spells out project objectives and the steps which will be taken to achieve them."

A major weakness in statements of work is that they do not specifically define what the Contractor or Grantee is to do. For example, a scope of work stated, the Grantee "will strengthen its organizational capacity through cooperation with international organizations, through further private contributions, and through further cooperation with AID and other U.S. Government agencies." At no place in the statement of work does it indicate how the organization will be strengthened or how cooperation will be used to strengthen organizational capacity.

Many statements of work use such vague terms as assist, encourage, strengthen, develop, generate, contribute and evaluate, without indicating in detail the steps that will be taken. To "assist," for example, the Project Officer should develop what the assistance should consist of. It should not be left to the contractor or grantee to decide what assistance is needed.

Some statements of work use terms such as "train" and "increase," without quantifying the goal. How many will be trained? How much will the increase be? Without some unit of measure, it is impossible to determine whether the work planned is being done or how much is expected. Without a quantifiable statement of work, the contractor or grantee has no obligation to meet and no goal to shoot for.

Some statements provide objectives but do not define or quantify them. For example, "establish an information sharing system." What is an information

sharing system? It could mean installing telephones, putting up a bulletin board, or engaging in correspondence. Failure to quantify may result from the absence of baseline data. Often baseline data is not available to determine the effect of a statement of work task, thus accomplishments are not measurable.

Reasons given by various individuals interviewed for statements of work being weak were as follows:

1. Lack of training on how to prepare a good statement of work,
2. Inability of the Project Officer to write a good statement,
3. Lack of time to prepare a good statement,
4. Rush at end of fiscal year to obligate funds,
5. Vague requirements that had not been adequately identified,
6. Contractors' or grantees' preference for vague, broad statements of work to reduce performance requirements,
7. Lack of critical review at the bureau level, and
8. Lack of motivation because drafter knows he will not have to monitor activity due to transfer.

Poor statements of work make monitoring more difficult and sometimes more time consuming. Moreover, a vague statement of work makes evaluation almost impossible because there is no base against which to evaluate. Weak statements also make it more difficult to negotiate the lowest possible price.

Conclusion

We conclude that the requirements for the contract or grant are not being adequately reviewed by the requesting office. If they were more critically reviewed before being sent to the Office of Contract Management (CM), statements of work might be more clearly defined. The responsibility for determining whether a statement of work is adequate should be in the

requesting office. The Contracting Officers indicate they frequently have to go back to the bureaus to get improved statements of work; but even with this effort, they are still weak. We suggest that:

5. Bureau management officials place more emphasis on critically reviewing statements of work for adequacy.

Project Evaluations Need to be More Critically Reviewed and Controlled

Although project evaluations are considered by the Agency to be an integral element of the Agency's program management process, special and regular evaluations are not being used as an effective management tool, are not being selectively conducted to meet Agency and project needs, and are not always being made when planned:

The annual evaluation continues to be used as a standard. Based on current statistics, the frequency of evaluations planned does not appear to be realistic, because fewer than 50 percent of the evaluations planned are actually being made. During fiscal year 1979, 780 evaluations were planned. Three hundred eight (48.7 percent) of the evaluations were actually made. We doubt that the Agency has the resources or the manpower to make all of the evaluations planned. Many of the evaluations made do no more than go through the motions to meet the schedule. We examined evaluations that were no more than progress reports, that did not evaluate critical areas, and did not support the conclusions made. In our opinion there are several basic weaknesses which exist in the evaluation process which need to be addressed if evaluations are to become a more useful and economical management tool.

Although the Evaluation Handbook provides evaluation guidance, there still appears to be no uniform understanding of what an evaluation should include. We believe this is why the quality of evaluations fluctuates so dramatically. This is particularly true when the evaluation team is drawn from the staff of the parties involved in the project.

Another problem is that evaluations are not being adequately planned when the project is designed. A typical evaluation plan is as follows: "Technical and administrative review of the activity will be carried out annually by a team drawn from the staff of the parties.... At the end of two years, a comprehensive evaluation of the activity will be made...."

The Project Paper normally includes an evaluation schedule but rarely does it provide the rationale for the schedule. As a result, evaluations are sometimes made to meet the schedule rather than to meet a project or management need.

The logical framework and project description normally establish the goals, purpose, inputs and outputs. The goals and purposes often cannot be evaluated because baseline data or the statistics to make an evaluation were not available. We feel the statements of purpose and goal are often made to meet the "new directions" rather than to provide a realistic objective that can be evaluated.

Another aspect of the output, purpose, and goal is the lack of linkages that can be directly attributed to the project. AID's inputs are normally only one of many factors which may contribute to the purpose and goal. As a result it is often impossible to determine a cause and effect relationship resulting specifically from the project. Unless all elements of evaluation are adequately considered when the project is planned, it is doubtful that subsequent evaluations will be of much value.

Frequently evaluations contain recommendations but there is little evidence that the recommendations were ever considered or acted upon. If the results of the evaluation are not used, the evaluation was a waste of time and funds. There is no requirement that Project Officers respond in writing to evaluation recommendations and no assurance that action will be taken.

There are other factors which we believe contribute to weak evaluations and to evaluations not being made when scheduled:

- There is little evidence that anyone independent of the project critically reviews the evaluation to determine whether it meets good evaluation standards.
- Candid evaluations may be derogatory to the Project Officer and other directly involved officials. This provides a disincentive to their making candid evaluations.
- The Agency does not follow up to see that scheduled evaluations are made.

Regular evaluations are an integral part of project monitoring. A good Project Officer is normally constantly assessing his projects and making decisions based on his assessment. The degree and availability of Project Officer monitoring should be a major factor in scheduling evaluations.

Conclusions

In summary, evaluations should be more selectively scheduled, more effectively planned, better controlled and selectively reviewed for adequacy.

The adequacy of monitoring should be a major factor in determining the frequency of evaluation. We believe the evaluation function needs to be realistically fit into the Agency's project management process.

A task force has been established by the Administrator to review the evaluation function. We fully support that action and suggest that the task force consider our findings and conclusions.

Field Trips to Project Sites Need to be Better Planned and Documented

An effective monitoring tool of Project Officers is seeing first hand what the Contractor or Grantee is doing. In addition to physically inspecting the activities, it provides an opportunity to meet personnel working at the site. It allows the Project Officer to discuss current activities, problems, defects in project design, etc.. It also allows him to provide technical assistance, guidance, and interpretations of what AID expects.

The number of trips needed to oversee a particular project is judgmental. Some projects need very little if any on site review while others need considerable review. Field trips are being made sparingly by AID/W Project Officers because of lack of time to make the trips and lack of travel funds. Some projects have never been visited, others have been visited infrequently. Some Project Officers indicated more trips should be made.

We reviewed some trip reports on trips that did not appear necessary from a good management standpoint. Also, when field trips are made, they are not always supported by adequate trip reports. Several of the reports reviewed provided very little information on the project activity.

Conclusion

Site visits are judgmental and subject to time and budget limitations and are generally left to the discretion of the Project Officer and his superiors. This appears to be a monitoring task which needs more guidance, planning, and management control.

In our opinion, when field trips are made, Project Officers are not consistently using such trips to the best advantage. Field trips should be planned with a specific purpose in mind. They should be used to improve monitoring and project implementation, not to merely observe project activities. Field trips should not be made merely because they are expected or are convenient to make, but because they are needed.

The draft of Handbook 3 contains a guide for planning and reporting on field trips which will make the Agency's requirements and expectations more specific. The Office of Financial Management has also indicated that assurance by operating bureaus that all trips are necessary will be required. In view of these actions, no specific suggestion is made.

Contractor Reporting Requirements are not Definitive

Contract or grant agreements frequently do not indicate what data should be included in progress reports. As a result, some progress reports include information of no value to monitoring the project, and often do not include information that would be vital to monitoring.

Because most AID/W Project Officers have limited opportunities to observe first hand the activities being implemented by contractors and grantees located away from Washington, the progress report takes on added significance. Ideally, progress reports should include what the Contractor or Grantee is going to accomplish during each step in the scope of work, whether the work is on schedule, the percentage of completion, problems that have been encountered, the effect of the problems on the work, actions being taken to resolve the problems, whether budgets are still valid and will be met, the status of commodities and purchases, whether the time frame is still valid, and any other information the Project Officer feels he needs.

A typical reporting requirement is "the Grantee shall submit activity and progress reports.... Each report will indicate progress and achievements... and problems encountered and the proposed solutions...." This type of general reporting requirement lets the contractor or grantee decide what progress or achievements, problems, or solutions will be reported. Progress against what - goals, work plans, statements of work? Should the progress be measured in numerical terms (percentage of completion)? What should the format of the report be? If there are no problems, should the report so state or should the reader assume there were none? What is the status of procurement, commodities, personnel matters?

Establishing a reporting format is an important aspect of reporting. By designating what the report should contain, the Project Officer can assure that each item identified as being important will be reported on. This would also eliminate information in areas that is not needed.

AID pays for the time spent preparing reports; therefore, reports that are short, concise and provide only information needed to monitor the project should be required. Time spent preparing reports is time taken away from project implementation. We have reviewed progress reports that contain information that is of questionable value to the project monitor. The time spent preparing this information is wasted and AID is paying for this wasted effort.

One area generally not covered in progress reports is the status of purchases (equipment, vehicles, commodities, etc.). The location and use, condition, source and origin, arrival dates, and losses or damage of commodities is important monitoring information. The status of purchases with source and origin lets the project officer monitor commodities plus it provides a basis for inspecting equipment during field trips.

Reports often do not indicate what percentage of effort has been expended and how this relates to the actual percentage of completion. This type of analysis will indicate whether the work is on schedule and whether there are enough manhours or funds left to complete the project.

Report timing fluctuates from as often as quarterly to as infrequently as annually. The Project Officer has no guidance or criteria to determine how frequently reports should be required. From our review, there appears to be no rationale behind the number and frequency of reports. A contractor located in AID/W was required to submit more frequent reports than a contractor in St. Louis, even though the Project Officer could keep closer contact with the AID/W contractor. The anticipated personal contact with the contractor should be a factor in determining the frequency of progress reports.

A private voluntary organization (PVO) implementing development activities in various underdeveloped countries was only required to report annually, while another PVO with similar activities was required to report quarterly. The reporting needs of the two projects appear to be similar. Reporting frequency does not appear to be based on project monitoring needs. For example, annual reporting on a three-year project provides only two progress reports during implementation. We doubt that this is enough for monitoring purposes.

AG audit report 80-49 dated April 1980 found that progress reports on the program audited had not been submitted regularly, and when they were received, did not provide an overview of progress achieved against research objectives. Of the 17 reports required, the contractor submitted only 9.

Some of the reports consisted of abstracts of research. In general, reports were not in the format required by the contract.

The Project Officers Guidebook for Management of AID Contracts, grants, and cooperative Agreements provides advice on what to do with reports, but does not include any guidance on determining the content, format, and frequency of reports. The draft revision to Handbook 3 indicates that "Because of the wide variety of programs and projects, no uniform monitoring and reporting system is suggested." It goes on to say that the system used should keep management informed on the status of the project and involve senior management when significant implementation problems arise.

Conclusion

Reporting is a key element of good project monitoring. From our review, it does not appear that the Project Officers are giving enough attention to reporting needs. Report content is generally not adequately detailed, report format is often not indicated, and report frequency is not always based on need. The Project Officers need more guidance so project reporting will provide needed project monitoring information. We suggest that:

6. More guidance be provided as to the format, content, and frequency of reports to be required on different types of projects funded by AID.

The Proper Legal Instrument is not Always Used

In our opinion, the Agency is not using contracts, grants, and cooperative agreements in accordance with Public Law 95-224 entitled, "Federal Grant and Cooperative Agreement Act of 1977." The act establishes that each executive agency shall use a type of legal instrument which reflects the relationship between the Federal Government and recipient. The act provides the following guidelines:

1. A contract shall be used when the principal purpose of the instrument is the acquisition by purchase, lease or barter of property or services for the direct benefit or use of the Federal Government.
2. The grant shall be used when the principal purpose of the relationship is the transfer of money, property, services or anything of value in order to accomplish a public purpose rather than acquisition by purchase, lease or barter of property or services. Under a grant there shall be no substantial involvement anticipated between the parties during performance of the activity.

3. A cooperative agreement shall be used when the principal purpose of the relationship is the transfer of money, property, service or anything of value in order to accomplish a purpose rather than an acquisition by purchase, lease or barter of property or services. This type of agreement shall be used when there is substantial involvement anticipated between the parties during performance of the activity. (Emphasis added.)

AID Handbook 1, Supplement B. Chapter 25, provides guidance on the selection of the proper legal instrument - contract, grant, or cooperative agreement. The guidance is consistent with the law and clearly presented. However, we found that the three types of instruments have been used interchangeably, apparently without taking into account the major controlling criteria, such as purchase versus transfer or substantial involvement versus no substantial involvement. We found, (1) grant agreements used to purchase the services of institutions, (2) contracts being used to provide general support to an institution, (3) grants being used when substantial involvement was anticipated, and (4) cooperative agreements being used when there was no substantial involvement and for the purchase of services.

AG made a similar finding in another report and recommended in April 1979 that the Office of Contract Management and PPC seek practical control procedures to assure that technical offices make uniform distinctions as to what types of projects or end-products are to be contract or grant funded. AG audit report 80-95 also found that the use of a cooperative agreement in that case was inconsistent with the intent of Public Law 95-224 and resulted in a lack of effective control over AID resources.

Conclusion

Despite clear guidance as to the use of contracts, grants, or cooperative agreements, an inappropriate instrument is frequently used. In our opinion the Agency needs to develop procedures for reviewing and approving legal instruments to ensure that the proper agreement is used. The impact of AID's involvement in the activities being financed on the type of agreement being used needs to be stressed. We suggest that:

7. The Agency develop review procedures and controls to ensure that the guidelines established by the Federal Grant and Cooperative Agreement Act of 1977 are met.

Project Files Range from Good to Poor

An important element of Project Officer monitoring is the ability to retrieve and locate project information. We have looked at project files that are well organized and provide easy retrieval and we have looked at files that are a shambles. When the files were good, we were able to get the documents we needed for the review with little trouble. Where the files were poorly maintained, it took considerable time to locate some of the documents. In some cases, important documents could not be located. The same situation exists when the Project Officer looks for documents in his files. Needless to say, considerable time is wasted in offices where the files are not adequately maintained. At the same time we doubt that the Project Officer can do a good job of monitoring when the files are poor. The information needed is not readily available, and in some instances cannot even be located. On one project we could not locate the project paper, on another we could not find recent progress reports.

Some of the Problems we observed relating to the project files are:

- Some offices have no system that tells them when a file has been pulled and where it is. In cases where this situation exists, time is wasted looking for a file because it is not known who may have pulled it.
- Some Project Officers blame the condition of the files on lack of secretarial help. Several indicated they must do the filing themselves if it is to be kept current.
- The Project Officers often do not adequately document project activity in the files. This leaves critical voids for future Project Officers and management officials.

AID Handbook 21 entitled "Communications" provides the system to be used for recordkeeping. The draft revisions of Handbook 3 has detailed documentation requirements for AID financed projects. This guidance should provide a basis for an adequate record system.

Conclusion

Efforts to assure that the Agency's project files contain the information required and are well maintained need to be improved. While assistance may be available from the AA/SER Communications and Records Management Division, the primary responsibility lies with the office responsible for

the files. One response to the draft of this report stated that a thorough study of this problem by qualified personnel is indicated. We agree that a study might help, but in the absence of such a study we suggest that:

8. Project files and the systems used to maintain them be reviewed by responsible officials and improved to assure compliance with Agency standards.

Contractor Performance Evaluation Reporting System is Not Working Effectively

Project Officers are not always preparing contractor performance evaluation reports as required by AID regulations, are not using the report files to evaluate potential contractors, and are frequently not adequately supporting their negative rating with the circumstances underlying the rating as required. The reporting procedure does not cover the submission of interim reports on indefinite quantity contracts and does not require submission of reports on grants or Host Country contracts. The reporting procedure is described in Handbook 14, Appendix C. The purposes of the reporting system are to (1) provide a record of contractor's performance for future evaluation purposes, (2) advise the contracting office of the contractor's performance to provide a basis for taking corrective action, (3) provide a means of evaluating contractors under consideration for new AID contracts, and (4) establish an up-to-date evaluation file. From our observations described below, it is obvious the purposes of the procedure are not being uniformly met and the report file is incomplete.

At random we selected nine contracts totalling approximately \$18.5 million to see whether the required reports were submitted. We found six of the contracts had no reports prepared, two had only an initial report prepared, one had three reports submitted before they stopped; only one had all the required reports prepared. In total 34 reports should have been prepared. Only seven reports (20%) were included in the reports files. The report files become unreliable when a significant number of reports are not prepared as required. We were unable to determine specifically why the reports were not prepared.

According to the secretary who maintains the report files, the files are not often used. Most of the use is by the Contracting Officers. There is little use by Project Officers located in Washington and virtually no inquiries from the field for Host Country contracts. Because many of the

Host Country contracts are with U.S. firms and because the contracting is done by the Host Country, use of this file takes on added importance as a tool to help evaluate the ability of a contractor to perform overseas.

Negative ratings do not always describe the underlying circumstances supporting the rating as required. Many of the negative factors are not discussed. Some of the reports appeared to be hastily prepared. On the other hand, some of the reports are good, detailed, comprehensive evaluations of the contractor's performance. One positive benefit from the negative evaluations appears to be improved performance on subsequent evaluations, indicating the contractor has taken corrective action. We also noted that some contracts were cancelled as a result of the evaluations.

The number of unsatisfactory evaluations on file appears small when considering the number of contractors AID deals with. We found only 71 contractors in the report files with unsatisfactory overall evaluations out of a total of approximately 2,177 contractors. This small number of unsatisfactory evaluations may indicate evaluations are not candid. The reason for this may be that unsatisfactory evaluations require more work to justify and cause more problems with the contractor.

The reporting system is not enforced. If the Project Officer does not prepare the required reports, there is no followup. Our sample showed that only 20% of the required reports were submitted. This is a major defect and weakness of the system. We were told that initially it was intended that a system would be developed to monitor and control submission, but no such system was ever developed.

The Handbook reporting procedure was never revised to cover indefinite quantity contracts which need evaluations upon completion of each work order. These reports enable the technical coordinating office to have first hand information available to assess specific contractor's field performance capabilities in terms of future usage. The reporting requirement does not provide for submission of reports after a work order is completed. The Contract Office has established a separate procedure which requires an evaluation to be prepared for each work order. The requirement has not been incorporated into the Handbook.

The evaluation reporting procedure does not require the preparation of evaluation reports for Host Country contractors. The reporting procedure

applies only to AID/W direct contracts and task orders. This is not consistent and overlooks a type of contracting that can most effectively use some historical record of performance. The Host Countries often contract with U.S. firms; therefore, any source which would provide information on the contractor's performance in the U.S. and other countries would be of value in keeping with the basic purpose of the procedure.

Another inconsistency is that performance evaluation reports are not required for grantees. An institution may have a grant and a contract. The contract performance should be evaluated but there is no requirement to evaluate the grant. A performance evaluation for a grantee is as important as for a contractor. An evaluation of whether the grantee performed or not is important for considering the grantee for future grants and for taking corrective action when the grantee is not performing.

The GAO recommended in February 1979 that Agency managers exercise appropriate surveillance over contractor activities and complete and use properly contractor evaluation reports. An April 1979 AG report made a similar recommendation. The Agency reminded Project Officers to provide the reports, but clearly that action has not resulted in any improvements in the system's operation.

AG report 80-84 dated July 22, 1980 found that the Contractor Performance Evaluation Report had been completed on only seven of the 28 completed IQC work orders reviewed.

Conclusion

Because of the lack of enforcement and use of the evaluation reporting system, the utility being received from the system is minimal. The contracting officers interviewed indicated the system is needed and worthwhile, but that it is not working or reliable. Several management responses to our draft report also indicated that the system should be improved and used.

We feel that there are two practical alternatives which should be considered with respect to the reporting system: (1) establish a control procedure to see that the reports are submitted for all contracts, grants and Host Country contracts, and are used; or (2) change the system so that only negative or unsatisfactory reporting is required. The first alternative, of course, is the best from a management control standpoint. The second alternative makes the system more cost effective by eliminating the time spent preparing and filing reports for satisfactory performance.

It should also be noted that the files are located in the Office of Small and Disadvantaged Business Utilization, which does not have the staff nor the authority to police or monitor the system. Responsibility for operation of the system should be appropriately placed within the Contract Management Office.

We have been informed that AA/SER was asked by the Administrator to look at the entire contractor performance evaluation system. They will be undertaking a study of the system including the format of reports and the location of the files. We suggest that the study team consider the findings and conclusions contained in this and previous audit reports.

Prior Audit Report

SUMMARY

<u>Report No.</u>	<u>Title</u>	<u>Date of Report</u>
79-38	An Examination of The African-American Scholars Council, Inc.	1/31/79
79-48	An Examination of The Asia Foundation	2/28/79
79-74	The JHPIEGO Corporation	5/24/79
79-82	Problems Arising from the Implementation of an AID Grant to the International Federation of Midwives	8/22/79
79-88	AID Grants to the Black Women's Community Development Foundation	9/6/79
80-4	Black Belly Sheep Development Project	10/22/79
80-6	International Executive Service Corps Program is Helping AID meet the Challenge of Development	10/31/79
80-16	Questionable Results Arising from the Implementation of AID Grant to the Institute of Cultural Affairs	1/9/80
80-39	A Review of Management and Operations of the International Fertility Research Program	3/25/80
80-49	An Assessment of the AID-Financed Research Program with Washington University	4/11/80

Functional Audits

73-20	Review of Africa Bureau Regional Projects Evaluation Technical Assistance	6/14/73
74-005	Loan Administration Activities in Bureau of Africa	9/19/73
74-011	Review of Bureau for Asia Regional and Selected Project Evaluation Practices	1/25/74
74-012	Review of Latin America Bureau Adherence to Agency Evaluation Requirements and Guidelines	1/25/74

<u>Report No.</u>	<u>Title</u>	<u>Date of Report</u>
74-013	Review of Bureau for Technical Assistance Adherence to Agency and Bureau Evaluation Requirements and Guidelines	2/28/74
75-150	Review of AID Program Evaluation	8/21/74
79-58	Review of AID/Washington's Practices and Procedures for Competitive Procurement of Technical Services	4/1/79

GAO Reports Dealing with Project Implementation Problems

"AID Slow in Dealing with Project Planning and Implementation Problems" 7/15/80

"Donor Coordination and Project Monitoring Practice" 4/24/80

"The Agency for International Development Needs to Improve the Planning and Monitoring of Project Implementation" 3/18/80

"U.S. Development Assistance to the Sahel - Progress and Problems" 3/29/79

"Efforts to Improve Management of U.S. Foreign Aid - Changes Made and Changes Needed" 3/29/79

"Agency for International Development Needs to Strengthen its Management of Study, Research, and Evaluation Activities" 2/12/79

"Need to Improve AID's Project Management and Contracting Practices and Procedures" 3/14/78

LIST OF SUGGESTIONS

1. Plans to establish critical monitoring activities be required for each project, and procedures for documentation those monitoring activities be developed as a part of implementation planning.
2. Operating managers be required to assure that project monitoring responsibilities are considered in evaluating the performance of Project Officers.
3. More emphasis be placed by bureau management officials on critically reviewing project designs for reasonableness and adequacy of detail.
4. More emphasis be placed on including quantified targets in contract and grant agreements.
5. Bureau management officials place more emphasis on critically reviewing statements of work for adequacy.
6. More guidance be provided as to the format, content, and frequency of reports to be required on different types of projects funded by AID.
7. The Agency develop review procedures and controls to ensure that the guidelines established by the Federal Grant and Cooperative Agreement Act of 1977 are met.
8. Project files and the systems used to maintain them, be reviewed by responsible officials and improved to assure compliance with Agency standards.

LIST OF RESPONSES TO THE DRAFT OF THIS REPORT

FM, Mr. M. Douglas Stafford	7/28/80
AFR/EMS, Mr, John Copes	8/4/80
AA/LAC, Mr. David Lazar	8/6/80
AA/DS, Mr. Sander Levin	8/5/80
AA/ASIA, Mr. John H. Sullivan	8/6/80
PPC/PDRP, Mr. Stephen Klein	8/7/80
PPC/PDI, Mr. John Welty	8/7/80
AA/NE/SA, Mr. Edward Vinson	8/5/80
NE/PD, Mr. Theodore H. Lustig	8/5/80
PM, Mrs. Edna A. Boorady	8/12/80
AA/SER/SA, Ms, Mary E. Wampler	8/15/80
PPC/E/PES, Ms. Nena Vreeland	8/18/80
PPC/W, Mr. Richard Blue	8/18/80

LIST OF REPORT RECIPIENTS

IDCA, Office of Legislative and Public Affairs	1
Deputy Administrator	1
Assistant Administrator, Bureau for Program and Management Services	5
Assistant Administrator, Bureau for Program and Policy Coordination	5
Assistant Administrator, Bureau for Development Support	5
Assistant Administrator, Bureau for Private and Development Cooperation	5
Assistant Administrator, Bureau for Latin America and the Caribbean	5
Assistant Administrator, Bureau for Asia	5
Assistant Administrator, Bureau for Africa	5
Assistant Administrator, Bureau for Near East	5
Office for Legislative Affairs	1
General Counsel	1
Office of Financial Management	1
Director, Office of Personnel Management	1
DS/DIU	4
Auditor General	1
AG/PPP	1
AG/EMS/C&R	13
AG/IIS	1
AAGs	1 each
PPC/E	1
SER/CM	1