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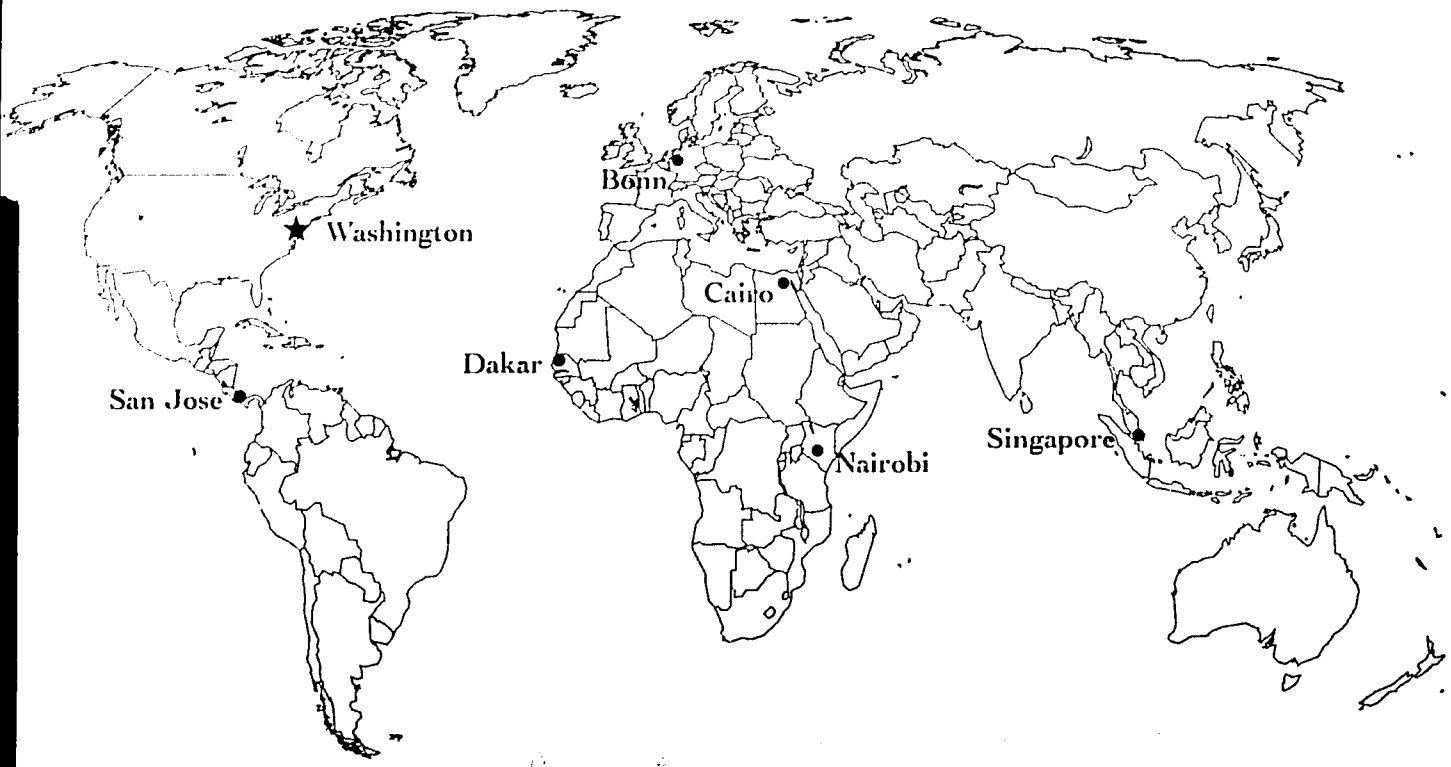
Regional Inspector General for Audit
San José, Costa Rica

Survey Report on Losses of Public Law 480 Title II Commodities in Haiti During the Political Transition Period September 15, 1994 to January 13, 1995

Audit Report No. 1-521-95-008
June 23, 1995



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June 23, 1995

MEMORANDUM

TO: USAID/Haiti Director, Lawrence Crandall

FROM: RIG/A/San José, Coinage N. Gothard

SUBJECT: Survey Report on Losses of Public Law 480 Title II Commodities in Haiti During the Political Transition Period, September 15, 1994 to January 13, 1995

The Office of the Regional Inspector General for Audit/San José has completed its survey of Public Law Title II Commodities in Haiti During the Political Transition Period. This final report is being transmitted to you for you action.

In preparing this report we reviewed your comments on the draft report and included them as Appendix II. A summation of your comments has been included in the "Survey Conclusions and Recommended Improvements" section of the report.

Based upon your written comments, we consider Recommendation No. 1 resolved upon report issuance.

I appreciate the cooperation and courtesies extended to my staff during the audit.

Regional Inspector General for Audit
San José, Costa Rica

Survey Report on Losses of Public Law 480 Title II Commodities in Haiti During the Political Transition Period September 15, 1994 to January 13, 1995

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EXECUTIVE SUMMARY

The Office of the Inspector General made an audit survey of alleged losses of Public Law (P.L.) 480 Title II commodities in Haiti. The survey included a review of the present physical security environment and control structure of the feeding program and a partial assessment of whether USAID/Haiti can provide reasonable assurances that program commodities are adequately safeguarded and used for intended purposes. We would like to note that the survey covered a period of time when Haiti was in a transition from military to civilian government.

The survey found that the P.L. 480 Title II food program incurred substantial commodity losses due to theft during the political transition period. Three Title II cooperating sponsors reported 2,732 metric tons of commodity losses valued at $1.1 million or 16 percent of the total commodities while reporting 14,259 metric tons of commodities distributed during the first quarter of Fiscal Year 1995. Due to the unique circumstances resulting from the lack of civil authority and uncertainty during the political transition period, the normal P.L. 480 Title II control system was not able to provide sufficient security over the distribution of commodities. The majority of commodity losses occurred from thefts at over 700 feeding centers. Some commodity losses also occurred when cooperating sponsor warehouses were broken into and when delivery trucks were robbed.

Federal regulations state that internal controls should protect assets from "waste, loss, unauthorized use and misappropriation." USAID/Haiti has not formally conducted a study of P.L. 480 Title II commodity losses to determine the extent and specific causes of losses, and to provide a basis for formalizing alternatives for additional security for commodity warehouses and distribution systems if civil unrest should recur in Haiti. Although civil unrest has subsided and general stability has returned to Haiti as of January 13, 1995, the situation remains somewhat volatile and uncertain. We believe that a normal P.L. 480 Title II control structure is not designed to function under the absence of civil authority and the type of civil instability that occurred; therefore, management needs to establish procedures for determining the extent and causes of commodity losses. These procedures should also incorporate a monthly monitoring of losses including a thorough examination of the circumstances in which the losses

occurred. This should be done to formalize alternatives for providing additional security measures to prevent future losses.

Although the scope of the survey did not include providing assurance on the internal control structure of USAID/Haiti and the cooperating sponsors, in general, we found the control system well-designed and operating as intended in the current period of relative stability. We found warehouse procedures to be very good, and a sample of feeding centers indicated that centers were well-run. We found that management coordination between USAID/Haiti and the cooperating sponsors was excellent. Management officials at the cooperating sponsors were particularly complimentary of the support they have received from USAID/Haiti food officials.

In responding to the draft audit report, USAID/Haiti generally agreed with the report findings. The Mission's comments are discussed after our audit finding and are included in their entirety as Appendix II.

Office of the Inspector General

Office of the Inspector General
June 23, 1995

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INTRODUCTION

Background

Recent Political Events

President Aristide returned to Haiti on October 15, 1994, after three years in exile. Events surrounding his return include an unopposed U.S. military landing beginning September 19, 1994, and the departure from Haiti of the leaders of the military coup of 1991.

In order to ensure the safe return of democratic government and to provide security to the Haitian people, U.S. troops landed first at Port-au-Prince, and then Cap Haitien. A contingent of U.S. Army Special Forces teams later fanned out to the smaller cities and towns to ensure security.

The U.S. military promptly established a Humanitarian Assistance Coordination Center (HACC) to serve as a clearinghouse for civilian-military humanitarian assistance issues. Working through the HACC, the USAID Office of Foreign Disaster Assistance's (OFDA) Disaster Assistance Response Team (DART) advised and coordinated the U.S. military's humanitarian assistance activities with USAID/Haiti, the United Nations system in Haiti, Non-Governmental Organizations (NGOs) and U.S. Private Voluntary Organizations (PVOs).

One of Aristide's priorities is Haiti's composition of government, including a professional army and police force. During the current transition period, this is the de facto role of the U.S. military, including facilitating the security of humanitarian assistance activities. In order to ensure security until the Haitian governmental organizations are operational, the U.S. military will turn over responsibility to the United Nations multinational force (MNF) who have already begun arriving in Haiti. The MNF is working closely with international police monitors and an International Criminal Investigative Training Assistance Program (ICITAP) to transform the Haitian police into a more professional force. Short-term programs to train interim police were completed, and these interim police have begun to patrol the streets under international monitors. As the security and logistics situations improve, fewer requests for U.S. military assistance are being received.

Public Law 480 Title II
Food Program in Haiti

In response to a chronic food shortage in Haiti, USAID has since 1955 provided approximately $250 million dollars of P.L. 480 Title II commodities, according to USDA and USAID/BHR/FFP statistics. In Fiscal Year 1994, the U.S. Government (USG) provided 57,650 metric tons of Title II commodities valued at $25.3 million. This included a regular program and a new supplementary emergency program that was approved in May 1994. For Fiscal Year 1995, a total of 78,430 metric tons of food valued at $32.8 million has been approved for the regular and emergency programs. As of January 1995, the food reaches a target beneficiary population of 1.3 million and is distributed through more than 3,000 distribution points throughout the country.

The food is managed and distributed through three PVOs referred to in this report as cooperating sponsors: Adventist Development and Relief Agency (ADRA), Cooperative for American Relief Everywhere (CARE), and Catholic Relief Services (CRS). The USG also contributes some commodities to the U.N. World Food Program (WFP). Exhibit I contains a map of Haiti that illustrates the geographic breakdown of PVO activities by region. The PVOs share a central warehouse in the Shodecosa industrial complex in Port-au-Prince which is used as the centralized point of distribution for the program.

The PVOs distribute food to beneficiaries six different ways.

1) Maternal child health (MCH) centers provide dry food rations and nutrition education to nutritionally at risk women and children.

2) A school feeding program provides a cooked meal on the school premises to students that may be the main source of calories and protein they receive.

3) Community kitchens target vulnerable children aged 0 to 5, pregnant and lactating women, and the elderly by providing cooked meals.

4) A food-for-work component rewards workers with food who carry out various community based projects.

5) A small other child-feeding program provides on-premise cooked food for orphans.

6) An emergency dry feeding program provides poor families with uncooked "take-home" food rations.

The food program in Haiti consists of the importation and distribution of four commodities: 1) soy fortified bulgur (SFB) in 50-kilo bags, 2) wheat soy blend (WSB) in 25-kilo bags, 3) green whole peas in 50-kilo bags, and 4) vegetable oil in 4-liter cans and 25-liter pails. An example of a cooked meal, provided 6 days a week, is wheat soy blend or soy fortified bulgur cooked with peas and oil. An example of a dry distribution is these same commodities provided once every 15 days to be taken home and cooked. The quantities and values of approved commodities for Fiscal Year 1995 by sponsor are provided in Exhibit II. The quantities by commodity are provided in Exhibit III.

In December 1994, USAID/Haiti received a report that stolen food commodities had been found in the town of Belladere. The report detailed the discovery of 155 bags of commodities, later determined to be Title II green peas and soy fortified bulgur, that were confiscated after being sold in a local market near the Dominican Republic border.

Concerned that the report might be indicative of a potentially-serious internal control problem, USAID requested that the Office of Inspector General (OIG) review the incident. As a result of this request, an OIG survey team traveled to Haiti in January 1995 to investigate the circumstances surrounding the reported incident. Appendix I contains a summary of the scope and methodology employed during the survey field work.

Audit Objectives

The objective of the survey was to assess the physical security environment and the relevant aspects of the control system of the P.L. 480 Title II food program in Haiti. The scope of the survey was limited to reviewing the physical security of commodities during the period of instability immediately before and after President Aristide's return. A secondary objective was to determine whether the current control environment was adequate to ensure that program commodities were properly safeguarded and used for intended program purposes. A survey is much more limited in scope than an examination in accordance with "Government Auditing Standards" issued by the Comptroller General of the United States. See Appendix I, Scope and Methodology, for a description of the work performed under this survey.

REPORT OF AUDIT FINDINGS

This report contains the results of our survey, our conclusions, and recommended improvements. We believe that USAID/Haiti can further strengthen commodity controls and provide additional assurances that program commodities are safeguarded from loss.

Commodity Losses

General

Our survey of the commodity losses in Haiti found that the physical security controls for the P.L. 480 Title II program were not adequate to prevent losses that occurred during the period of political transition from September 15, 1994 to January 13, 1995. We found that all three components of the distribution system were affected—cooperating sponsor warehouses, delivery trucks, and feeding centers. The following is a discussion of the reports that were made which describe the various incidents that occurred as a result of the civil instability. The incidents began shortly after the arrival of U.S. troops in September 1994. They began to diminish significantly in November 1994, with no significant reports since the middle of November.

ADRA Region

General - The Adventist Development and Relief Agency (ADRA) works through approximately 1,100 feeding centers in Port-au-Prince and north and central Haiti. ADRA services its feeding centers with three warehouses that are located in Cap Haitien in the north, Carrefour adjacent to Port-au-Prince, and the Shodecosa central warehouse in Port-au-Prince.

Loss Reports - During the last part of September 1994, ADRA reported various commodity losses through numerous break-ins. The warehouse in Cap-Haitien was broken into when the Haitian police were disarmed in that city by demonstrators and by the U.S. military. MCH feeding centers were also broken into in the northern provinces, the Artibonite province, and Port-au-Prince.

On September 30, 1994, ADRA reported groups of people gathered around their Carrefour warehouse saying the food should go to them rather than

to regular program beneficiaries. ADRA called the HACC, who responded within one hour, occupying the compound for two days and afterwards patrolling past ADRA's property on an hourly basis.

On October 10, ADRA reported that its director found a group of more than 200 people in front of its main gate in Carrefour. The people had heard from various sources, including the radio, a false report that ADRA would be making a dry food distribution. The HACC was called and arrived within twenty minutes. On October 12 when the regular HACC patrol ended, 400 people organized and broke through the concrete wall that separates the ADRA compound from neighboring municipal property. In addition, the crowd proceeded to break through the concrete walls of the warehouse. Haitian guards fired into the air but were not able to stop the crowd, as some people in the crowd were armed and fired back at the guards.

Between October 12 and 15, the DART and HACC reported that they responded to several break-ins at ADRA's warehouse near Port-au-Prince. The DART reported that when the HACC arrived at the warehouse the morning of October 15, no ADRA personnel were located on the premises, although ADRA claims that its personnel was present at the time. The HACC recovered a quantity of vegetable oil when they performed a house-to-house search in the neighborhood bordering the warehouse.

Between November 11 and 24, ADRA reported four attacks involving trucks carrying commodities; three of the trucks were robbed by thieves.

A summary of reported ADRA losses during this period of political transition is presented below.

ADRA Losses During Political Transition
September 15, 1994 to January 13, 1995
(Unaudited)

Location	Losses in Metric Tons
Cap Haitien Warehouse	247.1
MCH Centers	42.0
Carrefour Warehouse	94.9
Delivery Trucks	12.7
Total	396.7

Belladere Incident - The Belladere incident was reported by the Special Forces teams in the Belladere area in a report dated December 14, 1994. The incident occurred on December 12, 1994 and involved the confiscation by the Special Forces of 105 50-kilo bags of green peas, and 50 50-kilo bags of SFB. While working on a road construction project, the Special Forces teams first noticed five bags in the back of a pickup truck. When questioned, the driver of the truck led them to the market area near the border with the Dominican Republic where they discovered more bags. The report states that the bags had already been sold to three people who claimed to be Dominicans.

Two individuals were questioned regarding the initial purchase and sale of the commodities; however, they furnished nothing of value regarding the source of the commodities. Both individuals were released and the investigation ended without further follow-up.

We recorded the lot numbers of the confiscated commodities and determined from USAID/Haiti records that the confiscated food was from shipments that arrived in Haiti during the period July 31, 1994 to October 25, 1994, and that were consigned to CARE in Gonaives and ADRA in Port-au-Prince. We were unable to make any further determination regarding the theft.

CARE Region

General - Cooperative for American Relief Everywhere (CARE) works in the northwest and Artibonite regions through approximately 1,500 feeding centers. CARE reported that over 700 feeding centers were broken into for food, and at times, utensils and school equipment. As a result of rumors of pillaging on September 25, 1994, CARE asked the Special Forces team in the area to maintain a presence at the CARE warehouse in Gonaives. The team remained at the warehouse until late October, after which time CARE placed unarmed security at the warehouse. The warehouse suffered no losses.

In the first week of November, CARE reported that five trucks carrying Title II food for ten feeding centers were broken into near Gros Morne. CARE suspended food deliveries in the Gros Morne area for a time due to break-ins at feeding centers. On January 6, 1995, in an attempt to resume distributions, a delivery truck was stopped and broken into in the area. A Special Forces team was able recover some of the stolen food from neighboring houses.

The losses for CARE were confined strictly to feeding center losses in the greater Gonaives area and feeding center delivery trucks in the Gros Morne

area. During the transition period CARE reported that they incurred theft losses of 2,332 metric tons.

Port-de-Paix Incident - In Port-de-Paix, a report dated September 30, 1994, stated that rice, beans, corn, millet and flour were being openly sold in markets in Port-de-Paix. The report indicated that this was an illegal sale of CARE's relief supplies.

The report has two problems in that it does not specify the quantities of commodities, making it difficult to assess the magnitude of the problem. Also the commodities themselves are not the same commodities that CARE distributes through the Title II program; therefore the commodities did not come from CARE. However, USAID does furnish to WFP commodities of a similar description, so it may be possible that the reported commodities were from WFP. We attempted to contact the authorities in the Port-de-Paix area for a clarification of the report but were unable to make contact with them.

CRS Region

General - Catholic Relief Services (CRS) operates approximately 800 feeding centers in the Port-au-Prince area and in the south and southwest. In addition to the Shodecosa central warehouse, it has warehouses in Port-au-Prince and Les Cayes.

CRS reported no significant break-in incidents during the transition period. The CRS warehouse in Port-au-Prince was robbed of fuel, office equipment, and miscellaneous other program materials but contained no commodities at the time of the incident. The first of three minor incidents of reported commodity losses involved a delivery truck which had left the Shodecosa central warehouse and which was subsequently boarded by unknown persons on motorcycles who threw commodities off of the truck. The second incident involved commodities that were broken into at the wharf in the town of Dame Marie after being unloaded from a delivery boat. A third incident occurred at Anse a Veau in which a delivery truck became stuck in the mud and was broken into by the local population.

The losses from the central warehouse truck break-in totaled 1.8 metric tons, the Dame Marie incident totaled 7.8 metric tons, and the third incident involved the loss of 2.2 metric tons.

Les Cayes Incident - In Les Cayes, the International Police Monitors (IPM) informed USAID/Haiti that 91 50-kilo bags of SFB had been confiscated from a private residence. The bags were found on December 22, 1994, after an unidentified civilian in the street near the residence informed the IPM

that USAID food was in the residence. The commodities were taken to the CRS warehouse in Les Cayes. The IPM questioned two suspects who produced different stories regarding the acquisition of the commodities. Upon the advice of the local judge, the suspects were not arrested. The investigation ended because the local IPM officials stated that it was not in their mandate to conduct investigations. No further work was done on the case.

We recorded the lot numbers of the confiscated commodities and from USAID/Haiti records determined that they came from shipments which arrived in Haiti during the period November 3, 1993 and August 13, 1994, and consigned primarily to CRS. We were unable to make any further determination regarding the theft.

WFP Region

The United Nations World Food Program (WFP) program is different than the other three cooperating sponsors in that it operates outside of the normal Title II internal control system and Regulation 11, with different reporting and management requirements. It is largely independent of USAID/Haiti. In addition, the types of commodities are different than the conventional four commodities received by the other three sponsors.

WFP works in the northeast region and targets 100,000 people (41,000 vulnerable children, 22,000 pregnant and lactating mothers, and 37,000 destitute people in the region). It has about 200 school distribution centers that are supplied by warehouses in Damien near Port-au-Prince and Cap Haitien. On September 25 and 27, both of these warehouses were reported broken into.

Port Facilities and Central Warehouse

On September 27, 1994, USAID/Haiti suspended the distribution of food commodities from port to warehouse facilities in Port-au-Prince and from warehouses to existing feeding centers because of a series of acts of pilferage at feeding sites and small supply depots.

On October 26 the U.S. military provided security as a group of CRS trucks departed the Shodecosa warehouse for deliveries in the Port-au-Prince area. U.S. military personnel were used to secure the main entrance to the warehouse complex so that the six trucks would not be boarded by crowds who were congregating at the main entrance to the complex. There were no reported thefts from the Shodecosa central warehouse.

Title II Commodities in Local Markets

During visits to local markets in Gonaives and Les Cayes, we observed USAID-marked bags and containers of P.L. 480 Title II soy fortified bulgur, wheat soy blend, peas, and vegetable oil for sale in the markets. USAID/Haiti monitors the quantity of P.L. 480 Title II commodities for sale in the Port-au-Prince markets on a monthly basis by taking market surveys and has on occasion used de facto government authorities to confiscate Title II commodities. However, we found that USAID/Haiti did not have a definitive policy on how and when to respond to public sale of these commodities. We believe that allowing the public sale of these commodities indirectly encourages further thefts from the program.

The general BHR/FFP policy regarding sale of P.L. 480 Title II commodities in the markets is that commodities donated for direct distribution should not be on sale. The U.S. military has confiscated stolen Title II commodities in rural areas but generally is reluctant to be involved in issues regarding private property. Also, assistance from the U.S. military is only a short-term solution. Therefore, we believe that USAID/Haiti should develop some type of policy for specifically addressing the problem of stolen commodities in the local markets which is consistent with available assistance from the civil authorities. This policy should also have the concurrence of USAID General Counsel and BHR/FFP.

Contributing Factors

General

To analyze the significance of the losses during the period of civil instability, we compared the reported losses that occurred during the first quarter of Fiscal Year 1995 with the preceding quarters in Fiscal Year 1994. The results clearly show that losses were significantly higher during the first quarter of Fiscal Year 1995, during which the political transition and civil unrest occurred. Exhibit IV represents combined losses for the three major cooperating sponsors. WFP losses were not included in the analysis due to its relatively small operation and its not being subject to USAID Regulation 11.

The source of the analysis is the Commodity Status Reports from the cooperating sponsors for Fiscal Year 1994 and the cooperating sponsors special loss reports for the first quarter of Fiscal Year 1995. The reported distribution losses refer to losses due to theft.

Distribution Losses

As shown by Exhibit IV, the three principal cooperating sponsors reported theft losses in the first quarter of Fiscal Year 1995 of 2,732 metric tons valued at $1.1 million using Fiscal Year 1994 costs, which do not contain all PVO shipping costs. These figures represent 16.08 percent of the total commodities that were reported as available for distribution during the quarter.

To place these figures in perspective, we compared them with the losses reported in prior quarters. For example, the losses reported in the first quarter of Fiscal Year 1994 were only 11 tons valued at $6,500, representing 0.14 percent of total distributions. This shows the dramatic increase in theft that occurred during the first quarter of Fiscal Year 1995. The majority of the losses were incurred at feeding centers, with additional losses from delivery trucks and cooperating sponsor warehouses.

USAID Regulation 11 states that cooperating sponsors take title to donated commodities at U.S. ports prior to shipment. Section 211.9(d) makes sponsors financially liable for losses of commodities due to the sponsors' negligence unless USAID determines that the loss could not have been prevented by the sponsors exercising their responsibilities properly under the Title II agreement and Regulation 11.

Physical Security Controls

Warehouse losses resulted principally from the inability of warehouse guards to contain the crowds which formed outside of warehouses. These losses were partially due to the fact that PVOs generally employed unarmed guards. We were told that unarmed guards were used because it was difficult to find armed guards as a result of the embargo, and there was a reluctance on the part of some PVOs to be associated with firearms. Also, the lack of a functioning police force during the political transition period contributed to the problem in that large crowds were allowed to form outside of warehouses. The guards were unable to disperse the crowds, which, in the case of ADRA, pounded their way through a concrete perimeter wall and a concrete warehouse wall. Break-ins also occurred in many other commercial properties during this period as well. Commodity losses, however, were limited as a result of the assistance of the U.S. military in patrolling warehouses and confiscating stolen commodities.

Truck losses occurred when crowds either boarded or stopped delivery trucks after they departed from the central warehouse and sponsor warehouses. These losses occurred due to the absence of a functioning police force to control crowds and the lack of guards on the trucks during

a wave of widespread break-ins of commercial properties. Losses of this type were reduced when USAID/Haiti and the cooperating sponsors suspended delivery of commodities from the port to the warehouses in Port-au-Prince and from the warehouses to feeding centers during the height of the civil unrest. The U.S. military also helped prevent some losses by providing escorts for delivery trucks.

The majority of losses resulted from break-ins at feeding centers in the north of Haiti. Due to the large number of these centers, it is not practical to guard them, therefore civil authority is the most important consideration in providing security for these locations. Also, the Title II program in Haiti relies heavily on "cantine populaire" centers that are simply private citizens who run centers at their homes, with nothing more than a locked storage area for the commodities. This type of center does not have the institutional authority of centers such as MCH centers in hospitals and therefore was probably more susceptible to this type of theft.

The physical control structure for providing security to prevent theft or misappropriation of program commodities was not responsive to the civil instability of the magnitude described above. Without civil authorities, in was not possible to disperse crowds which formed outside of warehouses, feeding centers, and the routes traveled by delivery trucks. At present, the warehouses have a combination of 24-hour armed and unarmed guards which appears adequate provided that no more widespread civil unrest occurs and provided the interim police force is capable of assisting. Delivery trucks and most feeding centers continue to have no guards. Since there have been no reported significant theft losses for two months (mid-November 1994 to mid-January 1995), except for the one Gros Morne truck incident, the current physical security controls appear to be adequate given the current social climate and the presence of the interim police force under the IPM.

However, we believe that, since the situation remains somewhat volatile and uncertain, the current physical control system can not be relied on. Since we found that USAID/Haiti does not have a formal plan to protect program assets should civil instability recur, we believe it is essential that USAID/Haiti perform a formal study of the losses incurred during the first quarter of Fiscal Year 1995. This study should include an analysis of the environment in which the losses occurred to determine which aspects of the control system were particularly vulnerable, in addition to determining the exact extent of commodity losses. The study should then be able to serve as a basis to formalize what alternatives are available for adequate physical security controls. We believe that the significant amount of past losses, combined with the level of uncertainty regarding continued civil stability, warrant the effort of preparing such a plan. Also, we believe that in the

future USAID/Haiti should closely monitor theft losses on a monthly basis to include all contingencies in the above-mentioned examination.

Other Controls

Although the scope of the survey did not include providing assurance on the internal control structure of USAID and the cooperating sponsors, in general, we found the control system well designed and operating as intended in the current period of relative stability. We found warehouse procedures to be very good, and a sample of feeding centers indicated that centers were well run. We found that management coordination between USAID/Haiti and the cooperating sponsors was excellent. Management officials at the cooperating sponsors were particularly complimentary of the support they have received from USAID/Haiti food officials.

However, while visiting one feeding center, we observed the control procedure of marking bags of food with numeric codes according to the feeding center of final destination. This internal control procedure appears to be effective in that each bag can be tracked through the distribution process to the end user. However, we noted one center with bags coded for three different centers. This indicates that the coding system is compromised and cannot be relied on to control distribution of food nor to track the source of a bag if it is later found in the market.

Since this procedure is not functioning as intended, it should be reviewed to determine if it is contributing to the internal control structure, and, if so, why it isn't being followed. It could possibly be due to truck loading problems, or it may be due to deliberate circumvention of the control system. If the procedure does not significantly contribute to the internal control structure, then USAID/Haiti should consider deleting it from the control structure.

Current Security Environment

In early December 1994, the new democratic government discharged a majority of the men in the combined security services (police and army). Consequently, in many areas outside Port-au-Prince, there is no functioning law enforcement system, except for the U.S. military (Army Special Forces) which provides some security functions. In Port-au-Prince, the U.S. military refuses to intervene to protect private property or the property of non-governmental organizations, including a reluctance to protect P.L. 480 Title II commodities.

Contact with IPM has determined that plans are underway to recruit new Haitian police force. A four month training academy will begin operations

in February 1995. Security is now being provided by 3,000 men from the Cedras-era police/army and approximately 1,000 men trained in internment camps in Cuba. As trained police officers graduate from the new academy, they will be assigned initially to rural areas and smaller towns. Those members of the current police force and ex-internees who meet educational and background check requirements will be sent through the training academy.

Although the current situation is relatively stable, there still remain uncertainties associated with the new government, such as the ongoing economic problems and the problems of transitioning to a new police force. Consequently, it appears that the new government will probably not be able to provide significant security to the P.L. 480 Title II food program in the next year.

Summary

The above analysis of the losses that were incurred during the political transition period indicates that there is one area of concern for program management. This involves monitoring and analyzing commodity losses to determine areas in which to provide additional security or alternate procedures should civil unrest recur. An additional area of less concern is the coding of food for the feeding centers. These issues are discussed in the following section.

We would like to emphasize that, with the civil unrest and heavy losses during the first quarter of Fiscal Year 1995, USAID/Haiti and its cooperating sponsors were still able to distribute a reported 14,259 metric tons of Title II food. Also, by requesting assistance from the U.S. military for vehicle and warehouse security and by suspending certain commodity deliveries, they were able to limit losses which could potentially have been greater.

Survey Conclusions And Recommended Improvements

Federal regulations state that internal controls should protect assets from "waste, loss, unauthorized use and misappropriation." The P.L. 480 Title II food program in Haiti incurred substantial commodity losses from theft totaling at least $1.1 million during the political transition period which occurred in the first quarter of Fiscal Year 1995. The commodity losses occurred because USAID/Haiti had not anticipated the level of civil unrest and the lack of civil authority that occurred during the transition period. As a result, the physical security in place could not prevent losses from occurring in PVO warehouses, delivery trucks, and feeding centers.

In general, we found the Title II internal control structure to be well designed and operating as intended in the current period of relative stability. Our inspections of PVO warehouses and a sample of feeding centers indicated that they were well managed. We found that management coordination between USAID/Haiti and the cooperating sponsors was excellent. Management officials at the cooperating sponsors were particularly complimentary of the support they have received from USAID/Haiti food officials.

Although the program sustained substantial losses, given the current civil stability, we believe that physical controls are adequate to continue the P.L. 480 Title II program at its currently-planned beneficiary levels. However, considering the substantial losses that were incurred, the current uncertainty regarding continued stability, and the volatile nature of the situation in general, we believe some areas warrant additional management attention to strengthen the necessary internal controls to safeguard P.L. 480 commodities.

"Standards for Internal Controls in the Federal Government issued by the United States General Accounting Office" (1983) states that internal control systems should reasonably ensure that "...All assets are safeguarded against waste, loss, unauthorized use and misappropriation...." The control techniques standard "...requires that internal control techniques continually provide a high degree of assurance that the internal control objectives are being achieved." USAID/Haiti has not formally conducted a study of P.L. 480 Title II commodity losses to determine the extent of losses and provide a basis for formalizing alternatives for providing additional security for commodity warehouses and distribution systems should civil unrest recur in Haiti. Although civil unrest has subsided and general stability has returned to Haiti, the situation remains somewhat volatile and uncertain. USAID/Haiti should in the future require a monthly monitoring of losses which includes a thorough examination of the circumstances in which the losses occurred. This should be done with the intent to provide additional security where possible to protect program commodities.

Recommendation No. 1: We recommend that USAID/Haiti establish procedures for determining the extent of commodity losses and: a) examine the environment in which the first quarter Fiscal Year 1995 losses occurred to determine the areas of the control structure that were particularly vulnerable to civil instability, b) as a result of the examination of first quarter Fiscal Year 1995 losses, formalize the alternatives available to reinforce physical security and provide alternate procedures, c) monitor exception loss reports on a monthly basis to determine what existing procedures should be revised or additional procedures incorporated to prevent losses

of a similar nature in the future, and d) should the level of commodity losses increase, consult with BHR/FFP to determine at what point to consider program revision or suspension.

Of lesser importance, we noted that one cooperating sponsor had delivered P.L. 480 Title II commodities to certain feeding centers that had been designated by the sponsor for other feeding centers. Cooperating sponsors have initiated a system of coding bags of food according to the feeding center of final destination. This internal control procedure appears to be effective in that each bag can be tracked down the distribution chain to the end user. However, we noted one center with bags coded for three different centers. This indicates that the coding system is compromised and cannot be relied on to control distribution of food nor to track the source of a bag if it is later found in the market.

We therefore suggest that USAID/Haiti, in conjunction with the cooperating sponsors, review the control procedures for distribution of food from warehouses to feeding centers. The purpose of the review should be to determine if this control procedure is contributing to the internal control structure, and if so, implement procedures to ensure that a) the cooperating sponsors clearly mark all commodities with the feeding center code in an indelible marking prior to distribution, b) drivers deliver to individual feeding centers only those commodities marked with the respective feeding center codes, and c) feeding centers accept only those commodities marked with their respective individual center codes.

In addition, we found that USAID/Haiti did not have a definitive policy on how and when to respond to public sale of P.L. 480 Title II commodities in local markets. We suggest that USAID/Haiti develop a policy to specifically respond when P.L. 480 Title II commodities are found on public sale. The policy should be consistent with available assistance from civil authorities and have the concurrence of USAID General Counsel and BHR/FFP.

Management Comments and Our Evaluation

USAID/Haiti expressed agreement to our audit findings and has submitted a plan of action to address our recommendations as follows: 1) USAID/Haiti, with the participation of the three cooperating sponsors, will prepare an after-action report to document the events surrounding the return of President Aristide as they relate to the P.L. 480 Title II feeding program; 2) USAID/Haiti will prepare a Mission Operating Order to be provided to the cooperating sponsors and other donors which will provide a plan of action for periods of civil instability; 3) USAID/Haiti participates in weekly meetings hosted by the United Nations Mission in Haiti (UNMIH) to review security incidents and plan for the following week in coordination

with a military convoy system of P.L. 480 Title II commodity distribution established by the United Nations Multi-National Forces in Haiti in March 1995; and 4) the cooperating sponsors, with the cooperation of USAID/Haiti, have developed a policy to suspend deliveries in any area in which trucks or feeding centers are broken into. USAID/Haiti informs BHR/FFP daily on the overall security situation. USAID/Haiti has also taken the appropriate actions to address our suggestions. The Mission's comments on both our recommendations and suggestions are included in their entirety as Appendix II.

Based on USAID/Haiti's plan of action, Recommendation No. 1 is considered resolved. The recommendation can be closed upon receipt of evidence of completion of the after-action report and Mission Operating Order as described in parts 1 and 2, respectively, of the above paragraph. Parts 3 and 4 are considered closed with no further action is required.

EXHIBIT I

HAITI PUBLIC LAW 480 TITLE II PROGRAM

COOPERATING SPONSORS' INTERVENTION ZONES FOR FOOD DISTRIBUTION IN HAITI

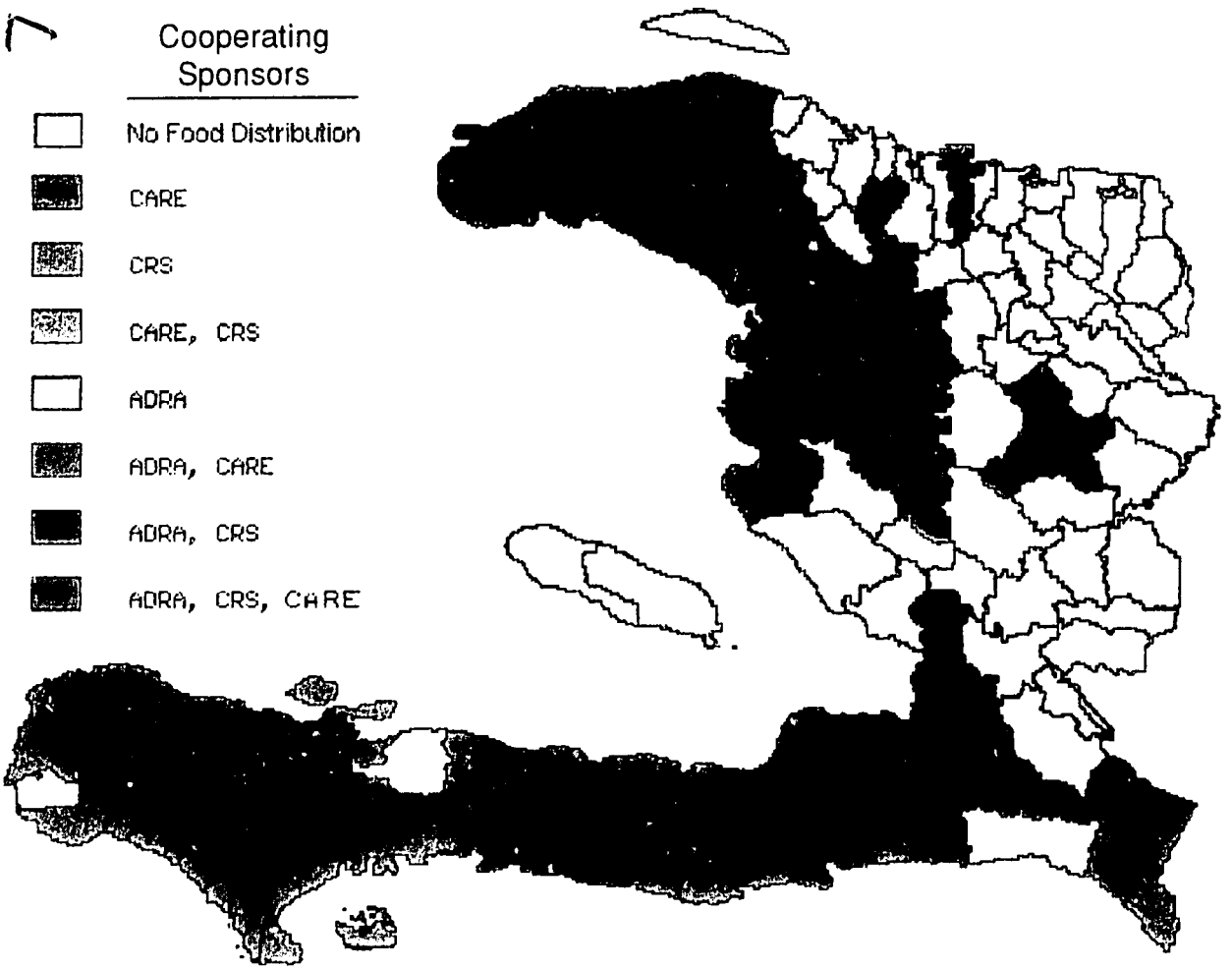

EXHIBIT II

Haiti P.L. 480 Title II Program
Approved Commodities By Sponsor - Fiscal Year 1995
(Unaudited)

Sponsor/Commodity	Metric Tons	Commodity Value (000)	Total Value (000)*
ADRA			
Soy-Fortified Bulgur	11,590	$2,121.0	$ 3,968.8
Glean Peas	2,650	583.0	993.1
Vegetable Oil	1,770	1,527.5	1,804.4
Wheat-Soy Blend	2,470	775.6	1,188.7
ADRA Total	18,480	$5,007.1	$ 7,955.0
CARE			
Soy-Fortified Bulgur	17,280	$3,162.2	$ 5,772.1
Green Peas	10,990	2,417.8	4,241.4
Vegetable Oil	2,660	2,295.6	2,691.3
Wheat-Soy Blend	5,130	1,610.8	2,252.1
CARE Total	36,060	$9,486.4	$14,956.9
CRS			
Soy-Fortified Bulgur	12,090	$2,212.5	$ 3,874.2
Green Peas	3,920	862.4	1,402.0
Vegetable Oil	2,200	1,898.6	2,199.2
Wheat-Soy Blend	3,780	1,186.9	1,698.3
CRS Total	21,990	$6,160.4	$ 9,173.7
WFP			
Pinto Beans	250	$ 115.0	$ 146.2
Corn Meal	1,000	185.0	310.0
Soy-Fortified Grits	550	104.0	172.7
Vegetable Oil	100	86.3	98.8
WFP Total	1,900	$ 490.3	$ 727.7

* Including Ocean Transport and ITSH (Internal Transport, Storage and Handling)

EXHIBIT III

Haiti P.L. 480 Title II Program
Approved Shipping Levels by Commodity* - Fiscal Year 1995
(Unaudited)

Commodities	Metric Tons	Commodity Value (000)	Total Value (000)**
Soy-Fortified Bulgur	40,960	$ 7,495.7	$13,615.1
Green Peas	17,560	3,863.2	6,636.5
Vegetable Oil	6,630	5,721.7	6,694.9
Wheat-Soy Blend	11,380	3,573.3	5,139.1
Total	76,530	$20,653.9	$32,085.6

* Does not include World Food Program
** Including Ocean Transport and ITSH (Internal Transport, Storage and Handling)

EXHIBIT IV

Haiti P.L. 480 Title II Program
PVO-Reported Losses By Quarter (Metric Tons)*
(Unaudited)

Quarter	Distributions	Losses	Percent Losses
1st FY 94	8,255.107	11.280	0.14
2nd FY 94	11,632.931	23.706	0.20
3rd FY 94	13,827.305	5.744	0.04
4th FY 94	13,984.568	12.930	0.09
1st FY 95	14,258.919	2,732.087	16.08

* Does not include World Food Program

SCOPE AND METHODOLOGY

The survey consisted principally of compilation of information, inquiries of personnel of USAID/Haiti and other parties involved in the P.L. 480 Title II food program in Haiti, and analytical procedures applied to this information. A survey is much more limited in scope than an examination in accordance with "Government Auditing Standards" issued by the Comptroller General of the United States, the objective of which is to provide an independent assessment of the overall performance of a program. Accordingly, due to the limited scope of our survey, we were unable to follow all requirements of the field work standards set forth in "Government Auditing Standards" concerning compliance with laws and regulations and management controls. As a result of these qualifications, we were not able to obtain reasonable assurance that USAID/Haiti has complied with applicable laws and regulations or designed and implemented the necessary internal controls to achieve this compliance. Additionally we were not able to reasonably ensure that: the program meets its objectives; valid and reliable data are obtained, maintained, and disclosed; and program commodities are adequately safeguarded.

Field work was conducted in Haiti from January 1 to January 13, 1995.

To review internal control systems and discuss physical security of program assets, we met with the USAID/Haiti Mission Director, the USAID/Haiti Food for Peace Officer, and various other individuals in the Food for Peace office of USAID/Haiti and BHR/FFP.

To assess the military's perspective, we interviewed U.S. military officers in the HACC and Civilian-Military Operations Center (CMOC) in Port-au-Prince. We also interviewed military personnel who were involved in the actual food confiscations in the field. This included personnel at Les Cayes, Gonaives, Gros Morne, and Belladere.

For the internal security issues, we interviewed the Regional Security Officer and the Director of the International Police Monitors.

To review internal control systems and discuss security in the food program from the perspective of the PVOs, we interviewed officials from the Port-au-Prince headquarters of ADRA, CARE, CRS, and WFP. We also met with officials from CARE and CRS at local field offices and warehouses in Gonaives and Les Cayes, respectively.

Reviewing internal control procedures and reported security problems, we inspected the port facilities in Port-au-Prince, the Shodecosa central warehouse in Port-au-Prince, the ADRA warehouse in Carrefour, and the CARE warehouse in Gonaives, and interviewed appropriate management officials at these sites.

We visited the actual sites in which the stolen commodities were confiscated, and inspected the stolen commodities. We visited a sample of feeding centers, similar to the ones that were broken into, in Gonaives, Gros Morne, and Les Cayes. We also conducted an informal inspection of local markets for stolen commodities in Gonaives and Les Cayes.

We assembled known U.S. military reports of stolen or confiscated P.L. 480 Title II commodities during the U.S. occupation. We also summarized ADRA, CARE, CRS, and WFP loss reports for the first quarter of Fiscal Year 1995, as well as USAID/Haiti loss reports during the same period. To obtain a perspective of the loss problem during the political transition period, we summarized the reported losses on commodity status reports for the four quarters of Fiscal Year 1994 and first quarter of Fiscal Year 1995.

We also reviewed various prior studies, reports, and background data from BHR/FFP offices in Washington and USAID/Haiti.

AGENCY FOR INTERNATIONAL DEVELOPMENT
MISSION TO HAITI

FOR INTERNATIONAL MAIL:
USAID/HAITI
P.O. Box 1634
Port-au-Prince, Haiti, W.I.

For U.S. MAIL:
USAID/HAITI
Department of State
Washington, D.C. 20521-34

APPENDIX II

June 1st, 1995

MEMORANDUM

TO: RIG/A/San Jose, Coinage N. Gothard

FROM: USAID/Haiti Director, Lawrence Crandall

SUBJECT: Plan of Action for Implementation of Draft Survey Report on Losses of P.L. 480 Title II Commodities in Haiti During the Political Transition Period

Attached for your review and approval is the USAID/Haiti Plan of Action for Implementation for the draft "Survey Report on Losses of Public Law 480 Title II Commodities in Haiti During the Political Transition Period September 15, 1994 to January 13, 1995," dated May 5, 1995. As noted in this attachment, while this Mission has been actively pursuing options to tighten security with respect to the Title II program much work was done on this issue prior to and during the time frame covered in the draft survey report. Documenting these actions, as well as formalizing plans for future contingencies are currently underway. Much of the success we have had in dealing with the general breakdown of security which has occurred since September 1994 has been due to the outstanding support we have received, first from the U.S.-led Multi-National Force and second, from the follow-on United Nations Mission in Haiti.

USAID/Haiti is committed to doing everything possible to provide the necessary security to ensure that Title II commodities reach the intended beneficiaries. We appreciate having the opportunity to comment on the subject draft report and are confident that the Plan of Action for Implementation of that report addresses all major concerns identified by the USAID/Inspector General.

We recommend that our attached "Plan of Action for Implementation" to deal with the recommendation and suggestions in the draft survey report be accepted by your office and that the recommendation be considered closed upon issuance of the final report.

Attachment: a/s

PLAN OF ACTION FOR IMPLEMENTATION

I. Recommendation No. 1

• We recommend that USAID/Haiti establish procedures for determining the extent of commodity losses and

a) Examine the environment in which the first quarter Fiscal Year 1995 loses occurred to determine the areas of the control structure particularly vulnerable to civil instability;

Response: We consider the circumstances under which the looting took place in the September/October 1994 time frame to be unique, and therefore highly unlikely to occur again. Unfortunately, the pace of the events surrounding the return of President Aristide precluded the drafting of a written plan to deal with the deterioration of the overall security situation. All organizations involved in the Title II feeding program, however, recognize the benefit of providing a written record of the events surrounding the return of President Aristide, (an after-action report) as the history of Haiti suggests that civil disorders are likely to occur again. Thus, a written record will be prepared in full coordination with the three Title II Cooperating Sponsors. This report will detail the additional security measures that were in fact taken to safeguard Title II program assets. This final report will be provided to BHR/FFP by July 31, 1995.

b) as a result of the examination of first quarter Fiscal Year 1995 losses, formalize the alternatives available to reinforce physical security and provide alternate procedures;

Response: This will be accomplished in the context of the report to be prepared as mentioned in a) above. The Mission also intends to prepare a Mission Operating Order for humanitarian assistance which outlines specific procedures to follow at the onset, during and after civil instability. Once approved, this document will be sent to all Cooperating Sponsors and shared with other donors.

c) monitor exception loss reports on a monthly basis to determine what existing procedures should be revised or additional procedures incorporated to prevent losses of a similar nature in the future, and

Response: As a result of increasing security problems in the mid-January through March 1995 time frame associated with food deliveries of Title II commodities, USAID/Haiti requested a meeting with Major General Fisher, the U.S. Army Commander of the Multi-National Forces (MNF), U.S. Ambassador Swing and Mr. Crandall, the USAID/Haiti Mission Director and the Country Directors of the Title II Cooperating Sponsors and representatives of the United Nations World Food Program and the

European Union. This meeting was held March 10, 1995 at the MNF Headquarters. The results were very positive as General Fisher established a military convoy system for Title II deliveries in the Port-au-Prince area and for container deliveries to the town of Gonaives. This system has been expanded to include convoys to outlying areas in the country and has greatly facilitated the delivery of Title II commodities to those most in need. As security problems are now being experienced in other parts of Haiti, the Cooperating Sponsors are requesting additional support from the UNMIH (United Nations Mission in Haiti). Weekly security meetings hosted by UNMIH are held each Tuesday to review incidents from the previous week and to plan for the following week. These meetings also include representatives of the UNMIH Civilian Police element (CIVPOL) as well as other UN representatives and interested donor groups.

d) should the level of commodity losses increase, consult with BHR/FFP to determine at what point to consider program revision or suspension.

Response: BHR/FFP is kept up to date on the overall security situation by a system of daily e-mails and monthly reporting cables on the status of the Title II program. The Cooperating Sponsors have, in full coordination with USAID/Haiti, developed a general policy procedure, wherein deliveries are suspended in areas where either delivery trucks or actual feeding centers are looted. Only after the overall security in that particular area has stabilized are programs to be restarted. For example, Catholic Relief Services, one of the three Title II Cooperating Sponsors, has suspended deliveries in Cite Soleil, one of the poorest slum areas of Port-au-Prince, for more than two months due to the fact that feeding centers have been looted and beneficiaries accosted by gangs. It should be noted here that the vast majority of the Title II program has been able to reach intended beneficiaries as approved in the Multi-Year Operation Plan.

II. Suggestions

1. We therefore suggest that USAID/Haiti in conjunction with the Cooperating Sponsors, review the control procedures for distribution of food from warehouses to feeding centers. The purpose of the review should be to determine if this control procedure is contributing to the internal control structure, and if so, implement procedures to ensure that

a) The Cooperating Sponsors clearly mark all commodities with the feeding center code in an indelible marking prior to distribution;

Response: USAID/Haiti and the Cooperating Sponsors are committed to making the system of marking center codes on Title II commodity containers work. As requested, an in-house review with the Cooperating Sponsors is currently underway to determine if

modifications in the current system are needed and to review the important issue of how to enforce its use. This report should be completed by July 31, 1995. Because BHR/FFP is unable to identify a precedent for a similar marking system in other Title II programs, no official guidance from USAID/Washington exists. Nevertheless, USAID/Haiti believes the current marking system has sufficient intrinsic merit as an internal control/management tool to continue and will work with the Cooperating Sponsors to further refine its implementation.

b) Drivers deliver to individual feeding centers only those commodities marked with the respective feeding center codes;

Response: This will be addressed as part of the review referred to in a) above. Drivers need more training in the importance of this system and in the proper way to load their trucks to ease in offload of the correctly marked bags and cases. Drivers who are consistently delinquent in complying with this requirement will not be used to deliver Title II commodities.

c) And, feeding centers accept only those commodities marked with their respective individual center codes.

Response: This is the second most important link in making the system of marking commodity containers work. Center directors will be briefed individually on the need to ensure that the commodities they receive from the delivery trucks are in fact properly marked for their center. If they are not, they should notify the appropriate Cooperating Sponsor immediately. It is the responsibility of the Cooperating Sponsors to advise the feeding center directors of the importance of this system. This notification of center directors is part of the continuing training effort and will be reinforced in future meetings with them. USAID/Haiti will propose that this be made a part of the written contract that new feeding centers have with their respective Title II Cooperating Sponsor for FY 96 programs.

2. We suggest that USAID/HAITI develop a policy to specially respond when P.L. 480 Title II commodities are found on public sale. The policy should be consistent with available assistance from civil authorities and have the concurrence of USAID General Counsel and BHR/FFP.

Response: USAID/Haiti initiated contact with the CIVPOL element of the UNMIH forces in early April 1995 to discuss the importance of developing a plan to seize Title II commodities for sale in the local markets. This was a follow-up request which had been made as early as November 1994 to the International Police Monitors (IPM) operating as part of the MNF. CIVPOL, which took over responsibilities from IPM on March 31, 1995, responded positively and planning began almost immediately. On May 3, 1995, CIVPOL was notified by UNMIH forces that a commercial warehouse in downtown Port-au-Prince had been discovered with significant amounts of Title II, WFP and European Union

commodities. Within two hours of notification, USAID/Haiti dispatched trucks and workers to pick-up this food. Approximately 32.5 metric tons of food was recovered. A meeting was held May 23, 1995 to begin developing a plan for accomplishing a more systematic search for other commercial warehouses with Title II commodities. A report on that meeting is attached. Before any plan is formalized, it will be reviewed with the USAID General Counsel and BHR/FFP. It will also be reviewed by the U.S. Embassy. Relevant Government of Haiti officials will participate in the development of the plan as a key feature will be incorporating a system of security for Title II program assets for the period after the UNMIH mission ends in February 1996. This plan should be in effect not later than July 31, 1995.

Attachment: a/s

May 23, 1995

To: Sarah Clark, AOIR

From: Betsy Brown, PHN

Subject: Outcomes From May 23, 1995 Food Security Meeting With UNMIH

Purpose: A meeting was called by LCOL Jean Marc Dufour at UNMIH Headquarters to discuss food security arrangements, and approaches to tackle the problem in a sytematic fashion. The meeting was attended by Chief of Operations from the CIVPOL and the CIVPOL legal advisor; US Embassy/MLO Representative, LCDR Kinsey; UNMIH intelligence and operations staff and Betsy Brown and Vern Conaway, USAID. Major Fereira, UNMIH Operations lead the group through an internal assessment of the security risks at various points in the food aid logistics and distribution chain. Weaknesses were identified at several key target locations: the port, the arterial choke points for the food convoys, and at the feeding centers. It was felt that security arrangements at the central warehouse and the PVO warehouses were adequate. The following mitigative actions were agreed upon to strengthen security operations at these various locations.

The Port:

Action: USAID will review with BHR the penalty clauses for shipping lines who incur losses. Currently the penalties do not appear to be a deterrant to losses once containers are off-loaded and are stored at the port.

Action: USAID will investigate the possiblity of locking containers upon their arrival and insisting that they be stacked at the port door to door. These procedures will become a part of the shipper's agreements with USAID.

Action: Joint inventories need to be done at the time of container arrival in order to ascertain if containers are really shortlanded. It is no longer sufficient to rely on a local survey company to perform this function alone. USAID will investigate the staffing requirements for this function for the remainder of the emergency program.

Arterial Choke Points:

Action: UNMIH intelligence will do a map of the national "hot spots" based on the weekly incident reporting generated by HAAC members. This will require timely reporting by the cooperating sponsors.

Action: CIVPOL will develop a handoff strategy for food convoy security in preparation for February 1996.

Feeding Centers:

Action: Looting at feeding centers is a function of lack of community ownership of the operation and lack of civic education. USAID will use the funding vested with each of its cooperating sponsors to develop a more sytematic information and education program for community leaders. MIST team resources will be used and MIST team members will train cooperating sponsors in the use of the materials. Major Ferreira, of the Operations Center will make contact with the MIST team. Data from the weekly incident reports will be analyzed and distributed to feeding centers to be used in civic education programs.

Action: Deterence of looting at feeding centers requires political will from the GOH. LCDR Kinsey will brief Ambassadors Swing and Brahimi on a strategy for conveying this message to President Aristide and the Minister of Justice. USAID will furinish data on losses and the costs of the losses to drive home the point. UNMIH will aggregate data from incident reports to support any public relations campaigns.

Recovery of Food Losses:

The topic was reviewed with all concerned. It was agreed that a recovery operation required the full cooperation and sanction of the GOH. It was also agreed that the recovery campaigns would be aimed at large wholesalers as opposed to individuals in the marketplace and would be timed to coincide with the graduation of the first class of Haitian police.

Action: CIVPOL will study the basis of authority under Haitian law to recover stolen property. LCDR Kinsey to do talking points for the U.S. Ambassador for the Minister of Justice on this subject once a position is adopted.

Action: A strategy paper for food recovery to be developed by UNMIH which lists alternatives will be prepared and reviewed at the highest levels of the military chain of command. Once an approach is identified UNMIH would seek a GOH request before intiating any action.

General Comment: The meeting was highly productive and produced a coherent set of mitigative and recovery measures to deter food losses. UNMIH, and CIVPOL have a valuable role to play in assuring security of Title II food. The U.S. Embassy and USAID have worked well together to forge consensus on this issue. We will continue to meet to follow-up on the actions outlined above.

c.c. LCDR Kinsey, MLO
Vern Conaway, PHN