INSPECTION REPORT

PL-480, TITLE II PROGRAMS
IN THE PHILIPPINES

AUGUST 10, 1976

Office of the
Inspector General of Foreign Assistance

OPTIONAL FORM NO. 10
MAY 1962 EDITION
GSA FPMR (41 CFR) 101-11.6

UNITED STATES GOVERNMENT

Memorandum

TO : C/FFP, Dr. Robert R. Spitzer

DATE: November 17, 1976

FROM : AG, Aubrey F. Mills
GAO-IGA Liaison, Room 547 PP

SUBJECT: IGA Report "PL 480, Title II Programs in the Philippines" dated August 10, 1976

Attached is a copy of the Agency response to the subject Inspector General of Foreign Assistance report as prepared by your office and signed by Mr. Murphy. Effectively, AID has agreed to all the recommendations. The response indicates that implementation of the recommendations is adequate at this time. Therefore, I am closing all the recommendations based on these statements.

Attachment: a/s

cc: AA/Asia, M. Adler
AA/PPC, P. Birnbaum
GC, G. Morgan
AA/TA, C. Farrar
AA/LEG, D. Neill
OPA, C. Wheeler
AA/PHA, F. Pinkham
SER/MP, P. Drohat
AG/OAS, P. Cody
AAG/W, R. Deschambault
AG/OC, W. Lane
AG/IIS, R. Parker
AAG/EA, F. Shaver

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Dept. of State.
~~Office of the~~ Inspector General of Foreign Assistance.
Inspection Report: PL-480, Title II Programs in the Philippines.
Aug. 1976.
16 p.

OFF-SITE

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DEPARTMENT OF STATE

AGENCY FOR INTERNATIONAL DEVELOPMENT
WASHINGTON

DEPUTY ADMINISTRATOR

NOV 16 1976

MEMORANDUM FOR HONORABLE JOHN A SHAW
Inspector General of Foreign Assistance
Department of State

SUBJECT: IGA Inspection Report: "PL 480, Title II Programs in the Philippines, dated August 10, 1976"

Your memorandum of August 10, 1976 to the Administrator, together with a copy of the subject Inspection Report concerning the PL 480, Title II programs in the Philippines, have been carefully reviewed within the Agency.

Our comments on each of the recommendations made in the report are attached.

John E. Murphy

Attachment:

Comments on the IGA Inspection Report for the Philippines

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A. PL 480, Title II Commodities

Recommendation No. 1: That the USAID/FFP Office institute a system for periodically monitoring the markets in Manila and elsewhere to identify possible diversion.

Comments: The Mission has advised AID/W that the FFP Office in the Philippines had been monitoring the market places for possible diversions of Title II commodities, but that no formal reports were made for records purposes when there were negative findings. This procedure now has been regularized and a system for periodic monitoring of the market places has been instituted with a report filed, regardless of findings, for record purposes.

Recommendation No. 2: That pilferage and diversion be emphasized as areas of concern for members of the FFP Office/Philippines when they visit the field.

Comments: The Mission advises that it is the policy of the Food for Peace Office to check on any pilferages and diversions when they visit the field. This has been the policy for a number of years, however, with the increased value of Title II commodities and with the increase of pilferage and diversion of commodities in early 1976, this policy has been reemphasized.

Recommendation No. 3: That the influence of the USAID be used more frequently to obtain assistance from the police in solving the problems of pilferage and diversion.

Comments: In general, commodity management and the monitoring of Title II shipments from arrival to distribution is very good in the Philippines. However, in early 1976, there were some problems of pilferage and diversions of Title II commodities. Police assistance was enlisted to investigate these diversions in the market places of greater Manila. The Mission will continue to request their assistance in the future when and where needed.

Recommendation No. 4: That the USAID institute more frequent meetings with TRANSCON and the voluntary agencies and encourage closer cooperation.

Comments: The Mission advises that over the past years, frequent meetings have been held with the voluntary agencies and TRANSCON for the purpose of discussing suspected pilferage and diversions of Title II commodities.

Recommendation No. 5: That the results of the AAG audit requested by the USAID Director be forwarded to IGA upon completion, together with the USAID Director's plans for responding to any AAG recommendations.

Comments: The Mission advises that the AID/Area Auditor General has decided not to conduct another audit at this time because the recent AID audit survey revealed that the Title II program in the Philippines is well-managed, and because of the small number of shortweight bags of commodities and diversions. The AAG feels that the Mission's referral of these matters to the police was sufficient action at this time.

B. USAID - Voluntary Agency Relations

Recommendation No. 1: That periodic meetings be held between the voluntary agencies and the USAID Director and/or the Food for Peace Office.

Comments: AID/W has been advised that it is the Mission's policy to hold frequent meetings at all levels with the voluntary agencies on a wide range of issues of mutual concern. This policy will continue.

Recommendation No. 2: That whenever decisions are made that affect the voluntary agencies or their operations, and other factors do not preclude it, every effort should be made to include them in the discussion process prior to making decisions.

Comments: The voluntary agencies are consulted prior to the making of decisions that affect them. In fact, as a case in point, the Food and Nutrition Project is now under review in the Mission. The voluntary agencies were invited to participate in this review, and made presentations at an early project review Committee meeting. The voluntary agencies were provided draft copies of the Food and Nutrition Project Paper and were encouraged to comment and make recommendations on it.

Recommendation No. 3: That all important decisions be a matter of record, and that decisions affecting the voluntary agencies be communicated to them in writing.

Comments: All formal decisions concerning the voluntary agency programs have been and will continue to be communicated to them in writing. This protects both sides from misunderstandings.

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UNITED STATES GOVERNMENT

Memorandum

TO : C/FFP, Dr. Robert R. Spitzer DATE: August 12, 1976

FROM : AG, Aubrey F. Mills
GAO-IGA Liaison, Room 547 PP

SUBJECT: IGA Report "PL 480, Title II Program in the Philippines" dated August 10, 1976

Attached is the subject Inspector General of Foreign Assistance report for action by your office in cooperation with the Asia Bureau. As the report contains recommendations for Agency action, a response to the report should be prepared for Mr. Murphy's approval.

The response should be in the form of a statement that fully presents the Agency's position regarding the recommended actions with our reasons therefore. A memorandum for Mr. Murphy's signature transmitting the comments to Mr. John A. Shaw, Inspector General of Foreign Assistance, and an action memorandum to Mr. Murphy should also be prepared. The response should be presented to AG with all necessary clearances, including the Action Addressees, by October 6, 1976. I would appreciate receiving a copy of the response in draft prior to that time.

Copies of the report are also being provided to other offices which may have an interest in its contents. Comments of these offices, if any, should be directed to Mr. Ed Fox, FFP/E to be received prior to September 10, 1976 with a copy to this office.

If there are any questions or I can be of any assistance regarding this action, please call me on 235-9220.

Attachment: a/s

Action Addressees

AA/Asia, A. Gardiner
AA/PPC, P. Birnbaum

Information Addressees

GC, C. Gladson
AA/TA, C. Farrar
AA/LEG, D. Neill
OPA, C. Wheeler
AA/PHA, F. Pinkham
SER/MP, P. Drohat
AG/OAS, P. Cody
AAG/W, R. Deschambault
AG/OC, W. Lane
AG/IIS, R. Parker
AAG/EA, F. Shaver

5010-108

Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

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DEPARTMENT OF STATE
THE INSPECTOR GENERAL OF FOREIGN ASSISTANCE
WASHINGTON, D.C. 20520

August 10, 1976

MEMORANDUM

TO: Honorable Daniel Parker, Administrator
Agency for International Development

FROM: John A. Shaw

SUBJECT: Inspection Report: PL-480, Title II
Programs in the Philippines

We have reported to the Acting Secretary on the subject inspection. Copies of our Briefing Memorandum and of the Inspection Report are attached.

Attachments:

1. Briefing Memo
2. Inspection Report

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DEPARTMENT OF STATE

BRIEFING MEMORANDUM

S/S

August 10, 1976

TO: The Acting Secretary

FROM: IGA - John A. Shaw

PL-480, Title II Programs in the Philippines

These are large and complex programs with the additional burden of a geographical area that necessitates a great deal of transshipment and inland transportation. While the programs have identifiable weaknesses we were impressed with the manner in which these were addressed by both the USAID and the volags.

We found a potentially serious problem of underweight bags of commodities being received by the consignees and frequently used without their underweight condition being reported. Both Catholic Relief Services (CRS) and CARE instituted corrective actions and the USAID Director immediately requested the AID Area Auditor General (AAG) to institute an audit. The problems we observed were due to the need for closer monitoring by both of the volags of their own operations and the need for closer liaison and monitoring of the volags by the Food for Peace Office.

Acting upon allegations that PL-480 commodities were being sold in plastic bags in various markets, we discovered rolled oats for sale which could have come from Title II recipients. We recommend that a system be instituted by the USAID to monitor the large markets for possible diversion.

We found that these programs were reaching the targeted recipients, namely, the poor. The large number of third degree malnourished children in the program is itself the best evidence of that fact.

Attachment:

Inspection Report

Drafted: IGA/RPM:TWNovotny:ee
x23632:8/10/76

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DEPARTMENT OF STATE
THE INSPECTOR GENERAL OF FOREIGN ASSISTANCE
WASHINGTON, D.C. 20520

August 10, 1976

INSPECTION REPORT

PL-480, Title II Programs in the Philippines

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PL-480, Title II Programs in the Philippines

SUMMARY

Under the authority provided by subsection 624(d) of the Foreign Assistance Act of 1961, as amended, we inspected the subject programs to determine the effectiveness of their administration and their consonance with U.S. foreign policy objectives.

These are large and complex programs with the additional burden of a geographical area that necessitates a great deal of transshipment and inland transportation. While the programs have identifiable weaknesses we were impressed with the manner in which these were addressed by both the USAID and the volags.

We found a potentially serious problem of underweight bags of commodities being received by the consignees and frequently used without their underweight condition being reported to either the voluntary agency (volag) concerned or to TRANSCON, the shipping agency responsible for inland transportation. Bags with the seal broken at the bottom had been "bled" and infestation often followed.

Both Catholic Relief Services (CRS) and the Cooperative for American Relief Everywhere, Inc. (CARE) admitted their system of monitoring delivery and receipt of commodities has been inadequate, with the result that pilferage by both transporters and consignees was possible. Both volags instituted corrective actions.

The consensus of the volags and TRANSCON was that they and the AID Mission (USAID) had been aware of the short-weight problem over an extended period but that it had never been properly addressed. The USAID Director immediately requested the AID Area Auditor General (AAG) to institute an audit.

The problems we observed were due to the need for closer monitoring by both of the volags of their own operations and the need for closer liaison and monitoring of the volags by the Food for Peace (FFP) Office. We recommend that the USAID hold more frequent meetings with TRANSCON and the volags, that the USAID utilize the local police in solving problems of pilferage and diversion, and that these problems be stressed to members of the FFP Office when they visit the field so that the problems might be monitored closely.

Acting upon allegations that PL-480 commodities were being sold in plastic bags in various markets, we discovered rolled oats in two stores in the Quiapo market in Manila which comments of sales persons indicated could have come from Title II recipients. CRS,

which utilizes rolled oats in its Targeted Maternal Child Health (TMCH) programs, wrote the Manila Police requesting an investigation and this fact was noted by the USAID Director for the AAG audit. We recommend that a system be instituted by the USAID to monitor the large markets for possible diversion.

Volags believed that the FFP Office was generally well run and supportive of their endeavors but they were concerned about the tendency of the FFPO to "dictate" to them rather than to discuss matters and seek their counsel. They believe that in both the recent allocation of non-fat dry milk (NFDM) and in the lack of written notification and consultation regarding their programs in Mindanao their relationship with the USAID and FFP Office has not been satisfactory. The FFP officer acknowledged that USAID officials thought of FFP as solely an AID program and that there is a tendency to "order" the volags. The USAID Director conceded that there has been a communications gap between the USAID and the volags and that in the future their relations would be more formalized.

We recommend regular meetings between the volags and the FFP Office and greater use of letters and memoranda to make decisions a matter of record. We also recommend that the volags be consulted before decisions which vitally affect them are made by the USAID.

We found that these programs were reaching the targeted recipients, namely, the poor. The large number of third degree malnourished children in the program is itself the best evidence of that fact.

BACKGROUND

PL-480, Title II activities in the Philippines date from CRS' arrival in 1957; CARE began school feeding in 1958. Other volags have administered programs, including Church World Service whose activities ceased December 31, 1975. CARE and CRS are now the only volags administering Title II commodity supplied projects.

The GOP was provided $84.4 million in commodities under the Title II program from 1955 to 1973. Volag programs were $10.6 million for FY 75 and $12.2 million for FY 76. Feeding programs contributed roughly 15 percent of total FY 75 U.S. economic assistance of $66 million, and roughly 27 percent of the $44.1 million in FY 76 assistance. The USAID hopes for a substantial expansion of the Title II program which will postpone the phaseover of this program to GOP financing until 1980 from 1978 as originally planned.

U.S. Title II commodities are provided to the following programs:

A. Targeted Maternal Child Health (TMCH) - The program provides up to eight pounds of highly nutritious food monthly which is generally corn soya blend (CSB), corn soya milk (CSM) and/or rolled oats. The eligible recipients are underweight infants up to the age of 11 months, malnourished preschool children from 6 months to 5 years and pregnant and lactating mothers from the third trimester of pregnancy until the children become eligible for direct supply of food at the age of 6 months.

While CARE will feed 20,000 children in FY 76 at 350 centers, the major participants is CRS which will reach 420,406 malnourished children and 105,323 pregnant and nursing mothers through 1,600 centers.

B. Targeted School Feeding Program (TSF) - A nationwide weighing program has shown that about 35 percent of the approximately 6 million school children are underweight.

The nutribun, made from FFP PL-480 soy-fortified wheat flour mixed with local ingredients, now supplies 300 calories and 8.6 grams of protein to each undernourished child in the program each school day. This is not a substitute for regular meals but rather a supplement of the present diets.

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CARE at the present time (FY 76) is reaching approximately 900,000 school children in kindergarten and grades 1 through 4 in 2,555 schools throughout the Philippines. CRS for the most part confines its TSF activities to the greater Manila metropolitan area and feeds 222,356 school children in the same grades in 250 schools.

C. Food for Work (FFW) - CRS FFP projects are self-help projects developed generally in poor villages to improve their social and economic conditions. Workers in these projects receive five pounds of commodity per worker per day for each day of work in an approved FFW project, intended to feed the entire family. CRS had 95 ongoing projects generally in irrigation, water conservation, feeder roads and bridges. The average number of daily workers (recipients) for all projects was 3,234.

SCOPE OF INSPECTION

The purpose of the inspection was to evaluate the effectiveness with which the PL-480, Title II programs were being administered, to determine the interest and the depth of support of the GOP, whether or not we are creating dependency upon Title II commodities we provide, and whether the programs in question are in consonance with the foreign policy of the United States. Comments on GOP support and dependency are included in our Inspection Report "AID Food and Nutrition Program in the Philippines" dated June 24, 1976.

We reviewed audits by the AAG, documents of the AID/Washington FFP Office and the AID desk for the Philippines, and interviewed State and AID Philippine desk officers and FFP officials.

During the five weeks we were in the Philippines, we worked with the FFP officer and members of his staff, with pertinent members of the CARE and CRS staffs and with the U.N. World Food Program (WFP) adviser for the South Pacific who is serving in the Philippines until the appointment of a WFP country director. We observed TSF activities of CARE on the island of Panay and in the area around Iloilo City and of CRS in the greater Manila area. Field trips were made to TMCH sites in Pangasinan on the island of Luzon and to the Dagupan, Bautista region. A number of bakeries which produce the nutribun

for the TSF programs were examined as were major port facilities and warehouses.

Exit conferences were held with the Deputy Chief of Mission and with the USAID Director and his staff at which times the results of the inspection were discussed in detail. The USAID Director substantially concurred with our findings and has already taken prompt action to correct the deficiencies identified. Upon returning to Washington, representatives of AID's FFP Office and other appropriate Department offices were debriefed.

RESULTS OF INSPECTION

A. Title II Commodities

1. Underweight Bags of Commodity - Soy fortified flour for the TSF nutrition program as well as rolled oats and CSM in the TMCH program were being delivered to the consignees in underweight condition, sometimes by as much as 6 to 9 lbs. per 50-lb. bag. Bags we inspected had been broken at the bottom seam and the contents "bled" through a small hole, probably using a suction device. Volag representatives admitted that their systems of accountability in the internal distribution area were inadequate inasmuch as underweight bags were frequently used instead of segregated and the shortfall was later replaced from reserve stocks.

A CARE auditor pointed out that consignees suffer shortages of commodity because of: (1) variation in the number of feeding days in a period, (2) failure to use proper amounts in recipes used, and (3) underweight bags at delivery. As a consequence, it is difficult if not impossible to specifically determine the extent of the thefts because of these other factors which confuse inventory levels. He said, as did others, that when bags arrive underweight they should be weighed and set aside so that the source of the problem can be traced. Otherwise it is possible that unscrupulous consignees could compound the problem by bleeding the bags further.

Insect infestation also results from the bleeding and may be the most serious problem. In the MCH program in particular, where rolled oats are used, infestation

is a serious problem although it was also found in the soy-fortified flour used in preparing the nutribun. Repeatedly consignees told us that there is little or no problem in the bags as received if they have not been tampered with, but where the plastic liner has been broken infestation is almost inevitable.

At first it was suggested that the bags were arriving underweight from the U.S., but checks of 2,000 incoming bags made for IGA and others by the volags' surveyor revealed no irregularities. The surveyor, who has served both volags for over 16 years, said that occasionally short-weighted bags have arrived from the U.S.; that it is a rare occurrence; and that nothing of this nature had been observed recently.

At a meeting with the General Manager of TRANSCON, the agency handling all internal transportation shipments of the volag commodities, attended by volag representatives and an IGA inspector, the consensus was that short weight is a recurring problem and one that has not been properly addressed. A CARE representative said that pilferage has been fairly common in the past and varies from area to area. The General Manager of TRANSCON insisted that the problem occurs after commodities leave his Manila warehouses and said he would discharge anyone in his employ caught stealing. He was adamant that there must be accountability, and underweight bags must never be used but should be set aside and the underweight condition reported so that the pilferage can be traced. He also suggested more frequent meetings with USAID officials and the volags on the subject. He said he had verbally notified the FFP Office of this matter many times in the past but suggested meetings should be held every two weeks until the matter is resolved.

2. Possible Diversion of PL-480, Title II Commodities - Four allegations were made to us that rolled oats believed to be from PL-480, Title II stocks were being sold in bulk in plastic bags in the Quiapo and Munoz markets in Manila.

On March 27, 1976, we visited the Quiapo market and found two locations selling rolled oats in bulk plastic bags. The salespersons at both stores refused to give their names but one said that the oats were obtained from "Social Welfare." The Department of Social Welfare is the agency of the GOP that administers the

TMCH program. The other person said that she buys the rolled oats in one or two kilo lots from mothers with young children. The monthly distribution of rolled oats is generally one kilo per person, and TMCH concerns itself with children from birth to 6 years of age.

We contacted the U.S. Agricultural Attache and the WFP Director regarding other possible sources of the rolled oats. It is not likely that commercial packers are a source of this bulk commodity because their product is higher priced, has a short shelf life, and they would jeopardize their import licenses. While the WFP has rolled oats, the sites are over 150 miles from Manila and the commodities available are old and would not be an attractive product.

While we cannot say conclusively that the commodities observed (a small sample of which we purchased) are necessarily diverted Title II commodities, we very strongly suspect that they are. It is therefore imperative that there be investigations to determine whether U.S.-donated commodities are being sold in the local markets and if so, the police should be notified, and other steps be taken to end this diversion.

3. Actions Taken by the USAID and the Volags - The USAID Director and the Directors of CARE and CRS are to be commended for their interest in and quick response to these matters.

On March 24, 1976, we advised the USAID Director of the condition of underweight bags. By memo dated March 25, 1976, he requested that the AAG's office undertake an audit to determine the extent of the problem. The allegations of diverted commodities in the Quiapo market and results of our trip to the market were reported at the exit conference with him on April 2, 1976, and notes were made of this new development by his assistants.

The CARE Director, during our inspection, instituted additional counts of stored commodities in the Central Warehouse in Manila and in the field, particularly where shortages have been identified. CARE is also instituting procedures which will make the consignee responsible for the correct weight and the correct number of bags of commodities. If a consignee signs an invoice and the bags are then underweight the consignee is responsible. He also recognized the need for closer

cooperation and coordination with both TRANSCON and the USAID. To this end he pledged his support for additional meetings--probably bimonthly as requested by TRANSCON.

CRS has requested additional surveillance of commodities by its surveyor; has asked TRANSCON to tighten its operation by increased surveillance of its drivers and truckhelpers; and has requested more meetings with TRANSCON. The CRS Director sent a letter to the Superintendent of the Metropolitan Police Force of Manila requesting an investigation of our finding of rolled oats being sold in the Quiapo market. CRS is also seeking an additional employee to assist in the shipping operations, primarily at the port and the TRANSCON warehouse.

We believe the excellent response to this problem by all concerned will undoubtedly help minimize future losses and should eliminate whatever diversion exists.

It became apparent as we reviewed the correspondence in both volag and USAID files, however, that the policy of the USAID FFP Office was to become involved in shipping and transportation problems only when written correspondence was directed to the FFP Office.

A review of the FFP Office field trip reports failed to reveal much of a concern for diversion of underweight bags and little else in the category of preventive actions. Inasmuch as there was enough correspondence in both volag and USAID files to indicate pilferage and diversion, we believe the volags should have insisted on USAID involvement and that the FFP Office should have routinely monitored the various market places for diversion.

Recommendations

1. That the USAID FFP Office institute a system for periodically monitoring the markets in Manila and elsewhere to identify possible diversion.

2. That pilferage and diversion be emphasized as areas of concern for members of the FFP Office when they visit the field.

3. That the influence of the USAID be used more frequently to obtain assistance from the police in solving the problems of pilferage and diversion.

4. That the USAID institute more frequent meetings with TRANSCON and the volags and encourage closer cooperation.

5. That the results of the AAG audit requested by the USAID Director be forwarded to IGA upon completion, together with the USAID Director's plans for responding to any AAG recommendations.

B. USAID - Voluntary Agency Relations - Our worldwide review of PL-480, Title II programs has demonstrated the importance of a close working relationship between the USAID which has oversight responsibility for the entire program and the volags which are the actual implementors of the programs and in that capacity identify the potential recipients, design the programs and cooperate with their counterpart agency in the host country in seeing that the programs have a beginning and continue to function.

In our judgment the role of the USAID and the FFP Office is one of oversight, articulating policy as it relates to Title II programs and assisting the volags whenever needed. The FFP Office also has a responsibility to point out weaknesses in the volag operation and insist that they be corrected. It is in this area that we believe the FFP Office has not met its full responsibility as far as the underweight bag matter is concerned. The two voluntary agency directors believe that in other areas the tendency has been to dictate to them rather than to seek their counsel and discuss matters before decisions are made. Except for this aspect both directors feel the FFP Office is for the most part well run and supportive of their endeavors.

The volags cited two incidents to support their contentions. The first was a lack of written notification and consultation concerning a sensitive issue affecting their operations in Mindanao. The second involved a misunderstanding concerning priority in allocation of NFDM.

On March 5 the USAID had sought an allocation of 10,000 (about 22 million pounds) metric tons of NFDM to be utilized in a government to government program, which would be sold and the proceeds used for approved USAID activities. The proceeds would be placed in an existing

joint NEDA (National Economic Development Agency) USAID peso account already established when Title II rice was sold in 1972 for emergency flood relief purposes.

On March 11, 1976, the Interagency Staff Committee approved a one-time NFDM allocation of 8.23 million pounds to CRS/Philippines and 1.0 million pounds to CARE. CRS headquarters in New York notified its Director in Manila of the allocation and he thereafter made inquiries of the USAID. The Director was told by a USAID FFP official that the USAID position was that its previous request for milk to be sold should be met first though neither the CARE nor the CRS Director had been consulted.

Both Directors believe that decisions that are significant should be supported by written notification to them or to their New York headquarters or in the absence of this that there should be verbal notification by Washington to the New York headquarters.

The FFP officer acknowledged that there is a tendency within USAID and also his office to "order" the volags and possibly to "dictate" to them and that USAID dealings with the volags are not always carried out the way they should be. He admitted that USAID officials thought of the FFP program as solely an AID program without due concern for the role of the volags. Progress has been made, partially as a result of IGA recommendations, in improving working relations with volags particularly between AID/Washington and the volag headquarters in New York. We believe this spirit could be improved in the Philippines.

Recommendations

1. That periodic meetings be held between the volags and the USAID Director and/or the FFP Office.

2. That whenever decisions are made that affect the volags or their operations, and other factors do not preclude it, every effort should be made to include them in the discussion process prior to making decisions.

3. That all important decisions be a matter of record, and that decisions affecting the volags be communicated to them in writing.