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AND THE BROADCASTING BOARD OF GOVERNORS

*(U) OFFICE OF INSPECTOR GENERAL*

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Office of Audits

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# **(U) Audit of the Bureau of International Narcotics and Law Enforcement Affairs Corrections System Support Program in Afghanistan**

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United States Department of State  
and the Broadcasting Board of Governors

*Office of Inspector General*

(U) PREFACE

(U) This report was prepared by the Office of Inspector General (OIG) pursuant to the Inspector General Act of 1978, as amended, and Section 209 of the Foreign Service Act of 1980, as amended. It is one of a series of audit, inspection, investigative, and special reports prepared by OIG periodically as part of its responsibility to promote effective management, accountability and positive change in the Department of State and the Broadcasting Board of Governors.

(U) This report is the result of an assessment of the strengths and weaknesses of the office, post, or function under review. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and a review of applicable documents.

(U) The recommendations therein have been developed on the basis of the best knowledge available to the OIG and, as appropriate, have been discussed in draft with those responsible for implementation. It is my hope that these recommendations will result in more effective, efficient, and/or economical operations.

(U) I express my appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in black ink, appearing to read "H. Geisel".

(U) Harold W. Geisel  
(U) Acting Inspector General

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**(U) Acronyms**

(U) CSSP	Corrections System Support Program
(U) FAM	<i>Foreign Affairs Manual</i>
(U) GDPDC	General Directorate of Prisons and Detention Centers
(U) GIRoA	Government of the Islamic Republic of Afghanistan
(U) INL	Bureau of International Narcotics and Law Enforcement Affairs
(U) INL/AP	Bureau of International Narcotics and Law Enforcement Affairs, Afghanistan/Pakistan Office
(U) OIG	Office of Inspector General
(U) USAID	United States Agency for International Development

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## (U) Executive Summary

(U) In 2006, the Department of State (Department), Bureau of International Narcotics and Law Enforcement Affairs (INL), established the Corrections System Support Program (CSSP) to assist the Government of the Islamic Republic of Afghanistan (GIRoA) in building a safe, secure, and humane prison system that meets international standards and Afghan cultural requirements. To meet that mission, INL focuses on providing the General Directorate of Prisons and Detention Centers (GDPDC)<sup>1</sup> with training, mentoring, and professional assistance. INL has projected that CSSP will continue through 2016, with several major CSSP initiatives scheduled to transition to the Afghan government between 2013 and 2015. As of June 5, 2013, The Department has obligated \$226 million and expended about \$208 million for CSSP contract task orders with PAE<sup>2</sup> to provide training, capacity building, and infrastructure support to the GDPDC. The Department of State, Office of Inspector General (OIG), conducted this audit to evaluate whether INL was effectively managing CSSP and to determine whether GIRoA could sustain the program's results.

(U) Because of sustainability concerns for U.S.-funded programs in Afghanistan, the Consolidated Appropriations Act of 2012 levied additional requirements on all INL programs in Afghanistan, to include CSSP. The Act stated that before FY 2012 INL funds could be obligated for Afghanistan-based assistance programs, the Secretary of State must certify to the Appropriations Committees that the funds would be used to "design and support" programs in accordance with the June 2011 United States Agency for International Development (USAID) sustainability guidance. The "Administrator's Sustainability Guidance for USAID in Afghanistan" was designed to ensure that U.S. Government resources are properly aligned with U.S. and Afghan national interests. On November 28, 2012, the Deputy Secretary certified to Congress that FY 2012 INL funds would not be obligated unless INL programs met the requirements of the USAID sustainability guidance. However, on March 13, 2013, INL began obligating FY 2012 CSSP funds without fully meeting those requirements. Specifically, INL had not

- (U) conducted a program review to determine CSSP program and cost effectiveness,
- (U) estimated the costs and activities necessary for the Afghans to sustain the corrections program, or
- (U) developed a quarterly assessment and reporting process for measuring CSSP success in achieving its program outcomes and GIRoA progress on meetings its commitments.

As a result, INL has no basis for determining whether CSSP is an effective program with a positive return on its \$226 million investment; whether the program should be revised, reduced, or canceled; or whether the GIRoA will have the capacity to sustain the corrections program

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<sup>1</sup> (U) The GDPDC was previously known as the Central Prisons Directorate.

<sup>2</sup> (U) The former Pacific Architects and Engineers is now a wholly owned subsidiary of Lindsay Goldberg, LLC, doing business as PAE.

once international contributions are reduced. At current GIRoA funding levels, the Afghan corrections program is not sustainable without continued international support.

(U) During the audit INL conducted a *Mission Kabul Portfolio Review* for “Corrections System Development,” which included, but was not limited to, CSSP. However, the portfolio review did not fulfill the requirements of the USAID sustainability guidance, which calls for immediate and on-going program reviews to determine whether a program is meeting the core principles of the guidance. Specifically, the portfolio review did not include an evaluation of CSSP effectiveness, either programmatically or cost-wise, one of the core principles in the sustainability guidance. In addition, the portfolio review did not identify the costs for GIRoA to sustain CSSP, nor whether GIRoA can sustain the corrections system, as the sustainability guidance requires. In October 2012, INL issued a performance management plan<sup>3</sup> which OIG acknowledges is a key first step in improving CSSP monitoring. However, INL had not met all of the plan’s requirements to include completing an initial review of CSSP’s progress in meeting its outcomes and intended impacts. In addition, the plan does not include a requirement for evaluating GIRoA’s progress in meeting its commitments to CSSP.

(U) In its August 20, 2013, response to the draft report (see Appendix B), INL raised concerns on the report finding and OIG’s use of certain terminology. Specifically, INL disagreed with the following statement: “If [GIRoA] is unable to sustain the corrections program when international support is likely reduced post 2014, the Department risks waste of about \$226 million in CSSP program costs.” INL considered this to be an “overstatement.” INL stated that with the support of CSSP the “GDPDC has developed the capacity to administer its own training program, with 22 of 24 corrections courses currently taught by GDPDC trainers” and that CSSP had improved GDPDC’s ability to manage its provincial prisons. INL further stated that the gains represent a return already achieved on the investment and reflects enduring capacity improvements of Afghan personnel that will remain even as international support decreases. INL also disagreed with OIG’s finding that CSSP did not meet the requirements of the Congressional certification, stating that it “believes that CSSP is consistent with the core principles” of the USAID sustainability guidance. In Attachment 3 to its response, INL also provided technical comments in which it expressed concern regarding the reported implementation date for the CSSP performance management plan and the clarity of some of the terminology used by OIG in the draft report.

(U) OIG maintains the position that if GIRoA is unable to sustain the corrections system the Department’s \$226 million investment in CSSP is at risk. At current GIRoA funding levels, and without international support, the number of courses the GDPDC trainers can teach and improvements in prison management become less relevant if the GDPDC cannot retain its staff. According to the GDPDC Director, there is a 33 percent attrition rate among the corrections officers, many of whom cited salary concerns as the primary reason for leaving the GDPDC. The Director also stated that the officers’ counterparts in the national police receive a higher salary and that additional corrections staff will likely leave to seek jobs with more reliable

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<sup>3</sup> (U) INL began developing the CSSP performance management plan in 2011 with the first draft dated October 2011; the final performance management plan was approved and issued in October 2012.

salaries if international funding for the corrections system is reduced and GIRoA is unable to sustain the GDPDC budget. OIG agrees that some aspects of CSSP align with core principles in the USAID sustainability guidance; however, not all core principles were met prior to obligating FY 2012 CSSP funding as required by the Consolidated Appropriations Act of 2012, and remain unmet. With respect to INL's technical comments, OIG made minor revisions to the report language based on those comments. OIG's reply to the technical comments, which describes the specific OIG action taken or not taken as a result of the comments, is contained in Appendix C.

(U) OIG made four recommendations to INL, including recommendations to conduct an immediate evaluation of CSSP for program effectiveness and sustainability, to include determining costs that will be incurred by GIRoA, and to take action as necessary in response to the evaluation results. OIG also recommended that the Department revise and reissue its program management and evaluation guidance to ensure that programs such as CSSP are effectively managed and sustainable.

(U) INL concurred with one recommendation and partially concurred with three recommendations. Based on INL's response, OIG considers Recommendations 1, 5, and 6 resolved, pending further action, and Recommendation 2 unresolved. INL's responses and OIG's replies to those responses are included after each recommendation.

(U) The Bureau of Budget and Planning did not respond to the draft report, and therefore, OIG considers Recommendations 3 and 4 unresolved.

## **(U) Background**

(U) In 2006, INL established CSSP as the Afghan prisoner population grew from approximately 600 prisoners in the early 2000s to roughly 16,000 in 2010. The CSSP mission is to assist GIRoA in building a safe, secure, and humane prison system that meets international standards and Afghan cultural requirements. To meet that mission, INL focuses on providing GDPDC with training, mentoring, and professional assistance. INL has projected that CSSP will continue through 2016, with several major CSSP initiatives scheduled to transfer to the Afghan government between 2013 and 2015.

(U) GDPDC has approximately 6,000 Afghan employees, who work at GDPDC headquarters in Kabul and at 34 provincial prisons and 203 detention centers located throughout Afghanistan. CSSP personnel primarily work in Kabul and in seven Afghan provinces at regional training centers, provincial reconstruction teams, and the INL Regional Law Enforcement Center. As of June 5, 2013, The Department had obligated \$226 million and expended about \$208 million for CSSP contract task orders with PAE to provide training, capacity building, and infrastructure support to the GDPDC. In addition to the \$226 million obligated for CSSP, INL contributes \$5 million annually to the Law and Order Trust Fund for Afghanistan<sup>4</sup> used specifically to pay GDPDC officers' salaries.

## **(U) Program Management**

(U) The INL Afghanistan/Pakistan office (INL/AP) in Washington, DC, is responsible for directing and managing programs that support the Afghanistan justice sector, to include CSSP. The INL CSSP program manager is located in Kabul and reports to Embassy Kabul's INL section Deputy Director. The program manager supervises a deputy and a staff of eight American and locally employed staff and is responsible for guiding, directing, developing, and implementing the INL corrections program and coordinates with INL/Kabul and INL/AP to conduct corrections strategic planning.

## **(U) CSSP Task Orders**

(U) Contractor support for CSSP is provided under the Department's worldwide civilian police advisor and logistics support services contract with PAE (Contract No. SLMAQM04C0033). The first CSSP task order (SAQMPPD06FA294) ran from March 2006 to April 2010, and the second (SAQMMA10F1572) was awarded on May 2010. The second task order was extended through December 31, 2013. As of June 5, 2013, the task orders were worth about \$270 million, approximately \$226 million of which had been obligated, as shown in Table 1.

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<sup>4</sup> (U) The Law and Order Trust Fund for Afghanistan is a multilateral trust fund set up in 2002 as a mechanism for coordinating contributions from the United Nations Development Program partners, as part of the international community's support to build the Afghan national police force.

**(U) Table 1: Task Order Funding (Amount in millions of U.S. dollars)**

	<b>Task Order Value</b>	<b>Obligated</b>	<b>Expended</b>
<b>SAQMPD06FA294 - March 7, 2006</b>	\$103	\$87	\$84
<b>SAQMMA10F1572 - May 6, 2010</b>	\$167	\$140	\$124
<b>Total:</b>	<b>\$270</b>	<b>\$226</b>	<b>\$208</b>

(U) Source: INL and the Department of State, Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management.

(U) Note: Numbers in this table may not add because of rounding.

(U) The contracting officer for the PAE task order is located in Washington, DC, and is responsible for establishing the task order terms and conditions, issuing the solicitations, conducting contract negotiations, and executing contract modifications. The contracting officer’s representative is located in Kabul and is responsible for reviewing contractor invoices, monitoring the contractor’s technical progress and the expenditures of resources relating to the contract, and informing the contracting officer of any contractor schedule or performance issues.

**(U) Certification Requirement**

(U) Because of sustainability concerns for U.S.-funded programs in Afghanistan, the Consolidated Appropriations Act of 2012 mandated specific requirements on all INL programs in Afghanistan, to include CSSP. The Act stated that before FY 2012 INL funds could be obligated for Afghanistan-based assistance programs, the Secretary of State must certify to the Appropriations Committees that the funds will be used to “design and support” programs in accordance with the June 2011 USAID sustainability guidance. The “Administrator’s Sustainability Guidance for USAID in Afghanistan” is designed to ensure that U.S. Government resources are properly aligned with U.S. and Afghan national interests to ensure that its work contributes to the following:

- (U) bringing stability to Afghanistan and confidence to the Afghan people,
- (U) assisting the Afghan people to build more capable, inclusive, and pluralistic governance and society, and
- (U) enabling sustainable economic growth and human development.

(U) The sustainability guidance also requires that the agency examine each individual assistance program to ensure that the Afghans will have the capacity to sustain the impact of a program’s work beyond 2014. Specifically, the guidance states that programs should meet the following core principles:

- (U) Increases Afghan ownership and capacity – programs must increase Afghan ownership, Afghan capacity to manage and lead, and Afghan commitment to sustain. If those characteristics are not present in the programs, then the guidance requires that a “realistic plan” be developed for achieving those characteristics in the short to medium term.

- (U) Contributes to stability and confidence – programs must increase the Afghan government’s capacity to deliver, equitably and accountably, critical social needs and promote economic conditions.
- (U) Is effective both programmatically and cost-wise – programs must be reviewed for both program effectiveness (is each program on track to achieve what was intended?), and for cost effectiveness (can we achieve similar results for less money?).

(U) To implement the sustainability guidance, programs should undergo immediate and ongoing program reviews to determine whether the program is meeting the core principles. In addition, the agency should determine program costs for operations, maintenance, and infrastructure and work with GIRoA to develop plans to ensure that those costs are prioritized and that GIRoA can sustain the program. For the programs that do not align with the core principles or for which there is insufficient commitment to fund, the agency should recommend whether the programs should be modified, ended, or postponed.

(U) The guidance further instructs that within 45 days, initial results of a program review should be reported to agency headquarters and a quarterly reporting process should be initiated. At the program level, the quarterly report should include analysis of the program’s progress towards meeting its outcomes and intended impacts.

### **(U) Objective**

(U) The audit objective was to evaluate whether INL was effectively managing CSSP and to determine whether GIRoA could sustain the program’s results.

## **(U) Audit Results**

### **(U) Congressional Certification Requirements Were Not Fully Met**

(U) On November 28, 2012, the Deputy Secretary certified to Congress that FY 2012 INL funds would not be obligated unless INL programs met the requirements of the June 2011 “Administrator’s Sustainability Guidance for USAID in Afghanistan.” However, on March 13, 2013, INL obligated FY 2012 CSSP funds without fully meeting those requirements. Specifically, INL had not

- (U) conducted a program review to determine CSSP program and cost effectiveness,
- (U) estimated the costs and activities necessary for the Afghans to sustain the corrections program, or
- (U) developed a quarterly assessment and reporting process for measuring CSSP success in achieving its program outcomes and GIROA progress on meetings its commitments.

(U) This occurred because the Department and INL had not developed clear, comprehensive, and mandatory guidance for managing and evaluating INL programs for effectiveness or sustainability. As a result, INL has no basis for determining whether CSSP is an effective program with a positive return on its \$226 million investment; whether the program should be revised, reduced, or canceled; or whether GIROA will have the capacity to sustain the corrections program once international contributions are reduced. At current GIROA funding levels, the Afghan corrections program is not sustainable without continued international support.

### **(U) INL Program Certification**

(U) On November 28, 2012, the Deputy Secretary certified to Congress that FY 2012 INL funds would not be obligated unless programs met the requirements of the June 2011 “Administrator’s Sustainability Guidance for USAID in Afghanistan.” The certification states that the INL Afghanistan programs will be in compliance with the principles of the USAID guidance. Specific to the corrections program, a Memorandum of Justification accompanying the certification states that to achieve sustainability, INL has implemented a train-the-trainer program to ensure that the Afghans can conduct corrections officer training and a facilities maintenance training program to ensure that the detention facilities and other properties will be adequately maintained.

(U) Although the Department certified that the INL programs would meet the USAID sustainability guidance before funds were obligated, INL began obligating FY 2012 CSSP funds on March 13, 2013, without fully meeting that guidance. Specifically, INL had not

- (U) conducted a program review to determine CSSP program and cost effectiveness,
- (U) estimated the costs and activities necessary for the Afghans to sustain the corrections program, or
- (U) developed a quarterly assessment and reporting process for measuring CSSP success in achieving its program outcomes and GIRA progress on meetings its commitments.

### **(U) Program Reviews Were Not Conducted**

(U) Although CSSP was initiated in 2006, INL had not conducted periodic reviews to determine program and cost effectiveness, as of July 2013. INL had also not developed a CSSP performance management plan until October 2012,<sup>5</sup> which is crucial for measuring program and cost effectiveness. INL provided OIG with a *Mission Kabul Portfolio Review* for “Corrections System Development,” conducted in early 2012, which includes, but is not limited to, CSSP. However, the portfolio review did not fulfill the requirements of the USAID sustainability guidance, which calls for immediate and on-going program reviews to determine whether the program is meeting the core principles of the guidance. The portfolio review also did not include an evaluation of CSSP effectiveness, either programmatically or cost-wise, one of the core principles in the sustainability guidance.

(U) To facilitate CSSP program and cost effectiveness reviews, INL should have developed a performance management plan when CSSP was initiated. According to the Department’s *Managing for Results: A Program and Project Management Guidebook*,<sup>6</sup> a management plan can be critical to program success because it focuses efforts towards achieving significant impacts in priority areas, provides a structure that allows program managers to respond to different challenges, establishes a framework for monitoring program effectiveness, and clearly communicates program expectations to stakeholders.

(U) In October 2012, INL issued a CSSP Performance Management Plan, which includes elements such as a program goal, objectives, inputs, outputs, outcome measures, and a methodology for evaluating performance. OIG acknowledges that issuance of the plan is a key first step to improve program monitoring; however, OIG’s review of the plan indicates that none of the plan elements fully align with definitions in the Department’s *Performance Management Guidebook*.<sup>7</sup> For example, of the six CSSP objectives listed in the plan, none are intermediate outcomes that are specific or that can be measured, as defined in the *Performance Management Guidebook*. Specifically, Objective Number 1 states that the program should “[p]rovide

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<sup>5</sup> (U) INL began developing the CSSP performance management plan in 2011 with the first draft dated October 2011; the final performance management plan was approved and issued in October 2012.

<sup>6</sup> (U) The *Managing for Results: A Program and Project Management Guidebook* is a “reference tool to point Department program or project managers to applicable requirements, existing methodologies, best practices within State, trainings and educational offerings, and sample program management tools and resources available to help effectively and efficiently manage Department programs and projects.”

<sup>7</sup> (U) The *Performance Management Guidebook*, Dec. 2011, is a guide to build capacity within the Department to plan for and conduct rigorous performance management efforts to collect data and to put that data to use in decision-making through analysis and results reporting.

technical training and mentoring of corrections staff and prison leadership,” which does not define an intermediate outcome or include measurable factors. Instead, the objective simply describes an activity that the program should undertake as part of its mission. OIG also found weaknesses in CSSP’s definition of its goal, inputs, outputs, and outcomes. In addition, the plan does not establish a methodology to link CSSP outcomes to the attainment of the CSSP goal. Further, the CSSP contractor is responsible for collecting and reporting much of the performance data, and there is no requirement for government or third-party validation of that data. Having the contractor responsible for collecting and reporting the performance data creates a conflict of interest since the contractor is responsible for providing the majority of the services that will be evaluated. Any of these factors taken separately or collectively could risk the viability of any future program and cost effectiveness reviews.

**(U) Sustainment Costs and Activities Were Not Identified**

(U) Although a Memorandum of Justification accompanying the certification to Congress and the *Mission Kabul Portfolio Review* identified sustainment-related activities that have been implemented for the Afghan corrections system, INL had not identified the costs or plans for GIRoA to sustain CSSP. The USAID sustainability guidance states that the agency should determine program costs for operations, maintenance, and infrastructure and should work with GIRoA to ensure that the program is sustainable. In the Memorandum of Justification, INL identified activities that would support sustaining the corrections program, such as train-the-trainer and facilities maintenance training. In addition, the portfolio review states, “INL partners with the Afghan Government on all aspects of the corrections system development effort, with an eye towards sustainability and Afghanization. State partnership trainings focus on building the capacity of Afghan corrections officers. Participants learn and reinforce professional skills that can be sustained without foreign support.” However, neither document identifies the costs for GIRoA to sustain the corrections program, as the sustainability guidance requires.

(U) At current GIRoA funding levels, the Afghan corrections program is not sustainable without continued international support. GDPDC’s annual average budget is about \$32 million, and of that amount, GIRoA funds about \$14 million (44 percent). To assist in meeting GDPDC expenses, GIRoA relies on annual funding from the Law and Order Trust Fund for Afghanistan of about \$5 million and funding from CSSP for activities such training, capacity building, and infrastructure programs. Despite the international support, GDPDC still has unpaid utility and food bills of \$8.4 million dating back to 2007. To offset part of its expenses, GDPDC, with CSSP assistance, has initiated a number of prison industries programs. Specifically, prison industries programs have been initiated in several prisons, including the Balkh Provincial Prison, the Paktya Provincial Prison, the Herat Provincial Prison, and the Pol-i-Charkhi Central Prison. OIG observed a tailoring program at the Kandahar Provincial Prison; rug weaving, shoe making, welding, and tailoring programs at the Pol-i-Charkhi Central Prison; and rug weaving, tailoring, and tin-smithing programs at the Herat Provincial Prison. The Herat prison commander told OIG that the industries program was one of the CSSP achievements at the prison.

(U) Although the prison industries programs could provide some revenue for prison operations, Afghan laws and corrections regulations limit the amount of program revenues that

GDPDC can retain and use. For example, according to the Afghan corrections regulations,<sup>8</sup> prisoners working in prisons shall be paid 60 percent of what their counterparts at nongovernmental organizations are paid. This regulation reduces the revenue the prison would generate after factoring in the cost of materials used in making the products. In addition, there are also local laws<sup>9</sup> that allow the Afghan Ministry of Finance to get 75 percent of the annual net profit from the industries programs. Therefore,<sup>10</sup> if a prison industries program product sold for \$100 and the profit after the costs of the materials and paying the prisoners was \$40, the Afghan Ministry of Finance would get \$30 and the GDPDC would get \$10. Moreover, many of the Afghanistan prisons are located in residential areas with insufficient land to support industries programs such as agriculture and husbandry.

#### **(U) Evaluation and Reporting Process Was Not Developed**

(U) To meet the USAID sustainability guidance requirements, INL needed to conduct an initial review of CSSP and establish a quarterly review and reporting process for measuring CSSP success in achieving its program outcomes and GIROA progress on meetings its commitments. However, INL had not conducted an initial review or developed a process for quarterly assessments and reporting prior to its certification to Congress on November 28, 2012. Further, the October 2012 CSSP performance management plan that INL developed included a requirement for quarterly reviews of the program; however, INL still had not completed the initial review of CSSPs progress in meeting its outcomes and intended impacts prior to obligating FY 2012 funds on March 13, 2013. In addition, the October 2012 CSSP performance management plan does not include a requirement for evaluating GIROA's progress in meeting its commitments to CSSP.

(U) Prior to the quarterly review and reporting requirement in the October 2012 performance management plan, the CSSP contractor was collecting program data and provided it to INL. However, INL did not use the data to measure program effectiveness, rather the data was used to provide INL with contract activities, successes, and points of concern. Although INL acknowledged that it had "voluminous" contractor provided data that could be evaluated, INL had never evaluated the data to determine CSSP progress, results, or effectiveness.

#### **(U) Clear, Comprehensive, and Mandatory Guidance Was Not Established**

(U) Guidance issued by the Department and INL for managing and evaluating programs for effectiveness and sustainability was not clear, comprehensive, or mandatory. The 2010 Quadrennial Diplomacy and Development Review called for changes to the Department with an

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<sup>8</sup> (U) Prisons and Detention Center's Regulation for Management of Affairs, Article 24.

<sup>9</sup> (U) Official Gazette No. 743, published May 21, 1991, State-Owned Enterprises Law.

<sup>10</sup> (U) OIG used a hypothetical example because of the lack of reliable prison industries program revenue data. GDPDC does not have the infrastructure to allow the provincial prisons to report financial data electronically. Therefore, prison industries program revenue reports are hand delivered by GDPDC staff that travel to Kabul on a sporadic and unreliable basis.

emphasis, among others, on managing for results. In December 2011, the Department<sup>11</sup> began issuing new and revised program evaluation and management policy and guidance in an effort to improve program performance and results. In 2012, INL issued the Guide to Project Design, the Guide to Results Framework, and the Guide to Developing a Performance Measurement Plan on its Web site.

### **(U) Program and Performance Management Guidance**

(U) The revised program evaluation policy is contained in the *Foreign Affairs Manual* (FAM); however, the policy does not establish a rigorous program evaluation process and does not require consistent application across Department bureaus. The FAM<sup>12</sup> requires that all “large” programs, projects, and activities be evaluated at least once in their lifetime or every 5 years. However, the policy gives considerable leeway to the bureaus on the definition of large, stating that “keeping these guidelines in mind, bureaus have the flexibility to determine what constitutes a large program or activity in the context of their portfolio.” This lack of specific thresholds for program evaluation does not provide assurance that the policy will be applied consistently across the Department or, in fact, whether shorter-term projects will be evaluated, regardless of their size or risk. The FAM also does not contain specific guidance for reporting the program evaluation results. With respect to CSSP, INL’s evaluation plans for FYs 2012–2014 did not specifically include CSSP as one of the programs selected for evaluation. Therefore, by the end of FY 2014, CSSP will have been operating for 8 years without a formal program evaluation. In addition to the FAM policy, for INL, there are at least five supplemental guides available (two issued by the Department and three by INL). Although the guidance contains information relevant to program management and performance evaluation, their use is not mandatory.

**(U) Performance Management Guidebook.** The Performance Management Guidebook<sup>13</sup> states that the goal of performance management is to use performance and evaluation results to make programming and policy decisions as necessary, to effectively and efficiently reach program goals and objectives. The guidebook defines five phases to performance management: 1) Strategic Planning, 2) Operational Planning, 3) Data Collection & Performance Measurement, 4) Performance Analysis & Review, and 5) Performance Improvement. The guidebook provides information on the activities that should take place during each of the stages. Although the guidebook provides a baseline for ensuring that program managers have the data needed to make informed program decisions, its use is not mandatory.

**(U) Program and Project Management Guidebook.** The Program and Project Management Guidebook is intended to supplement existing Department project management methodologies. According to the guidebook, those existing project management methodologies

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<sup>11</sup> (U) The Bureau of Budget and Planning, Office of Performance and Planning, works in coordination with the Office of Foreign Assistance Resources to oversee the Department’s annual performance planning and reporting processes, systems, and products, as well as the implementation of the Department’s evaluation policy. It also establishes the policies that ensure Department plans, budget requests, and appropriations meet requirements.

<sup>12</sup> (U) 18 FAM 300, “Program Evaluation Policy,” effective Apr. 6, 2012.

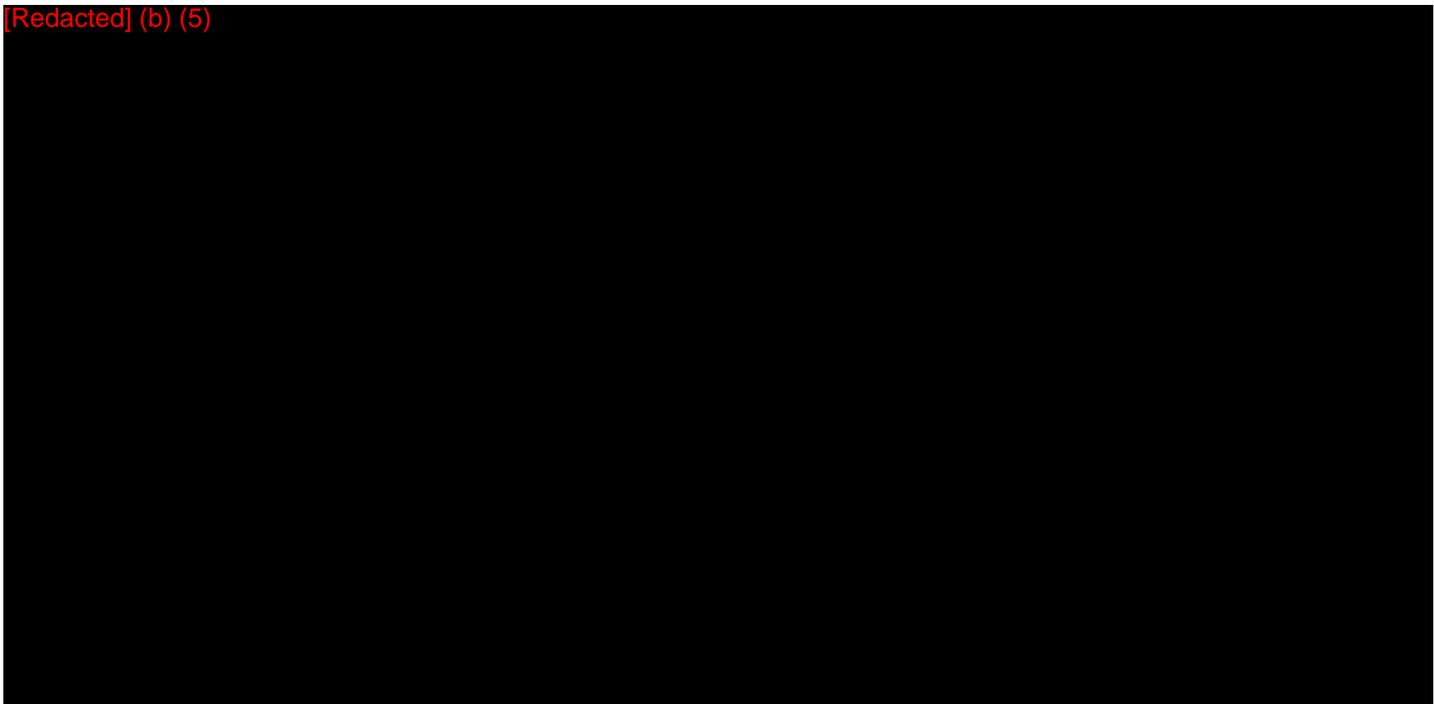
<sup>13</sup> (U) Performance Management Guidebook, Dec. 1, 2011.

are contained in the FAM and FAH, which contain “recommended” methodologies. It further states that the Department “has no mandated project management methodology required to be used and employed by program managers.”

**(U) INL Program Management Guides.** In 2012, INL posted three undated program guides on its Web site—Guide to Project Design, Guide to Results Framework, and Guide to Developing a Performance Measurement Plan. The guides provide INL program and project managers with steps to ensure that program and projects are adequately designed and that those designs will facilitate the collection of data necessary to measure progress and impact. Although INL’s Project Design Guide states “in keeping with the Department’s strategic and budgeting processes,” the INL guides primarily provide best practices for use in managing INL programs and projects, and their use is not mandatory.

(U) To ensure that INL programs and projects such as CSSP are effectively managed, Department and INL program and project management guidance should be revised with respect to planning, evaluation, and reporting requirements. All projects and programs should be required to prepare a comprehensive performance management plan that includes an overall strategy, goals, objectives, schedules, timelines, risks, and a desired end state. Annual performance evaluations should be required for all high-risk programs and projects as well as those that meet a designated and consistent threshold. In addition, there should be a process established for reporting the results of those evaluations so that the Department and INL can make informed decisions concerning program or project viability. Lastly, use of the supplemental guides should be mandatory to ensure consistency across programs and bureaus.

[Redacted] (b) (5)



[Redacted] (b) (5)



**(U) Program Effectiveness and Sustainability Requirements Were Not Known**

(U) As a result of the Department not having developed clear, comprehensive, and mandatory guidance, INL has no basis for determining whether CSSP is an effective program with a positive return on its \$226 million investment or whether the program should be revised, reduced, or canceled. Had a performance management plan been developed and periodic program effectiveness reviews been conducted, INL may have been prepared to meet the USAID sustainability guidance and therefore the Consolidated Appropriations Act of 2012 requirements.

(U) Further, if the Department had developed and issued guidance for evaluating sustainability of programs, INL would have been required to determine CSSP sustainability. Table 2 shows recent annual shortfall in the GDPDC budget. If GIRoA is unable to sustain the corrections program when international support is likely reduced post 2014, the Department risks waste of about \$226 million in CSSP program costs that were obligated through May 2013 and any other funds obligated thereafter. At current GIRoA funding levels, the Afghan corrections program is not sustainable without continued international support.

**(U) Table 2: Annual GDPDC Budget Shortfall (Amount in millions of U.S. dollars)**

<b>Fiscal Year</b>	<b>GDPDC Budget Request</b>	<b>GDPDC's Budget Received from GIRoA</b>	<b>Funds From Other Sources</b>	<b>Shortfall</b>
<b>2012</b>	\$60	\$17	\$14	\$29
<b>2013</b>	\$109	\$27	\$18	\$64

(U) Source: PAE.

**(U) Management Response to the Finding**

(U) In its August 20, 2013, response to the draft report (see Appendix B), INL raised concerns on the report finding and OIG's use of certain terminology. Specifically, INL disagreed with the following statement: "If [GDPDC] is unable to sustain the corrections program when international support is likely reduced post 2014, the Department risks waste of about \$226 million in CSSP program costs." INL considered this to be an "overstatement." INL stated that with the support of CSSP the "GDPDC has developed the capacity to administer its own training program, with 22 of 24 corrections courses currently taught by GDPDC trainers" and that CSSP had improved GDPDC's ability to manage its provincial prisons. INL further stated that the gains represent a return already achieved on the investment and reflects enduring capacity improvements of Afghan personnel that will remain even as international support decreases.

(U) INL also disagreed that CSSP did not meet the requirements of the Congressional certification and requested OIG amend the report to reflect its compliance. INL stated that it "believes that CSSP is consistent with the core principles" of the USAID sustainability guidance. INL provided an attachment to its response (Attachment 1) that included three examples of how CSSP is consistent with those core principles. INL cited the increase in GDPDC's capacity to train its corrections personnel and the exclusion of GDPDC prisons from the 2011 and 2012

United Nations Assistance Mission – Afghanistan list of Afghan detention facilities with credible allegations of systemic torture as two of those examples. The third example addressed CSSP cost and program effectiveness. Specifically, INL stated that it assessed the program in March 2011 and issued a draft report that identified areas for improvement, as well as, areas in which the program was effective to include training and mentoring. INL further stated that it revised CSSP reporting requirements in October 2011 to better measure programmatic performance, including data reporting requirements, and that INL verified program effectiveness through analysis of CSSP monthly and quarterly reports, site visits, and review of CSSP narrative reports.

(U) As Attachment 3 to its response, INL provided technical comments to the draft report in which it expressed concerns regarding clarity of terminology used by OIG included in the report, as well as, the distinction between the certification to Congress, signed by the Deputy Secretary, and the accompanying memorandum of justification. INL also noted that it is “strongly committed to implementing robust performance management practices,” stating that it began implementing the CSSP performance management plan in October 2011, two months prior to the release of the Department’s Performance Management Guidebook. INL further stated that as reported by OIG, there is a misalignment between CSSP and INL procedures, and Department guidance, and it will work to align those terms, policies, and procedures.

#### **(U) OIG Reply**

(U) OIG maintains the position that if GIRoA is unable to sustain the corrections system the Department’s \$226 million investment in CSSP is at risk. At current GIRoA funding levels, and without international support, the number of courses the GDPDC trainers can teach and improvements in prison management become less relevant if the GDPDC cannot retain its staff. According to the GDPDC Director, there is a 33 percent attrition rate among the officers, many of whom cited salary concerns as the primary reason for leaving the GDPDC. The Director also stated that the officers’ counterparts in the national police receive a higher salary and that additional staff will likely leave to seek jobs with more reliable salaries if international funding for the corrections system is reduced and if GIRoA is unable to sustain the GDPDC budget.

(U) OIG did not revise the report to reflect INL’s assertion that CSSP met the requirements of the Congressional certification. OIG agrees that some aspects of CSSP align with core principles in the USAID sustainability guidance; however, not all core principles were met prior to obligating FY 2012 CSSP funding as required by the Consolidated Appropriations Act of 2012, and remain unmet. OIG specifically disagrees with INL’s statement that it has met the cost and program effectiveness principle as a result of its March 2011 assessment. During the audit, INL provided only contractor prepared documents that highlighted the activities of the contractor as well as the *Mission Kabul Portfolio Review*, both of which OIG reported did not meet the cost or program effectiveness core principle. Further, INL acknowledged during the audit that although it had voluminous data provided by the contractor, it had never evaluated the data to determine CSSP progress, results, or effectiveness. INL’s statement that it revised CSSP reporting requirements in October 2011 to “better measure programmatic performance,” refers to the contractor’s reporting activities, the results of which were not used to measure CSSP effectiveness.

(U) With respect to INL's technical comments, OIG made minor revisions to the report based on those comments. OIG's reply to the technical comments is contained in Appendix C.

**(U) Recommendation 1.** OIG recommends that the Bureau of International Narcotics and Law Enforcement Affairs conduct an immediate evaluation of Corrections System Support Program on-going and planned projects in Afghanistan and determine whether the projects are viable and take the necessary action to address the evaluation results, as required by the "Administrator's Sustainability Guidance for USAID in Afghanistan" and the Consolidated Appropriations Act of 2012.

**(U) Management Response:** INL concurred, stating that it would conduct an independent evaluation of CSSP and implement processes for quarterly systematic INL-drafted program analyses.

**(U) OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG reviews and accepts documentation showing the evaluation results and the actions INL has taken to address those results.

**(U) Recommendation 2.** OIG recommends that the Bureau of International Narcotics and Law Enforcement Affairs determine the costs, then develop and implement a sustainability strategy in partnership with the Government of the Islamic Republic of Afghanistan to ensure the sustainability of the Afghan General Directorate of Prisons and Detention Centers and the Afghan corrections system once international funding is removed, as required by the "Administrator's Sustainability Guidance for USAID in Afghanistan" and the Consolidated Appropriations Act of 2012.

**(U) Management Response:** INL partially concurred, stating that its objective is "to build a sustainable capacity within the Afghan government to administer correctional facilities safely, securely, and humanely." INL stated that it is working with civil society partners to engage in long-term planning and actively working to have the Afghan government assume more responsibility for many of its programs.

**(U) OIG Reply:** OIG considers the recommendation unresolved because INL did not address the need to determine the costs to operate the GDPDC and to build a sustainability strategy with respect to those costs. This recommendation can be considered resolved when INL concurs with the recommendation and can be closed when OIG reviews and accepts documentation showing that INL has determined the costs for GDPDC to sustain the corrections system, and develops and implements a sustainment strategy in partnership with GIRoA.

**(U) Recommendation 3.** OIG recommends that the Bureau of Budget and Planning, in coordination with the Director of Foreign Assistance, revise and reissue 18 FAM 300 to

- (U) require mandatory use of supplemental program management guidance for all Department programs and projects;
- (U) require that all programs and projects prepare comprehensive management plans that include an overall strategy, goals, objectives, schedules, timelines, risks, and desired end state;
- (U) establish a threshold for programs and projects across all Department bureaus and offices for performance evaluation purposes;
- (U) require mandatory annual performance evaluations for all programs and projects that are high-risk or meet the designated threshold;
- (U) include guidance for evaluating sustainability of programs; and
- (U) require bureaus provide the evaluations to the Office of Performance and Planning for review.

**(U) Management Response:** The Bureau of Budget and Planning did not provide a response to the draft report.

(U) INL provided an unsolicited response, suggesting that the recommendation be redirected to the Director of Foreign Assistance. INL further stated that the recommendation would “impact all foreign assistance programs and, if not timed correctly, could provide unreliable information for decision makers.”

**(U) OIG Reply:** OIG considers the recommendation unresolved because the Bureau of Budget and Planning did not provide a response. OIG redirected the recommendation to include the Director of Foreign Assistance as a coordinating office for implementation in accordance with INL’s unsolicited response.

**(U) Recommendation 4.** OIG recommends that the Bureau of Budget and Planning, in coordination with the Director of Foreign Assistance, establish a process for Department bureaus to provide performance evaluations of the programs and projects and review the evaluations to ensure that the programs and projects continue to be viable. Evaluations that do not reflect adequate performance should be provided to appropriate officials to determine whether to terminate, modify, or continue the program or project.

**(U) Management Response:** The Bureau of Budget and Planning did not provide a response to the draft report.

(U) INL provided an unsolicited response, suggesting that the recommendation be redirected to the Director of Foreign Assistance. INL further stated that the recommendation would “impact all foreign assistance programs and, if not timed correctly, could provide unreliable information for decision makers.”

**(U) OIG Reply:** OIG considers the recommendation unresolved because the Bureau of Budget and Planning did not provide a response. OIG redirected the recommendation to

include the Director of Foreign Assistance as a coordinating office for implementation in accordance with INL's unsolicited response.

**(U) Recommendation 5.** OIG recommends that the Bureau of International Narcotics and Law Enforcement Affairs revise its program and project management guidance to reflect and align with the recommended changes to Department guidance, including requiring all INL programs and projects to follow the guidance and ensure performance evaluations are conducted and reviewed for viability.

**(U) Management Response:** INL partially concurred, stating that there was misalignment between "some CSSP and Bureau procedures and Department guidance" and that INL would work to align terms, policies, and procedures. INL further stated that it is "aggressively pursuing the intent of the Department's current evaluation policy" but raised concerns over Recommendations 3 and 4 and the impact those recommendations would have on INL's ability to comply with Recommendation 5.

**(U) OIG Reply:** OIG considers the recommendation resolved. Although INL only partially concurred, the actions described met the full intent of the recommendation, which was to ensure that Bureau and Department program and project management guidance are aligned. This recommendation can be closed when OIG reviews and accepts documentation showing that INL has issued updated program and project management guidance that aligns with the Department's guidance once the Department's guidance is revised in accordance with Recommendations 3 and 4.

**(U) Recommendation 6.** OIG recommends that the Bureau of International Narcotics and Law Enforcement Affairs revise and update the Performance Management Plan for the Corrections System Support Program in Afghanistan. The revisions should

- (U) align the Corrections System Support Program performance management plan with the definitions in Department program management guidance, including a program goal that uses specific terminology, objectives that are specific and measureable, inputs that are resources used to produce outputs, outputs that are products and services delivered by the program, and outcomes that are declarative statements of long-term results at a fully successful level;
- (U) establish a methodology for linking Corrections System Support Program outcomes to achieving the program goal;
- (U) require government (or other third-party) validation of contractor collected data;
- (U) establish quarterly assessment and reporting process of the Government of the Islamic Republic of Afghanistan's progress in meeting its CSSP commitments; and
- (U) include suspense dates and distribution process for reporting Corrections System Support Program data.

**(U) Management Response:** INL partially concurred, stating that it believed that some of the requested changes “are already in place or are not appropriate or viable” for the CSSP performance management plan. INL agreed to align terms and amend the CSSP performance management plan to strengthen the quarterly review process and include suspense dates and a distribution process for reporting CSSP data. In addition, INL requested further clarification on the recommendation’s implication that CSSP would “mandate that the GDPDC meet certain programmatic commitments,” which INL stated would be “difficult to sustain.”

**(U) OIG Reply:** OIG considers the recommendation resolved. With regard to the requested clarification, the USAID sustainability guidance requires quarterly assessments of GIRA’s progress in its ability to sustain the corrections system; the recommendation is not intended to “mandate that the GDPDC meet certain programmatic commitments,” as INL stated. Although INL only partially concurred, its response meets the intent of the recommendation, which was for INL to revise and update the CSSP performance management plan in accordance with the findings and other recommendations in the report. The recommendation can be closed when OIG reviews and accepts documentation showing that INL has updated the CSSP performance management plan.

## (U) Scope and Methodology

(U) The Department of State (Department), Office of Inspector General (OIG), conducted this audit to evaluate whether the Bureau of International Narcotics and Law Enforcement Affairs (INL) was effectively managing the Corrections System Support Program (CSSP) and to determine whether the Government of the Islamic Republic of Afghanistan (GIROA) could sustain the program's results. OIG conducted this audit from January 2012 to July 2013 in Afghanistan and in the Washington, DC, metropolitan area. This performance audit was conducted in accordance with generally accepted government auditing standards. These standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

(U) To determine whether INL was effectively managing CSSP and ensuring the results could be sustained by GIROA, OIG reviewed the CSSP task order statement of work, training records, and other supporting documentation obtained from INL and PAE, the CSSP contractor. In addition, OIG also reviewed Department program management guidance, including the *Foreign Affairs Manual*,<sup>1</sup> the Performance Management Guidebook,<sup>2</sup> and the Managing for Results: A Program and Project Management Guidebook.<sup>3</sup> OIG also reviewed INL-specific program management guidance, including its Project Design Guide, Guide to Results Frameworks, and Guide to Developing a Performance Measurement Plan. Further, OIG analyzed the October 2012 performance management plan developed by INL for CSSP.

(U) OIG also reviewed guidance and documentation to ensure that INL complied with Federal regulations, including the Consolidated Appropriations Act of 2012, which requires the Secretary of State to certify to Congress that the funds will be used to “design and support” programs in accordance with United States Agency for International Development (USAID) sustainability guidance<sup>4</sup> before FY 2012 INL funds could be obligated for Afghanistan-based assistance programs. OIG reviewed USAID sustainability guidance, as well as the Deputy Secretary's certification to Congress regarding obligation of FY 2012 INL funds, and accompanying Memorandum of Justification. In addition, OIG also reviewed *Mission Kabul Portfolio Review* for “Corrections System Development,” that INL provided, which includes, but is not limited to, CSSP.

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<sup>1</sup> (SBU) 18 FAM 300, “Program Evaluation Policy,” and 18 FAM 055, “Key Priorities for Development Diplomacy.”

<sup>2</sup> (U) Performance Management Guidebook, Dec. 1, 2011.

<sup>3</sup> (U) The Managing for Results: Program and Project Management Guidebook is a “reference tool to point Department program or project managers to applicable requirements, existing methodologies, best practices within State, trainings and educational offerings, and sample program management tools and resources available to help effectively and efficiently manage Department programs and projects.”

<sup>4</sup> (U) “Administrator's Sustainability Guidance for USAID in Afghanistan,” June 2011.

(U) OIG also interviewed officials from INL, PAE, and GIRoA. GIRoA officials OIG interviewed included the General Directorate of Prisons and Detention Centers (GDPDC) Director and prison commanders. While conducting fieldwork in Afghanistan, OIG made visits to eight sites throughout Afghanistan: GDPDC, Kabul Female Prison/Detention Center, Kabul Detention Center, Counter Narcotics Justice Center, Pol-i-Charkhi Central Prison, Kandahar Provincial Prison, Gardez Prison, and Herat Prison.

**(U) Work Related to Internal Controls**

(U) OIG performed steps to assess the adequacy of internal controls related to management of CSSP. OIG reviewed INL obligations to determine whether it was meeting the requirements in the Consolidated Appropriations Act of 2012. Deficiencies identified regarding obligations of funds without meeting the appropriations requirements can be found in the Audit Results section of the report.

**(U) Use of Computer-Processed Data**

(U) During the audit, OIG did not use computer-processed data.

(U) Bureau of International Narcotics and Law Enforcement Affairs Response



United States Department of State

Washington, D.C. 20520

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August 20, 2013

**MEMORANDUM FOR OIG/MERO/AUD DEPUTY ASSISTANT  
INSPECTOR GENERAL CAROL N. GORMAN**

FROM: INL – James A. Walsh, Executive Director *JAW*

SUBJECT: INL Responses to the Draft Report, “Audit of Bureau of International Narcotics and Law Enforcement Affairs Corrections System Support Program (CSSP) in Afghanistan” (AUD-MERO-13-XX, August 2013)

The Bureau of International Narcotics and Law Enforcement Affairs (INL) welcomes the opportunity to comment on this draft OIG report and offers additional information and clarification for your consideration.

INL agrees with many of the draft report’s recommendation, including conducting an evaluation of the Corrections System Support Program (CSSP). INL will also take immediate steps to further strengthen INL’s oversight of CSSP by including enhanced validation of reporting provided quarterly by the CSSP contractor in Afghanistan.

However, INL has identified a number of concerns and respectfully requests that the OIG provide clarifications with respect to these concerns when it publishes the final report. Detailed responses to the recommendations included in the OIG’s draft report are provided at the conclusion of this letter. (Technical corrections and comments are provided in Attachment 3.)

First, INL requests that the OIG reconsider its assessment that “If [the Afghan government’s] General Directorate of Prisons and Detention Centers (GDPDC) is unable to sustain the corrections program when international support is likely reduced post 2014, the Department risks waste of about \$226 million in CSSP program costs...”

INL believes this is an overstatement. As noted in the OIG report, \$226 million represents the totality of INL’s investment in CSSP since the program was established 2006. At that time, the GDPDC struggled to effectively manage fewer than 10,000 prisoners, was unable to exercise full control over several provincial

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prisons, could not respond effectively and humanely to serious incidents such as riots or hostage crises, and did not have an organized basic training program for its corrections personnel.

With CSSP's support, the GDPDC has developed the capacity to administer its own training program, with 22 of 24 corrections courses currently taught by GDPDC trainers; safeguard prisoners from mistreatment and abuse; manage a population of over 28,000 prisoners and detainees, including nearly 7,000 National Security Threat (NST) inmates, despite significant overcrowding and often substandard infrastructure; and effectively quell critical incidents such as riots and hostage takings. These gains represent a substantial return already achieved on our investment; moreover, this progress reflects enduring improvements in the capacity of Afghan personnel who will remain even as international support decreases. (Further information regarding CSSP's successes, sustainability, and oversight is included in Attachment 2.)

Second, INL requests that the OIG amend the report to reflect INL's compliance with the Certification requirements of the Department of State, Foreign Operations, and Related Programs Appropriations Act, 2012. INL believes that CSSP is consistent with the core principles of the USAID Administrator's Sustainability Guidance dated June 2011, which called for programs to develop Afghan ownership and capacity, contribute to Afghan stability and confidence, and exhibit cost effectiveness and program effectiveness. (Additional information regarding INL's compliance with the Certification requirements is included in Attachment 1.)

Third, INL notes that a reader of the report unfamiliar with the distinctions between statutory requirements, Department regulations, Bureau guidance, and best practices, not all of which are mandatory, might conflate them with the Certification requirement if the text of the draft does not observe those distinctions. As currently drafted, the report addresses compliance not only with the statutory Certification requirement, but also with the Foreign Affairs Manual, the Performance Management Guidebook, INL's Guide to Project Design, INL's Guide to Results Framework, and INL's Guide to Developing a Performance Measurement Plan. These additional criteria are not directly relevant to the requirements of the Certification.

In the interest of clarity, INL respectfully requests that the report be revised to show the source of any unmet requirements identified by the OIG, indicating where it is associated with the Certification and where it is not. Additionally, the

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distinction between the Certification, as signed by the Deputy Secretary on November 23, 2012, and the accompanying Memorandum of Justification should be clarified.

Finally, INL notes that the Bureau is strongly committed to implementing robust performance management practices, and in some cases our efforts precede the Department's guidance. For example, INL began implementing the CSSP Performance Management Plan (PMP) in October 2011, two months before the Department released the "Performance Management Guidebook." The result, as reported by the OIG, is misalignment between some CSSP and Bureau procedures and Department guidance. In these cases, INL will work to align its terms, policies, and procedures in accordance with the more recently promulgated Department guidance.

Above all, INL believes in the sustainability of CSSP's legacy in Afghanistan. CSSP, from its inception, has worked to build Afghanistan's capacity to effectively manage its own correctional system in a cost-effective manner consistent with international standards and Afghan law. CSSP activities, such as specialized mentoring for GDPDC leadership, support the institutional capacity to maintain these changes even as international support decreases post-2014. The program is a central component of the U.S. and international strategy to bring stability to Afghanistan and confidence to the Afghan people in their government.

INL is hopeful that the aforementioned corrections and additions will be incorporated into the final report. Additionally, INL offers the following responses to the current recommendations contained in the July 2013 draft report.

**INL Responses to the OIG's Draft Recommendations ( as of August 2013)**

**Recommendation 1:** OIG recommends that INL conduct an immediate evaluation of CSSP's on-going and planned projects in Afghanistan to determine whether the projects are viable and take the necessary action to address the evaluation results.

**INL Response (August 2013):** INL agrees with this recommendation and will develop a statement of work to conduct an independent evaluation of CSSP. INL also notes that the Bureau is conducting an assessment of Afghanistan's corrections system in September 2013, which will inform future INL programming and lay the groundwork for this evaluation that will determine the state of the Afghan government's correctional capacity based on INL and CSSP assistance.

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Furthermore, INL will immediately implement improved processes for systematic, INL-drafted programs analyses on at least a quarterly basis.

**Recommendation 2:** OIG recommends that INL determine the costs, then develop and implement a sustainability strategy in partnership with the Government of the Islamic Republic of Afghanistan to ensure the sustainability of the Afghan GDPDC and CSSP once international funding is removed, as required by the “Administrator’s Sustainability Guidance for USAID in Afghanistan” and the Consolidated Appropriations Act of 2012.

**INL Response (August 2013):** INL partially agrees, but wishes to clarify that INL’s objective is not to sustain CSSP, but to build a sustainable capacity within the Afghan government to administer correctional facilities safely, securely, and humanely. As such, INL coordinates extensively with the Afghan government, including by negotiating a Letter of Agreement on an annual basis, and engages in an ongoing review process to ensure program goals are aligned and that sustainability is addressed. INL has engaged in detailed transition planning and has either transitioned or is in the process of transitioning major lines of effort to the Afghan government. For example, CSSP will transfer leadership of all corrections training courses in December 2013 and transition classification and case management activities to GDPDC in 2014. Additionally, as reported in the FY 2012 INL Program and Budget Guide (PBG), a report submitted to Congress annually, INL stated that funds will focus on “Afghanization” and sustainability. In the Congressional Notification of our FY 2012 funding, INL explained that programs will increasingly focus on building the capacity of the Afghan government so that they may continue to sustainably deliver services at the national and sub-national levels through transition in 2014 and beyond. INL is actively working with the Afghan government to assume more responsibility for many current programs, as well as working with our civil society partners to engage in long-term planning.

**Recommendation 3:** OIG recommends that the Bureau of Budget and Planning revise and reissue 18 FAM 300 to

- require mandatory use of supplemental program management guidance for all Department programs and projects;
- require all programs and projects prepare comprehensive management plans that include an overall strategy, goals, objectives, schedules, timelines, risks, and desired end state;

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- establish a threshold for programs and projects across all Department bureaus and offices for performance evaluation purposes;
- require mandatory annual performance evaluations for all programs and projects that are high-risk or meet the designated threshold;
- include guidance for evaluating sustainability of programs; and
- require bureaus provide the evaluations to the Office of Performance and Planning for review.

**INL Response (August 2013):** INL recommends that this recommendation be assigned to the Director of Foreign Assistance.

**Recommendation 4:** OIG recommends that the Bureau of Budget and Planning establish a process for Department bureaus to provide performance evaluations of the programs and projects and review the evaluations to ensure that the programs and projects continue to be viable. Evaluations that do not reflect adequate performance should be provided to appropriate officials to determine whether to terminate, modify, or continue the program or project.

**INL Response (August 2013):** INL recommends that this recommendation be assigned to the Director of Foreign Assistance.

**Recommendation 5:** OIG recommends that INL revise its program and project guidance to reflect and align the recommended changes to Department guidance, including requiring all INL programs and projects to follow the guidance and ensure performance evaluations are conducted and reviewed for viability.

**INL Response (August 2013):** INL partially agrees with this recommendation, but respectfully requests that the OIG clarify the use of the term “evaluation” in the report. This is critical as it appears the OIG uses that term to describe three distinct and separate terms: “Assessment”, “Oversight”, and “Evaluation.” The definitions below attempt to differentiate between evaluations which occur periodically over the life of a program or project, assessments which can be implemented on an annual basis, and oversight which occurs on an ongoing basis.

INL assessments are typically completed at the beginning of a program by subject matter experts in a particular field and analyze the current situation of the country and system that INL anticipates assisting, with recommendations provided for program design and implementation. These assessments are then conducted on a periodic basis to show variance in baseline data and progress in achieving intended

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goals and objectives. In contrast, INL evaluations are conducted at the mid-point or end of the lifecycle of a program or initiative. They must be independent and follow sound mixed methodologies, including both quantifiable and qualitative data to show evidence-based results and return on investment. The evaluations utilize past assessments in their desk review and provide best practice recommendations and lessons learned. Finally, INL oversight occurs throughout the entire program life-cycle. This is often accomplished by a combination of government and contractor support to ensure program implementation complies with government requirements and intent. As concerns are identified throughout the oversight process, INL makes changes to existing work plans and updates time, scope, and resource requirements.

INL is aggressively pursuing the intent of the Department's current evaluation policy and has completed or initiated five program evaluations since the Department announced the policy in 2012. In recommendations three and four, the OIG proposes annual performance evaluations for all programs and projects that are high-risk or meet a designated threshold. Because evaluations utilize scientific and statistical methods in an attempt to measure programmatic impact, they must take into consideration the timeframe associated with measuring results in multi-year foreign assistance programs or projects. OIG's recommendation of annual evaluations will impact all foreign assistance programs and, if not timed correctly, could provide unreliable information for decision makers.

**Recommendation 6:** OIG recommends that INL revise and update the Performance Management Plan for CSSP in Afghanistan. The revisions should:

- Align the CSSP PMP with the definitions in the Department program management guidance, including a program goal that uses specific terminology, objectives that are specific and measurable, inputs that are resources used to produce outputs, outputs that are products and services delivered by the program, and outcomes that are declarative statements of long-term results at a fully successful level;
- Establish a methodology for linking CSSP outcomes to achieving the program goal;
- Require Government (or third-party) validation of Contractor-collected data;

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- Establish a quarterly evaluation and reporting process for the Afghan government's progress in meetings its CSSP commitments; and
- Include suspense dates and distribution processes for reporting CSSP data

**INL Response (August 2013):** As detailed below, INL partially agrees with this recommendation and is committed to working with the OIG to improve the CSSP PMP. INL believes that some of the OIG's requested changes are already in place or are not appropriate or viable for the CSSP PMP.

- *Align the CSSP PMP with the definitions in the Department program management guidance, including a program goal that uses specific terminology, objectives that are specific and measurable, inputs that are resources used to produce outputs, outputs that are products and services delivered by the program, and outcomes that are declarative statements of long-term results at a fully successful level.*
  - INL partially agrees with this recommendation. The OIG correctly identifies some misalignment in terms between the INL-drafted CSSP PMP and the Department's guidance. INL will work to align our efforts with such guidance.
- *Establish a methodology for linking CSSP outcomes to achieving the program goal.*
  - INL partially agrees with this recommendation because such a methodology linking CSSP's program activities to its goals already exists through the CSSP PMP logical framework. However, INL will work to ensure that the CSSP PMP's methodology aligns with the Department's terminology and program management guidance.
- *Require Government (or third-party) validation of Contractor-collected data.*
  - INL partially agrees with this recommendation and will work with the OIG to develop the best, most cost-effective mechanism for carrying out such validation. We fully support the importance of verifying data provided by the CSSP contractor. INL oversight of CSSP-provided data occurs on a regular basis through site visits, review of contract deliverables, and analysis of INL-created CSSP output and outcome reporting templates. In the interim, INL has already required the CSSP implementer to hire a monitoring and evaluation expert to

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continue to improve data quality and performance management practices in line with the INL-drafted CSSP PMP.

- *Establish a quarterly evaluation and reporting process for the Afghan government's progress in meetings its CSSP commitments.*
  - INL partially agrees with this recommendation and acknowledges the need to strengthen and codify the quarterly review process analyzing CSSP's performance as well as GDPDC's willingness to implement corrections reforms. However, INL requests clarification regarding this recommendation in two areas. First, this recommendation appears to imply that CSSP would mandate that the GDPDC meet certain programmatic commitments. As CSSP does not oversee GDPDC, but rather provides assistance to Afghan corrections officials in their administration of prisons and detention centers, this type of arrangement would be difficult to sustain. Second, as stated in the response to recommendation five, INL requests clarification of the term "evaluation," as implementing quarterly evaluations (meaning third party program reviews using empirically-based methods) would not be feasible.
  
- *Include suspense dates and distribution processes for reporting CSSP data.*
  - INL partially agrees with this recommendation as such a process has already been implemented through the CSSP contract. However, INL will amend the CSSP PMP to include these processes.

INL hopes that the additional information is helpful for providing clarification for the draft report. Please see Attachments 1-3 for additional information. We look forward to our continued work with OIG.

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**Attachment 1 – INL’s Compliance with the Core Principles of the USAID Sustainability Guidance of June 2011**

INL satisfied the requirements of the Certification submitted to Congress on November 28, 2012. Specifically, INL’s CSSP is consistent with the core principles of the USAID Administrator’s Sustainability Guidance for USAID in Afghanistan dated June 2011, which called for programs to develop Afghan ownership and capacity, contribute to Afghan stability and confidence, and exhibit cost effectiveness and program effectiveness.

**USAID Core Principle: Afghan Ownership and Capacity**

INL’s CSSP was designed to increase Afghan ownership, Afghan capacity to manage and lead, and Afghan commitment to sustain. Due to CSSP’s efforts, Afghanistan’s General Directorate of Prisons and Detention Centers (GDPDC) now has the capacity to train its corrections personnel and to operate 90 percent of its corrections training courses with minimal support from CSSP. The last two CSSP-led classes will be transitioned to Afghan trainers in December 2013. Additionally, in the CSSP contract, INL directs CSSP to work toward ensuring GDPDC’s self-sufficiency by emphasizing sustainable operating procedures and providing strategic guidance. Furthermore, CSSP’s mentoring and other program activities seek to build the Afghan government’s capacity to manage correctional institutions as international support decreases. These efforts are fully supported by the Afghan government and align with broad policy objectives of developing policies that ensure that the corrections system operates in accordance with international standards.

**USAID Core Principle: Contribution to Stability and Confidence**

CSSP also contributes to stability and confidence in Afghanistan. CSSP supports classification and case management personnel at all 33 provincial prisons in Afghanistan. These efforts help separate prisoners affiliated with the insurgency from the general population where infrastructure permits. CSSP also supports Afghan efforts to provide educational, vocational, and industries programs to promote prisoner rehabilitation and post-release reintegration. CSSP’s support for human rights training for corrections personnel has contributed to the GDPDC’s strong record on human rights, as reflected in the absence of GDPDC prisons and detention centers from the 2011 and 2012 United Nations Assistance Mission –

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Afghanistan (UNAMA) reports naming Afghan detention and correctional facilities with credible allegations of systemic torture and mistreatment.

**USAID Core Principle: Cost Effectiveness and Program Effectiveness**

INL reviews CSSP for cost effectiveness and program effectiveness. In 2012, INL conducted a review of the contract upon which the FY 2012 funds were later obligated, analyzing the Contractor's proposal for program sustainability, alignment with program goals, and cost effectiveness. In March 2011, INL's chief corrections subject matter expert completed an assessment of the Afghan prison system, including CSSP activities and performance. The resulting report, issued in draft form to INL program officers, identified several areas for improvement but found that CSSP mentors enjoyed strong relationships with their Afghan counterparts and that CSSP successfully increased GDPDC's classification and training capabilities.

INL also revised CSSP's reporting requirements in October 2011 to better measure programmatic performance, including requiring trainee test scores and outcome statements from CSSP advisors following mentoring sessions. INL verified program effectiveness through ongoing analysis of these CSSP monthly and quarterly reports, in addition to ongoing INL program officer site visits and reviews of CSSP's narrative weekly reports.

INL program officers conduct ongoing reviews of CSSP activities to ensure the sustainable transition of programs intended for eventual Afghan operational leadership, such as classification and case management, and the administration of training classes. Our ongoing reviews also assess the outcomes of CSSP's mentoring and capacity building activities, which are designed to develop a sustainable capacity to administer a safe, secure, and humane corrections system.

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**Attachment 2: Major CSSP Contributions to the Afghan Corrections System**

*INL's CSSP has effectively assisted the Afghan government in developing a safer, more secure and humane Afghan corrections system.*

In 2006, fewer than 10,000 people were incarcerated in Afghanistan's prison system. The Afghan government did not have control over all of the provincial prisons, could not respond effectively and humanely to serious incidents such as riots or hostage crises, and did not have an organized basic training program for its corrections personnel. The Afghan government had no standardized records system or institutional capacity to help prison commanders securely and humanely organize, segregate, and track inmate populations nationwide based on the severity and nature of their crimes. Insurgents, violent criminals, and nonviolent offenders were co-mingled in a chaotic, largely inhumane system. Prisons and detention centers were centers for recruitment and radicalization by the Taliban.

Today, the Afghan government manages a population of over 28,000 prisoners and detainees. Nearly 7,000 are National Security Threat (NST) inmates linked to the insurgency, which directly threatens Afghanistan's future. INL's CSSP, by far the largest donor to Afghanistan's corrections system, has been critical in helping the Afghan government manage this exponential increase in prison population, establish standard operating procedures at key facilities, and counter the significant threat posed by NST inmates.

Since the CSSP program started in 2006, INL has assisted the GDPDC in deploying an advanced classification tool to separate dangerous and nonviolent offenders where infrastructure permits. As of July 2013, CSSP Afghan staff and GDPDC records management officers have classified a total of over 30,000 prisoners in all 33 provincial prisons. This represents a significant improvement in the Afghan government's ability to prevent insurgents and criminals from advocating and planning attacks while they are incarcerated. There have been some noteworthy results as well on the human rights front. In 2011 and 2012, the United Nations Assistance Mission-Afghanistan (UNAMA) released reports documenting systemic torture and mistreatment at Afghan detention facilities. None of the facilities run by the GDPDC were named in the reports as exhibiting signs of systematic torture or mistreatment.

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*INL's CSSP assistance is focused on building sustainable capacity within the Afghan government's GDPDC.*

CSSP has helped the Afghan government develop the capacity to train its own corrections officers to develop a professional corps of corrections officers who understand human rights issues, are able to practice proper security measures, and effectively manage prison operations. A new CSSP training effort is also focused on supporting a sustainable Afghan capacity to conduct facility maintenance and other repairs at correctional facilities, historically a major weakness for GDPDC. Finally, over 90 percent of training courses are now conducted by GDPDC with minimal CSSP assistance, and by 2014, all of GDPDC's training courses will be taught by GDPDC trainers – a significant milestone in terms of program sustainability. The training has produced some dramatic results. In 2008, for example, NST inmates controlled two large sections of Pol-i-Charkhi prison where they pressed other prisoners to join the insurgency and operated their own court and training center. A CSSP-trained Afghan Emergency Response Team (ERT) retook the insurgent-controlled areas of the prison and returned them to GDPDC control. GDPDC has since utilized this Afghan ERT capacity to quell riots and other disturbances at prisons throughout Afghanistan.

By design, CSSP is reducing its presence and decreasing the number of its American advisors in Afghanistan. In August 2011, there were over 70 CSSP advisors in Afghanistan; today there are 50 advisors with further reductions planned. The program is relying increasingly on its Afghan professional staff – a move which will decrease costs while slowly transferring program responsibilities to the Afghan government. INL has also placed a critical focus on specialized senior mentoring at GDPDC headquarters in Kabul, an effort which will help us cement the gains we have helped the Afghan government realize in its corrections system.

*INL makes an extensive effort to monitor, oversee, and evaluate CSSP, and it is continually improving these processes.*

As part of INL's oversight regime, INL requires weekly, monthly, quarterly, and annual reporting as part of the CSSP contract. INL program officers and contract specialists review regular and periodic financial reports required by the contract, including invoices; verify deliverables through frequent contact with CSSP and Afghan government officials; engage in weekly phone calls between program staff in Washington and Kabul to jointly review CSSP performance and address urgent

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policy issues; and conduct site visits to CSSP project sites and CSSP headquarters in Kabul.

With respect to monitoring and evaluation activities, INL developed and began implementing a PMP specifically for CSSP in October 2011. INL program officers and contracting representatives review weekly, monthly, and quarterly reports on an ongoing basis to ensure CSSP compliance with program objectives. INL also rewrote the CSSP statements of work on at least an annual basis since 2006 to recalibrate the program as a result of ongoing careful analysis of the program's implementation and impact.

Finally, INL's chief corrections subject matter expert either led or participated in four assessments of the Afghan corrections system between 2008 and 2011. INL is deploying three subject matter experts to Afghanistan in September 2013 to conduct another assessment with a focus on assisting the Afghan government in maintaining sustainable corrections system operations post 2014.

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**Attachment 3 – INL Technical Corrections to Draft OIG Report**

INL respectfully requests that the OIG incorporate the proposed technical corrections below into the final report.

- i. Page 2, paragraph one: INL notes that the CSSP PMP began implementation in October 2011. The PMP was formally approved in October 2012, but as INL communicated to the OIG audit team on July 18, 2013, INL began implementing the plan in October 2011. INL respectfully requests that this clarification be explained in the OIG’s report.
- ii. Page 2, paragraph 2: INL disagrees with OIG’s statement that as a result of a failure to fully implement the June 2011 USAID Sustainability Guidance “INL has no basis for determining whether CSSP is an effective program with a positive return on its \$226 investment.”

We note that this section of the Certification became law in December 2011 and INL funds subject to these requirements were only made available in March 2013 for use on the CSSP contract. INL disagrees that a failure to fully implement policy guidance that became law in 2011 resulted in INL having “no basis” to determine effectiveness for a program begun in 2006. Prior to December 2011, INL had already begun implementing the CSSP PMP, adding to robust program oversight mechanisms such as ongoing reviews of weekly, monthly, and quarterly reporting; annual revisions of statements of work; program officer site visits; and periodic assessments, among other methods described in this response.

- iii. Page 6, first paragraph under INL Program Certification: The OIG refers to the Department’s November 2012 Certification to Congress in the following sentence: “Specific to the corrections program, the certification states that to achieve sustainability, INL has implemented a train-the-trainers program...” We request that the OIG revise the previous sentence to clarify that this information was contained in the Memorandum of Justification accompanying the Certification.
- iv. Page 7, first sentence under Program Reviews Were Not Conducted: Although the CSSP PMP was not officially approved until October 2012, INL began implementing the plan in October 2011, as communicated to the OIG on July 18, 2013.

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- v. Page 8, first paragraph under Sustainment Costs and Activities Were Not Identified: The OIG references the Department's November 2012 Certification to Congress in the following sentence, "Although the certification to Congress and the *Mission Kabul Portfolio Review* identified sustainment-related activities that have been implemented for the Afghan corrections system, INL had not identified the costs or plans for [the Afghan government] to sustain CSSP." INL requests that the OIG amend the sentence above to reflect that fact that the Memorandum of Justification described the sustainment-related activities, not the Department's November 2012 Certification.
  
- vi. Page 9, first paragraph under Evaluation and Reporting Process was not Developed: The OIG states that "...INL had not completed an initial review or developed a process for quarterly evaluations and reporting prior to its certification to Congress on November 28, 2012." In fact, INL had conducted a review, specifically the aforementioned *Mission Kabul Portfolio Review*, prior to that date. Additionally, as stated previously, INL's program officers and contract officials provided continuous monitoring of CSSP, including weekly, monthly, and quarterly reviews of contractor reporting. These ongoing reviews were supplemented by site visits to Afghan correctional facilities conducted by Embassy Kabul's corrections subject matter experts. These site visits, which occurred on at least a monthly basis, allowed INL program officers to directly observe CSSP activities and CSSP's engagement with Afghan prison staff.

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**(U) Office of Inspector General Replies to Bureau of International Narcotics and Law Enforcement Affairs Technical Comments**

(U) In its August 20, 2013, response to the draft report on the Corrections System Support Program (CSSP) (see Appendix B), the Bureau of International Narcotics and Law Enforcement Affairs (INL) provided technical comments that did not relate directly to the recommendations. As appropriate, the Office of Inspector General (OIG) incorporated those technical comments that it could validate into the report. INL's principal comments and OIG's replies are as presented.

**(U) Performance Management Plan**

***(U) INL Comments (page 2, paragraph 1)***

(U) "INL notes that the CSSP [performance management plan] began implementation in October 2011. The [performance management plan] was formally approved in October 2012, but as INL communicated to the OIG audit team on July 18, 2013, INL began implementing the plan in October 2011. INL respectfully requests that this clarification be explained in the OIG's report."

***(U) INL Comments (page 8, paragraph 1)***

(U) "Although the CSSP [performance management plan] was not officially approved until October 2012, INL began implementing the plan in October 2011, as communicated to the OIG on July 18, 2013."

***(U) OIG Reply***

(U) OIG revised the report based on the comments. OIG disagrees with INL's statement that it began "implementing" the CSSP performance management plan in October 2011. In September 2012, INL officials told OIG that they were in the "first step" to creating a usable performance management plan for CSSP and that the plan dated October 2011 was only a draft and should not be evaluated. However, to clarify the actions taken by INL concerning the performance management plan, OIG added a footnote, stating that "INL began developing the CSSP performance management plan in 2011 with the first draft dated October 2011; the final performance management plan was approved and issued in October 2012."

**(U) U.S. Agency for International Development Sustainability Guidance**

***(U) INL Comments (page 1, paragraph 3)***

(U) "INL disagrees with OIG's statement that as a result of a failure to fully implement the June 2011 [U.S. Agency for International Development (USAID)] Sustainability Guidance

‘INL has no basis for determining whether CSSP is an effective program with a positive return on its \$226 [million] investment.’ We note that this section of the Certification became law in December 2011 and INL funds subject to these requirements were only made available in March 2013 for use on the CSSP contract. INL disagrees that a failure to fully implement policy guidance that became law in 2011 resulted in INL having ‘no basis’ to determine effectiveness for a program begun in 2006. Prior to December 2011, INL had already begun implementing the CSSP [performance management plan], adding to robust program oversight mechanisms such as ongoing reviews of weekly, monthly, and quarterly reporting; annual revisions of statements of work; program officer site visits; and periodic assessments, among other methods described in this response.”

***(U) OIG Reply***

(U) OIG did not revise the report based on the comment. OIG did not state that the reason the Department’s \$226 million investment is at risk is because INL did not fully implement the USAID sustainability guidance. OIG cited the Department’s lack of clear, comprehensive, and mandatory guidance for INL having “no basis” for determining whether CSSP is an effective program with a positive return on investment. Had a performance management plan been developed and had periodic program effectiveness reviews been conducted, INL may have been prepared to meet the June 2011 USAID sustainability guidance and therefore the Consolidated Appropriations Act of 2012 requirements. OIG maintains the position that if GIRoA is unable to sustain the corrections system, the Department’s \$226 million investment in the Afghanistan corrections system is at risk.

(U) At current Government of the Islamic Republic of Afghanistan (GIRoA) funding levels, and without international support, the number of courses the GDPDC trainers can teach and improvements in prison management become less relevant if the GDPDC cannot retain its staff. According to the GDPDC Director, there is a 33 percent attrition rate among the officers, many of whom cited salary concerns as the primary reason for leaving the GDPDC. The Director also stated that the officers’ counterparts in the national police receive a higher salary and that additional staff will likely leave to seek jobs with more reliable salaries if international funding for the corrections system is reduced and if GIRoA is unable to sustain the GDPDC budget, which is currently the case.

(U) OIG disagrees with INL’s statement that it began “implementing” the CSSP performance management plan in October 2011. In September 2012, INL officials told OIG that they were in the “first step” to creating a usable performance management plan for CSSP and that the plan dated October 2011 was only a draft and should not be evaluated. Further, the “robust program oversight mechanisms” that INL cites in its technical response pertains to oversight of the contractor and not oversight of the CSSP.

***(U) INL Comments (page 10, paragraph 1)***

(U) “The OIG states that ‘...INL had not completed an initial review or developed a process for quarterly evaluations and reporting prior to its certification to Congress on November

28, 2012.’ In fact, INL had conducted a review, specifically the aforementioned *Mission Kabul Portfolio Review*, prior to that date. Additionally, as stated previously, INL’s program officers and contract officials provided continuous monitoring of CSSP, including weekly, monthly, and quarterly reviews of contractor reporting. These ongoing reviews were supplemented by site visits to Afghan correctional facilities conducted by Embassy Kabul’s corrections subject matter experts. These site visits, which occurred on at least a monthly basis, allowed INL program officers to directly observe CSSP activities and CSSP’s engagement with Afghan prison staff.”

**(U) OIG Reply**

(U) OIG did not revise the report based on the comment. As OIG states in the report, the *Mission Kabul Portfolio Review* did not fully meet USAID sustainability guidance requirements. Further, as OIG also stated in the report, INL acknowledged it had “voluminous” contractor provided data but had not used it to determine CSSP progress, results, or effectiveness.

**(U) Congressional Certification Memorandum of Justification**

**(U) INL Comments (page 7, paragraph 3)**

(U) “The OIG refers to the Department’s November 2012 Certification to Congress in the following sentence: ‘Specific to the corrections program, the certification states that to achieve sustainability, INL has implemented a train-the-trainers program....’ We request that the OIG revise the previous sentence to clarify that this information was contained in the Memorandum of Justification accompanying the Certification.”

**(U) INL Comments (page 9, paragraph 1)**

(U) “The OIG references the Department’s November 2012 Certification to Congress in the following sentence, ‘Although the certification to Congress and the *Mission Kabul Portfolio Review* identified sustainment-related activities that have been implemented for the Afghan corrections system, INL had not identified the costs or plans for [the Afghan government] to sustain CSSP.’ INL requests that the OIG amend the sentence above to reflect that fact that the Memorandum of Justification described the sustainment-related activities, not the Department’s November 2012 Certification.”

**(U) OIG Reply**

(U) OIG revised the report based on the comments to clarify that the information was contained in the Memorandum of Justification accompanying the certification to Congress and not the certification itself.

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