

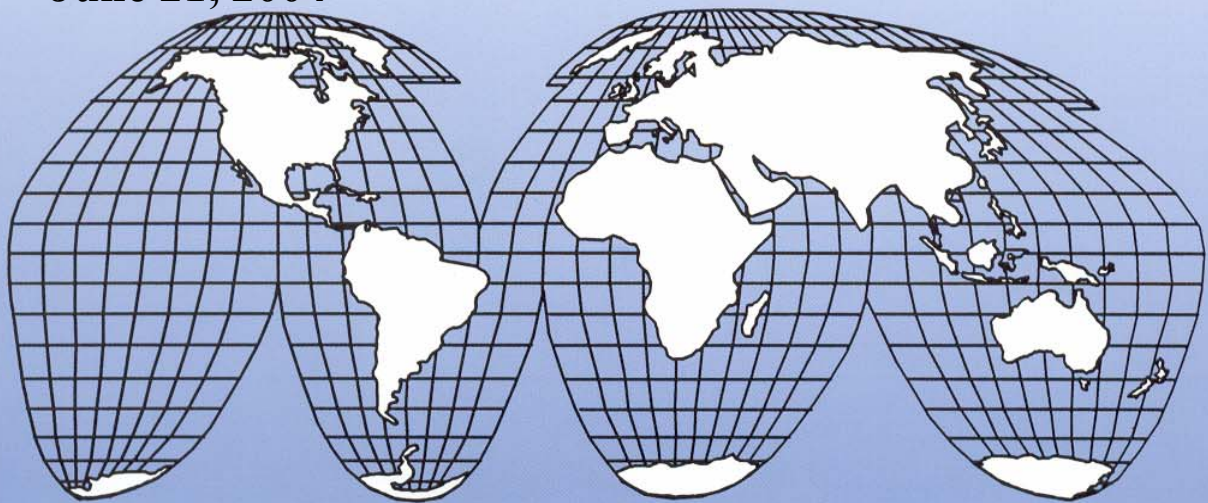
USAID

OFFICE OF INSPECTOR GENERAL

Audit of Benefits to Individuals and Organizations by USAID/Colombia Under Its Human Rights Protection Program

Audit Report No. 1-514-04-008-P

June 21, 2004



San Salvador, El Salvador



June 21, 2004

MEMORANDUM

FOR: USAID/Colombia Director, J. Michael Deal

FROM: RIG/San Salvador, Steven H. Bernstein “/s/”

SUBJECT: Audit of Benefits to Individuals and Organizations by USAID/Colombia Under Its Human Rights Protection Program (Report No. 1-514-04-008-P)

This memorandum transmits our report on the subject audit. In finalizing this report, we considered your comments on our draft report and have included your response in Appendix II.

The report includes five recommendations for your action as follows: improve record-keeping; more clearly define approved purposes for cash, cell phones, and radios; develop procedures on conducting periodic reviews; maintain files on rejected applicants; and provide more accurate and consistent protection program information. Based on your comments, management decisions have been reached for all five recommendations. A determination of final action will be made by the Bureau for Management’s Office of Management Planning and Innovation (M/MPI/MIC).

Once again, thank you for the cooperation and courtesy extended to my staff throughout the audit.

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Summary of Results

As part of its fiscal year 2004 audit plan, the Regional Inspector General/San Salvador performed this audit to determine if 1) the Government of Colombia (GOC) followed approved criteria and procedures when providing benefits under its human rights protection program and 2) beneficiaries of the protection program used the awards received for approved purposes (page 6).

We were not able to fully answer the first objective. The GOC followed approved criteria and procedures for selecting offices to be armored; however, for other types of benefits, we were unable to determine if they were given properly. The GOC did not keep organized records for each beneficiary. Therefore, we were unable to review documentation needed to demonstrate whether the GOC was following selection criteria and procedures when providing benefits under its human rights protection program (page 7).

We were unable to fully answer the second audit objective either. Although we verified that the offices were armored as approved, we could not determine if the other awards were used for approved purposes. The GOC's Ministry of Interior and Justice could not provide the information needed to contact the beneficiaries. Therefore, we could not state positively that all the awards received were being used for the intended purposes (page 8). Based on the information provided, however, the following problem areas came to our attention:

- 1) approved uses for cash, cell phones, and radios were not clearly documented (page 9); and
- 2) procedures for conducting periodic reviews of each protection measure were not clearly defined (page 11).

Two other issues, which were not directly related to the audit objectives, were identified. First, records were not kept on rejected applicants. Second, protection program data were inaccurate and inconsistent (page 12-14).

We made five recommendations as follows: improve record-keeping; more clearly define approved purposes for cash, cell phones, and radios; develop procedures on conducting periodic reviews; maintain files on rejected applicants; and provide more accurate and consistent protection program information (pages 8-14).

USAID/Colombia agreed with the findings and recommendations presented in this report. Accordingly, management decisions were made for the recommendations (page 17).

Background

USAID/Colombia's fiscal year 2000-2005 strategic plan established the objective to "promote more responsive, participatory, and accountable democracy," which included human rights activities. The human rights program responded to a severe human rights crisis in Colombia manifest in political killings, kidnappings, and massacres. One of the three main components under USAID/Colombia's human rights program was to provide protection to individuals and groups under threat for their political beliefs, human rights activities, or membership in an ethnic minority. This component was designed to strengthen and expand an existing protection program in the Government of Colombia's Ministry of Interior and Justice (MOIJ). The program provided protection to threatened individuals in the form of "hard protection" (i.e., bullet-proof vests, metal detectors, vehicles, and armoring of offices) and/or "soft protection" (i.e., economic assistance, national relocation, cellular phones, radios, and international relocation).

The Government of Colombia created the protection program in mid-1997. The assistance area of the human rights program has been administered by the Human Rights Office within the MOIJ. In particular, a Risk Regulation and Evaluation Committee, comprised of key Colombian officials, evaluated protection program applicants, analyzed risk assessments and threat levels, and recommended the type of benefit that should be given.

USAID/Colombia's primary role in the protection program has been to provide the financial assistance to strengthen the protection program by funding awards approved by the evaluation committee. USAID/Colombia has also provided technical assistance aimed at strengthening the operation of the program. Its involvement in the process has been minimal with regard to the approval, processing, and monitoring of benefits. An agreement between USAID and the MOIJ implied that USAID was not to have direct contact with the beneficiaries.

USAID/Colombia contracted with Management Sciences for Development to manage the human rights program beginning in March 27, 2001 until March 26, 2006. Through December 31, 2003, approximately \$5 million had been disbursed from USAID/Colombia's total protection program budget of about \$11 million. In general, the Mission contributed about 16 percent of the total protection program budget, with the rest of the funds coming from the Government of Colombia. As of December 31, 2003, USAID/Colombia reportedly provided 5,945 protection measures to a total of 3,293 beneficiaries and armored 77 offices.

As part of its fiscal year 2004 audit plan, the Regional Inspector General/San Salvador performed this audit to answer the following questions:

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- Did the Government of Colombia follow approved criteria and procedures when providing benefits under its human rights protection program?
 - Did beneficiaries of USAID/Colombia’s human rights protection program use the awards received for approved purposes?

The audit scope and methodology are presented in Appendix I.

Audit Findings

Did the Government of Colombia follow approved criteria and procedures when providing benefits under its human rights protection program?

We were not able to answer this objective because the Government of Colombia was unable to provide us with the documentation needed to demonstrate that criteria and procedures were followed, except in the case of armored offices. For all 10 of the armored offices we reviewed (selected from a population of 77 offices protected), the Government of Colombia followed approved criteria and procedures. Documents revealed that risk assessments were performed, each component on an itemized list was installed, contracts between USAID and the offices were signed, and approval was authorized from the evaluation committee. Although we were unable to determine if criteria and procedures were followed for other benefits, we were able to report that record-keeping was inadequate.

Record-Keeping Was Inadequate

Colombian law and decrees established three general criteria for entry into the protection program. Each beneficiary must 1) belong to a protected group, 2) have a risk assessment to verify the threat level, and 3) hold a position that is linked to the threat. Qualified applicants that met these three general criteria were approved by the Risk Regulation and Evaluation Committee, which was comprised of key Colombian officials. The committee recorded the approval of cases by signing “actas”, or meeting minutes.

Inadequate record-keeping became apparent when we attempted to review the basis for the committee’s approval as documented in the meeting minutes. MOIJ officials explained that some of the documentation had been misplaced due to poor record-keeping. They acknowledged that files were not well organized as each file contained different types of documents and that the documents were not filed in a uniform order. Furthermore, information on individual beneficiaries could be found in separate file cabinets throughout the office. Several files were missing important documents while others contained unnecessary documents. Despite assistance from MOIJ officials, it was difficult to determine, by looking at the file, what was unintentionally missing and what was missing for a valid reason. For example, in reviewing documentation for 90 cases (excluding the 10 armored offices) with the assistance of MOIJ officials, nine cases did not contain

evidence that the beneficiary belonged to a protected group. Thirty-eight cases were missing the risk assessments. Also, the files often contained information regarding more than one protection measure, making it difficult to determine which document belonged to which case.

USAID/Colombia officials stated that supporting documentation existed but had been misplaced and expressed confidence in the selection process. Therefore, USAID officials attributed inadequate record-keeping for the absence of evidence that the three requirements above have been met.

The U.S. General Accounting Office's Standards for Internal Control in the Federal Government, November 1999, states that "all transactions and other significant events need to be clearly documented, and the documentation should be readily available for examination.... All documentation and records should be properly managed and maintained." The MOIJ's procedures manual also defined the required documentation that must be maintained by the program.

The MOIJ has acknowledged deficiencies in this area and requested assistance in establishing an advanced information management system. This system is a key part of the MOIJ's ongoing plan to reorganize and improve the way documentation is stored and accessed. The system was to become a basic support tool to handle documents, to manage and process requests, and to implement and monitor measures. It included a specific unit for the "file system" to enable the systematization of information to support timely and transparent decision-making. Although the system was accepted on May 31, 2003, the process of migrating historical data will last until October 2004.

Important records should be readily accessible so that the basis for approving an applicant is transparent and so that periodic reviews may be performed. Incomplete beneficiary records may lead to unnecessary delays, incorrect decision-making, and difficulties in reviewing cases. It can also be an indicator for the possibility of fraud.

Recommendation No. 1: We recommend that USAID/Colombia require the Ministry of Interior and Justice to systematically file documentation to justify the proper selection of beneficiaries for entry into the human rights protection program.

Did beneficiaries of USAID/Colombia's human rights protection program use the awards received for approved purposes?

Except for the case of armored offices, we were not able to answer this objective because the MOIJ was unable to provide us with the phone numbers of beneficiaries—information that was essential for us to render a professional opinion. Nevertheless, phone numbers were not needed to verify that all 10 offices tested, out of 77 offices in total, were properly armored. We visited four

of the 10 offices to ascertain the existence of each item that was installed to protect the office. For all 10 offices, our review of the documentation, including before and after pictures, concluded that they were armored as approved by the evaluation committee. Armoring an office may consist of installing steel doors, shatter-proof windows, and security cameras.

We could not contact approximately 50 percent of the beneficiaries as phone numbers for them were not readily available in the MOIJ office. According to MOIJ officials, to acquire some of the missing numbers, the MOIJ would have to refer to other sources (such as community leaders, employers, and other agencies).

Furthermore, over 75 percent of the calls we made resulted in three possibilities: the call was not answered, the beneficiary was unavailable, or the number provided was incorrect. As a result, we spoke to 23 of the 144 beneficiaries we attempted to reach¹. Therefore, we could not confirm with beneficiaries that awards were being used for their intended purposes, except in the case of armored offices.

The phone call limitation did not preclude us from reporting on two problem areas that came to our attention. These problems were that approved purposes were not clearly documented for cash, cell phones, and radios, and procedures on conducting periodic reviews for each protection measure were unclear.

Approved Purposes Were Not Clearly Documented for Cash, Cell Phones, and Radios

The protection program did not have clearly documented, approved purposes for cash, cell phones, and radios. Neither the MOIJ, Management Sciences for Development, nor USAID/Colombia had fully developed written guidance outlining the approved purposes for these protection measures.

Automated Directives System (ADS) 200.3.2.1 states that “managing for results means that we seek to define and organize our work around the end result we seek to accomplish. This means making intended results explicit; ensuring agreement among partners, customers, and stakeholders that proposed results are worthwhile; and organizing our day-to-day work and interactions to achieve results as effectively as possible.”

The need to document the program’s approved purposes for cash, radios, and cell phones was overlooked by program officials because they felt that the existing

¹ Even though we could not contact many beneficiaries, we did note that there were controls in place to ensure that awards were given to the selected beneficiary. The beneficiary had to provide identification and sign a statement prior to receiving cash, phones, radios, bulletproof vests, or metal detectors. Furthermore, records from the phone and radio companies and the travel agency were available to demonstrate that the awards were being used.

documentation was already adequate. Nevertheless, USAID/Colombia agreed that stating the purposes for and the definition of each protection measure more clearly would be helpful.

According to USAID/Colombia and Management Sciences for Development officials, the following paragraphs describe the implied purposes of cash, cell phones, and radios provided under the program. The implied purposes, considered to be approved purposes by program personnel, were compared against the purposes that were described in MOIJ's draft regulation document.²

The implied purpose for cash was to provide economic assistance to those who had to leave their homes to be protected. The cash awards were intended for lodging, food, transportation, utilities, and other necessities associated with relocation. The draft regulation document only mentioned that cash was provided for emergency relocation purposes. It did not identify what types of expenses were acceptable or unacceptable.

The implied purpose for cell phones and radios was to allow the beneficiary to contact others for immediate assistance to protect the beneficiary's life. As a preventative mechanism, cell phones and radios guaranteed safe communication between beneficiaries and their homes, offices, and colleagues. Personal use was expected and deemed to be acceptable. However, the draft regulation document stated that they were to be used exclusively to contact state entities participating in the protection program (such as the police and the network of the protected group).

As stated above, acceptable uses for cash were not documented. In addition, opinions differed on how much, if any, personal use should be allowed for cell phone and radio beneficiaries. Without clearly documenting the defined purposes for each protection measure, the possibility of improper or ineffective usage of cash, cell phones, or radios increased. Beneficiaries may be inadvertently using these awards improperly.

Recommendation No. 2: We recommend that USAID/Colombia require the Ministry of Interior and Justice to document the approved purposes for beneficiaries receiving cash, cell phones, and radios.

² The draft regulation was the "Proyecto de Reglamentación" document dated November 2003, which is to be finalized by the end of 2004. Its purpose was to develop and regulate the Human Rights Protection Program.

Procedures on Conducting Periodic Reviews Were Unclear

There was no written guidance that defined how periodic reviews would be conducted for each protection measure. As each measure was different, the approach taken and the frequency of reviews needed to be different. It is not sufficient to report how many protection measures were delivered when there may be insufficient follow-up done to determine whether these measures were useful or effective. In the absence of clearly defined periodic review procedures for each protection measure, some of the following scenarios could exist:

- The beneficiary could give the protection measure to someone else (in the case of cash, phones, radios, vests, and metal detectors).
- The beneficiary may not be using the benefit enough, if at all (in the case of vests, metal detectors, armored offices, and vehicles).
- The beneficiary could be using the benefit for unintended purposes (in the case of cash, phones, radios, and vehicles).
- The beneficiary could no longer need the protection measure (in the case of cash, phones, radios, vests, metal detectors, and vehicles).

Despite the lack of clear guidance, the MOIJ performed some limited follow-up of some protection measures during 2003 including the following:

- Cell phones and radios – The MOIJ attempted to verify that phones and radios were being answered by the approved beneficiary as evidenced by calling logs. In 2003, the MOIJ called about 70 to 80 percent of the beneficiaries, and if no answer was received after three attempts on different days, the service was disconnected. The purpose of the calls was to verify that the beneficiary had the phone or radio. USAID officials also explained that the MOIJ also required phone and radio providers to produce a report on equipment that was not being used. Service for those on this list was disconnected.
- Bullet-proof Vests – The MOIJ informed us that they followed-up on the use of vests during meetings with beneficiaries. In addition, self-protection courses reinforced the need to use protection measures such as the vest.
- Armoring of Offices – The MOIJ stated that follow-up was done on armored offices only when the office reported a problem.

USAID/Colombia officials believed that these actions were sufficient. They believed that the protection measures were effective because the level of threats have diminished, and there have only been nine reported deaths out of over 3,000

individuals protected. However, the Mission agreed that details on conducting periodic reviews should be documented.

While it may not be cost effective to review all beneficiaries, up-front controls could be designed to mitigate the risks that these benefits could be misused, and it may be reasonable to test a sample of beneficiaries. In addition, while it may not be cost effective to review the usage of cash, airline tickets, and armored offices, it may be reasonable to review the usage and effectiveness of the other protection measures. While it was easy to review armored offices in Bogota, most of the other offices were located further away in less secure areas of the country.

According to the MOIJ's draft regulation document, the MOIJ was responsible for reviewing each case at least every six months. The Government of Colombia's Law 782, which became effective in December 2002, stated that cases must be reviewed "periodically." In addition to the program's requirements for periodic reviews, ADS 202.3.6.2, states that "use of customer feedback is essential. Strategic Objective Teams should develop mechanisms to ensure that partners share the Agency's commitment to customer focus and that an effective feedback loop exists to bring customer information into management decisions." In order to conduct periodic reviews on a consistent basis, the program must define when and how they are to be performed.

Recommendation No. 3: We recommend that USAID/Colombia require the Ministry of Interior and Justice to (a) clearly define when and how periodic reviews should be performed for each protection measure and (b) develop a system to ensure that this periodic review takes place.

Other Matters

Two matters that were not directly related to the audit objectives, but were significant enough to be reported, were that files on rejected applicants were not maintained and protection program data were inconsistent and inaccurate.

Files on Rejected Applicants Were Not Maintained

The Ministry of Interior and Justice (MOIJ) did not maintain files on applications that were rejected before being reviewed by the evaluation committee. MOIJ officials explained that there was no formal procedure for documenting reasons for rejecting applicants, but that in these cases, a rejection letter was sent. Management Sciences for Development later added that those rejection letters were registered in the MOIJ's physical files; however, due to weaknesses in record-keeping, they were not readily accessible. Most rejections resulted from the beneficiary not belonging in one of the approved protection classes.

As stated on page 8, the General Accounting Office’s Internal Controls Standards states that all significant events need to be clearly documented, and the documentation should be readily available for examination. It is important to maintain these records so that the decision to reject an applicant can be reviewed and independently verified. Without information on rejected applicants, it is not possible to determine whether qualified applicants have been incorrectly rejected without sufficient cause. As a result, an applicant’s life may be at risk after being incorrectly denied a protection measure.

Recommendation No. 4: We recommend that USAID/Colombia require the Ministry of Interior and Justice to maintain documentation on the basis for rejecting each applicant.

Protection Program Data Were Inaccurate and Inconsistent

The MOIJ and Management Sciences for Development (MSD) each had their own database to manage cases and keep track of approved beneficiaries and awards. MSD also reported protection measures and approved beneficiaries to USAID/Colombia via a weekly report. However, the numbers of protection measures and beneficiaries reported by each of the three organizations were different, partly due to the fact that different criteria was used for counting beneficiaries and protection measures. The measures (not including metal detectors and vests) reported by the three sources in calendar year 2003 were as follows:

Table 1 – Protection Measures as Reported by Each Source	
Source	No. of Protection Measures
MOIJ Database	1,768
MSD Database	1,539
USAID Weekly Report	1,577

While reviewing the differences noted in Table 1, MSD discovered that each source of data was missing approved protection measures. The MSD database contained beneficiaries that the MOIJ database did not have and vice versa. Therefore, the true numbers of beneficiaries and protection measures provided by the program were understated.

Furthermore, the dates for inclusion used in each of the three sources were inconsistent. For example, the USAID weekly report recorded hard benefits (vehicles, metal detectors and bullet-proof vests) based on the date of delivery to the MOIJ while soft benefits were based on the date of delivery to the beneficiary. The date that the MOIJ actually delivered the benefit to the beneficiary could have been several months later. Another example was that the MOIJ database recorded cash and airline tickets based on the date requests were sent to MSD,

while other protection measures were recorded based on the dates that benefits were actually delivered to the beneficiary.

According to MSD's contract with USAID, MSD must measure through appropriate indicators the achievement of results. ADS 203.3.5.3 further explains that USAID should "review data collection, maintenance, and processing procedures to ensure that the procedures are consistently applied and continue to be adequate." ADS 202.3.6 adds that "monitoring the quality and timeliness of outputs produced by implementing partners is a major task.... Problems in output quality provide an early warning that results may not be achieved as planned."

According to a MOIJ official, the three sources of information had different criteria for inclusion. Therefore, there was a logical explanation for some of the differences reported above. Although the MOIJ and MSD knew that the information would not be equal, they did not recognize that all three sources of information were incomplete. With the exception of international airline tickets, vehicles, and armored offices, USAID/Colombia did not verify the accuracy of the numbers of protection measures and beneficiaries reported by MSD because it relied on MSD to report correct numbers.

According to a MSD official, the MOIJ and MSD were in the process of reconciling the three sources. Afterwards, they intended to update all three sources of information and distinguish measures approved by the MOIJ, measures submitted by the MOIJ to MSD, and measures effectively delivered. They further planned to design processes and procedures to improve the reporting of information.

Recommendation No. 5: We recommend that USAID/Colombia (a) establish a procedure to verify the accuracy of all protection program data provided by Management Sciences for Development and (b) request that Management Sciences for Development and the Ministry of Interior and Justice reconcile their databases and develop a process to ensure that their reported data continues to be accurate and consistent.

**Management
Comments
and Our
Evaluation**

USAID/Colombia agreed with the findings and recommendations presented in this report. Accordingly, management decisions were made for the recommendations. The Mission's comments are included in their entirety in Appendix II. Determination of final actions will be made by the Bureau for Management's Office of Management Planning and Innovation (M/MPI/MIC).

**Scope and
Methodology****Scope**

We audited the process of selecting beneficiaries and the use of benefits provided to individuals and organizations by USAID/Colombia under its human rights protection program in accordance with generally accepted government auditing standards. However, the Ministry of Interior and Justice (MOIJ) was unable to provide us with the documentation required to review beneficiary files and the correct phone numbers of the beneficiaries. Both of these were essential for us to answer our audit objectives. Regarding the armoring of offices, the documentation was available. Nonetheless, we were unable to fully answer either audit objective. The MOIJ's inability to provide us with the documentation on other applicants and its inability to provide phone numbers within a reasonable time constituted limitations on the scope of the audit.

Without receiving documentation on the applicants, we could not determine if the MOIJ followed approved criteria and procedures when providing benefits under the protection program. Similarly, without speaking to the beneficiaries, we could not determine if the awards received by the beneficiaries were being used for their intended purposes. While we could not render a positive conclusion, the scope limitations did not preclude us from reporting on problem areas that came to our attention.

We assessed risk exposure and tested management controls at USAID/Colombia, Management Sciences for Development, and the MOIJ to ensure that benefits were being provided and used in accordance with the established criteria. Some specific management controls tested included the following:

- A travel agency report ensured that beneficiary names and destinations were clearly identified.
- Forms signed by beneficiaries demonstrated that a live person received the awarded radio, cell phone, or bulletproof vest.
- Files containing applications, letters, and other correspondence related to protection program selection demonstrated that the files were incomplete and unorganized.
- Actas, or meeting minutes, ensured that the selection committee agreed to assist the beneficiary.

The audit was conducted at the offices of USAID/Colombia, the MOIJ, Management Sciences for Development, and at four armored offices throughout Bogotá from January 13 to February 12, 2004. Additional analysis, follow-up, and review were conducted at RIG/San Salvador until May 10, 2004.

Our audit covered protection program benefits approved during calendar year 2003, during which time the protection program disbursed \$1,734,000. We reviewed only the hard and soft benefits provided under the protection program. All protection measures were covered except vehicles, since none were purchased during 2003. Other aspects of the protection program -- such as training, support to the MOIJ, and construction of a radio communications network -- were not covered by our audit.

Methodology

To answer the first objective, we reviewed agreements and other documents between and within USAID/Colombia, Management Sciences for Development, and the MOIJ to ascertain the criteria and procedures being followed in providing benefits under the protection program. Such documents included applicable Colombian laws, resolutions, regulations, and Management Sciences for Development's quarterly reports. We also reviewed available documentation of all the selected beneficiaries. We interviewed officials from USAID/Colombia, Management Sciences for Development, and the MOIJ to clarify our understanding of the documentation reviewed and to inquire about issues that were not specified in the documentation.

We selected a statistical sample of 81 out of 2,043 cases (including 77 cases of armored offices) during calendar year 2003 from the MOIJ database, using a 95 percent confidence level with a 4% precision rate. We selected 19 more cases for additional representation of the selected sample in order to ensure that all types of awards were reviewed adequately. In total, we reviewed the available documentation on 100 cases, including 10 armored offices.

To answer the second objective, we interviewed program officials and reviewed documentation to determine the approved and implied purpose for each award. We attempted to contact the beneficiaries to inquire about how benefits were actually used. According to an agreement between USAID/Colombia and the Government of Colombia, beneficiaries were to interact exclusively with the MOIJ due to the sensitive nature of the program. Therefore, we agreed to make calls in conjunction with a MOIJ representative using the speakerphone function. As stated above, our audit scope was limited, as we were unable to obtain the correct phone numbers for all the selected beneficiaries. We also inquired about efforts made to periodically review case files to ensure that benefits were still being used. Lack of documentation limited the steps we could take to answer the objective.

We used the same 100 cases selected from objective one for objective two; however, due to the unavailability of the phone numbers, we attempted to contact any beneficiary that the MOIJ could provide numbers for, including those outside of the sample. We contacted 23 out of 144 beneficiaries before concluding that further attempts would not be worthwhile.

**Management
Comments**

June 10, 2004

Mr. Steven H. Bernstein
USAID Regional Inspector General
San Salvador
FAX No. (503) 228-5459

Dear Steve:

The Mission has reviewed the draft Audit of Benefits to Individuals and Organizations by USAID/Colombia Under Its Human Rights Protection Program (Report No. 1-514-04-XXX-P). We concur with the Recommendations of the Audit. We will share the audit recommendations and ask the Ministry of Interior and Justice to improve its record keeping for the program; clearly define the approved purposes for cash and other program benefits; develop procedures for periodic program reviews; maintain files on rejected applicants; and provide more accurate and consistent protection program information. To implement Recommendation No. 5, the Mission will review with Management Sciences for Development and the Ministry the different criteria used for reporting and develop uniform criteria to be used for reporting by the three organizations. The Mission will also ask Management Sciences for Development to reconcile the current data bases so that they are consistent.

We believe these actions will resolve the concerns raised by the Audit.

Yours truly,

Michael Deal
Director