GAO

United States Government Accountability Office

Report to Congressional Committees

December 2018

HUMAN TRAFFICKING

State and USAID Should Improve Their Monitoring of International Counter-trafficking Projects

Accessible Version

HUMAN TRAFFICKING

State and USAID Should Improve Their Monitoring of International Counter-trafficking Projects

Why GAO Did This Study

Human trafficking is a pervasive problem throughout the world. Victims are often held against their will in slave-like conditions.

The National Defense Authorization Act for Fiscal Year 2017 includes a provision for GAO to report on the programs conducted by specific agencies, including State, DOL, and USAID, that address trafficking in persons. Among other objectives, this report (1) identifies the recent projects in international counter-trafficking in persons that key U.S. agencies have awarded to implementing partners; and, for selected projects, assesses the extent to which key agencies have (2) documented their monitoring activities and (3) ensured the reliability of project performance information.

GAO reviewed State, DOL, and USAID project documents and interviewed agency officials. GAO reviewed monitoring documents for 54 of the 57 projects that were active from the beginning of fiscal year 2016 through the end of fiscal year 2017. Of these 54 projects, GAO selected a nongeneralizable sample of 5 projects, based primarily on largest total award amounts, for review of the reliability of project performance information.

What GAO Recommends

GAO is making four recommendations to State and one recommendation to USAID, including that both agencies establish additional controls to improve the consistency and completeness of project performance information, and that State maintain monitoring activity documentation and establish targets for each performance indicator. State and USAID concur with GAO's recommendations.

View GAO-19-77. For more information, contact Jennifer Grover at (202) 512-7141 or groverj@gao.gov.

What GAO Found

The Departments of State (State), Labor (DOL), and the U.S. Agency for International Development (USAID)—through agreements with implementing partners—managed 120 international counter-trafficking in person projects during fiscal year 2017.

GAO reviewed a selection of 54 counter-trafficking projects (37 State, 3 DOL, and 14 USAID), and found that DOL and USAID had fully documented their monitoring activities, while State had not. All three agencies used similar tools to monitor the performance of their projects, such as monitoring plans, performance indicators and targets, progress reports, and site visits. GAO found, however, that State did not fully document its monitoring activities for 16 of its 37 projects (43 percent). GAO found that State did not have the monitoring plans or complete progress reports for one-third of its projects and often lacked targets for performance indicators in its final progress reports. State officials said they had not required targets for each performance indicator for the projects GAO reviewed, or had not set targets due to limited resources in prior years. State has taken steps to improve its monitoring efforts, including issuing a November 2017 policy that requires targets to be set for each performance indicator and developing an automated data system that would require targets to be recorded. However, because the pilot data system allows targets to be recorded as "to be determined" and does not have controls to ensure entry of actual targets, it is uncertain whether performance targets will be regularly recorded. Without full documentation of monitoring activities and established performance targets, State has limited ability to assess project performance, including project efficiency or effectiveness.

GAO reviewed the reliability of project performance information for 5 of the 54 counter-trafficking projects (2 State, 1 DOL, and 2 USAID) and found that State and USAID used inconsistent and incomplete performance information, while DOL used consistent and complete information. For example, some quarterly indicator results in State and USAID progress reports were inconsistent with annual total results, and narrative explanations for significant deviations from performance targets were sometimes not present in quarterly reports. According to agency officials, performance information from these projects is regularly used not only for direct project oversight but also for internal and external reporting, program decisions, and lessons learned. GAO found that State's and USAID's processes lack sufficient controls to ensure the reliability of project performance information, but did not find inadequate controls in DOL's process. For example, neither State nor USAID consistently used automated checks on indicator results to ensure consistency and completeness of performance indicator result calculations. In contrast, DOL used automated checks as part of its process. Without implementing controls to ensure that performance information is consistent and complete, State and USAID officials cannot fully or accurately understand what projects are, or are not, achieving, and how their efforts might be improved.

_____ **United States Government Accountability Office**

Contents

Tables

Figure

Abbreviations

ADS	Automated Directives System
CPI	common performance indicators
DIS	Development Information Solution
DOD	Department of Defense
DOL	Department of Labor
DRG Center	Center of Excellence on Democracy, Human Rights and Governance
DRL	Bureau of Democracy, Human Rights, and Labor
FAPD	Federal Assistance Policy Directive
FinCEN	Financial Crimes Enforcement Network
GPD-42	Grants Policy Directive Number 42
ILAB	Bureau of International Labor Affairs
MPG	Management Procedures and Guidelines

OCFT	Office of Child Labor, Forced Labor, and Human Trafficking
OFAC	Office of Foreign Assets Control
PITF	President's Interagency Task Force to Monitor and Combat Trafficking in Persons
SAMS-D	State Assistance Management System - Domestic
State	Department of State
TFFC	Office of Terrorist Financing and Financial Crimes
TFI	Office of Terrorism and Financial Intelligence
TIP Office	Office to Monitor and Combat Trafficking in Persons
Treasury	Department of the Treasury
USAID	United States Agency for International Development

December 4, 2018

Congressional Committees

Trafficking in persons, or human trafficking, is a longstanding and pervasive problem throughout the world, as traffickers buy, sell, and transport victims across national boundaries.[1] Victims are often held against their will in slave-like conditions or forced to work in the commercial sex trade, garment factories, fishing boats, agriculture, domestic service, and other types of servitude. In addition to inflicting grave damage upon its victims, trafficking in persons is a multi-billion dollar industry that undermines government authority, distorts markets, fuels organized criminal groups and gangs, enriches transnational criminals and terrorists, and imposes social and public health costs. The Department of State (State) noted in its June 2018 Trafficking in Persons Report that terrorist organizations also use trafficking in persons to recruit adherents and finance their operations.[2] Congress enacted the Trafficking Victims Protection Act of 2000 to combat trafficking in persons,[3] and has reauthorized this act four times.[4] The act, as amended, defines severe forms of trafficking in persons as (1) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act is under age 18; or (2) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion, for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.[5] According to the International Labor Organization, in 2016, there were an

---

[1]The terms "human trafficking" and "trafficking in persons" are often used interchangeably. In this report, we use the term "trafficking in persons," as referred to in U.S. law, except where source documents use the term "human trafficking."

[2]U.S. Department of State, *Trafficking in Persons Report* (June 2018).

[3]Enacted as Division A of the Victims of Trafficking and Violence Protection Act of 2000. Pub. L. No. 106-386, Div. A, 114 Stat. 1464, 1466-91.

[4]Trafficking Victims Protection Reauthorization Act of 2003, Pub. L. No. 108-193, 117 Stat. 2875; Trafficking Victims Protection Reauthorization Act of 2005, Pub. L. No. 109-164, 119 Stat. 3558 (Jan. 10, 2006); William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008, Pub. L. No. 110-457, 122 Stat. 5044; Violence Against Women Reauthorization Act of 2013, Pub. L. No. 113-4, Title XII, 127 Stat. 54,136-160.

[5]22 U.S.C. § 7102.

estimated 24.9 million people in forced labor, including 4.8 million people in forced sexual exploitation. However, as we previously reported, estimates of the number of trafficking victims are often questionable due to data and methodological weaknesses.[6]

The National Defense Authorization Act for Fiscal Year 2017 includes a provision for GAO to report on the programs conducted by the Department of State (State), the Department of Labor (DOL), the United States Agency for International Development (USAID), the Department of Defense (DOD), and the Department of the Treasury (Treasury) that address human trafficking and modern slavery, including a detailed analysis of the effectiveness of such programs in limiting human trafficking and modern slavery.[7] Three of these agencies—State, DOL, and USAID—have programs that design and award counter-trafficking projects to implementing partners, through contracts, grants, or cooperative agreements.[8] These agencies then oversee and monitor these projects. Since DOD and Treasury officials did not identify these types of projects as part of their counter-trafficking in persons efforts, we provide background information on their efforts but do not cover these agencies in our reporting objectives. This report (1) identifies the recent projects in international counter-trafficking in persons that key U.S. agencies have awarded to implementing partners, and for selected projects, assesses the extent to which key agencies have (2) documented their monitoring activities, (3) ensured the reliability of the performance information they use in monitoring projects, and (4) reviewed the usefulness of the performance indicators they use in monitoring projects.

To address these objectives, we reviewed relevant agency documents and interviewed agency officials. To report on agencies' programs, we asked knowledgeable officials at State, DOL, USAID, DOD, and Treasury to identify their projects that (1) had an international focus; (2) were delivered by implementing partners to external recipients, such as trafficking victims or host governments, as project beneficiaries; and (3)

---

[6]See GAO, *Human Trafficking: Better Data, Strategy, and Reporting Needed to Enhance U.S. Antitrafficking Efforts Abroad*, GAO-06-825 (Washington, D.C.: July 18, 2006).

[7]See Pub. L. No. 114-328, Div. A, Title XII, § 1298(h), 130 Stat. 2000, 2563 (2016).

[8]For the purposes of our review, implementing partners include contractors, grantees, and recipients of cooperative agreements.

addressed trafficking in persons, modern slavery,[9] or forced labor.[10] Because State, DOL, and USAID managed such projects, we focus on them as the three key agencies for the purposes of our reporting objectives. According to officials from these three agencies, the projects they identified range from those with counter-trafficking in persons as a primary goal, to those in which this goal was integrated as part of the agency's activities.[11] We used the lists of projects that these agencies provided to report the relevant counter-trafficking projects that agencies

---

[9]According to the Department of State, "trafficking in persons," "human trafficking," and "modern slavery" are used as umbrella terms to refer to both sex trafficking and compelled labor. Agency officials we met with also commented that modern slavery is not defined in law, and often used interchangeably with the term "trafficking in persons" or "human trafficking."

[10]To address the mandate, we gathered information about agencies' programs and projects. In past GAO reports, we noted that the *Glossary of Terms Used in the Federal Budget Process* defines "program" as "generally, an organized set of activities toward a common purpose or goal that an agency undertakes or proposes to carry out its responsibilities." This definition acknowledges that because the term program has many uses in practice, it does not have a well-defined, standard meaning in the legislative process. It is used to describe an agency's mission, functions, activities, services, projects, and processes. Our report focuses on, and therefore uses the term, "projects," to refer to counter-trafficking in persons interventions funded by key agencies through awards made to implementing partners, though some agencies may sometimes refer to what we term "projects" as "programs."

[11]The agencies used different approaches to identify relevant projects. State's projects are those with a primary goal of counter-trafficking in persons. DOL's list of projects includes those that either solely focused on forced labor or trafficking in persons, or included a substantial component on either of those issues. DOL's projects also include those in which reducing child labor was the primary goal, but for which there was a substantial component focused on forced labor or trafficking. In addition to including projects with a primary goal of counter-trafficking in persons, USAID included projects that do not have counter-trafficking in persons as a primary goal. According to USAID officials, USAID's counter-trafficking in persons integration is part of USAID's counter-trafficking in persons policy, and that excluding integrated projects that do not have a primary goal of counter-trafficking in persons, but incorporate a counter-trafficking component, would present an incomplete picture and would leave out a set of projects that reflect USAID's holistic approach to addressing trafficking in persons. According to DOD officials, DOD's only relevant program is its trafficking in persons awareness training provided to its staff, which is not internationally focused nor delivered to external recipients as projects. Treasury officials informed us that Treasury does not have specific programs on countering-trafficking in persons to report. As such, our reporting objectives do not cover DOD or Treasury.

awarded to implementing partners to carry out the projects.[12] For our first objective, we determined the projects that were active during fiscal year 2017, including those which began, were ongoing, or ended during fiscal year 2017, and interviewed agency officials to confirm project information.

To analyze the effectiveness of agencies' programs in limiting human trafficking and modern slavery, we assessed the key agencies' monitoring efforts for a subset of the projects. We identified State's, DOL's, and USAID's projects that started before or during October 2015, which corresponded to the first quarter of fiscal year 2016, and were active through September 30, 2017, which corresponded to the fourth and last quarter of fiscal year 2017.[13] This resulted in a selection of 54 projects—37 from State, 3 from DOL, and 14 from USAID—for our review.[14] To assess the extent to which State, DOL, and USAID documented their monitoring activities for selected projects, we reviewed documentation of key monitoring activities as specified in agency policy or the project award

---

[12]Funding amounts for the counter-trafficking in persons projects were provided by each agency in response to our request for funding information. However, the agencies used different methods for collecting and reporting the funding data, which limited our ability to combine funding information across agencies. State's reported funding consists of total award amounts for projects that focused on counter-trafficking in persons. DOL also reported total award amounts for projects that focused on counter-trafficking in persons, and estimated award amounts for the counter-trafficking in persons component of the total award amounts for projects that did not focus on counter-trafficking in persons. USAID's reported funding consists of total award amounts for counter-trafficking in persons standalone projects, in which the sole focus of the project was to combat trafficking in persons. However, for USAID's integrated projects in which counter-trafficking in persons efforts make up a component of the overall project, USAID reported on the commitment of its funds specifically for counter-trafficking in persons activities, which consist of obligated amounts plus committed amounts.

[13]For our reporting objectives to assess the extent to which agencies have documented their monitoring activities, ensured the reliability of the performance information, and reviewed the usefulness of the performance indicators they use for that monitoring, we reviewed projects based on the information contained in an initial list of projects that agencies provided. USAID subsequently provided an updated list of projects that slightly affected the count of projects that we report in our objective to identify projects, but we did not revise the scope of projects we reviewed for other objectives.

[14]We identified a total of 57 State, DOL, and USAID projects that started before or during October 2015 and were active through September 30, 2017. Out of these 57 projects, we excluded 3 projects from our selection for various reasons. We excluded one DOL project because DOL identified the project as being a research project for which certain agency performance monitoring requirements (e.g., indicators, targets) are not applicable. We also excluded two USAID projects because USAID identified each project as including several projects with various start and end dates, thus making it difficult to determine their time frames for inclusion in our report.

agreements, including (1) the monitoring plan for each project, (2) evidence of performance indicators and targets for each project,[15] (3) fiscal year 2017 progress reports for each project, (4) final progress reports for the projects that ended by December 2017, and (5) evidence of the agency's site visits for each project. Additionally, we interviewed knowledgeable monitoring officials from each agency to understand agencies' monitoring process and application of monitoring requirements for counter-trafficking in persons projects.

To assess the extent to which key agencies ensured the reliability of the performance information, as well as the extent to which they reviewed the usefulness of the performance indicators they use to monitor selected international counter-trafficking in persons projects, we selected for review a nongeneralizable sample of 5 projects—2 State projects, 1 DOL project, and 2 USAID projects—out of the 54 counter-trafficking in persons projects identified by agencies that started before or during October 2015 and were active through fiscal year 2017. We based our selection of these projects primarily on the largest total award amounts.[16] For these five selected projects, we collected 2 years of progress reports and other documents to assess the quantitative and qualitative performance information. We assessed whether quarterly or semi-annual indicator totals were consistent with annual and cumulative totals where these were reported. Using this quantitative information, we judgmentally selected indicators for inclusion in agency interviews where it appeared likely that numerical errors had occurred or there appeared to be significant project events, such as large over- or under-performance or the elimination of the indicator. We interviewed agency officials, including managers of each of the 5 projects, about the consistency and completeness of monitoring information in these projects for about 60 indicators identified through our analysis, as well as to determine whether our findings for these selected projects reflected general agency policies and procedures, and to understand the processes and systems agencies

---

[15]For State and USAID projects that ended by December 2017 and therefore had final progress reports, we reviewed those reports to determine whether State and USAID had documented indicators and targets for their projects. Because DOL's projects were ongoing at the time of our request, we reviewed the second semi-annual report for fiscal year 2017 for each project to determine whether DOL had documented indicators and targets for its projects.

[16]Total award amount of the project may include components that are not focused on counter-trafficking in persons effort.

use to review indicators.[17] We assessed the completeness and consistency of project performance data that State, DOL, and USAID use to monitor projects as part of our data reliability assessment. We found State and USAID data to be unreliable in the projects we reviewed. We discuss the implications of these unreliable data for State and USAID's project management and reporting in our findings and recommendations. We found the performance data that DOL used were consistent and complete for the project we reviewed. While we examined indicator and narrative information for consistency and completeness, we did not verify the accuracy of performance information. See appendix I for more details on our scope and methodology.

We conducted this performance audit from October 2017 to December 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Human trafficking exploits individuals and often involves transnational criminal organizations, violations of labor and immigration codes, and government corruption. Many forms of trafficking—including sex trafficking and labor trafficking—can take place anywhere in the world and occur without crossing country boundaries. As discussed in State's annual Trafficking in Persons Report, trafficking victims include, for example, Asian and African women and men who migrate to the Persian Gulf region for domestic labor but then suffer both labor trafficking and sexual abuse in the homes of their employers. Some victims are children. For example, Pakistani children as young as 5 years are sold or kidnapped into forced labor to work in brick kilns, some of which are

---

[17]While we reviewed all available indicator data as part of our process that led to selecting about 60 indicators for which we requested additional information, we did not attempt to count the total number of indicators. In the five projects we reviewed, there were varying practices for labeling and categorizing indicators, leading to ambiguity in counting indicators, such as whether a reported figure is a disaggregation of an indicator or, itself, an indicator; and whether an indicator had been discontinued or was not reported for a given reporting period. Further, the number of indicators for a given project sometimes varied from quarter to quarter.

owned by government officials. Other victims are subjected to sexual exploitation. In some cases, women and girls have been bought and sold as sex slaves by members of the Islamic State. In other cases, adult men and women have been forced to engage in commercial sex, and children induced to do the same. Individuals, including men, are exploited in forced labor in a variety of industries. Burmese men, for example, have been forced to labor 20 hours a day, 7 days a week on fishing boats in Thailand. See figure 1 for examples of victims of trafficking in persons.

Figure 1: Examples of Trafficking in Persons Victims in the Department of State's *Trafficking in Persons Report June 2018*

Venezuelan migrants wait to be resettled in a migrant shelter in Brazil. When political or economic crises force large numbers of people to leave their home, neighboring countries can struggle to adequately protect them from becoming vulnerable to human trafficking.

A woman picks cotton as part of the annual harvest in Uzbekistan. Many rural women serve as voluntary cotton pickers to supplement their income; however, government-compelled forced labor in the annual cotton harvest remains common in Central Asia.
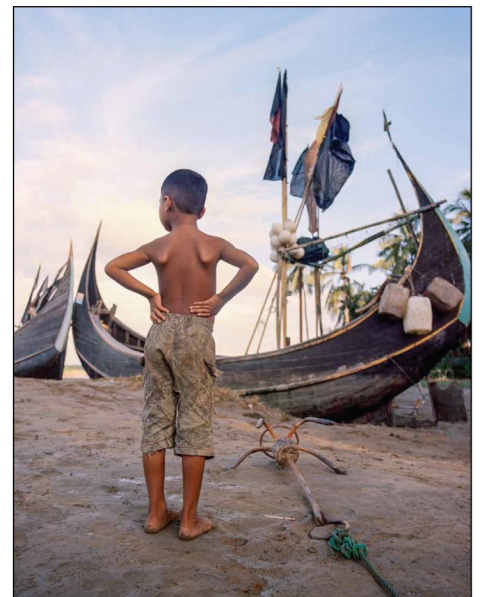
A boy who labors on a fishing vessel stands on the beach in Bangladesh in front of his boat.

Sources: photos: clockwise from top: © United Nations High Commissioner for Refugees/Reynesson Damasceno, © Misty Keasler for Winrock International, © Simon Buxton, Anti-Slavery International; text: Department of State *Trafficking in Persons Report June 2018*. | GAO-19-77

Among other U.S. agencies involved in counter-trafficking in persons, State, DOL, USAID, DOD, and Treasury have various roles and

responsibilities related to international counter-trafficking in persons, including some internationally-focused programs and activities that do not involve awards made to implementing partners, as follows:

- **State.** State leads the global engagement of the United States, and supports the coordination of efforts across the U.S government in counter-trafficking in persons. State's Office to Monitor and Combat Trafficking in Persons (TIP Office), established pursuant to the Trafficking Victims Protection Act of 2000, is responsible for bilateral and multilateral diplomacy, targeted foreign assistance, and public engagement on trafficking in persons. The office also prepares and issues an annual *Trafficking in Persons Report* that assesses the counter-trafficking efforts of governments and assigns them tier rankings.[18] Furthermore, the TIP Office develops annual regional programming strategies, awards projects to implementing partners and oversees the project award process, and provides technical assistance to implementing partners. Other parts of State, including regional bureaus that cover geographic regions and functional bureaus that cover global issues such as human rights, are also responsible for work related to combating trafficking in persons.[19]

- **DOL.** Within DOL, the Bureau of International Labor Affairs' (ILAB) Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) conducts research, publishes reports, and administers projects awarded to implementing partners on international child labor, forced labor, and trafficking in persons. ILAB's reports include the annual *Findings on the Worst Forms of Child Labor* report, which assesses

---

[18]For more information on State's *Trafficking in Persons Report*, see GAO, *Human Trafficking: State Has Made Improvements in Its Annual Report but Does Not Explicitly Explain Certain Tier Rankings or Changes*, GAO-17-56 (Washington, D.C.: December 5, 2016).

[19]In addition to the projects that State awarded to implementing partners, State officials also reported two other programs related to counter-trafficking in persons during fiscal year 2017. According to State officials, the Intermittent Legal Advisor for Trafficking in Persons Proposal for Malaysia and Cambodia is an interagency agreement between U.S. Department of Justice's Office of Overseas Prosecutorial Development, Assistance and Training with State TIP Office, in which the Department of Justice's office would work with the Government of Malaysia and of the Royal Government of Cambodia to strengthen the justice sector to effectively prosecute traffickers, protect victims, and prevent trafficking throughout the two countries. In addition, State's Bureau of Educational and Cultural Affairs managed the International Visitor Leadership Program in which the bureau brought 143 foreign leaders with responsibilities related to combating trafficking in persons to the United States in 2017. Through such exchanges, foreign participants examined the global problem of trafficking in persons, and explored effective practices in prevention, including the prosecution of and enforcement against traffickers.

the efforts of approximately 140 countries and territories to eliminate the worst forms of child labor in the areas of laws and regulations, institutional mechanisms for coordinating and enforcement, and government policies and programs. ILAB also reports on the *List of Goods Produced by Child Labor or Forced Labor* showing goods and their source countries which ILAB has reason to believe are produced by child labor or forced labor in violation of international standards.

- **USAID.** USAID administers projects awarded to implementing partners that address counter-trafficking in persons, including increased investments in conflict and crisis areas, and integrating such projects into broader development projects. USAID field missions manage the majority of these counter-trafficking activities through projects that address trafficking challenges specific to the field mission's region or country. USAID's Center of Excellence on Democracy, Human Rights and Governance (DRG Center) in Washington, D.C. is responsible for oversight of USAID's counter-trafficking policy. The DRG Center is responsible for coordinating and reporting on USAID-wide counter-trafficking in persons efforts; oversees the implementation of USAID's counter-trafficking in persons policy in collaboration with regional bureaus and country missions; works with regional bureaus and country missions to gather counter-trafficking best practices and lessons learned; provides technical assistance and training to field and Washington-based staff on designing, managing, and monitoring and evaluating trafficking in persons projects; and conducts and manages research and learning activities related to combating trafficking in persons to collect data to inform the design of field projects.[20]

- **DOD.** DOD's Combating Trafficking in Persons Program Management Office, under the Under Secretary of Defense for Personnel and Readiness in the Defense Human Resources Activity, develops trafficking awareness and training material for all DOD components. On December 16, 2002, the President signed National Security Presidential Directive 22, which declared the United States had a zero

---

[20]In addition to the projects that USAID awarded to implementing partners, USAID officials also reported that during fiscal year 2017, USAID's Office of Innovation and Development Alliances, Local Sustainability Division, implemented the Peace Corps Small Project Assistance (SPA) Program that relates to combating trafficking in persons. Small Project Assistance is a multi-sector program that aims to build the capacity of host country individuals, organizations, and communities to meet their own development needs and priorities. Funds provided to the Peace Corps go toward supporting small community grants that are awarded to Peace Corps volunteers to implement.

tolerance policy for trafficking in persons.[21] The Combating Trafficking in Persons Program Management Office is responsible for overseeing, developing, and providing the tools necessary for implementing National Security Directive 22 within DOD.[22] The office has developed several different training programs, designed to provide an overview of trafficking in persons (including signs of trafficking, key policies and procedures, and reporting procedures), as well as awareness materials for distribution to DOD components and defense contractors overseas.

- **Treasury.** Treasury has activities, but not specific programs, that may support wider U.S. efforts to address counter-trafficking in persons, according to Treasury officials. Pursuant to its mandate, components of Treasury's Office of Terrorism and Financial Intelligence (TFI), including Financial Crimes Enforcement Network (FinCEN), Office of Terrorist Financing and Financial Crimes (TFFC), and Office of Foreign Assets Control (OFAC) work on addressing illicit finance

---

[21]The Directive states, "Departments and agencies shall ensure that all of the appropriate offices within their jurisdiction are fully training to carry out their responsibilities to combat trafficking…. Agencies shall review their internal structures, personnel requirements, capabilities, information systems, professional education programs, training procedures, legislative authorities, and budgets to accommodate the provisions of this Directive."

[22]For more information on DOD's and other agencies oversight of contractors' use of foreign workers, see GAO, *Human Trafficking: Oversight of Contractors' Use of Foreign Workers in High-Risk Environments Needs to Be Strengthened*, GAO-15-102 (Washington, D.C.: November 18, 2014).

activities that support the wider goal of combating global trafficking in persons.[23]

Pursuant to the Trafficking Victims Protection Act of 2000, the President established the President's Interagency Task Force to Monitor and Combat Trafficking in Persons (PITF), which is a cabinet-level entity that consists of agencies across the federal government responsible for coordinating implementation of the Trafficking Victims Protection Act of 2000, among other activities.[24] It is chaired by the Secretary of State; State, DOL, USAID, DOD, and Treasury are all PITF agencies.[25] In addition, the Trafficking Victims Protection Act, as amended in 2003, established the Senior Policy Operating Group, which consists of senior officials designated as representatives of the PITF agencies.

---

[23]For example, FinCEN is the lead anti-money laundering and countering the financing of terrorism supervisor and regulator for the United States. TFFC focuses on policy development and coordination on combatting illicit finance globally. OFAC administers sanctions programs that target, among many other actors, transnational criminal organizations that are often involved in human trafficking and individuals and organizations involved in the recruitment and use of child soldiers. In 2014, FinCEN issued an advisory note to financial institutions on human trafficking, including descriptions of indicators and red flags for use in identifying this kind of activity. According to Treasury officials, in 2017, FinCEN and other foreign financial intelligence units launched a project within the Egmont Group of Financial Intelligence Units, an intergovernmental body, to analyze information related to human trafficking. The human trafficking project team applies new approaches, processes, and tools for enhanced bilateral information sharing to produce actionable information and disrupt financial movement related to human trafficking. The project focuses on producing results on both a jurisdictional and global level. The scope of the Egmont human trafficking project consists of three major objectives: strengthening knowledge; identifying and disrupting financial flows; and supporting the Financial Action Task Force, an intergovernmental body, and the Financial Action Task Force-style Regional Bodies projects. Moreover, TFI contributed to a report on Financial Flows Associated with Human Trafficking, published in August 2018 by the Financial Action Task Force, according to Treasury officials.

[24]Pub. L. No. 106-386, § 105.

[25]Other PITF members are the Departments of Agriculture, Education, Health and Human Services, Homeland Security, Interior, Justice, and Transportation; as well as the Office of Management and Budget, the Office of the U.S. Trade Representative, the Office of the Director of National Intelligence, the National Security Council, the Domestic Policy Council, the Federal Bureau of Investigation, and the U.S. Equal Employment Opportunity Commission.

During Fiscal Year 2017, State, DOL, and USAID Managed 120 Counter-Trafficking in Persons Projects

State, DOL, and USAID managed 120 projects in counter-trafficking in persons carried out by implementing partners during fiscal year 2017, according to information provided by officials with these agencies. These projects, as identified by agency officials, ranged from those focused on counter-trafficking in persons, to those in which counter-trafficking in persons was integrated into but was not the primary goal of the project.[26] At these agencies, project officers work with the implementing partner on the administration and technical guidance of the project, such as reviewing progress reports.[27] Table 1 shows a summary of these agencies' project information; appendix II provides more detailed information on all 120 projects.

---

[26]Funding amounts for the counter-trafficking in persons projects were provided by each agency in response to our request for funding information. However, the agencies used different methods for collecting and reporting the funding data, which limited our ability to combine funding information across agencies. State's reported funding consists of total award amounts for projects that focused on counter-trafficking in persons. DOL also reported total award amounts for projects that focused on counter-trafficking in persons, and estimated award amounts for the counter-trafficking in persons component of the total award amounts for projects that did not focus on counter-trafficking in persons. USAID's reported funding consists of total award amounts for counter-trafficking in persons standalone projects, in which the sole focus of the project was to combat trafficking in persons. However, for USAID's integrated projects in which counter-trafficking in persons efforts make up a component of the overall project, USAID reported on the commitment of its funds specifically for counter-trafficking in persons activities, which consists of obligated amounts plus committed amount.

[27]We use the term "project officer" to include various job titles for this position, including State TIP Office's Project Officers, Program Advisor, and Grants Officer Representative; State DRL's Grants Officer Representative; DOL's Project Officers or Grant Officer's Representatives; and USAID's Contracting Officer's Representatives or Agreement Officer's Representatives.

Table 1: Summary of Departments of State (State) and Labor (DOL), and U.S. Agency for International Development (USAID) Counter-trafficking in Persons Projects Active during Fiscal Year 2017, as Identified by Agency Officials

Responsible Agency/Office	Total Number of Projects	Locations of Projects
State (total)	79	(see details below)
State/TIP Office	75	• 11 global projects • 11 regional projects that cover Africa, Asia, Balkans, Caribbean, and South America • 53 projects that cover 41 different countries
State/DRL	4	• 4 projects that cover 3 different countries
DOL/ILAB/OCFT	6	• 3 global projects • 3 projects that cover 5 different countries
USAID/DRG and overseas missions	35	• 2 regional projects covering 5 countries in South and Southeast Asia and 5 countries in Central Asia • 33 DRG and field-managed bilateral projects that cover 22 different countries
Total (all agencies)	**120**	**(see details above)**

Legend: State/TIP Office = State's Office to Monitor and Combat Trafficking in Persons; State/DRL = State's Bureau of Democracy, Human Rights, and Labor; DOL/ILAB/OCFT = DOL's Bureau of International Labor Affairs' Office of Child Labor, Forced Labor, and Human Trafficking; USAID/DRG = USAID's Center of Excellence on Democracy, Human Rights and Governance.

Source: GAO analysis of the information provided by the Departments of State and Labor, and the U.S. Agency for International Development officials. | GAO-19-77

Note: Projects in the table, as identified by agency officials, ranged from those focused on counter-trafficking in persons, to those in which counter-trafficking in persons was integrated into but was not the primary goal of the project.

During fiscal year 2017, State managed 79 counter-trafficking projects, from those focused on individual countries, to regional and global ones that covered several countries, with a total award amount of approximately $62 million, according to information provided by State officials. State TIP Office managed 75 projects with total awarded amount of around $57 million. Award amounts per project ranged from approximately $150,000 to $2.55 million. For example,

- State TIP Office had 11 global projects totaling about $10 million and 6 regional projects in Africa amounting to about $4 million.

- State TIP Office had two projects in Ghana that received the highest amount of awards, approximately $2.5 million for each project.

- State TIP Office had four projects in India amounting to around $3 million, and four in Thailand totaling around $2.35 million.

In addition to State TIP Office's projects, State's Bureau of Democracy, Human Rights, and Labor (DRL) managed four counter-trafficking projects with a reported total award amount of about $5 million, with two

projects in Mauritania making up around 70 percent of DRL's total awarded amount.

DOL's ILAB/OCFT managed six projects in fiscal year 2017 with a total award amount of approximately $31 million, according to DOL officials. These projects ranged from one scheduled to last for 5 years with an awarded amount of about $1 million, to one scheduled to last for about 4 years with an awarded amount of about $14 million. Three of DOL's projects were global projects, while two others focused on two countries each and one project focused on one country.

USAID's projects during fiscal year 2017 consisted of 2 regional projects in Asia, and 33 individual projects in 22 different countries. Some of these USAID-identified projects were integrated projects with a broader development focus that includes USAID programmatic objectives other than counter-trafficking in persons.[28] According to information provided by USAID officials, the award amount for all counter-trafficking in persons projects active in fiscal year 2017, including all integrated projects and standalone projects with a sole focus on combatting trafficking in persons, totaled around $296 million; and USAID's committed funding to these projects' activities related to counter-trafficking in persons was about $79 million as of September 2018.[29] During fiscal year 2017, USAID focused on a few countries where the agency awarded multiple counter-trafficking projects, such as four projects in Nepal and four projects in Burma.

According to officials, State, DOL, and USAID generally design projects to align with the "3Ps approach"—prevention, protection, and prosecution—and to consider trends and recommendations identified in agency reports on foreign governments' counter-trafficking efforts. According to State's publicly available information, the "3Ps" approach serves as the fundamental counter-trafficking in persons framework used around the world, and the U.S. government follows this approach to

---

[28]For example, USAID identified a development project that supported the government of Ghana to rebuild the marine fisheries sector through the adoption of responsible fishing practices. According to USAID officials, because there is documented forced child labor in the fisheries sector in Ghana, an activity to combat child labor and trafficking was integrated into this broader fisheries project, but the majority of this project's total award amount of $24 million was not focused on counter-trafficking in persons efforts.

[29]According to USAID officials, USAID's commitment of funds is an administrative reservation of the funds in anticipation of an obligation. USAID reported its committed funding to date for counter-trafficking in persons activities that consists of its obligated amounts plus committed amounts.

1. prevent trafficking in persons through public awareness, outreach, education, and advocacy campaigns;

2. protect and assist victims by providing shelters as well as health, psychological, legal, and vocational services; and

3. investigate and prosecute trafficking in persons crimes by providing training and technical assistance for law enforcement officials, such as police, prosecutors, and judges.

State's publicly available information on the 3Ps noted that prevention, protection, and prosecution efforts are closely intertwined. Prosecution, for example, can function as a deterrent, potentially preventing the occurrence of human trafficking. Likewise, protection can empower those who have been exploited so that they are not victimized again once they re-enter society. A victim-centered prosecution that enables a survivor to participate in the prosecution is integral to protection efforts.

In addition to the "3Ps," a "4th P"—for partnership—serves as a complementary means to achieve progress across the "3Ps" and enlist all segments of society in the fight against human trafficking, according to State's publicly available information. Addressing the partnerships element, USAID's counter-trafficking policy seeks to increase coordination across a broad range of national, regional, and global stakeholders from civil society, government, the private sector, labor unions, media, and faith-based organizations.

Examples of individual counter-trafficking in persons projects that agencies awarded to implementing partners include the following.

- **Short-term Assistance to Victims of Trafficking.** One project offered assistance on an emergency basis that could include shelter; food and other basic necessities; counseling; medical services; legal services; travel documentation; safe transport arrangements for return, reintegration, or for participation in criminal justice proceedings; family tracing; and resettlement arrangements.

- **Education, Empowerment, and Awareness Efforts for Girls**. One project provided services to decrease the incidence of sex trafficking, child labor trafficking, domestic violence, early marriage, unsafe early migration, and sexual abuse, through education, empowerment, and awareness for girls, their families, and their communities. The scope of services includes enrolling girls in schools, paying for their education, and motivating them to stay in school and stay safe, while

indirectly supporting other girls, parents, and key stakeholders for community-level protection.

- **Specialized Services.** One project contributed specialized services for victims of trafficking and individuals at risk and capacity building for first responders. The scope of services includes offering timely information and raising awareness on trafficking risks to victims and populations at risk of being trafficked; ensuring that first responders are equipped to identify and respond to human trafficking, as well as furnishing emergency referrals for trafficking victims; and providing crisis-specific interventions for affected and at-risk individuals.

- **Reintegration and Prevention of Recruitment.** One project supported efforts to reintegrate children rescued from illegal armed groups that forcibly recruit children and to prevent future recruitment. This project supported host government entities to provide physical, psychological, social, and economic assistance to disengaged children and adolescents. The project also supported the reception of, and assistance to, children in temporary transitional centers, and assisted in preparation for their reincorporation and social inclusion into their families and communities.

- **Assistance to Strengthen Host Government Capacity.** One project provided assistance to investigate and prosecute suspected trafficking cases, improve the identification and referral of trafficking victims, introduce common and improved standards of care and assistance for victims of trafficking, and raise awareness of the crime.

- **Technical Assistance to Develop and Implement Laws and Policies**. One project provided assistance to bring laws and policies into alignment with international labor standards, including on forced labor. The project will also create an occupational safety and health management system, and establish effective labor market information systems and employment services

DOL and USAID Fully Documented Their Monitoring Activities for All Selected Projects, but State Did Not Fully Document Its Activities for 16 of 37 Selected Projects

State, DOL, and USAID Use Similar Tools to Monitor Performance of Their Counter-Trafficking in Persons Projects

Monitoring is the collecting of data to determine whether a project is being implemented as intended and the tracking of progress through preselected performance indicators during the life of a project. State, DOL, and USAID use a number of similar tools—according to their current policies, guidance, and agency officials—to monitor the performance of their counter-trafficking in persons projects, including monitoring plans, indicators and targets, periodic progress reports, and final progress reports. The agencies also conduct site visits, but their policies vary on whether site visits are required for every project during implementation.

- **Monitoring plan.** The monitoring plan—according to monitoring policies of the three agencies—documents, among other things, all of the indicators and targets for the project as well as data collection frequency for each indicator. In addition, according to State TIP Office officials, the monitoring plan's indicators and targets for TIP Office-managed counter-trafficking in persons projects are to be organized in a logic model, which is a visual representation that shows the linkages among the project's goals, objectives, activities, outputs, and outcomes (see table 2).[30] The logic model is intended to show relationships between what the project will do and what changes it expects to achieve.

---

[30]State TIP Office officials also informed us that the TIP Office organizes the monitoring plan's common performance indicators (CPI) and targets in a CPI reporting template. We did not include the CPI reporting template in our review of the extent to which agencies documented their monitoring activities because, according to TIP Office officials, older projects that were awarded prior to fiscal year 2018 might not have used the template.

Table 2: GAO Summary of Logic Model Example from Department of State's Office to Monitor and Combat Trafficking in Persons

PROJECT GOAL: To develop and strengthen the national criminal justice system's response to trafficking in persons (TIP) and ensure access to justice and fair treatment for all victims of TIP.

Objective 1: To increase the number of TIP cases identified, investigated, and prosecuted by criminal justice practitioners in XX country (region, etc.).

Activity 1: Develop a training manual with tools that address core elements of a victim-centered criminal justice response to combat human trafficking that is structured around national laws and case files.

Output 1.1:	Output indicator 1.1:	Outcome 1.1:	Outcome indicator 1.1:
Tailored training manual with tools developed	Training manual and tools developed (Target: manual & tools in 2 languages)	Training manual and tools appropriately and effectively utilized by government stakeholders	# of government institutions/structures that appropriately and effectively utilize manual/tools (Target: 4 ministries, 8 state-level police units, 30 district-level court systems)

Activity 2: Conduct multidisciplinary week-long trainings on victim-centered investigations and prosecutions.

Output 1.2:	Output indicator 1.2:	Outcome 1.2:	Outcome indicator 1.2:
Trainings conducted on victim-centered investigations and prosecutions	# of week-long trainings (Target: 10) # of criminal justice practitioners trained (Target: 150)	Trained criminal justice practitioners identify, investigate, and prosecute TIP crimes	1.2.1 # of investigations by trained law enforcement officials (Target: 50) 1.2.2# of prosecutions by trained prosecutors (Target: 40) 1.2.3 # of convictions by trained prosecutors (Target: 10)

Source: GAO summary of logic model example from Department of State's Office to Monitor and Combat Trafficking in Persons. | GAO-19-77

- **Indicators and Targets.** Performance indicators—according to monitoring policies of the three agencies—are used to monitor progress and measure actual results compared to expected results. Targets are to be set for each performance indicator to indicate the expected results over the course of each period of performance. According to agency officials, the monitoring plan documents indicators and targets to be tracked and reported on through periodic progress reports to assess whether the project is likely to achieve the

desired results.[31] GAO has also found that a key attribute of effective performance measures is having a measurable target.

- **Periodic progress reports.** The reporting templates for the three agencies show that periodic progress reports—which are submitted at established intervals during the project's implementation—compare actual to planned performance and indicate the progress made in accomplishing the goals and objectives of the project, including reporting on progress toward the monitoring plan's indicator targets.

- **Final progress report.** The final progress report—according to monitoring policies of the agencies or agency officials—is a stand-alone report that provides a summary of the progress and achievements made during the life of the project.

- **Site Visits.** The three agencies policies vary on whether site visits are required for every project during implementation.[32] For example, State's policy notes that site visits may be conducted to review and evaluate recipient records, accomplishments, organizational procedures, and financial control systems, as well as to conduct interviews and provide technical assistance as necessary. In 2015, the State TIP Office established a goal to conduct at least one site visit during the life time of every project. While site visits during a project's implementation are not required under DOL's policy, DOL officials explained that they use site visits when deemed necessary to supplement information from other forms of oversight. USAID's policy requires that a site visit be conducted for every project during implementation to provide activity oversight, inspect implementation progress and deliverables, verify monitoring data, and learn from activity implementation.

In addition to these monitoring tools, State, USAID, and DOL officials told us that they rely on frequent communication with implementing partners as part of their monitoring process. Overall, monitoring is intended to help agencies determine whether the project is meeting its goals, update and

---

[31]For example, the semi-annual or final progress reports we reviewed for State, DOL, and USAID projects showed indicators such as (1) number of beneficiaries who received medical care (including mental-health care) from a healthcare professional; (2) number of trained trafficking survivors and at-risk women placed in jobs; and (3) number of forced labor complaints sent from workers' organizations to the Ministry of Labor and Employment.

[32]We did not include pre-award site visits in the scope of our review. According to the State TIP Office's current policy, new grantees who have never received funding from the TIP Office usually receive a pre-award site visit.

adjust interventions and activities as needed, and ensure that funds are used responsibly.

DOL and USAID Fully Documented Their Monitoring Activities for Selected Projects, while State Did Not

We found, based on our review of 54 selected counter-trafficking in persons projects (37 State, 3 DOL, and 14 USAID), that DOL and USAID had fully documented their performance monitoring activities, while State did not fully document its activities for 16 of 37 (43 percent) of the projects we reviewed with project start dates between fiscal years 2011 to 2016.[33]

DOL's documented monitoring activities included the monitoring plan for each project as well as fiscal year 2017 semi-annual progress reports, including indicators and targets.[34] USAID's documented monitoring activities included the monitoring plan for each project; fiscal year 2017 progress reports at the reporting frequency specified in the agreements for each project; the final progress report, including indicators and targets, for the three projects that ended as of December 2017; and evidence that at least one site visit was conducted during each project's implementation. Overall, the three agencies reported having conducted at least one site visit during the life time of the project for 47 of 54 (87 percent) of the selected projects.[35]

As shown in table 3, State did not fully document its monitoring activities (monitoring plan; fiscal year 2017 quarterly progress reports; and final

---

[33]We identified all of State's, DOL's, and USAID's projects that started before or during October 2015, which corresponded to the first quarter of fiscal year 2016, and were active through September 30, 2017, which corresponded to the fourth and last quarter of fiscal year 2017. This produced a list of a total of 57 State, DOL, and USAID projects. Out of these 57 projects, we excluded 3 projects from our selection for various reasons. We excluded one DOL project because DOL identified the project as being a research project for which certain agency performance monitoring requirements (e.g., indicators, targets) are not applicable. We also excluded two USAID projects because USAID identified each project as including several projects with various start and end dates, thus making it difficult to determine their time frames for inclusion in our report.

[34]Because DOL's projects were ongoing at the time of our request, we reviewed the second semi-annual progress report for each project to confirm DOL had documented indicators and targets.

[35]Specifically, DOL reported having conducted at least one site visit for all 3 of its projects; USAID reported having conducted at least one site visit for all 14 of its projects; and State reported having conducted at least one site visit for 30 of its 37 projects.

progress report, including indicators and targets, for projects that ended as of December 2017) for 16 of the 37 selected projects we reviewed.[36] Specifically, State did not have nine monitoring plans, five complete progress reports, or targets for each indicator in six of seven final progress reports for projects that ended as of December 2017.[37] (See appendix III for detailed information on each of the 37 projects.)

Table 3: Extent to Which Department of State Documented Performance Monitoring Activities for 37 Selected Counter-Trafficking in Persons Projects

Documentation	Monitoring plan	Q1 FY17 progress report	Q2 FY17 progress report	Q3 FY17 progress report	Q4 FY17 progress report	Final progress report at end of project[a]	Indicators and targets in final progress report[a]
Fully documented	28	34	37	36	36	7	1
Partially Documented	0	3	0	0	1	0	6
Not documented	9	0	0	1	0	0	0

Legend: Q = quarter; FY = fiscal year.

Source: GAO analysis of Department of State (State) documents. | GAO-19-77

Notes: State projects we reviewed all started between fiscal years 2011 to 2016. State did not fully document its monitoring activities (monitoring plan; fiscal year 2017 quarterly progress reports; and final progress report, including indicators and targets, for projects that ended as of December 2017) for 16 of the 37 selected projects we reviewed. The combined count for "partially documented" and "not documented" will not add to 16 due to certain projects appearing across categories.

[a]We reviewed the final progress reports for the 7 of 37 projects that ended as of December 2017. (The remaining 30 projects continued after December 2017.)

- For the nine projects for which the monitoring plan was not documented, the State TIP Office indicated that it was unable to locate these documents or they were not completed because the

[36]The combined count for "partially documented" and "not documented" will not add to 16 due to certain projects appearing across categories.

[37]Our prior work emphasizes key attributes of effective performance measures, such as measurable targets. See GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures,* GAO-03-143 (Washington, D.C.: Nov. 22, 2002), p. 45, for a description of how we developed the attributes of effective performance goals and measures, and GAO, *Defense Health Care Reform: Additional Implementation Details Would Increase Transparency of DOD's Plans and Enhance Accountability*, GAO-14-49 (Washington, D.C.: Nov. 6, 2013), p. 17, for a description of why the baseline measure was added as an attribute of effective performance measures. See also *GPRA Performance Reports,* GAO/GGD-96-66R (Washington, D.C.: Feb. 14, 1996); *Missile Defense: Opportunity to Refocus on Strengthening Acquisition Management,* GAO-13-432 (Washington, D.C.: Apr. 26, 2013); *Performance Measurement and Evaluation: Definitions and Relationships,* GAO-11-646SP (Washington, D.C.: May 2011); and *Agency Performance Plans: Examples of Practices That Can Improve Usefulness to Decisionmakers*, GAO/GGD/AIMD-99-69 (Washington, D.C.: Feb. 26, 1999).

projects were finalized when the TIP Office was beginning to institute the monitoring plan requirement.[38] Although TIP Office officials told us that the TIP Office piloted and began to phase in the monitoring plan requirement over the course of 2014 and early 2015, eight of the nine projects without monitoring plans started in September or October 2015.[39] We found that each of the nine projects had a logic model used to report progress in the fiscal year 2017 quarterly progress reports we reviewed, which would have provided TIP Office officials a basis for monitoring project performance at that point. However, federal standards for internal control call for agency management to design monitoring activities so that all transactions are completely and accurately recorded and so that management can evaluate project results.[40] Specifically, internal controls specify that monitoring should be ongoing throughout the life of the project, which is consistent with State's current policy that generally requires completion of the monitoring plan prior to award. Without timely documentation of the monitoring plans at the start of the project, TIP Office officials may not be able to ensure that projects are achieving their goals, as intended, from the beginning of project operations.

- For the three projects for which the quarterly progress report for the first quarter of fiscal year 2017 had been partially completed, the State TIP Office indicated that the implementing partners began to use the TIP Office's quarterly reporting template for subsequent reports after TIP Office officials instructed the implementing partner to do so. For the one project where the quarterly progress report was not completed for the third quarter of fiscal year 2017, or partially completed for the fourth quarter of fiscal year 2017, the project officer provided possible reasons why the documents were not in the project's file, including that the implementing partner lacked the

---

[38]State TIP Office officials also informed us that documents were lost in the database changeover to State Assistance Management System Domestic in January 2018 and that some of the monitoring plans may have been among the documents that were lost.

[39]In March 2015, State had issued a new policy specifying that it is the responsibility of the grants officer and grants officer representative to develop a monitoring plan that is appropriate for the award, and that all grants officers must ensure that a copy of the monitoring plan and all revisions/updates are kept in the official award file. In October 2017, State issued a new policy explicitly excluding from the requirement voluntary and assessed contributions, and property grants where the property is turned over immediately and permanently to the recipient.

[40]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept. 2014), and *Standards for Internal Control in the Federal Government,* GAO/AIMD-00-21.3.1 (Washington, D.C.: Nov. 1999).

capacity to design a logic model. The project ended December 31, 2017. Federal standards for internal control call for agency management to design monitoring activities, such as performance reporting, so that all transactions are completely and accurately recorded, and project results can be continuously evaluated.[41] As previously discussed, performance progress reports should compare actual to planned performance and indicate the progress made in accomplishing the goals and objectives of the project. Therefore, the TIP Office may lack information needed to assess project performance if it does not have access to complete monitoring documentation.

- For the six projects for which targets were not fully documented in the final progress reports,[42] we found that targets were lacking for 110 of 253 (43 percent) of indicators across the six final progress reports.[43] Our prior work on performance measurement identified 10 key attributes of performance measures—such as having a measurable target—that GAO has found are key to successfully measuring a project's performance.[44] For example, our prior work has shown that numerical targets or other measurable values facilitate future assessments of whether overall goals and objectives are achieved because comparisons can be easily made between projected performance and actual results.[45] State TIP Office officials explained that the final progress reports we reviewed lacked targets because the TIP Office had not required targets for each indicator for the projects we reviewed that started in fiscal years 2011 to 2016. State TIP Office

---

[41]See GAO-14-704G and GAO/AIMD-00-21.3.1.

[42]The final progress reports provide information on output and outcome indicators. According to the State TIP Office's logic model proposal template, output indicators provide a means to measure the products, goods, and services which result from an activity, program, or policy (e.g., number of training manuals and tools developed). Outcome indicators provide a means to measure the extent to which an activity, project, program, or policy achieves its objectives (e.g., number of government institutions/structures that utilize manual/tools to train others). For the total number of indicators lacking targets across the six final progress reports, we excluded from the count any disaggregated indicators or indicators for which the target could be inferred, such as when the target could be inferred as being a value of "1."

[43]The number of indicators lacking targets across the six final progress reports ranged from 2 to 50.

[44]See GAO-03-143, GAO-14-49, GAO-13-432, GAO-11-646SP, and GAO/GGD/AIMD-99-69.

[45]See GAO-03-143.

officials also said that project officers may not have set targets due to limited resources in previous years. A lack of actual targets limits the TIP Office's ability to assess project performance, including effectiveness, and determine if implementation is on track or if any timely corrections or adjustments may be needed to improve project efficiency or effectiveness.

According to State TIP Office officials, the TIP Office has taken steps to improve its documentation of monitoring activities, such as instituting a monitoring plan requirement; increasing staff, including hiring a monitoring and evaluation specialist; and developing standard templates for implementing partners to use for reporting. Moreover, in November 2017, State established a new policy asserting that, building on the logic model or project charter, bureaus and independent offices must set targets for each performance indicator to indicate the expected change over the course of each period of performance. It further notes that bureaus and independent offices should maintain documentation of project design, including the logic model. Additionally, State TIP Office officials said that State is developing a department-wide automated information management system (State Assistance Management System - Domestic, or SAMS-D) that officials expect to standardize entry of performance information and, under the new system targets, must be recorded for each indicator. State TIP Office officials have worked to pilot-test SAMS-D to provide feedback on the system, including suggestions to improve the completeness of data collection, according to TIP Office officials.

Despite these efforts, the TIP Office's documentation of all monitoring activities, and implementation of its November 2017 requirement to set targets for all performance indicators, is uncertain. For example, even though the TIP Office informed us that it began to institute a monitoring plan requirement over the course of 2014 and early 2015, as previously noted, eight projects we reviewed that started in September or October 2015 did not have monitoring plans. In addition, according to State officials, in SAMS-D, targets could be recorded as "to be determined" and there are no controls in place to ensure that "to be determined" entries are replaced with actual targets. State officials said that SAMS-D has the capability to implement controls to alert users to update "to be determined" targets, but pilot users of SAMS-D, which include the TIP Office, have not provided feedback for this capability so far. Furthermore, State TIP Office officials informed us that the TIP Office cannot require all implementing partners to set targets, but that the TIP Office aspires to update relevant targets regularly in the future and would encourage

implementing partners to update target values when appropriate.[46] Without controls to ensure full documentation of monitoring activities and established performance targets, State is limited in its ability to assess project performance, including project efficiency or effectiveness.

State and USAID Do Not Have Sufficient Controls to Ensure the Reliability of Project Information, while DOL Had Consistent and Complete Performance Information in the Project We Reviewed

In our review of selected indicators in two State TIP Office and two USAID projects, we found that State and USAID used inconsistent and incomplete performance information to monitor these projects. We found that State TIP Office and USAID do not have sufficient controls in place to ensure that the performance information they use is reliable. In contrast, we found that DOL had consistent and complete performance information in a project we reviewed, and we identified no controls in DOL's process that were insufficient for assuring the reliability of this information.

State and USAID Projects We Reviewed Showed Inconsistent and Incomplete Performance Information

For selected indicators in two State TIP Office and two USAID projects, we found numerous errors or omissions in progress reports we reviewed, which resulted in inconsistent and incomplete performance information agencies used to monitor these projects.[47] Specifically, we found examples of inconsistent information, which included many instances in

---

[46]According to TIP Office officials, the TIP Office cannot require targets for projects using grants as an award agreement instrument.

[47]We selected for review a nongeneralizable sample of 5 projects—2 State projects, 1 DOL project, and 2 USAID projects—out of the 54 projects that started before or during October 2015 and were active through fiscal year 2017. While projects we selected were identified by the relevant agency as being counter-trafficking in persons projects, not all indicators for these projects were explicitly related to counter-trafficking in persons. In order to fully analyze the monitoring of counter-trafficking in persons related projects, and because many activities in these projects may be inter-related, we reviewed all types of indicators among our selection of indicators within a selected project.

which quarterly indicator totals differed from annual or cumulative totals reported separately on the same projects, and numbers reported in narrative information that differed from numbers reported as indicator values. In addition, we found examples of incomplete information, including narrative elements that were missing in whole or in part.[48]

Inconsistent Performance Information. We found numerous instances in which quarterly totals differed from annual or cumulative totals reported separately on the same projects. When these errors occurred, it was not possible to independently determine project performance based on report information. For example,

- For one State TIP Office project, reported cumulative progress overstated quarterly progress for at least 11 indicators (3 of which by 25 percent or more) and understated quarterly progress for at least 5 indicators (once by 25 percent or more). For example, for the indicator *"number of standardized reintegration protocols/guidelines/tools developed (case forms, family assessment, etc.,)"* State's cumulative performance report as of the 4th quarter of fiscal year 2017 indicated that two tools had been developed, whereas quarterly reports showed that only one had been developed.

- For one USAID project, the indicator *"number of assisted communes allocating and accessing funds for trafficking in persons prevention activities"* showed that annual results were 60, while quarterly report data combined showed that the number was 6, which USAID officials confirmed was the correct figure.[49]

- For another USAID project, the indicator, *"number of food security private enterprises (for profit), producers organizations, water users associations, women's groups, trade and business associations, and community-based organizations receiving U.S. government assistance"* showed an annual result of one, while quarterly totals combined showed a total of three, which USAID officials confirmed was the correct figure.

For the projects we reviewed, implementing partners produced narrative descriptions of progress made to accompany indicator results. We found

---

[48]While we were able to examine indicator and narrative information for consistency and completeness in order to assess its reliability, we did not verify the accuracy of the reported information.

[49]USAID officials said that, although 60 communes had an allocated budget for counter-trafficking in persons activities, only 6 had actually spent the budgeted money.

cases in which numbers reported in narrative information were not consistent with numbers reported as indicator values. For example, for the State TIP Office indicator *"number of criminal justice practitioners trained"* for one project, indicator results for two quarters differed from results presented in the corresponding narrative during fiscal years 2016 to 2017. State officials found that the narrative information was correct for one of these inconsistencies and the indicator result was correct for the other. In addition, for one USAID indicator—*number of public awareness tools on trafficking in persons developed and disseminated*—the narrative report for one quarter described distributions that added up to 21,765 products, while the reported quantitative indicator total was 21,482. USAID officials confirmed that 21,765 was the correct figure.[50]

Incomplete Performance Information. Additionally, some quarterly reports had narrative elements that were incomplete in whole or in part, which made independent interpretation of project performance difficult or impossible.

- The implementing partner in one State TIP Office project copied and pasted significant portions of narrative information in quarterly reports for 2 years and, according to State TIP Office officials, did not fulfill a request by State TIP Office to include only current quarterly information in formal quarterly reports because it was focused on other activities. For nearly the entire period, the implementing partner indicated that it was "following up" with government entities in three countries to set up counter-trafficking in persons training for government officials, but no indication was made in formal quarterly reports about the results of any of these follow-up activities.[51]

- For one State TIP Office project, the indicator *"number of children receiving care, whose cases are reported to the police"* had no narrative information or incomplete narrative information provided for three of the four quarters in which activity occurred during our period of review (comprising almost 90 percent of reported performance under this indicator).

---

[50]According to USAID officials, the implementing partner for this project subsequently took steps to reduce manual entry errors for its indicators, including developing its own database system to store information from subcontractors and perform calculations automatically.

[51]State TIP Office officials said that they were aware of the current status of this project because of emails and telephone calls that were not part of the formal quarterly reporting process.

- For a USAID project, the implementing partner reported a combined performance number of approximately 200 from the first through third quarters of fiscal year 2017 for the *indicator "number of members of producer organizations and community based organizations receiving U.S. government assistance."* However, annual performance for fiscal year 2017 was reported as nearly 1,700 organizations. USAID officials explained that this difference was the result of the implementing partner's misinterpretation of the indicator's definition when producing the quarterly reports, but the annual report narrative did not explain this correction.

- Additionally, for USAID's indicator on the *"number of public awareness tools on trafficking in persons developed and disseminated,"* no narrative information in the quarterly or annual reports explained how the last quarter of fiscal year 2016 performance approximately doubled from that of the previous quarter. Narrative information in the annual report described performance for the year only in general terms and did not clarify this significant change.

In addition to direct project oversight, State TIP Office and USAID officials stated that performance information from progress reports that the agencies use to monitor counter-trafficking in persons projects is regularly used for internal and external reporting, program decisions, and lessons learned. For example, according to officials, this information is used by senior agency officials to inform their decision-making, in reports such as the Attorney General's Annual Report to Congress and Assessment of U.S. Government Activities to Combat Trafficking in Persons, and to fulfil other requests from Congress.

Neither State TIP Office nor USAID Has Sufficient Controls to Ensure the Reliability of Performance Information

Neither State TIP Office nor USAID has sufficient controls to ensure consistent and complete performance information, and both face challenges to data reliability stemming from information reported in non-standard formats, implementing partners with limited capacities to report performance information, and the time-consuming nature of reviewing

reported information.[52] Federal internal control standards state that management should obtain data from reliable internal and external sources.[53] According to these standards, reliable internal and external sources should provide data that are reasonably free from error and bias and faithfully represent what they purport to represent; and management should evaluate both internal and external sources of data for reliability. Without implementing additional controls to ensure that performance information are consistent and complete, State and USAID officials may not fully or accurately understand what projects are, or are not, achieving and, therefore, how their efforts could be altered as needed. Further, reports that are prepared or program decisions that are made using the TIP Office monitoring reports could be based on inconsistent or incomplete information that does not accurately present project results.

State Lacks Adequate Controls to Ensure the Reliability of Performance Information

State TIP Office currently receives performance information using documents submitted by implementing partners, although this information is not compiled into a single data system and is not in a standardized format. While State provides suggested templates for reporting information, officials said that they cannot require implementing organizations to use these templates and we found that implementing partners provided information in varying formats.

According to State TIP Office officials, project officers perform manual reviews of quantitative information in monitoring reports but have insufficient time to carry out detailed reviews of data reliability for all indicators. State TIP Office project officers also stated that the process of comparing narrative information to indicator information was time consuming and difficult. According to these officials, the quality of the information in progress reports also depends on the priorities and resources—which can be limited—of the implementing partner. In addition to reviewing progress reports, State project officers we spoke to said that they rely on site visits and frequent, less formal communication as part of their oversight process.

---

[52]According to State TIP Office officials, State TIP Office cannot require a specific reporting format from its grantees, including international organizations, due to the Paperwork Reduction Act.

[53]See GAO-14-704G.

Project officers for the State TIP Office projects we reviewed stated that they did not always examine performance trends over time or review consistency in reported cumulative totals—which should be the sums of the previous and current quarters' reported results—with quarterly totals, for reasons including the difficulty in assembling quarterly information in this manner and resource limitations. State TIP Office officials noted that they are aware of data quality problems in counter-trafficking in persons monitoring reports.

State is developing SAMS-D, a system that officials expect to standardize entry of information from common performance indicators and logic models, according to State officials. These officials stated that if SAMS-D is deployed, State TIP Office could find it easier to analyze and revise logic models that implementing partners submit, as well as examine performance indicator results over time, since standardized data would be available in a centralized location. According to State officials, SAMS-D could be programmed with automatic checks or alerts under conditions defined by the TIP Office and the database programmer. For example, the system could require that fields be filled out in particular formats or provide an alert if performance under a certain indicator has significantly deviated from prior quarters or the indicator's target.

State TIP Office officials said they were uncertain whether SAMS-D would become operational in 2019, as currently planned. According to officials, State TIP Office has participated in planning and pilot activities for SAMS-D, including testing monitoring tools with implementing partners. According to these officials, additional work is needed to develop rules and controls necessary to operationalize SAMS-D to meet the TIP Office's particular needs and ensure improved data. Another challenge to implementation of SAMS-D, according to these officials, is that some implementing partners are unable to maintain consistent internet connections necessary to upload information, impeding full roll-out of the system, and an alternative upload mechanism does not yet exist.

USAID Lacks Adequate Controls to Ensure the Reliability of Performance Information

According to USAID officials, overseas missions currently set many of their own policies and procedures for data quality oversight.[54] For the two projects we reviewed, USAID relied on implementing partners to manage information, while it reviewed this information in addition to conducting site visits and communicating with implementing partners on a regular basis to monitor the projects. USAID officials attributed errors in the project reports we reviewed to factors including implementing partners' errors in manual computation and misunderstandings of indicator definitions. According to USAID officials, data quality errors due to factors such as transcription errors can also occur in the performance information USAID uses to monitor counter-trafficking in persons projects.

USAID project officers for the projects we reviewed said that they regularly conducted manual analysis of information received from implementing partners, but USAID and implementing partners are often pressed for time during the quarterly reporting cycle. According to these project officers, some of the errors GAO found had already been identified by USAID implementing partners during their annual review process and corrected in the annual reports we reviewed. For example, for the USAID indicator *"value of new private sector investments in select value chains,"* quarterly totals overstated corrected annual results by more than $120,000—approximately $170,000 instead of approximately $50,000. USAID officials said that they and the implementing partner had identified that the implementing partner was incorrectly including additional, unrelated data when producing its quarterly totals and while the annual total had been corrected to approximately $50,000, the annual report did not indicate that this error had occurred in the quarterly reports. USAID officials noted that the quality of the information in the progress reports also depends on the experience and capacity—which can be limited—of the implementing partner.[55]

---

[54]According to USAID officials, USAID has centrally established a data-quality assessment process, which requires that all data collected externally have a data-quality assessment within the 1st year of collecting data and every 3 years thereafter.

[55]USAID officials said that, for one of the projects GAO reviewed, USAID uses a third-party monitoring project to work with local organizations to improve their collection and analysis of data, which these officials said is a major challenge to building local capacity in USAID's partners.

According to USAID officials, USAID is currently building the Development Information Solution (DIS), an agency-wide information system that would provide USAID's operating units (such as headquarters bureaus or field missions) with a tool to better collect, track, and analyze information to improve how they manage their projects and overall strategies. Implementing partners would be able to access the DIS via a portal where they would directly enter project information and upload reports and supporting information, according to this official. In addition, this information would better inform USAID's decision-making at the operating unit level and agency level. A USAID official explained that USAID developed DIS partly as a result of USAID senior management's concern about the lack of one corporate system to collect data in a timely fashion and improve efficiency.

A USAID official responsible for managing DIS informed us that the business case for DIS was approved in fiscal year 2016. Developers have regularly solicited input from across the agency, according to this official, and a pilot with six missions is expected to begin in November 2018. This official explained that USAID plans to have DIS operational by the end of 2019, but DIS's timeframe has been accelerated by a year, to 2019 from 2020, which may create programming and budget challenges, and unexpected challenges may also arise during the pilot process as mission needs for DIS are more fully assessed. USAID is currently developing training, deployment, and communications plans to prepare the agency for implementing DIS, according to officials.

DOL Had Consistent and Complete Performance Information for the Selected Project and We Identified No Controls Insufficient to Ensure the Reliability of Performance Information

We reviewed selected indicators and targets information in one DOL project and identified no significant consistency or completeness issues beyond early project stages. For example, for the indicator *"number of countries that ratify the International Labor Organization Protocol on Forced Labor,"* the October 2016 report contained no reported value for this indicator, while the subsequent report (April 2017) updated this figure to indicate a value of "4" for October 2016. DOL officials explained that a data reporting form had not yet been developed as of October 2016, but indicator performance was discussed in the October 2016 narrative and added to the data reporting form when it was developed. While DOL does not require that a project progress report discuss every indicator

associated with an activity in the performance report narrative, according to officials, we found that explanations were present for every significant performance-related event that we identified for the fiscal year 2016 and fiscal year 2017 period.[56]

We did not identify any controls in DOL's process that were insufficient to ensure the reliability of performance monitoring information. DOL officials said that they use a system of spreadsheets with automated calculations and validation checks that are intended to standardize information submission and assure consistency and completeness of submitted information. These officials said that the project's Comprehensive Monitoring and Evaluation Plan defines rules for how information for indicators is to be collected and how indicators are to be computed from this information. According to these officials, DOL develops a customized indicator reporting form for each project in conjunction with implementing partners, which implementing partners complete as part of their regular reporting requirements. According to these officials, these spreadsheets contain formula checks to mitigate the risk of implementing partners making undisclosed changes to indicator results and array information in a standardized manner across reporting periods. Officials also commented that for internal reporting purposes, such as the Government Performance and Results Act, project officers can extract information from indicator templates in a manner that is not overly burdensome. According to officials, DOL is developing an enhancement to existing tools, expected in late 2019, which will provide a traceable way to send and receive reports from grant recipients; timestamps when reports are sent, received, and accepted; and tracking of performance monitoring communications between DOL and implementing partners. They plan to continue to use a spreadsheet-based system for tracking indicator information.

---

[56]While we examined indicator and narrative information for consistency and completeness in order to assess its reliability, we did not verify the accuracy of the reported information.

State Does Not Have a Process to Ensure that All Performance Indicators are Useful, while USAID and DOL Have Established Processes to Regularly Review the Usefulness of Indicators

State TIP Office Does Not Have a Process to Review All Indicators to Ensure Their Usefulness

State TIP Office does not have a process to regularly review the number and content of indicators for counter-trafficking in persons projects to ensure that these indicators are useful and that collecting and reviewing information for them is not overly burdensome. State TIP Office officials acknowledged there are too many indicators for many counter-trafficking in persons projects. Project officers have the discretion to revise indicators if the scope of the project is not altered, according to State officials. In addition, according to these officials, changes that alter the project scope are possible with the consent of the implementing partner. However, State TIP Office project officers do not formally indicate which indicators they have determined are most useful and informed us that they have insufficient time and resources to do so as projects progress. One official who focuses on monitoring issues stated that, ideally, there should be three to five indicators per activity, and efforts have been made to reduce the number of indicators in some projects. For example, in one of the State TIP Office projects we reviewed—which was designed prior to the hiring of this official—had more than 230 indicators across 20 activities as of the first quarter of fiscal year 2017, which had been reduced to about 150 by the fourth quarter of fiscal year 2017.

Our review of two State TIP Office projects showed that indicators did not change in some situations even when the project officer considered the indicator to have become less relevant. State project officers explained that, instead of only relying on indicator information, they regularly spoke with implementing partners for an understanding of what performance level to expect. While acknowledging errors in the numerical information for some indicators, project officers for the two projects we reviewed said that they sometimes overlooked reviews of all reported indicators in the quarterly progress reports because they consider some indicators to be less useful or unimportant and not needed for monitoring purposes, and

burdensome to review in depth. These officials said that project officers focus on the indicators that they consider to be most important for project oversight or congressional requests.

State TIP Office officials said that logic models, which include indicators, have improved significantly in recent years (including improvements to the suggested logic model template and the glossary of definitions), partly due to hiring additional monitoring staff, but that State has found the analysis of logic models to be difficult because of the absence of centralized and standardized information and a lack of staff capacity. In addition, project officers stated that they often rely on implementing partners for suggestions with regard to changing indicators. However, according to State officials, these implementing partners may be reluctant to bring up challenges they encounter out of concern that doing so may damage their relationship with State.

State's Program Design and Performance Management Toolkit, rolled-out in 2017, states that indicators can be costly to collect and manage and should therefore be "useful," which includes having a clear utility for learning, tracking, informing decisions, or addressing ongoing program needs. This policy further states that indicators should also be "adequate," which includes having only as many indicators in overall monitoring plan as are necessary and feasible to track key progress and results, inform decisions, conduct internal learning, and meet any external communication or reporting requirements. Further, federal internal control standards state that management should establish and operate monitoring activities, and, after doing so, may determine how often it is necessary to change the design of the internal control system as conditions change to effectively address objectives.[57] Without a process to ensure that the number and content of counter-trafficking in persons project indicators are reviewed and modified as needed, project monitoring may be less efficient and effective as implementing partners and State TIP Office staff spend time collecting and reviewing indicator information that is not useful for project monitoring and management.

[57]See GAO-14-704G.

DOL and USAID Have Established Processes to Regularly Review the Usefulness of Indicators

DOL and USAID had processes in place to regularly review indicators for the projects we selected. DOL officials told us that project officers work with subject-matter experts to review the relevance of indicators in each semi-annual reporting period. These officials also stated that grantees are required to review their monitoring and evaluation plan annually, which includes the project's indicators, and to provide the most recent work plan with each semi-annual report. According to DOL officials, while not a DOL requirement, the project we reviewed incorporated a work plan for each component of the project defining when important activities were planned under each output indicator. We found that DOL and the implementing partner made regular changes to these project plans in response to changing conditions. These plans were consistently included in the monitoring documents and most elements were discussed in the associated narrative text.

USAID conducts its project oversight primarily out of its overseas missions, according to USAID officials.[58] According to USAID officials associated with the projects we reviewed, these officials should review the project's indicators annually, as well as when they determine a review is needed, such as when projects have changes in planned activities. USAID officials stated that this annual review process may be explicitly required in some agreements. According to these officials, missions or other operating units are required to manage and update reference sheets for indicators, which officials said are intended to define each indicator and the information to be collected to measure each indicator. Changes to these reference sheets are tracked, according to these officials. Projects we reviewed showed evidence of regular changes to indicators and associated targets. We spoke to project officers about several specific changes that we had identified. For many of these changes, the project officers provided information about their work with implementing partners to appropriately adjust program goals and

---

[58]According to officials, USAID/Washington also reviews indicator data that is submitted in the Performance Plan Report, which is an annual data call to all operating units that implement foreign assistance funds. According to these officials, the Performance Plan Report process informs dialogue between USAID/Washington and overseas missions intended to ensure that there is appropriate oversight and understanding of counter-trafficking in persons programming.

expectations, such as adapting the project indicators and targets to unexpected or changing conditions.

Conclusions

Given the grave suffering of victims and damaging effects on society that trafficking in persons imposes, and the U.S. government's reliance on implementing partners to carry out its counter-trafficking projects, performance monitoring is important to ensure that the United States funds projects that are effective, efficient, and achieve their intended counter-trafficking goals. In fiscal year 2017, State, DOL, and USAID managed 120 counter-trafficking projects and monitored the performance of the projects. However, weaknesses in State's and USAID's monitoring processes limit their ability to collect reliable performance information and assess project performance. First, we found that the State TIP Office did not fully document its monitoring activities for many of the projects we reviewed that started in between fiscal years 2011 to 2016. Monitoring the implementation of projects and fully documenting the results of such monitoring are key management controls to help ensure that project recipients use federal funds appropriately and effectively. The State TIP Office was also not setting targets for some project indicators, which may have limited the TIP Office's ability to determine if implementation was on track or if corrections needed to be made. Furthermore, we found that the State TIP Office and USAID used project performance information reported by the implementing partners—used for internal and external reporting purposes—that was not always consistent or complete, and did not have sufficient controls to ensure the reliability of performance information. Finally, to ensure effective and efficient monitoring, projects need to establish a reasonable number of indicators and update them as needed. However, we found that the State TIP Office does not regularly evaluate and revise all of its indicators for counter-trafficking in persons projects, which can have large numbers of indicators. As a result, the State TIP Office may be using information to monitor project performance that that is less useful and relevant for understanding project progress, and requires more resources and time for the implementing partners to produce and agency officials to review.

State TIP Office officials noted that the TIP Office has taken steps to improve its monitoring process, and State and USAID officials explained that State and USAID are developing information management systems that may increase the quality and usefulness of the monitoring information they use. However, these systems are not fully designed or operational

and their capabilities are not yet known. Thus, the potential of these systems to strengthen the ability of State and USAID to collect reliable performance information and assess their efforts to combat the serious problem of global trafficking in persons is unclear. State and USAID could benefit from making additional improvements to ensure their projects are being implemented as intended and achieving project goals to prevent trafficking in persons, protect victims, and prosecute trafficking crimes.

Recommendations for Executive Action

We are making a total of five recommendations, including four to State and one to USAID. Specifically:

The Secretary of State should ensure that the Director of the TIP Office establishes targets for each performance indicator. (Recommendation 1)

The Secretary of State should ensure that the Director of the TIP Office maintains documentation of all required monitoring activities, including monitoring plans, progress reports, and performance targets. (Recommendation 2)

The Secretary of State should ensure that the Director of the TIP Office establishes additional controls to improve the consistency and completeness of performance information that the TIP Office uses to monitor counter-trafficking in persons projects. (Recommendation 3)

The Secretary of State should ensure that the Director of the TIP Office establishes a process to review and update performance indicators, with the participation of implementing partners, to ensure that project monitoring remains efficient and effective. (Recommendation 4)

The Administrator of USAID should establish additional controls to improve the consistency and completeness of performance information that USAID uses to monitor counter-trafficking in persons projects. (Recommendation 5)

Agency Comments and Our Evaluation

We provided a draft of this report to State, DOL, USAID, DOD, and the Treasury for review and comments. In State's and USAID's letters, reproduced in appendixes IV and V, respectively, both agencies concurred with our recommendations and described their planned actions to address the recommendations. In addition, State's letter indicated that our draft report did not fully recognize the investment State has made, and the changes underway, to improve the TIP Office's performance measurement and ensure complete and consistent documentation. State cited additional dedicated financial and personnel resources for monitoring and evaluation added over the past two years. We acknowledge and report on these positive steps, including the hiring of a monitoring and evaluation specialist and other TIP Office staff, in our report. USAID's letter included other comments that we have responded to in appendix V. Furthermore, State, DOL, USAID, and the Treasury provided technical comments, which we incorporated as appropriate. DOD had no comments.

We are sending copies of this report to the appropriate congressional committees; the Secretaries of State, Labor, Defense, and Treasury; and the Administrator of USAID. In addition, the report is available at no charge on the GAO website at http://www.gao.gov.

If you or your staff members have any questions about this report, please contact me at (202) 512-7141, or groverj@gao.gov. Contact points for our Office of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix VI.

Jennifer Grover
Director, International Affairs and Trade

List of Committees

The Honorable James M. Inhofe
Chairman
The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Bob Corker
Chairman
The Honorable Bob Menendez
Ranking Member
Committee on Foreign Relations
United States Senate

The Honorable Richard Shelby
Chairman
The Honorable Dick Durbin
Ranking Member
Subcommittee on Defense
Committee on Appropriations
United States Senate

The Honorable James Lankford
Chairman
The Honorable Christopher Coons
Ranking Member
Subcommittee on Financial Services and General Government
Committee on Appropriations
United States Senate

The Honorable Roy Blunt
Chairman
The Honorable Patty Murray
Ranking Member
Subcommittee on Labor, Health and Human Services, Education, and
Related Agencies
Committee on Appropriations
United States Senate

The Honorable Lindsey Graham
Chairman

The Honorable Patrick Leahy
Ranking Member
Subcommittee on State, Foreign Operations, and Related Programs
Committee on Appropriations
United States Senate

The Honorable Mac Thornberry
Chairman
The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

The Honorable Ed Royce
Chairman
The Honorable Eliot Engel
Ranking Member
Committee on Foreign Affairs
House of Representatives

The Honorable Kay Granger
Chairwoman
The Honorable Pete Visclosky
Ranking Member
Subcommittee on Defense
Committee on Appropriations
House of Representatives

The Honorable Tom Graves
Chairman
The Honorable Mike Quigley
Ranking Member
Subcommittee on Financial Services and General Government
Committee on Appropriations
House of Representatives

The Honorable Tom Cole
Chairman
The Honorable Rosa DeLauro
Ranking Member
Subcommittee on Labor, Health and Human Services, Education, and
Related Agencies
Committee on Appropriations
House of Representatives

The Honorable Hal Rogers
Chairman
The Honorable Nita Lowey
Ranking Member
Subcommittee on State, Foreign Operations, and Related Programs
Committee on Appropriations
House of Representatives

Appendix I: Objectives, Scope, and Methodology

The National Defense Authorization Act for Fiscal Year 2017 includes a provision for GAO to report on the programs conducted by the Department of State (State), the Department of Labor (DOL), the United States Agency for International Development (USAID), the Department of Defense (DOD), and the Department of the Treasury (Treasury) that address human trafficking and modern slavery, including a detailed analysis of the effectiveness of such programs in limiting human trafficking and modern slavery.[1] Three of these agencies—State, DOL, and USAID—have programs that design and award counter-trafficking projects to implementing partners, through contracts, grants, or cooperative agreements.[2] These agencies then oversee and monitor these projects. Since DOD and Treasury officials did not identify these types of projects as part of their counter-trafficking in persons efforts, we provided background information on their efforts but did not cover these agencies in our reporting objectives. This report (1) identifies the recent projects in international counter-trafficking in persons that key U.S. agencies have awarded to implementing partners, and for selected projects, assesses the extent to which key agencies have (2) documented their monitoring activities, (3) ensured the reliability of the performance information they use in monitoring projects, and (4) reviewed the usefulness of the performance indicators they use in monitoring projects.

To address these objectives, we reviewed relevant agency documents and interviewed agency officials. To report on agencies' programs, we asked knowledgeable officials at State, DOL, USAID, DOD, and Treasury to identify their projects that (1) had an international focus; (2) were delivered by implementing partners to external recipients, such as trafficking victims or host governments, as project beneficiaries; and (3) addressed trafficking in persons,

---

[1]See Pub. L. No. 114-328, Div. A, Title XII, § 1298(h), 130 Stat. 2000, 2563 (2016).

[2]For the purposes of our review, implementing partners include contractors, grantees, and recipients of cooperative agreements.

modern slavery,[3] or forced labor.[4] Because State, DOL, and USAID
managed such projects, we focus on them as the three key agencies for
the purposes of our reporting objectives. According to officials from these
three agencies, the projects they identified range from those with counter-
trafficking in persons as a primary goal, to those in which this goal was
integrated as part of each agency's activities.[5] We used the lists of
projects that these agencies provided to report the relevant counter-
trafficking projects that agencies awarded to implementing partners to

---

[3]According to the Department of State, "trafficking in persons," "human trafficking," and
"modern slavery" are used as umbrella terms to refer to both sex trafficking and compelled
labor. Agency officials we met with also commented that modern slavery is not defined in
law, and often used interchangeably with the term "trafficking in persons" or "human
trafficking."

[4]To address the mandate, we gathered information about agencies' programs and
projects. In past GAO reports, we noted that the *Glossary of Terms Used in the Federal
Budget Process* defines "program" as "generally, an organized set of activities toward a
common purpose or goal that an agency undertakes or proposes to carry out its
responsibilities." This definition acknowledges that because the term program has many
uses in practice, it does not have a well-defined, standard meaning in the legislative
process. It is used to describe an agency's mission, functions, activities, services,
projects, and processes. Our report focuses on, and therefore uses the term, "projects," to
refer to counter-trafficking in persons interventions funded by key agencies through
awards made to implementing partners, though some agencies may sometimes refer to
what we term "projects" as "programs."

[5]The agencies used different approaches to identify relevant projects. State's projects are
those with a primary goal of counter-trafficking in persons. DOL's list of projects includes
those that either solely focused on forced labor or trafficking in persons, or included a
substantial component on either of those issues. DOL's projects also include those in
which reducing child labor was the primary goal, but for which there was a substantial
component focused on forced labor or trafficking. In addition to including projects with a
primary goal of counter-trafficking in persons, USAID included projects that do not have
counter-trafficking in persons as a primary goal. According to USAID officials, USAID's
counter-trafficking in persons integration is part of USAID's counter-trafficking in persons
policy, and that excluding integrated projects that do not have a primary goal of counter-
trafficking in persons, but incorporate a counter-trafficking component, would present an
incomplete picture and would leave out a set of projects that reflect USAID's holistic
approach to addressing trafficking in persons. According to DOD officials, DOD's only
relevant program is its trafficking in persons awareness training provided to its staff, which
is not internationally focused or delivered to external recipients as projects. Treasury
officials informed us that Treasury does not have specific programs on countering-
trafficking in persons to report. As such, our reporting objectives do not cover DOD or
Treasury.

carry out the projects.[6] For our first objective, we determined the projects
that were active during fiscal year 2017, including those which began,
were ongoing, or ended during fiscal year 2017, and interviewed agency
officials to confirm project information.

To analyze the effectiveness of agencies' programs in limiting human
trafficking and modern slavery, we assessed the key agencies' monitoring
efforts for selected projects by examining the extent to which agencies
have documented their monitoring activities, ensured the reliability of the
performance information, and reviewed the usefulness of the
performance indicators they use in monitoring projects.

To assess the extent to which State, DOL, and USAID documented their
monitoring activities for selected counter-trafficking in persons projects,
we reviewed these agencies' monitoring policies and related guidance as
well as the full agreements for the projects to identify specific required
monitoring activities. The policies and related guidance included State's
Grants Policy Directive Number 42 (GPD-42) related to monitoring
assistance awards;[7] *Federal Assistance Policy Directive* (FAPD),[8] which
according to a State official superseded State's grants policy directives,
including GPD-42; *Federal Assistance Directive*,[9] which superseded the

---

[6]Funding amounts for the counter-trafficking in persons projects were provided by each
agency in response to our request for funding information. However, the agencies used
different methods for collecting and reporting the funding data, which limited our ability to
combine funding information across agencies. State's reported funding consists of total
award amounts for projects that focused on counter-trafficking in persons. DOL also
reported total award amounts for projects that focused on counter-trafficking in persons,
and estimated award amounts for the counter-trafficking in persons component of the total
award amounts for projects that did not focus on counter-trafficking in persons. USAID's
reported funding consists of total award amounts for counter-trafficking in persons
standalone projects, in which the sole focus of the project was to combat trafficking in
persons. However, for USAID's integrated projects in which counter-trafficking in persons
efforts make up a component of the overall project, USAID reported on the commitment of
its funds specifically for counter-trafficking in persons activities, which consists of obligated
amounts plus committed amount.

[7]Department of State, Bureau of Administration, Office of the Procurement Executive,
Grants Policy Directive Number 42 (Aug. 30, 2010).

[8]Department of State, Office of the Procurement Executive, *U.S. Department of State
Federal Assistance Policy Directive* (Mar. 13, 2015), and *U.S. Department of State
Federal Assistance Policy Directive* (Jan. 14, 2016).

[9]Department of State, Office of the Procurement Executive, Federal Assistance Division,
Federal Assistance Directive, version 1.0 (May 20, 2017), and *Federal Assistance
Directive,* version 2.0 (Oct. 1, 2017).

FAPD*; Program Design and Performance Management Toolkit*;[10] and
Program and Project Design, Monitoring, and Evaluation Policy.[11] We
also reviewed State's Office to Monitor and Combat Trafficking in Persons
standard operating procedures.[12] For DOL, we reviewed its Management
Procedures and Guidelines (MPG)[13] as well as the Comprehensive
Monitoring and Evaluation Plan Guidance Document[14] referenced in the
fiscal year 2017 MPG. For USAID, we reviewed—from its Automated
Directives System or ADS—Chapter 203 on Assessing and Learning[15]
and Chapter 201 on Program Cycle Operational Policy,[16] which according
to USAID officials superseded Chapter 203. Once we determined what
tools the agencies use to monitor their counter-trafficking in persons
projects, we sought documentation of those tools to determine whether
agencies were implementing those tools.

To assess the agencies' monitoring efforts, we identified all of State's,
DOL's, and USAID's projects that started before or during October 2015,
which corresponds to the first quarter of fiscal year 2016, and were active
through September 30, 2017, which corresponds to the fourth and last

---

[10]Department of State, *Program Design and Performance Management Toolkit* (Sept.
2016)*.*

[11]Department of State, *Department of State Program and Project Design, Monitoring, and
Evaluation Policy* (Nov. 2017).

[12]Department of State, Office to Monitor and Combat Trafficking in Persons, *International
Programs Team Manual* (updated Apr. 2018).

[13]Department of Labor, Bureau of International Labor Affairs, Office of Child Labor, Forced
Labor and Human Trafficking, *Management Procedures and Guidelines for USDOL-ILO
Cooperative Agreements: FY2012 Projects awarded to ILO Programme for the Elimination
of Child Labour, Management Procedures and Guidelines for Cooperative Agreements
2014; Management Procedures and Guidelines for USDOL-ILO Cooperative Agreements:
FY2015 Projects awarded to the ILO*; and *Management Procedures and Guidelines for
Cooperative Agreements Fiscal Year 2017* (Dec. 19, 2017).

[14]Department of Labor, Bureau of International Labor Affairs, Office of Child Labor, Forced
Labor and Human Trafficking, *Resources for Developing an OCFT Comprehensive
Monitoring & Evaluation Plan (CMEP)* (Feb. 13, 2018).

[15]United States Agency for International Development, *ADS Chapter 203 Assessing and
Learning* (revised Nov. 2, 2017).

[16]United States Agency for International Development, *ADS Chapter 201 Program Cycle
Operational Policy* (revised Oct. 5, 2017).

quarter of fiscal year 2017.[17] This produced a list of a total of 57 State, DOL, and USAID projects. Out of these 57 projects, we excluded 3 projects from our selection for various reasons. We excluded one DOL project because DOL identified the project as being a research project for which certain agency performance monitoring requirements (e.g., indicators, targets) are not applicable. We also excluded two USAID projects because USAID identified each project as including several projects with various start and end dates, thus making it difficult to determine their time frames for inclusion in our report. This resulted in a selection of 54 projects—37 from State, 3 from DOL, and 14 from USAID. We reviewed documentation of key monitoring activities as specified in agency policy or the project award agreements to determine the extent to which the agencies had full documentation of key monitoring activities. We also applied federal standards for internal control, which call for agency management to design monitoring activities so that all transactions are completely and accurately recorded,[18] and GAO's key attributes of effective performance measures, specifically the attribute of

---

[17]For our reporting objectives to assess the extent to which agencies have documented their monitoring activities, ensured the reliability of the performance information, and reviewed the usefulness of the performance indicators they use for that monitoring, we reviewed projects based on the information contained in an initial list of projects that agencies provided. USAID subsequently provided an updated list of projects that slightly affected the count of projects that we report in our objective to identify projects, but we did not revise the scope of projects we reviewed for other objectives.

[18]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept. 2014), and *Standards for Internal Control in the Federal Government,* GAO/AIMD-00-21.3.1 (Washington, D.C.: Nov. 1999).

having a numerical target.[19] We made our determinations of the extent to which agencies had full documentation of key monitoring activities, as follows:

- State (37 projects[20]). To determine whether State had fully documented its monitoring activities, we reviewed the monitoring plan for each project; fiscal year 2017 quarterly progress reports for each project; and the final progress report, including indicators and targets, for the seven projects that ended as of December 2017.

  - We determined that State had "fully documented" the monitoring plan, if State provided a monitoring plan worksheet for the project. If State did not provide a monitoring plan worksheet for the project, we determined the monitoring plan was "not documented."

  - For each quarterly progress report for fiscal year 2017 as well as the final progress report for projects that ended as of December 2017, we determined that State had "fully documented" the report, if the report included both a qualitative and quantitative summary of progress. For the State TIP Office projects we reviewed, the qualitative summary of progress is captured in a narrative and the quantitative summary of progress is captured in the logic model. For the State DRL project we reviewed, the qualitative summary of

---

[19]Our prior work on performance measurement identified 10 key attributes of performance measures—such as having a measurable target—that GAO has found are key to successfully measuring a project's performance. For example, our prior work has shown that numerical targets or other measurable values facilitate future assessments of whether overall goals and objectives are achieved because comparisons can be easily made between projected performance and actual results. See GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures,* GAO-03-143 (Washington, D.C.: Nov. 22, 2002), p. 45, for a description of how we developed the attributes of effective performance goals and measures. See GAO, *Defense Health Care Reform: Additional Implementation Details Would Increase Transparency of DOD's Plans and Enhance Accountability*, GAO-14-49 (Washington, D.C.: Nov. 6, 2013), p. 17, for a description of why the baseline measure was added as an attribute of effective performance measures. See also *GPRA Performance Reports,* GAO/GGD-96-66R (Washington, D.C.: Feb. 14, 1996); *Missile Defense: Opportunity to Refocus on Strengthening Acquisition Management,* GAO-13-432 (Washington, D.C.: Apr. 26, 2013); *Performance Measurement and Evaluation: Definitions and Relationships,* GAO-11-646SP (Washington, D.C.: May 2011); and *Agency Performance Plans: Examples of Practices That Can Improve Usefulness to Decisionmakers*, GAO/GGD/AIMD-99-69 (Washington, D.C.: Feb. 26, 1999).

[20]Of the 37 projects, 36 are managed by State's Office to Monitor and Combat Trafficking in Persons (TIP Office) and the remaining project is managed by State's Bureau of Democracy, Labor, and Human Rights (DRL). We did not find any instances of "partially documented" or "not documented" monitoring activities for the DRL project.

---

progress is captured in a narrative and the quantitative summary of progress is captured in the monitoring plan. If either component—narrative or quantitative summary—was not documented, we determined that the report was "partially documented." If both components were not documented, we determined that the report was "not documented."

- We determined that State had "fully documented" indicators and targets for projects that ended as of December 2017, if the final progress report for the project included indicators as well as targets for each indicator.[21] If the final progress report included indicators but did not specify targets for each indicator, we determined that indicators and targets were "partially documented."[22] If the final progress report did not include indicators and targets, we determined that indicators and targets were "not documented." (We did not find any instances of "not documented.")

- DOL (3 projects). To determine whether DOL had full documentation of its monitoring activities, we reviewed the monitoring plan as well as fiscal year 2017 semi-annual progress reports for each project. Because DOL's three projects were ongoing as of December 2017, we reviewed the second semi-annual progress report for fiscal year 2017 to determine whether DOL had "fully documented" indicators and targets for each project. Overall, we determined that DOL had "fully documented" (1) the monitoring plan for each project, if the monitoring plan documented the performance metrics and data collection frequency for the project; (2) each fiscal year 2017 semi-annual progress report for the project, if the report included a qualitative and quantitative summary of progress for the period of performance; and (3) indicators and targets for the project, if the second semi-annual progress report included indicators as well as targets for each applicable indicator.

---

[21]The final progress reports provide information on output and outcome indicators. According to the State TIP Office's logic model proposal template, output indicators provide a means to measure the products, goods, and services which result from an activity, program, or policy (e.g., number of training manuals and tools developed). Outcome indicators provide a means to measure the extent to which an activity, project, program, or policy achieves its objectives (e.g., number of government institutions/structures that utilize manual/tools to train others).

[22]For indicators lacking targets, we excluded from the count any disaggregated indicators or indicators for which the target could be inferred, such as when the target could be inferred as being a value of "1."

- USAID (14 projects). To determine whether USAID had full
  documentation of its monitoring activities, we reviewed the monitoring
  plan for each project; fiscal year 2017 progress reports at the
  reporting frequency specified in the agreements for each project; and
  the final progress report, including indicators and targets, for the three
  projects that ended as of December 2017. We also reviewed evidence
  of site visits conducted during the life time of the projects. Overall, we
  determined that USAID had "fully documented" (1) the monitoring plan
  for each project, if the monitoring plan documented performance
  metrics for the project; (2) the periodic progress reports for fiscal year
  2017 as well as the final progress report for projects that ended as of
  December 2017, if the report included a qualitative and quantitative
  summary of progress for the period of performance; and (3) indicators
  and targets for the three projects that ended as of December 2017, if
  the final progress report included indicators as well as targets for each
  applicable indicator. We determined that USAID "fully documented" a
  project's site visit, if USAID provided evidence of having conducted at
  least one site visit during the life time of the project.

Additionally, we interviewed knowledgeable monitoring officials from each
agency to understand agencies' monitoring process and application of
monitoring requirements for counter-trafficking in persons projects.
Because State and DOL officials also identified site visits as a key tool
they use to monitor their counter-trafficking in persons projects, we
reviewed evidence of site visits conducted during the life time of the
projects to report on these efforts.[23] We also interviewed State TIP Office
officials to discuss instances in which the agency did not have full
documentation of key monitoring activities.

To assess the extent to which key agencies have ensured the reliability of
the performance information they use to monitor selected projects, we
selected for review a nongeneralizable sample of 5 projects—2 State
projects, 1 DOL project, and 2 USAID projects—out of the 54 counter-
trafficking in persons projects identified by agencies that started before or
during October 2015 and were active through fiscal year 2017. We based
our selection of these projects primarily on largest total award amounts.[24]

---

[23]We did not include pre-award site visits in the scope of our review. According to the
State TIP Office's current policy, new grantees who have never received funding from the
TIP Office usually receive a pre-award site visit.

[24]Within a given agency's portfolio, we chose not to select a second project if it was being
implemented in the same locale as the first project. We instead selected the next largest
project. Total award amount of the project may include components that are not focused
on counter-trafficking in persons effort.

For these selected projects, we obtained 2 years of progress reports and
other documents to assess the quantitative and qualitative performance
information. We developed a standardized template to capture all
quarterly or semi-annual indicator performance information reported for
each of these projects and assessed whether quarterly or semi-annual
totals were consistent with annual and cumulative totals where these
were reported. Using this quantitative information, we judgmentally
selected indicators for inclusion in agency interviews where it appeared
likely that numerical errors had occurred or there appeared to be
significant project events, such as large over- or under-performance or
the elimination of the indicator. We interviewed agency officials, including
managers of these five projects, about the consistency and completeness
of monitoring information in these projects for about 60 indicators
identified through our analysis.[25] Additionally, we questioned these
officials about performance report narrative information describing project
activities that, in our judgement, appeared to be incomplete or
inconsistent with respect to indicator results. We also used these
interviews to determine whether our findings for these selected projects
reflected general agency policies and procedures. We assessed the
completeness and consistency of project performance data that State,
DOL, and USAID use to monitor projects as part of our data reliability
assessment. We found State and USAID data to be unreliable in the
projects we reviewed. We discuss the implications of these unreliable
data for State and USAID's project management and reporting in our
findings and recommendations. We found the performance data that DOL
used were consistent and complete for the project we reviewed. While we
examined indicator data and narrative information for consistency and
completeness, we did not verify the accuracy of performance information.

To assess the extent to which key agencies have reviewed the
usefulness of the performance indicators they use to monitor selected
projects, we used the same nongeneralizable sample of five projects—
two State projects, one DOL project, and two USAID projects. We
interviewed agency officials, including managers of these five projects,

---

[25]While we reviewed all reported indicator data as part of our process that led to selecting
about 60 indicators for which we requested additional information, we did not attempt to
count the total number of indicators. In the five projects we reviewed, there were varying
practices for labeling and categorizing indicators, leading to ambiguity in counting
indicators, such as whether a reported figure is a disaggregation of an indicator or, itself,
an indicator; and whether an indicator had been discontinued or was not reported for a
given reporting period. Further, the number of indicators for a given project sometimes
varied from quarter to quarter.

about processes and systems they use to review the usefulness of
indicators on an ongoing basis, such as when conditions in the project
activity region change or if the agency and implementing partner learn
that certain project activities are less effective than expected. We
identified examples of indicators that had apparently been discontinued,
as well as continued indicators that showed minimal progress, and we
asked these officials to explain what had or had not been discontinued.
We also used these interviews to determine whether our findings for
these selected projects reflected general agency policies and procedures.

We conducted this performance audit from October 2017 to December
2018 in accordance with generally accepted government auditing
standards. Those standards require that we plan and perform the audit to
obtain sufficient, appropriate evidence to provide a reasonable basis for
our findings and conclusions based on our audit objectives. We believe
that the evidence obtained provides a reasonable basis for our findings
and conclusions based on our audit objectives.

Appendix II: Three Key U.S. Agencies' Counter-trafficking in Persons Projects, Active in Fiscal Year 2017

The Departments of State (State) and Labor (DOL), and U.S. Agency for International Development (USAID) managed 120 projects in counter-trafficking in persons carried out by implementing partners during fiscal year 2017, according to information provided by officials with these agencies. The three agencies used different approaches to identify relevant projects. For example, State reported projects with a primary goal of counter-trafficking in persons, while DOL and USAID included projects that may not have counter-trafficking in persons as a primary goal. Table 4 lists these agencies' reported project information for projects that were active during fiscal year 2017.

Table 4: Departments of State (State) and Labor (DOL), and U.S. Agency for International Development (USAID) Counter-trafficking in Persons Projects Active during Fiscal Year 2017, as Identified by Agency Officials

Agency	Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding amount[a] (in dollars)
State/ TIP Office	Support for United Nations Office on Drugs and Crime's (UNODC) normative work on the implementation and interpretation of the UN Protocol to Prevent, Suppress, and Punish Trafficking in Persons	Global	9/2011	4/2018	1,410,000
State/ TIP Office	Global Database for Human Trafficking Cases	Global	10/2013	3/2018	1,025,000
State/ TIP Office	Counter-Trafficking Training and Technical Assistance (T&TA): A Global Rapid Response Project	Global	10/2013	3/2018	1,000,000
State/ TIP Office	Strengthening National and Regional Capacity in the Criminal Justice Response to Trafficking in Persons	Global	10/2013	6/2018	2,094,792

Agency	Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding amount[a] (in dollars)
State/ TIP Office	Providing comprehensive support to victims of trafficking in Sierra Leone	Sierra Leone	10/2013	9/2018	1,200,000
State/ TIP Office	Enhance Government and Civil Society Responses to Counter Trafficking in Persons in Bhutan	Bhutan	10/2013	9/2018	750,000
State/ TIP Office	Providing comprehensive support to victims of trafficking in South Kivu and educating key stakeholders on Trafficking in Persons (TIP).	Democratic Republic of Congo	10/2014	11/2017	1,000,000
State/ TIP Office	Strengthening coordination to respond to TIP and ensure justice and protection for victims of trafficking in Mozambique	Mozambique	10/2014	12/2017	750,000
State/ TIP Office	Building a National Non-Governmental Organization (NGO) Network to Combat Trafficking, Especially in Conflict and Ceasefire Areas in Myanmar	Burma	10/2014	12/2017	700,000
State/ TIP Office	Integrated Services for Human Trafficking Victims in Peru	Peru	10/2014	12/2017	700,000
State/ TIP Office	Best Practices in Global Data Collection on Trafficking in Persons: The Science (and Art) of Understanding Trafficking in Persons	Global	10/2014	3/2018	500,000
State/ TIP Office	Supporting the Enactment of Anti-Trafficking Legislation and National Action Plan in Tunisia, as well as Strengthening the National Capacities on Identification and Assistance to Victims of Trafficking	Tunisia	10/2014	9/2018	700,000
State/ TIP Office	A cloud-based case data capture, management and analysis platform for anti-trafficking NGOs across different countries in Asia for standardization of TIP data collection and for data research	Global: Burma, Cambodia, Hong Kong, Indonesia, Laos, Malaysia, the Philippines, Thailand, Vietnam, Bangladesh, India, Nepal, Ghana, Kenya, Uganda	10/2014	9/2018	650,000
State/ TIP Office	Safe and Sound	Vietnam	10/2014	9/2018	600,000
State/ TIP Office	International Organization for Migration's (IOM) Human Trafficking Information Exchange: A Reliable Foundation for Effective Anti-Trafficking Policies	Global	10/2014	12/2018	600,000

Agency	Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding amount[a] (in dollars)
State/ TIP Office	Strengthening the criminal justice response to trafficking in persons through legislative assistance and capacity building in Somalia	Somalia	10/2014	3/2018	750,000
State/ TIP Office	Protect, Shelter and Heal: Victim-Centered Technical Assistance for Sub-Saharan African Governments and Civil Society	Africa regional: Nigeria, Swaziland	4/2015	12/2017	750,000
State/ TIP Office	Strengthening Uruguay's efforts to effectively combat TIP at the local level	Uruguay	4/2015	3/2018	470,000
State/ TIP Office	Trafficking in Persons-Legal Assistance Program (TIP-LAP)	Africa regional: Mozambique, Rwanda, Togo, Madagascar, Mauritius	4/2015	6/2018	750,000
State/ TIP Office	Growing up Free: An Effective Response to Child Trafficking in Ghana	Ghana	9/2015	9/2019	2,550,000
State/ TIP Office	United States Conference of Catholic Bishops' Migration and Refugee Services (USCCB/MRS) Project to Combat Global Maritime Human Trafficking	East Asia and the Pacific Regional	10/2015	12/2017	500,000
State/ TIP Office	Establishment of data collection systems in Southern African Development Community (SADC) member states	Africa regional: Malawi, Mozambique, Seychelles, Zimbabwe, South Africa, Lesotho, Swaziland	10/2015	12/2017	400,000
State/ TIP Office	Strengthening coordination to respond to TIP and ensure justice and protection for victims of trafficking in Namibia	Namibia	10/2015	9/2018	750,000
State/ TIP Office	Combating Human Trafficking in Bangladesh through the Promotion of Safe Migration and Protection	Bangladesh	10/2015	9/2018	750,000
State/ TIP Office	Combating human trafficking by strengthening law enforcement responses, facilitating interstate police cooperation, building capacities of victim support systems, enhancing multi sectoral partnerships	India	10/2015	9/2018	750,000
State/ TIP Office	Technical Assistance to the Government of Kyrgyzstan to Strengthen the Legal and Operational Framework on Combating Trafficking in Persons	Kyrgyzstan	10/2015	9/2018	750,000
State/ TIP Office	New Law on the Books: women Judges Provide Leadership on Trafficking in Haiti	Haiti	10/2015	9/2018	750,000

Agency	Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding amount[a] (in dollars)
State/ TIP Office	Strengthening the capacity of the Mexican government to conduct victim-centered investigations and prosecutions of TIP cases and to enhance victims' protection systems	Mexico	10/2015	9/2018	750,000
State/ TIP Office	Burma Anti-Trafficking in Persons project	Burma	10/2015	9/2018	700,000
State/ TIP Office	Protecting Victims of Human Trafficking through Enhanced Partnership, Identification and Referral	Timor-Leste	10/2015	9/2018	600,000
State/ TIP Office	Improving the Capacity of Philippines Law Enforcement, Judicial System and Social Services in Combating Human Trafficking	Philippines	10/2015	9/2018	500,000
State/ TIP Office	Strengthening the National Action Plan on TIP in Turkmenistan to Ensure Coordinated Assistance and a Victim-centered Approach	Turkmenistan	10/2015	9/2018	500,000
State/ TIP Office	Strengthening the Institutional Capacity of Criminal Justice Actors in the Caribbean to Counter Trafficking in Persons Using a Victim Centered Approach	Caribbean Regional-Antigua and Barbuda, Belize, Jamaica, Trinidad and Tobago	10/2015	9/2018	500,000
State/ TIP Office	Assisting the Government of Ghana to Combat Child Trafficking	Ghana	10/2015	9/2019	2,540,000
State/ TIP Office	Emergency Direct Assistance for Victims of Trafficking	Global	10/2015	9/2018	750,000
State/ TIP Office	Strengthening the national criminal justice system's response to trafficking in persons in Djibouti	Djibouti	10/2015	3/2018	500,000
State/ TIP Office	Enhancing National Counter-Trafficking Efforts in Malaysia	Malaysia	1/2016	12/2017	400,000
State/ TIP Office	A Shelter and Repatriation Services for Survivors of Human Trafficking in Vientiane, Lao People's Democratic Republic	Laos	1/2016	12/2018	930,000
State/ TIP Office	Bangladesh: Combating Labor Trafficking through Awareness Raising and Enhancing Victim Protection	Bangladesh	4/2016	3/2018	500,000

Agency	Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding amount[a] (in dollars)
State/ TIP Office	Providing Assistance & Support to Victims of Human Trafficking in Thailand's Fishing Industry	Thailand	4/2016	3/2019	600,000
State/ TIP Office	Urban Light: Expanding Victim-Services for Males Who Are Victims of Trafficking and Exploitation in Northern Thailand	Thailand	6/2016	11/2018	250,000
State/ TIP Office	UNODC Country Programme for Pakistan-Illicit Trafficking and Border Management Sub-Programme	Pakistan	9/2016	8/2019	750,000
State/ TIP Office	IMPACT TIP-TAN	Tanzania	10/2016	9/2018	750,000
State/ TIP Office	GLOT59 Global Programme Against Trafficking in Persons: Strengthening the Implementation of a Comprehensive Response to Trafficking in Persons in Selected Countries	Global	10/2016	9/2018	750,000
State/ TIP Office	Establishment of data collection systems in Angola, Botswana and Namibia	Africa Regional: Angola, Botswana, Namibia	10/2016	9/2018	500,000
State/ TIP Office	Unraveling the Net: Human Trafficking in the Indonesian Fishing Industry	Indonesia	10/2016	9/2018	500,000
State/ TIP Office	Strengthening Governmental Efforts to Combat Human Trafficking through Increased Prosecution and Enhanced Victim Protection in Egypt (SETIP)	Egypt	10/2016	9/2018	400,000
State/ TIP Office	Establishment of a national data collection system in Tanzania	Tanzania	10/2016	9/2018	150,000
State/ TIP Office	Strengthening institutional capacity to coordinate national anti-trafficking response including the identification, protection of victims, investigation and prosecution of trafficking offenders in Mali	Mali	10/2016	3/2019	750,000
State/ TIP Office	Strengthening Counter-Trafficking Efforts for Improved Human Security in Indonesia	Indonesia	10/2016	9/2019	829,964
State/ TIP Office	Strengthened Capacities for Improved Coordination, Protection, and Prosecution on TIP in Madagascar	Madagascar	10/2016	9/2019	750,000

Agency	Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding amount[a] (in dollars)
State/ TIP Office	International Criminal Police Organization (INTERPOL) Project to Combat Human Trafficking via Rapid Response Technical Assistance and Training (T&TA)	Global	10/2016	9/2019	750,000
State/ TIP Office	Counter-Trafficking Training and Technical Assistance (T&TA): A Global Rapid Response Project	Global	10/2016	9/2019	750,000
State/ TIP Office	Strengthening Capacities of Civil Society in Morocco to Identify and Provide Services to Victims of Trafficking in Persons	Morocco	10/2016	9/2019	722,000
State/ TIP Office	Strengthening and Sustaining Tanzania's Response to Trafficking in Persons, Ensuring Access to Justice and Fair Treatment for TIP Victims	Tanzania	10/2016	9/2019	600,000
State/ TIP Office	Improving the Judiciary's Capacity to Fight Human Trafficking in Lebanon	Lebanon	12/2016	3/2018	400,000
State/ TIP Office	Strengthening Investigation of Trafficking in Persons Cases & Services for Victims in Jordan	Jordan	12/2016	11/2018	750,000
State/ TIP Office	Improving national capacities to fight trafficking in persons by enhancing prosecution of traffickers, identification and protection of victims of trafficking in Burkina Faso	Burkina Faso	12/2016	11/2018	715,000
State/ TIP Office	Engaging Indigenous Women to Prevent and Counter Trafficking in Persons	Bolivia	12/2016	11/2018	635,000
State/ TIP Office	Enhancing National and Local Capacities for the Prevention of Trafficking in Persons and Protection of Victims of Trafficking and Vulnerable Returnees in Ethiopia	Ethiopia	12/2016	11/2018	500,000
State/ TIP Office	Capacity-building of the INTERPOL Regional Bureau for Southern Africa to support Southern African Regional Police Chiefs Cooperation Organization (SARPCCO) member states in victim-centered investigations and prosecution of trafficking in persons cases	Africa Regional	12/2016	11/2019	750,000
State/ TIP Office	Strengthening Guyana's capacity to effectively combat TIP and assist victims of trafficking	Guyana	12/2016	11/2019	750,000

Agency	Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding amount[a] (in dollars)
State/ TIP Office	Training and Technical Assistance to Ensure Comprehensive Services for Victims of Trafficking in the Lake Chad Basin	Lake Chad Basin: Nigeria and Cameroon	1/2017	12/2018	750,000
State/ TIP Office	Enhancing Counter Trafficking in Crisis in the Western Balkans	Balkans Regional (Albania, Bosnia and Herzegovina, Macedonia, Kosovo, Montenegro, Serbia)	2/2017	7/2018	750,000
State/ TIP Office	Ending impunity for traffickers in the Thai fishing industry	Thailand	2/2017	1/2019	1,000,000
State/ TIP Office	Reduce the vulnerability and level of labor exploitation and trafficking of local and inter-state migrant workers in the brick kiln and agriculture industry in Chhattisgarh, Uttar Pradesh and Punjab.	India	2/2017	1/2019	750,000
State/ TIP Office	Innovation in Analytics, Technology and Partnerships to Eliminate Slavery in Thai Supply Chains	Thailand	2/2017	1/2019	500,000
State/ TIP Office	Activating the Bonded Labor System Abolition (BLSA) Act	India	2/2017	1/2020	750,000
State/ TIP Office	Combating TIP through Victim-Centered Approaches in India	India	2/2017	1/2020	735,000
State/ TIP Office	Improving Victim-Centered Investigations and Prosecutions of TIP Cases in Mongolia	Mongolia	4/2017	3/2019	750,000
State/ TIP Office	Enhancing Availability and Accessibility of Services for (Potential) Victims of Trafficking, Especially Children in Ukraine	Ukraine	4/2017	3/2019	750,000
State/ TIP Office	SEA Fisheries Project (Strengthened Coordination to Combat Trafficking in Fisheries in Southeast Asia)	Burma, Brunei, Cambodia, Indonesia, Laos, Malaysia, Philippines, Singapore, Thailand, and Vietnam	4/2017	3/2020	1,500,000
State/ TIP Office	Fostering a South American (SA) Network for Knowledge Management (KM) on TIP Investigations and Prosecutions	South American Regional	5/2017	12/2018	750,000
State/ TIP Office	Capacity Enhancement for institutionalized victim centered investigations and prosecutions of Trafficking in Persons (TIP) Cases in South Africa	South Africa	6/2017	5/2020	500,000

Agency	Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding amount[a] (in dollars)
State/ TIP Office	Supporting Availability and Access to Specialized Services for Victims of Trafficking and Individuals At Risk	Iraq	8/2017	4/2019	690,630
State/ DRL	Strengthening Civil Society in Mauritania	Mauritania	9/2014	2/2019	1,927,622
State/ DRL	Aar Sunu Khaleyi ("Protect Our Children")	Senegal	8/2016	9/2018	693,069
State/ DRL	Freedom, Rights and Justice: Combating Descent-based Slavery in Mauritania	Mauritania	8/2016	6/2019	1,675,594
State/ DRL	Combatting Hereditary Slavery and Forced Child Labor in Mali	Mali	9/2016	3/2018	693,069
DOL/ ILAB/ OCFT	Consolidating and Disseminating Efforts to Combat Forced Labor in Brazil and Peru	Brazil, Peru	12/2012	12/2018	6,800,000
DOL/ ILAB/ OCFT	Randomized controlled trial impact evaluations examining the effects of mass media campaigns on norms and behaviors related to vulnerability to forced labor and the worst forms of child labor in Nepal and China	Nepal, China	12/2014	12/2019	999,993
DOL/ ILAB/ OCFT	Support for the Implementation of the Decent Work Country Programme in Uzbekistan	Uzbekistan	12/2014	12/2018	6,000,000
DOL/ ILAB/ OCFT	From Protocol to Practice: A Bridge to Global Action on Forced Labor (The Bridge Project)	Global; priority in Malaysia, Mauritania, Nepal, Niger, and Peru; limited activities in Thailand, the Dominican Republic, and Paraguay	9/2015	9/2019	14,395,138
DOL/ ILAB/ OCFT	Monitoring and Evaluation (M&E) Toolkit: OCFT Sector-Specific Interventions and Cross-Cutting Themes	Global	9/2016	8/2018	1,000,000
DOL/ ILAB/ OCFT	Measurement, Awareness-Raising, and Policy Engagement (MAP 16) Project on Child Labor and Forced Labor in Support of Sustainable Development Goal Target 8.7	Global	12/2016	12/2020	1,500,000
USAID	Ushindi	Democratic Republic of Congo	7/2010	7/2017	783,000
USAID	Counter Trafficking in persons Program (CTIP)	Nepal	7/2010	6/2017	10,177,548
USAID	Reintegration for Trafficking Survivors Project	Uzbekistan	3/2011	12/2017	1,279,683

Agency	Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding amount[a] (in dollars)
USAID	Livelihoods and Food Security Trust Fund (LIFT)	Burma	9/2012	12/2019	661,500
USAID	The Sajhedari Bikaas Partnership for Local Development	Nepal	12/2012	5/2018	743,922
USAID	The Association of Southeast Asian Nations (ASEAN)-US Partnership for Good Governance, Equitable and Sustainable Development and Security (PROGRESS)	Indonesia	9/2013	9/2018	214,000
USAID	Counter-trafficking in Persons-Belarus (IOM)	Belarus	9/2013	9/2020	1,910,036
USAID	Promoting Rule of Law Program (CTIP Component)	Burma	10/2013	9/2018	770,000
USAID	Philippine-American Fund	Philippines	6/2014	9/2018	2,527,468
USAID	Sustainable Fisheries Management Project	Ghana	10/2014	10/2019	623,862
USAID	Bangladesh Counter Trafficking-in-Persons Program (BC/TIP)	Bangladesh	10/2014	11/2020	5,520,000
USAID	Supply Unchained/International Labor Rights Forum (ILRF)	Thailand	6/2015	9/2017	150,000
USAID	Criminal Justice System Strengthening Project	Dominican Republic	6/2015	6/2020	100,000
USAID	Cambodia Countering Trafficking in Persons (CTIP) Program	Cambodia	8/2015	9/2019	8,500,000
USAID	Counter-trafficking in Persons - Azerbaijan (IOM)	Azberbaijan	9/2015	9/2018	600,000
USAID	Positive Life Alternatives for Egyptian Youth At-Risk of Irregular Migration	Egypt	9/2015	12/2018	2,071,465
USAID	Supply Unchained/GoodWeave	India	10/2015	9/2017	250,000
USAID	Reintegration and Prevention of Recruitment	Colombia	10/2015	10/2018	1,800,000
USAID	Dignity and Rights (IOM)	Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan.	10/2015	9/2020	4,300,592
USAID	USAID Mali Justice Project	Mali	12/2015	12/2018	100,000
USAID	Combatting Human Trafficking in Afghanistan (CTIP)	Afghanistan	1/2016	1/2019	7,098,717
USAID	Youth and Gender Justice Project	Guatemala	5/2016	2/2021	2,250,000
USAID	Impact Evaluation for USAID/Cambodia Counter-Trafficking in Persons Activity	Cambodia	6/2016	1/2020	684,972
USAID	Stop Girl Trafficking	Nepal	7/2016	7/2019	1,500,000

Agency	Project name	Location(s) of project	Start date of project (month and year)	End date of project (month and year)	Funding amount[a] (in dollars)
USAID	The IOMX Campaign for the Prevention of Human Trafficking and Exploitation Asia Pacific Region Phase II (For USAID/Regional Development Mission for Asia (RDMA)). IOM X Bangladesh Roadshow (For USAID/Bangladesh)	Bangladesh	9/2016	9/2018	200,000
USAID	Migrant and Refugee Human Rights Project (Macedonian Young Lawyers Association)	Macedonia	9/2016	3/2018	673,301
USAID	USAID Asia CTIP	Asia-Pacific region	12/2016	12/2021	10,524,278
USAID	Improving knowledge, enforcement and coordination in counter-trafficking	Rwanda	1/2017	1/2019	1,360,000
USAID	Growing in Peace Project	Guatemala	3/2017	3/2019	69,646
USAID	Hamro Samman	Nepal	7/2017	7/2022	2,765,270
USAID	Reducing Vulnerabilities to Human Trafficking	Burma	8/2017	12/2018	650,000
USAID	Enabling Communities and Stakeholders to Proactively Address Forced Labour	Burma	9/2017	1/2019	350,000
USAID	Municipal Partnerships for Violence Prevention in Central America and the Dominican Republic	Dominican Republic	9/2017	9/2019	100,000
USAID	USAID Thailand CTIP	Thailand	9/2017	9/2022	6,487,799
USAID	USAID Laos CTIP	Laos	9/2017	9/2022	1,500,001

Legend: State/TIP Office = State's Office to Monitor and Combat Trafficking in Persons; State/DRL = State's Bureau of Democracy, Human Rights, and Labor; DOL/ILAB/OCFT = DOL's Bureau of International Labor Affairs' Office of Child Labor, Forced Labor, and Human Trafficking; USAID/DRG = USAID's Center of Excellence on Democracy, Human Rights and Governance.

Source: GAO analysis of the information provided by the Departments of State and Labor, and the U.S. Agency for International Development. | GAO-19-77

[a]Funding amounts for the counter-trafficking in persons projects were provided by each agency in response to our request for funding information. However, the agencies used different methods for collecting and reporting the funding data, which limited our ability to combine funding information across agencies. State's reported funding consists of total award amounts for projects that focused on counter-trafficking in persons. DOL also reported total award amounts for projects that focused on counter-trafficking in persons, and estimated award amounts for the counter-trafficking in persons component of the total award amounts for projects that did not focus on counter-trafficking in persons. USAID's reported funding consists of total award amounts for counter-trafficking in persons standalone projects, in which the sole focus of the project was to combat trafficking in persons. However, for USAID's integrated projects in which counter-trafficking in persons efforts make up a component of the overall project, USAID reported on the commitment of its funds specifically for counter-trafficking in persons activities, which consists of obligated amounts plus committed amount.

Appendix III: State Documentation for Its Performance Monitoring Activities for 37 Counter-Trafficking in Persons Projects

The Department of State (State) did not fully document its monitoring activities (monitoring plan; fiscal year 2017 quarterly progress reports; and final progress report, including indicators and targets, for projects that ended as of December 2017) for 16 of the 37 selected projects we reviewed with start dates between fiscal years 2011 to 2016.[1] (See table 5.) For example, State's Office to Monitor and Combat Trafficking in Persons did not have monitoring plans for nine projects or targets for

---

[1]Federal standards for internal control call for agency management to design monitoring activities so that all transactions are completely and accurately recorded. See GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept. 2014), and *Standards for Internal Control in the Federal Government,* GAO/AIMD-00-21.3.1 (Washington, D.C.: Nov. 1999).

each indicator in six of seven final progress reports for projects that
ended as of December 2017.[2]

Table 5: Extent to Which Department of State Documented Performance Monitoring Activities for 37 Selected Counter-Trafficking in Persons Projects

Project	Monitoring plan	Q1 FY17 progress report	Q2 FY17 progress report	Q3 FY17 progress report	Q4 FY17 progress report	Final progress report at end of project[a]	Indicators and targets in final progress report[a]
Project #1	fully documented	fully documented	fully documented	fully documented	fully documented	fully documented	fully documented
Project #2	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #3	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #4	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #5	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #6	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #7	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #8	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #9	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #10	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #11	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #12	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #13	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #14	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a

[2]Our prior work on performance measurement identified 10 key attributes of performance
measures—such as having a measurable target—that GAO has found are key to
successfully measuring a project's performance. For example, our prior work has shown
that numerical targets or other measurable values facilitate future assessments of whether
overall goals and objectives are achieved because comparisons can be easily made
between projected performance and actual results. See GAO, *Tax Administration: IRS
Needs to Further Refine Its Tax Filing Season Performance Measures,* GAO-03-143
(Washington, D.C.: Nov. 22, 2002), p. 45, for a description of how we developed the
attributes of effective performance goals and measures. See GAO, *Defense Health Care
Reform: Additional Implementation Details Would Increase Transparency of DOD's Plans
and Enhance Accountability*, GAO-14-49 (Washington, D.C.: Nov. 6, 2013), p. 17, for a
description of why the baseline measure was added as an attribute of effective
performance measures. See also *GPRA Performance Reports,* GAO/GGD-96-66R
(Washington, D.C.: Feb. 14, 1996); *Missile Defense: Opportunity to Refocus on
Strengthening Acquisition Management,* GAO-13-432 (Washington, D.C.: Apr. 26, 2013);
Performance Measurement and Evaluation: Definitions and Relationships,
GAO-11-646SP (Washington, D.C.: May 2011); and *Agency Performance Plans:
Examples of Practices That Can Improve Usefulness to Decisionmakers*,
GAO/GGD/AIMD-99-69 (Washington, D.C.: Feb. 26, 1999).

Project	Monitoring plan	Q1 FY17 progress report	Q2 FY17 progress report	Q3 FY17 progress report	Q4 FY17 progress report	Final progress report at end of project[a]	Indicators and targets in final progress report[a]
Project #15	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #16	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #17	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #18	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #19	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #20	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #21	fully documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #22	not documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #23	not documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #24	not documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #25	not documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #26	not documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #27	not documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #28	not documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #29	not documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #30	not documented	fully documented	fully documented	fully documented	fully documented	n/a	n/a
Project #31	fully documented	partially documented	fully documented	fully documented	fully documented	n/a	n/a
Project #32	fully documented	partially documented	fully documented	fully documented	fully documented	fully documented	partially documented
Project #33	fully documented	partially documented	fully documented	not documented	partially documented	fully documented	partially documented
Project #34	fully documented	fully documented	fully documented	fully documented	fully documented	fully documented	partially documented
Project #35	fully documented	fully documented	fully documented	fully documented	fully documented	fully documented	partially documented
Project #36	fully documented	fully documented	fully documented	fully documented	fully documented	fully documented	partially documented
Project #37	fully documented	fully documented	fully documented	fully documented	fully documented	fully documented	partially documented

Legend: Q = quarter; FY = fiscal year; n/a = not applicable because project was ongoing as of December 2017.
● = fully documented, ◐ = partially documented, ○ = not documented.
Source: GAO analysis of Department of State (State) documents. | GAO-19-77

[a]We reviewed the final progress reports for the 7 of 37 projects that ended as of December 2017. (The remaining 30 projects continued after December 2017.)

Appendix IV: Comments from the Department of State

United States Department of State
Comptroller
Washington, DC 20520

October 24, 2018

Thomas Melito
Managing Director
International Affairs and Trade
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548-0001

Dear Mr. Melito:

We appreciate the opportunity to review your draft report, "HUMAN TRAFFICKING: State and USAID Should Improve Their Monitoring of International Counter-trafficking Projects, GAO Job Code 102348.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

If you have any questions concerning this response, please contact Karen Allen, Evaluation Coordinator, Office of Monitor and Combat Trafficking in Persons, Bureau of Civilian Security, Democracy and Human Rights at (202) 312-9856.

Sincerely,

Christopher H. Flaggs

Enclosure:
 As stated

cc: GAO – Jennifer Grover
  J/TIP – Joel Maybury (Acting)
  OIG - Norman Brown

Department of State Comments on GAO Draft Report

<u>Human Trafficking: State and USAID Should Improve Their Monitoring of
International Countertrafficking Projects</u>
(GAO-19-77, GAO Code 102348)

Thank you for providing the Department of State (State) the opportunity to respond to the GAO
draft report, *"Human Trafficking: State and USAID Should Improve their Monitoring of
International Counter-trafficking Projects."* State welcomes GAO's interest in additional
controls and monitoring to improve the consistency and completeness of project performance
information for USAID and State projects, as well as State maintaining monitoring activity
documentation and establishing targets for all performance indicators. It is important that our
foreign assistance grants advance strategic foreign policy goals on human trafficking.

The National Defense Authorization Act for Fiscal Year 2017 includes a provision for GAO to
report on the programs to combat trafficking conducted by specific agencies, including
Departments of State (State), Labor (DOL), and the U.S. Agency for International Development
(USAID), which among them managed 120 international counter-trafficking projects during
fiscal year 2017.

State has welcomed the GAO audit, which has acknowledged some areas of strength and has
offered recommendations for areas of Monitoring and Evaluation (M&E) that are in need of
additional attention and support. The GAO's draft report does not fully recognize the investment
State has made and the changes underway to improve the TIP Office's performance
measurement and ensure complete and consistent documentation. Additional dedicated financial
and personnel resources for M&E have been added over the past two years at the TIP Office but
with sizeable recent increases in grants made through the TIP Office, additional resources will be
needed for State to fully address GAO's monitoring recommendations.

RESPONSE TO GAO RECOMMENDATIONS FOR EXECUTIVE ACTION

<u>**Recommendation 1:**</u> *The Secretary of State should ensure that the Director of the TIP Office
establishes targets for each performance indicator.*

Response: The Department concurs. The TIP Office hired a Performance Measurement
Specialist in December 2016. The Performance Measurement Specialist reviews all projects'
initial logic frameworks and common performance indicator (CPI) spreadsheets for completeness
and ensures the appropriateness of each indicator and that each indicator has a target. The TIP
Office is in the process of updating its existing International Programs manual, notice of funding
opportunities templates, and logic framework and CPI guidance to require that each indicator has
a target. The TIP Office will also require all future annual updates to Risk Assessment and
Monitoring Plans (RAMPs) to include a review of indicators and targets for each project.
Indicators may be added or deleted, and targets may be adjusted at the time of the review—or
between reviews—as needed. The TIP Office sits on the Change Control Board for—and is
piloting enhancements to—the State Assistance Management System - Domestic (SAMS-D)
Results Monitoring Plan (RMP) database, which is the Department's award processing system
for Domestic Bureaus and Offices. These enhancements include controls to ensure that targets

2

are entered at an appropriate time for each project. The Department plans to fully integrate these enhancements in 2019.

Recommendation 2: *The Secretary of State should ensure that the Director of the TIP Office maintains documentation of all required monitoring activities, including monitoring plans, progress reports, and performance targets.*

Response: The Department concurs. All TIP Office grantees are currently required to complete quarterly progress reports and update and upload performance monitoring logic frameworks and CPIs into SAMS-D, to include target information. The TIP Office uploads into SAMS-D other monitoring information, such as site visit worksheets, grantee call notes, monitoring plans, and validation of activities, in addition to other relevant information. Program Officers receive regular training on performance monitoring. Moreover, as per internal State guidance issued through the Federal Assistance Directive (FAD), *"If the Federal award has a period of performance in excess of 12 months, an annual review of the award should be conducted by the Federal Assistance Team. Risk assessments should be reviewed for any changes to the level of risk for the award. If no revisions are needed, the official Federal award file should be documented to indicate that."* Since the May 2017 update of the FAD, RAMPs are required across all Department grants and will be uploaded into SAMS-D by 2019.

Recommendation 3: *The Secretary of State should ensure that the Director of the TIP Office establishes additional controls to improve the consistency and completeness of performance information that the TIP Office uses to monitor counter-trafficking in persons projects.*

Response: The Department concurs. As a pilot user for the SAMS-D RMP database enhancements and a member of the system's Change Control Board, the TIP Office is helping develop controls to improve the consistency and completeness of performance information. The TIP Office is currently updating the existing International Programs manual and other relevant guidance materials to ensure all program staff are clear about the monitoring information required of implementing partners and to require an annual review of risk and monitoring plans, including logic frameworks. This information will also be integrated into the SAMS-D RMP tool when it is fully deployed in 2019. The TIP Office will continue to complete regular data quality assessments according to State policy.

Recommendation 4: *The Secretary of State should ensure that the Director of the TIP Office establishes a process to review and update performance indicators, with the participation of implementing partners, to ensure that project monitoring remains efficient and effective.*

Response: The Department concurs. The annual review of each project, as specified in the International Programs manual and as referred to above, will include the review of performance indicators and targets to ensure performance monitoring is most efficient and effective. Indicators and targets may be adjusted and / or new indicators and targets may be added to ensure appropriate performance information is collected and ensure the Department is able to assess each grant against its intended outcomes.

Appendix V: Comments from the U.S. Agency for International Development

USAID
FROM THE AMERICAN PEOPLE

OCT 2 6 2018

Jenny Grover
Director, International Affairs and Trade
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20226

Re: HUMAN TRAFFICKING: State and USAID Should Improve Their Monitoring
of International Counter-Trafficking Projects (GAO-19-77)

Dear Ms. Grover:

I am pleased to provide the formal response of the United States Agency for International
Development (USAID) to the draft report of the U. S. Government Accountability Office (GAO)
entitled, *"HUMAN TRAFFICKING: State and USAID Should Improve Their Monitoring of
International Counter-Trafficking Projects"* (GAO-19-77).

USAID concurs with GAO's recommendation that "The Administrator of USAID should
establish additional controls to improve the consistency and completeness of performance
information that USAID uses to monitor counter-trafficking in persons (C-TIP) projects." We
are committed to addressing this recommendation to strengthen the Agency's investments to end
modern slavery.

We appreciate GAO's acknowledgment in the draft report that USAID fully documented
monitoring activities for the 14 USAID projects reviewed, and the recognition that we prepared
monitoring-and-evaluation plans, annual reports, periodic quarterly reports, and final reports.
The Agency also appreciates GAO's recognition of our policy that requires site visits for all
programs we fund and that we fulfilled this requirement for all the C-TIP programs GAO
selected for review. The Agency's monitoring of C-TIP programs is in alignment with our
broader initiative to improve collection of metrics (qualitative/quantitative), to ensure the careful
and thorough tracking of program monitoring data across sectors, to document the
accomplishments and outcomes of funded programs, and to strengthen our oversight, and the
accountability for our partners in all sectors.

As a part of USAID's transformation efforts, the Agency is strengthening its overall
records-management program. Effective records-keeping is central to the ability of our staff to
manage programs and ensure our partners are achieving the results we expect. Ensuring we have
every document for every current grant and contract accessible in a central repository is a goal to
which the Administrator is committed. This step will lower the Agency's risk, meet our
responsibility to demonstrate prudent management to taxpayers, and enable us to advance
USAID's mission with efficiency.

USAID is grateful for the attention that the issue of trafficking in persons, also called
modern slavery, has received from Congress and the Trump Administration. We thank Congress
for generously providing us with funds to combat this horrific abuse of human rights that
threatens national and global security and prosperity. USAID appreciates President Trump's
reaffirmation of his dedication to end modern slavery at the recent meeting of the President's
Interagency Task Force to Monitor and Combat Trafficking in Persons. We look forward to
further strengthening and reinvigorating our C-TIP investments to realize this commitment.

I am transmitting this letter and the enclosed USAID comments for incorporation as an appendix to the GAO's final report. Thank you for the opportunity to respond to your draft report, and for the courtesies extended by your staff while conducting this engagement. We appreciate the opportunity to participate in the complete and thorough evaluation of our monitoring of international C-TIP projects.

Sincerely,

Angelique M. Crumbly
Acting Assistant Administrator
Bureau for Management

Enclosure: a/s

COMMENTS BY THE UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID) ON THE DRAFT REPORT BY THE U.S. GOVERNMENT ACCOUNTABILITY OFFICE (GAO), ENTITLED – "HUMAN TRAFFICKING: State and USAID Should Improve Their Monitoring of International Counter-trafficking Projects" (GAO-19-77)

- USAID agrees with GAO's Recommendation for USAID on page 34 of the report:

  "The Administrator of USAID should establish additional controls to improve the consistency and completeness of performance information that USAID uses to monitor counter-trafficking in persons projects."

- We are committed to addressing this recommendation throughout our programs to counter trafficking-in-persons (C-TIP), which Congress has made possible through its generous funding, for which we are grateful.

- We take very seriously GAO's finding that some of our performance data are inconsistent or incomplete. As our field officers shared during the audit interviews with GAO staff, a number of these inconsistencies resulted from transcription errors during the transfer of data from our implementing partners to our field Missions. To mitigate the risk of data errors through transcription, we require completion of a data-quality assessment (DQA) for all data reported externally. USAID has conducted DQAs for 25 of the 35 projects we submitted to GAO. One additional project is conducting a DQA currently, and an additional four projects have scheduled upcoming DQAs.

- Some data discrepancies in the data result from the challenging development contexts in which we implement the majority of our activities and our reliance on local implementing partners. While local partners are highly competent to implement projects because of their deep knowledge of the local context, some might not have strong familiarity or experience with standard protocols for information management or U.S. Government data collection, when we begin our financial relationships with them.

- As part of USAID's broader emphasis on building local capacity in developing countries, our Missions work closely with local partners to strengthen their understanding of the standards and protocols for the collection of data. When our field officers spot data inconsistencies in our partners' progress reports or monitoring plans, they meet with them to review and address these errors as part of a broader learning process.

- A country's Journey toward Self-Reliance includes building strong local organizations and government institutions capable of implementing and managing their own high performing programs.

- We are deeply committed to making improvements to fulfill GAO's recommendation. We do believe, however, that our current controls mitigate the extent and depth of Inconsistencies in data reported from partners. That the examples GAO presents in its draft report reveal minor discrepancies proves this point. For example, on page 24 of the report, GAO analyzes data USAID collected for the indicator: "number of public awareness tools on trafficking in persons developed and disseminated." The

inconsistency between the two numbers reported for this indicator is low at 1% (21,482 versus 21,765 products).

- We appreciate GAO's finding that USAID Missions are setting their own policies and procedures for information management in C-TIP programs. To address this, moving forward we will require that our Missions upload every document related to a C-TIP program into Assist, our centralized database managed by the Office of Acquisitions and Assistance within the Bureau for Management (M). Additionally, USAID is committed to ensuring that our C-TIP projects follow Automated Directives System (ADS) 201, USAID's operational policy for our program cycle, which sets the monitoring-and-evaluation (M&E) standards for the Agency and ensures our compliance with GPRA-MA.

- Below, please see our additional technical comments and questions about GAO's methodology.

USAID Comments Related to the Ghana Project Examined by GAO:

See comment 1.

- USAID does not believe the report reflects the existing controls the USAID/Ghana team shared with the auditors. USAID/Ghana furnished the assessment team with an Excel file that contained correct information for all indicators and their results from the time the activity began until the audit. The assessment team chose to look at the quarterly reports instead, some of which contained data with a few errors that were corrected after the fact when USAID and the implementing partner verified the data. Verifying, validating, and correcting data when we find them to have errors, even after the publication of a quarterly report by an implementing partner, is a normal and continuing process, and a proper control, conducted by the USAID/Ghana Mission on a routine basis.

See comment 2.

- Other tools to control the quality of data that USAID/Ghana presented to GAO include Data-Quality Assessments and the use of third-party monitor, such as through the USAID/Ghana Monitoring, Evaluation and Technical Support Services (METSS) activity. The report characterizes regular activity-monitoring and conversations with implementing partners as "informal." USAID/Ghana leadership, however, formally mandates that staff file trip reports, and Contracting Officers require the filing of the official activity correspondence. The characterization of these practices as "informal" conveys an inaccurate sense of lack of management oversight at the USAID Mission in Ghana.

See comment 3.

- There is no discussion about how USAID/Ghana uses its third-party monitoring project, METSS, to work with local organizations to improve their collection and analysis of data, which is a major challenge to building local capacity in USAID's partners.

See comment 4.

- Please note that one of the Ghana C-TIP project indicators GAO closely examined for the audit was not related to trafficking-in-persons and, therefore, was not directly related to

the focus of this GAO audit. As GAO knows, this project is a C-TIP integrated project, meaning that the C-TIP activity is part of a larger program focused on promoting food security by improving the sustainability of Ghana's fishing sector. The indicator GAO selected was related to private-sector investment in the fishing industry (*"value of new private sector investments in select value-chains"*). Since the C-TIP component of the project focused, in part, on policy change, a more appropriate indicator for GAO to have examined would have been *"Number of agricultural and nutritional enabling environment policies drafted, adopted and implemented with USAID assistance."* For this indicator, the numbers reported for FY 2017 were a result of seven, against a target of seven.

GAO Comments

1. USAID commented that it does not believe that our draft report reflected the existing controls the USAID mission in Ghana shared with us, and that the mission had furnished us with a file that, according to USAID, contained correct information for all indicators and their results from the time the activity began until our audit. While the mission provided us with a spreadsheet, this document included only annual performance totals for several years without accompanying quarterly totals, or quarterly or annual narrative information. We focused our analysis on the quarterly and annual performance reports to understand the extent to which USAID was ensuring the consistency and completeness of performance information, including associated narratives, underlying its aggregate and higher-level performance reports. We reported on inconsistent or incomplete performance information only after discussing and substantiating the specific errors we identified with USAID officials. Further, we recognize USAID's efforts to address errors that the agency identified prior to our review and we provide an example of such efforts in the report.

2. We have incorporated USAID's comment. Our report no longer characterizes USAID's regular activity monitoring and conversations with implementing partners as "informal."

3. USAID noted that our report does not discuss how the USAID mission in Ghana uses its third-party monitoring project—Monitoring, Evaluation and Technical Support Services (METSS)—to work with local organizations to improve their collection and analysis of data. We have added a reference to USAID's third-party monitoring project to the report where we discussed limited capacity of local partners as a cause of data reliability issues.

4. USAID commented that one of the Ghana counter-trafficking in persons indicators we examined in the integrated project ("value of new private sector investments in selected value-chains"), was not related to trafficking in persons and, therefore, was not directly related to the focus of our audit. As discussed in the Objectives, Scope, and Methodology section of our report (see app. I), we selected projects, including the integrated project in Ghana, based on a list of counter-trafficking in persons projects provided by USAID. Because the same operational policy that sets the monitoring and evaluation standards

for the agency applied to all indicators within a given project,[1] we examined available quarterly or semi-annual indicator data for all reported indicators in selected projects to determine the completeness and consistency of the data. We then conducted interviews with agency officials to discuss instances in which we identified potentially incomplete and inconsistent performance information, as well as whether our findings about the management of performance information for these selected projects reflected general agency policies and procedures.

---

[1]United States Agency for International Development, *ADS Chapter 201 Program Cycle Operational Policy* (revised Oct. 5, 2017).

Appendix VI: GAO Contact and Staff Acknowledgments

GAO Contact

Jennifer Grover, (202) 512-7141, or groverj@gao.gov

Staff Acknowledgments

In addition to the contact named above, Leslie Holen (Assistant Director),
Victoria Lin (Analyst-in-Charge), Esther Toledo, and Andrew Kurtzman
made key contributions to this report. The team benefited from the expert
advice and assistance of Neil Doherty, Justin Fisher, Benjamin Licht,
Grace Lui, and Aldo Salerno.

Appendix VII: Accessible Data

Agency Comment Letter

Text of Appendix IV: Comments from the Department of State

<u>Page 1</u>

Dear Mr. Melito:

We appreciate the opportunity to review your draft report, "HUMAN TRAFFICKING: State and USAID Should Improve Their Monitoring of International Counter-trafficking Projects, GAO Job Code 102348.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

If you have any questions concerning this response, please contact Karen Allen, Evaluation Coordinator, Office of Monitor and Combat Trafficking in Persons, Bureau of Civilian Security, Democracy and Human Rights at (202) 312-9856.

Sincerely,

Christopher H. Flaggs

Enclosure:

As stated
cc: GAO-Jennifer Grover
J/TIP - Joel Maybury (Acting)
OIG- Norman Brown

<u>Page 2</u>

**Department of State Comments on GAO Draft Report
Human Trafficking: State and USAID Should Improve Their
Monitoring of International Countertrafficking Projects
(GAO-19-77, GAO Code 102348)**

Thank you for providing the Department of State (State) the opportunity to respond to the GAO draft report, "Human Trafficking: State and USAID Should Improve their Monitoring of International Counter-trafficking Projects." State welcomes GAO's interest in additional controls and monitoring to improve the consistency and completeness of project performance information for USAID and State projects, as well as State maintaining monitoring activity documentation and establishing targets for all performance indicators. It is important that our foreign assistance grants advance strategic foreign policy goals on human trafficking.

The National Defense Authorization Act for Fiscal Year 2017 includes a provision for GAO to report on the programs to combat trafficking conducted by specific agencies, including Departments of State (State), Labor (DOL), and the U.S. Agency for International Development (USAID), which among them managed 120 international counter-trafficking projects during fiscal year 2017.

State has welcomed the GAO audit, which has acknowledged some areas of strength and has offered recommendations for areas of Monitoring and Evaluation (M&E) that are in need of additional attention and support. The GAO's draft report does not fully recognize the investment State has made and the changes underway to improve the TIP Office's performance measurement and ensure complete and consistent documentation. Additional dedicated financial and personnel resources for M&E have been added over the past two years at the TIP Office but with sizeable recent increases in grants made through the TIP Office, additional resources will be needed for State to fully address GAO's monitoring recommendations.

Response To Gao Recommendations for Executive Action

Recommendation 1:

The Secretary of State should ensure that the Director of the TIP Office establishes targets for each performance indicator.

Response:

The Department concurs. The TIP Office hired a Performance Measurement Specialist in December 2016. The Performance Measurement Specialist reviews all projects' initial logic frameworks and common performance indicator (CPI) spreadsheets for completeness and ensures the appropriateness of each indicator and that each indicator has a target. The TIP Office is in the process of updating its existing International Programs manual, notice of funding opportunities templates, and logic framework and CPI guidance to require that each indicator has a target. The TIP Office will also require all future annual updates to Risk Assessment and Monitoring Plans (RAMPs) to include a review of indicators and targets for each project. Indicators may be added or deleted, and targets may be adjusted at the time of the review—or between reviews—as needed. The TIP Office sits on the Change Control Board for—and is piloting enhancements to—the State Assistance Management System - Domestic (SAMS-D) Results Monitoring Plan (RMP) database, which is the Department's award processing system for Domestic Bureaus and Offices. These enhancements include controls to ensure that targets are entered at an appropriate time for each project. The Department plans to fully integrate these enhancements in 2019.

Page 3

Recommendation 2:

The Secretary of State should ensure that the Director of the TIP Office maintains documentation of all required monitoring activities, including monitoring plans, progress reports, and performance targets.

Response:

The Department concurs. All TIP Office grantees are currently required to complete quarterly progress reports and update and upload performance monitoring logic frameworks and CPIs into SAMS-D, to include target information. The TIP Office uploads into SAMS-D other monitoring information, such as site visit worksheets, grantee call notes, monitoring plans, and validation of activities, in addition to other relevant information. Program Officers receive regular training on performance monitoring. Moreover, as per internal State guidance issued through the Federal Assistance Directive (FAD), "If the Federal award has a period of performance in excess of 12 months, an annual review of the award should be conducted by the Federal Assistance Team. Risk assessments

should be reviewed for any changes to the level of risk for the award. If no revisions are needed, the official Federal award file should be documented to indicate that." Since the May 2017 update of the FAD, RAMPs are required across all Department grants and will be uploaded into SAMS-D by 2019.

Recommendation 3:

The Secretary of State should ensure that the Director of the TIP Office establishes additional controls to improve the consistency and completeness of performance information that the TIP Office uses to monitor counter-trafficking in persons projects.

Response:

The Department concurs. As a pilot user for the SAMS-D RMP database enhancements and a member of the system's Change Control Board, the TIP Office is helping develop controls to improve the consistency and completeness of performance information. The TIP Office is currently updating the existing International Programs manual and other relevant guidance materials to ensure all program staff are clear about the monitoring information required of implementing partners and to require an annual review of risk and monitoring plans, including logic frameworks. This information will also be integrated into the SAMS-D RMP tool when it is fully deployed in 2019. The TIP Office will continue to complete regular data quality assessments according to State policy.

Recommendation 4:

The Secretary of State should ensure that the Director of the TIP Office establishes a process to review and update performance indicators, with the participation of implementing partners, to ensure that project monitoring remains efficient and effective.

Response:

The Department concurs. The annual review of each project, as specified in the International Programs manual and as referred to above, will include the review of performance indicators and targets to ensure performance monitoring is most efficient and effective.

Indicators and targets may be adjusted and / or new indicators and targets may be added to ensure appropriate performance information is

collected and ensure the Department is able to assess each grant against its intended outcomes.

Text of Appendix V: Comments from the U.S. Agency for International Development

Page 1

Dear Ms. Grover:

I am pleased to provide the formal response of the United States Agency for international Development (USAID) to the draft report of the U.S. Government Accountability Office (GAO) entitled, "HUMAN TRAFFICKING: State and USAID Should Improve Their Monitoring of International Counter-Trafficking Projects" (GA0-19-77).

USAID concurs with GAO's recommendation that "The Administrator of USAID should establish additional controls to improve the consistency and completeness of performance information that USAID uses to monitor counter-trafficking in persons (C-TIP) projects." We are committed to addressing this recommendation to strengthen the Agency's investments to end modem slavery.

We appreciate GAO's acknowledgment in the draft report that USAID fully documented monitoring activities for the 14 USAID projects reviewed, and the recognition that we prepared monitoring-and-evaluation plans, annual reports, periodic quarterly reports, and final rep01is.

The Agency also appreciates GAO's recognition of our policy that requires site visits for all programs we fund and that we fulfilled this requirement for all the C-TIP programs GAO selected for review. The Agency's monitoring of C-TIP programs is in alignment with our broader initiative to improve collection of metrics (qualitative/quantitative), to ensure the careful and thorough tracking of program monitoring data across sectors, to document the accomplishments and outcomes of funded programs, and to strengthen our oversight, and the accountability for our partners in all sectors.

As a part of USAID's transformation effo1is, the Agency is strengthening its overall records-management program. Effective records-keeping is central to the ability of our staff to manage programs and ensure our partners are achieving the results we expect. Ensuring we have every

document for every current grant and contract accessible in a central repository is a goal to which the Administrator is committed. This step will lower the Agency's risk, meet om responsibility to demonstrate prudent management to taxpayers, and enable us to advance USAID's mission with efficiency.

USAID is grateful for the attention that the issue of trafficking in persons, also called modern slavery, has received from Congress and the Trump Administration. We thank Congress for generously providing us with funds to combat this horrific abuse of human rights that threatens national and global security and prosperity. USAID appreciates President Trump's reaffirmation of his dedication to end modern slavery at the recent meeting of the President's Interagency Task Force to Monitor and Combat Trafficking in Persons. We look forward to further strengthening and reinvigorating our C-TIP investments to realize this commitment.

Page 2

I am transmitting this letter and the enclosed USAID comments for incorporation as an appendix to the GAO's final report. Thank you for the opportunity to respond to your draft report, and for the courtesies extended by your staff while conducting this engagement. We appreciate the opportunity to participate in the complete and thorough evaluation of our monitoring of international C-TIP projects.

Sincerely,

Angelique M. Crumbly
Acting Assistant Administrator Bureau for Management

Enclosure: a/s

Page 3

COMMENTS BY THE UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID) ON THE DRAFT REPORT _B Y THE U.S. GOVERNMENT ACCOUNTABILITY OFFICE (GAO), ENTITLED- "HUMAN TRAFFICKING: State and USAID Should Improve Their Monitoring of International Counter-trafficking Projects" (GAO-19-77)

- USAID agrees with GAO's Recommendation for USAID on page 34 of the report:

"The Administrator of USAID should establish additional controls to improve the consistency and completeness of perfo1mance inf01mation that USAID uses to monitor counter-trafficking in persons projects."

- We are committed to addressing this recommendation throughout our programs to counter trafficking-in-persons (C-TIP), which Congress has made possible through its generous funding, for which we are grateful.

- We take very seriously GAO's finding that some of our perfo1mance data are inconsistent or incomplete. As our field officers shared during the audit interviews with GAO staff, a number of these inconsistencies resulted from transcription errors during the transfer of data from our implementing partners to our field Missions. To mitigate the risk of data errors through transcription, we require completion of a data-quality assessment (DQA) for all data repo1ted externally. USAID has conducted DQAs for 25 of the 35 projects we submitted to GAO. One additional project is conducting a DQA currently, and an additional four projects have scheduled upcoming DQAs.

- Some data discrepancies in the data result from the challenging development contexts in which we implement the majority of our activities and our reliance on local implementing partners. While local partners are highly competent to implement projects because of their deep knowledge of the local context, some might not have strong familiarity or experience with standard protocols for information management or U.S. Government data collection, when we begin our financial relationships with them.

- As part of USAID's broader emphasis on building local capacity in developing countries, our Missions work closely with local partners to strengthen their understanding of the standards and protocols for the collection of data. When our field officers spot data inconsistencies in our partners' progress reports or monitoring plans, they meet with them to review and address these errors as part of a broader learning process.

- A country's Journey toward Self-Reliance includes building strong local organizations and government institutions capable of implementing and managing their own high performing programs.

- We are deeply committed to making improvements to fulfill GAO's recommendation. We do believe, however, that our current controls mitigate the extent and depth of Inconsistencies in data reported from partners. That the examples GAO presents in its draft report reveal minor discrepancies proves this point. For example, on page 24 of the report, GAO analyzes data USAID collected for the indicator: "number of public awareness tools on trafficking in persons developed and disseminated." The inconsistency between the two numbers reported for this indicator is low at 1% (21,482 versus 21,765 products).

Page 4

- We appreciate GAO's finding that USAID Missions are setting their own policies and procedures for information management in C-TIP programs. To address this, moving forward we will require that our Missions upload every document related to a C-TIP program into Assist, our centralized database managed by the Office of Acquisitions and Assistance within the Bureau for Management (M). Additionally, USAID is committed to ensuring that our C-TIP projects follow Automated Directives System (ADS) 201, USAID's operational policy for our program cycle, which sets the monitoring-and-evaluation (M&E) standards for the Agency and ensures our compliance with GPRA- MA.

- Below, please see our additional technical comments and questions about GAO's methodology.

USAID Comments Related to the Ghana Project Examined by GAO:

- USAID does not believe the report reflects the existing controls the USAID/Ghana team shared with the auditors. USAID/Ghana furnished the assessment team with an Excel file that contained correct information for all indicators and their results from the time the activity began until the audit. The assessment team chose to look at the quarterly reports instead, some of which contained data with a few errors that were corrected after the fact when USAID and the implementing partner verified the data. Verifying, validating, and correcting data when we find them to have errors, even after the publication of a quarterly report by an implementing partner, is a no1mal mid continuing process, and a proper control, conducted by the USAID/Ghana Mission on a routine basis.

- Other tools to control the quality of data that USAID/Ghana presented to GAO include Data-Quality Assessments and the use of third-party monitor, such as through the USAID/Ghana Monitoring, Evaluation and Technical Support Services (METSS) activity. The report characterizes regular activity-monitoring and conversations with implementing partners as "informal." USAID/Ghana leadership, however, formally mandates that staff file trip reports, and Contracting Officers require the filing of the official activity correspondence. The characterization of these practices as "informal" conveys an inaccurate sense of lack of management oversight at the USAID Mission in Ghana.

- There is no discussion about how USAID/Ghana uses its third-party monitoring project, METSS, to work with local organizations to improve their collection and analysis of data, which is a major challenge to building local capacity in USAID's partners.

- Please note that one of the Ghana C-TIP project indicators GAO closely examined for the audit was not related to trafficking-in-persons and, therefore, was not directly related to the focus of this GAO audit. As GAO knows, this project is a C-TIP integrated project, meaning that the C-TIP activity is part of a larger program focused on promoting food security by improving the sustainability of Ghana's fishing sector. The indicator GAO selected was related to private-sector investment in the fishing industry ("value of new private sector investments in select value-chains"). Since the C-TIP component of the project focused, in part, on policy change, a more appropriate indicator for GAO to have examined would have been "Number of agricultural and nutritional enabling environment policies drafted, adopted and implemented with USAID assistance." For this indicator, the numbers reported for FY 2017 were a result of seven, against a target of seven.

Related GAO Products

Human Trafficking: State Has Made Improvements in Its Annual Report but Does Not Explicitly Explain Certain Tier Rankings or Changes, GAO-17-56 (Washington, D.C.: December 5, 2016).

Human Trafficking: Oversight of Contractors' Use of Foreign Workers in High-Risk Environments Needs to Be Strengthened. GAO-15-102 (Washington, D.C.: November 18, 2014).

Human Trafficking: Monitoring and Evaluation of International Projects Are Limited, but Experts Suggest Improvements. GAO-07-1034 (Washington, D.C.: July 26, 2007).

Human Trafficking: Better Data, Strategy, and Reporting Needed to Enhance U.S. Antitrafficking Efforts Abroad. GAO-06-825 (Washington, D.C.: July 18, 2006).

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's website (https://www.gao.gov). Each weekday afternoon, GAO posts on its website newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to https://www.gao.gov and select "E-mail Updates."

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, https://www.gao.gov/ordering.htm.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on Facebook, Flickr, Twitter, and YouTube.
Subscribe to our RSS Feeds or E-mail Updates. Listen to our Podcasts.
Visit GAO on the web at https://www.gao.gov.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact:

Website: https://www.gao.gov/fraudnet/fraudnet.htm

Automated answering system: (800) 424-5454 or (202) 512-7700

Congressional Relations

Orice Williams Brown, Managing Director, WilliamsO@gao.gov, (202) 512-4400,
U.S. Government Accountability Office, 441 G Street NW, Room 7125,
Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800
U.S. Government Accountability Office, 441 G Street NW, Room 7149
Washington, DC 20548

Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, spel@gao.gov, (202) 512-4707
U.S. Government Accountability Office, 441 G Street NW, Room 7814,
Washington, DC 20548