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FOREIGN ASSISTANCE

Federal Monitoring and Evaluation Guidelines Incorporate Most but Not All Leading Practices

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Why GAO Did This Study

The Trump Administration requested $28.5 billion in foreign assistance in fiscal year 2019, to be administered by at least 22 federal agencies. Almost 95 percent of this assistance is administered by six agencies—the Departments of Agriculture (USDA), Defense (DOD), State (State), Health and Human Services (HHS), the Millennium Challenge Corporation (MCC), and the U.S. Agency for International Development (USAID). FATAA required the President to set forth guidelines for M&E of U.S. foreign assistance. In January 2018, OMB issued the required guidelines for federal agencies. FATAA also contained a provision for GAO to analyze the guidelines established by OMB; and assess the implementation of the guidelines by the agencies.

In this report, GAO examined the extent to which (1) OMB's M&E Guidelines incorporate GAO leading practices, and (2) agencies incorporate the OMB Guidelines in their M&E policies and plans. GAO assessed the OMB Guidelines against GAO's 28 leading practices identified in GAO-16-861R. GAO also assessed the six agencies' foreign assistance M&E policies against the Guidelines and interviewed OMB and relevant agency officials in Washington, DC.

What GAO Recommends

GAO is making recommendations to OMB, DOD, State, and USDA. OMB did not agree with the recommendation to update the Guidelines, but GAO maintains that doing so can help to emphasize the importance of the M&E practices we identified. DOD, State, and USDA agreed with GAO's recommendations.

View GAO-19-466. For more information, contact David B. Gootnick at (202) 512-3149 or gootnickD@gao.gov.

What GAO Found

The Office of Management and Budget's (OMB) foreign assistance Guidelines incorporate most of GAO's leading practices for monitoring and evaluation (M&E), but gaps exist (see figure).

Summary of Office of Management and Budget's Guidelines Addressing GAO's Leading Practices for Monitoring and Evaluation

Leading monitoring practice	Office of Management and Budget Guidelines
	●●●●●●●●●●● 11
	○○○ 3
Leading evaluation practice	●●●●●●●●●●●● 12
	○○ 2

● The Guidelines incorporate this practice.
○ The Guidelines do not incorporate this practice.

Source: GAO analysis of U.S. government documents and professional organization reports. | GAO-19-466

- *Monitoring*: The Guidelines define monitoring as the continuous tracking of program or project data to determine whether desired results are as expected during implementation. The Guidelines do not require GAO's leading practices on risk assessments, staff qualifications, and program close-out procedures.

- *Evaluation*: The Guidelines define evaluation as the systematic collection and analysis of program or project outcomes for making judgments and informing decisions. They do not require GAO's leading practices on developing staff skills and following up on recommendations.

OMB officials indicated the Guidelines are focused on elements required in the Foreign Aid Transparency and Accountability Act of 2016 (FATAA), but noted that agencies can add additional requirements to their own M&E policies. FATAA requires the President to set forth guidelines "according to best practices of monitoring and evaluation." OMB staff acknowledged that GAO's leading practices are important, but stated that there is no singular established standard for best monitoring practices. Nevertheless, all of GAO's leading practices can help agencies address impediments, effectively manage foreign assistance, and meet their goals.

When assessing agencies' M&E policies against OMB Guidelines, GAO found that agencies incorporated most of the requirements. However, for monitoring, one of the six agencies GAO reviewed—DOD—did not include the requirements to establish agencies' roles and responsibilities and ensure verifiable data for monitoring activities. For evaluation, agencies required most Guideline requirements, but not all. For example, DOD, HHS, and USDA did not require conducting impact evaluations for pilot programs or projects. Without a clear requirement to do such evaluations, agencies risk duplicating or scaling up programs without fully understanding the factors that could lead to their success or failure. Agencies GAO reviewed have plans or mechanisms in place to oversee the implementation of their M&E policies. For example, State developed a guidance document to operationalize and oversee its M&E policy to ensure the implementation of the Guidelines.

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Congressional Committees

The Trump Administration has requested $28.5 billion in foreign assistance in fiscal year 2019, to be administered by at least 22 federal agencies.[1] Foreign assistance is used to improve the lives and health of millions living in poverty, support democracy, enhance global security, and achieve other U.S. foreign policy goals. Managing these funds effectively requires reliable monitoring and evaluation (M&E) systems. Almost 95 percent of foreign assistance is administered by six agencies— the Departments of Agriculture (USDA), Defense (DOD), Health and Human Services (HHS), and State (State); the Millennium Challenge Corporation (MCC); and the U.S. Agency for International Development (USAID).

Enacted in July 2016, the Foreign Aid Transparency and Accountability Act of 2016 (FATAA) required the President to set forth guidelines for establishing measurable goals, performance metrics, and M&E plans for U.S. foreign assistance within 18 months.[2] In January 2018, the Office of Management and Budget (OMB) issued the required guidelines for federal agencies on developing these M&E policies (Guidelines).[3] Agencies were required to align their M&E policies with the Guidelines by January 2019.

FATAA also contained a provision for GAO to (1) analyze the guidelines established by OMB; and (2) assess the implementation of the guidelines by the agencies, bureaus, and offices that implement U.S. foreign assistance as outlined in the President's budget request within 18 months of OMB issuing the guidelines.

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[1]See foreignassistance.gov, https://foreignassistance.gov/explore, accessed on July 15, 2019.

[2]Foreign Aid Transparency and Accountability Act of 2016, Pub. L. No. 114-191, § 3(b) (July 15, 2016).

[3]Office of Management and Budget, *Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance*, OMB Memorandum M-18-04 (Washington, D.C.: 2018).

In this report, we examine the extent to which (1) OMB's M&E Guidelines incorporate GAO leading practices, and (2) agencies incorporate the OMB Guidelines in their M&E policies and plans. To examine the extent to which OMB Guidelines incorporate GAO's leading practices, we assessed the Guidelines against the 28 leading practices—14 for monitoring and 14 for evaluation—identified in GAO-16-861R.[4] In 2016, we developed this list of leading practices for monitoring and evaluating foreign assistance programs. For monitoring, we identified 14 leading practices primarily from our review of Standards for Internal Control in the Federal Government;[5] the GPRA Modernization Act of 2010;[6] and *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.[7]

For evaluation, we identified 14 leading practices from our review of the American Evaluation Association's (AEA) *An Evaluation Roadmap for a More Effective Government (AEA Roadmap)*.[8] AEA published the AEA Roadmap to guide the development and implementation of federal agency evaluation programs and policies. The AEA Roadmap offers a set of general principles intended to facilitate the integration of evaluation activities with program management. In addition to reviewing OMB guidelines, we interviewed relevant OMB staff and agency officials in Washington, D.C., involved in developing the OMB Guidelines.

To examine the extent to which agencies are implementing OMB's Guidelines, we focused on the six agencies that reported obligating the most foreign assistance: USDA, DOD, HHS, State, MCC, and USAID. We collected these agencies' foreign assistance M&E policies and assessed them against OMB's Guidelines for M&E. For HHS, we reviewed the M&E policy for the U.S. President's Emergency Plan for AIDS Relief

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[4]See GAO, *Foreign Assistance: Selected Agencies' Monitoring and Evaluation Policies Generally Address Leading Practices*, GAO-16-861R (Washington, D.C.: Sept. 27, 2016).

[5]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sep. 10, 2014).

[6]The GPRA Modernization Act of 2010, Pub. L. No 111–352, amended the Government Performance and Results Act of 1993, Pub. L. No. 103-62.

[7]U.S. Office of Management and Budget, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,* 2 C.F.R. § 200.

[8]American Evaluation Association, *An Evaluation Roadmap for a More Effective Government*, accessed August 6, 2018, http://www.eval.org/d/do/472.

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(PEPFAR).[9] State administers PEPFAR funds and HHS implements many of its programs.[10] For USDA, we reviewed the Foreign Agricultural Service's (FAS) M&E policy.[11] In addition to reviewing policies, for all six agencies, we reviewed agency-wide implementation plans and interviewed relevant agency officials involved in developing and implementing these policies and plans in Washington, D.C. Appendix I contains additional information on our scope and methodology.

We conducted this performance audit from July 2018 to July 2019 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

OMB Guidelines

In January 2018, OMB released (M-18-04) *Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance*[12] (the "Guidelines") in response to the 2016 FATAA legislation. (See appendix III for additional information on the requirements in the legislation). The Guidelines provide direction to federal departments and agencies that administer foreign assistance on monitoring the use of resources, evaluating the outcomes and impacts of

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[9]The U.S. President's Emergency Plan for AIDS Relief (PEPFAR) is a U.S. government initiative that aims to help save the lives of those suffering from HIV/AIDS around the world. In addition to HHS, other PEPFAR implementing agencies include the Departments of State, Defense, Labor, and Commerce; U.S. Agency for International Development; and the Peace Corps.

[10]In this report, we focused on HHS's implementation of the PEPFAR program.

[11]U.S. Department of Agriculture Foreign Agricultural Service-Food Assistance Division, *Monitoring and Evaluation Policy*, (Washington, D.C.: February 2019). The Foreign Agricultural Service (FAS) leads USDA's efforts to help developing countries improve their agricultural systems and build their trade capacity. The agency also administers food assistance programs that benefit people in need around the world. The M&E policy applies to McGovern-Dole, Food for Progress and Local and Regional Procurement programming.

[12]OMB Memorandum M-18-04.

the foreign assistance projects and programs, and applying the findings and conclusions of such evaluations to proposed project and program design. The goals of the Guidelines are to set forth key principles to guide each agency and to specify requirements, where appropriate, that agencies must cover in their own policies on M&E of foreign assistance.[13]

The Guidelines define monitoring and evaluation as follows:

- Monitoring is the ongoing and systematic tracking of data and information relevant to policies, strategies, programs, projects, and/or activities and is used to determine whether desired results are occurring as expected during program, project, or activity implementation. Monitoring often relies on indicators, quantifiable measures of a characteristic or condition of people, institutions, systems, or processes that may change over time.

- Evaluation is the systematic collection and analysis of information about the characteristics and outcomes of the program, including projects conducted under such program, as a basis for making judgments and evaluations regarding the program; improving program effectiveness; and informing decisions about current and future programming.[14]

Table 1 lists OMB's M&E requirements and key excerpts of the descriptions as noted in the OMB M-18-04.[15]

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[13]OMB staff noted that an interagency group developed the Guidelines, which consulted several different sources on M&E practices, including the Organisation for Economic Co-operation and Development (OECD) and the AEA.

[14]For evaluation, the definition noted in the Guidelines is from the FATAA legislation. The legislation does not provide a definition for monitoring.

[15]The table shows key excerpts from the OMB Guidelines. The descriptions include the FATAA objective required, if applicable, and the initial description noted in the Guideline. For the complete description of each of the requirements noted in the Guidelines, see appendix II.

Table 1: Key Excerpts of the Requirements Noted in Office of Management and Budget's (OMB) 2018 Foreign Assistance Monitoring and Evaluation (FATAA) Guideline Requirements (M-18-04)

Type of Activity	Guideline Requirement	Selected Description
Monitoring and Evaluation	Establish a foreign assistance monitoring and evaluation policy	All federal departments and agencies that administer covered United States foreign assistance must put in place or establish specific policies and procedures for monitoring and evaluation of covered foreign assistance no later than one year after these guidelines are published.
Monitoring and Evaluation	Define key terms used in monitoring and evaluation activities such as "program," "project," and "activity"	Other than the term "evaluation," which is specifically defined in FATAA, agency policies should define key terms within the agency context as necessary, such as "program," "project," and "activity," and be clear about how monitoring and evaluation requirements apply to each level.
Monitoring and Evaluation	Apply the findings and conclusions of monitoring and evaluation information to proposed projects/programs	Policies must include mechanisms and requirements for applying the findings and conclusions of monitoring and evaluation information to proposed projects and programs and, where appropriate, to ongoing projects and programs.
Monitoring and Evaluation	Define roles and responsibilities for monitoring and evaluation among agencies that participate in funding transfers	Policies must address funding transfers between or among U.S. government agencies and ensure accountability for monitoring and evaluation, including in cases where one agency leads or coordinates an overall program, but multiple agencies implement activities under that program.
Monitoring and Evaluation	Establish annual monitoring and evaluation objectives and timetables	Establish annual monitoring and evaluation objectives and timetables [Sec.3(c)(2)(A)]: Agencies may do this centrally, or when decentralized, agency policies should require that operating units annually document their monitoring and evaluation objectives and timetables, as well as other key aspects of managing monitoring and evaluation and using the resulting information for learning.
Monitoring and Evaluation	Develop specific project monitoring and evaluation plans	Develop specific project monitoring and evaluation plans [Sec.3(c)(2)(B)]: Monitoring and evaluation plans should be developed as part of program, project, and activity design, and should include measurable goals.
Monitoring and Evaluation	Apply rigorous monitoring and evaluation methodologies to such programs	Apply rigorous monitoring and evaluation methodologies to such programs [Sec.3(c)(2)(C)]: Guidance should require that evaluations be "evidence based," meaning they should be based on verifiable data and information that have been gathered using the monitoring and evaluation principles established in these guidelines.
Monitoring and Evaluation	Disseminate guidelines for the development and implementation of monitoring and evaluation programs to all personnel	Disseminate guidelines for the development and implementation of monitoring and evaluation programs to all personnel [Sec.3(c)(2)(D)]: Guidelines should be disseminated to all personnel, including those in the field.
Monitoring	Establish methodologies for the collection of data and monitoring of results, including baseline data	Establish methodologies for the collection of data, including baseline data [Sec.3(c)(2)(E)]: Policies should cover the standards for data collection.
Evaluation	Evaluate, at least once in their lifetime, all programs whose dollar value equals or exceeds the median program size for the relevant office or bureau or an equivalent calculation	Evaluate, at least once in their lifetime, all programs whose dollar value equals or exceeds the median program size for the relevant office or bureau or an equivalent calculation [Sec.3(c)(2)(F)]: At a minimum, agencies that directly manage foreign assistance program funds should direct their responsible organizational units to evaluate, at least once in their lifetimes, all programs whose dollar value equals or exceeds the median program size for the relevant bureau or office, or an equivalent calculation, such that the majority of program resources are evaluated.

Type of Activity	Guideline Requirement	Selected Description
Evaluation	Conduct impact evaluations on all pilot programs before replicating, or conduct performance evaluations and provide a justification for not conducting an impact evaluation	Conduct impact evaluations on all pilot programs before replicating, or conduct performance evaluations and provide a justification for not conducting an impact evaluation [Sec.3(c)(2)(G)]: Agency policies should include the expectation that pilot programs or interventions (defined above) should be evaluated for impact before being replicated or expanded. If an impact evaluation is deemed to be impracticable or inappropriate for a particular pilot program or intervention, a performance evaluation must be conducted with a justification of the methodological choice.
Evaluation	Develop a clearinghouse capacity for the collection, dissemination, and preservation of knowledge and lessons learned	Develop a clearinghouse capacity for the collection, dissemination, and preservation of knowledge and lessons learned [Sec.3(c)(2)(H)]: Agencies should make information on program plans, monitoring data, and evaluation findings available to the public, other foreign assistance agencies, implementing partners, the donor community and aid recipient governments.
Evaluation	Internally distribute evaluation reports	Internally distribute evaluation reports [Sec.3(c)(2)(I)]: Evaluation reports, program summaries, and other relevant documents should be made available internally for learning and analysis.
Evaluation	Publically report each evaluation	Publicly report each evaluation [Sec.3(c)(2)(J)]: Evaluation reports should be clear, concise, and empirically grounded. They should include an executive summary, a succinct description of the program, evaluation purpose and questions, evaluation design and data collection methods and their limitations, key findings, and conclusions or recommendations.
Monitoring and Evaluation	Ensure verifiable, reliable, and timely data are available to monitoring and evaluation personnel	Ensure verifiable, reliable, and timely data are available to monitoring and evaluation personnel [Sec.3(c)(2)(L)]: Monitoring and evaluation should employ methods appropriate to context and population to ensure that verifiable, reliable, and timely quantitative and qualitative information is collected, included, and considered, with appropriate provisions for the protection of human subjects in the collection and use of this information.

Source: Office of Management and Budget Memorandum M-18-04 Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance. | GAO-19-466

Note: The table does not include Guidelines that OMB encouraged but did not require agencies to follow in monitoring and evaluation activities, such as undertaking collaborative partnerships and beneficiary engagement. The table shows key excerpts from the OMB Guidelines. The descriptions include the FATAA objective required, if applicable, and the initial description noted in the Guideline. For the complete description of each of the requirements noted in the Guidelines, see appendix II.

GAO Leading Practices

In 2016, we reported on leading practices for foreign assistance program M&E.[16] We identified 28 leading practices—14 for monitoring and 14 for evaluation. Table 2 lists and defines these monitoring practices.

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[16]GAO-16-861R.

Table 2: GAO Leading Practices for Monitoring Foreign Assistance

Leading Practice	Definition
1. Develop monitoring plan(s) with program goals and objectives	Develop agency-wide monitoring plans with defined program goals, objectives, timetables, and requirements for tracking financial and performance information.
2. Develop monitoring plan(s) to address risk	Develop monitoring plans that identify, assess, and mitigate risk related to achieving program/project objectives.
3. Develop relevant performance goals, output and outcome performance indicators, and milestones at the program or project level	Describe means to assess programs by establishing performance/financial goals, output and outcome indicators, baselines, and milestones.
4. Identify a source (s) for resources to support monitoring	Describe resources and their sources, including the staff needed to monitor the program or project.
5. Collect, review, and analyze monitoring data on a periodic basis	Develop a process to collect, review, and analyze performance and financial data.
6. Implement procedures for ensuring quality of data on performance indicators	Implement procedures to ensure the accuracy and reliability of the financial and performance data used to measure progress towards performance goal(s).
7. Assign staff with appropriate qualifications for monitoring	Establish requirements for staff responsible for monitoring program or project to have relevant knowledge, skills, and training.
8. Establish roles and responsibilities of personnel responsible for monitoring	Establish roles and responsibilities of personnel monitoring the program or project.
9. Submit periodic and final financial and performance reports and data	Establish procedures for implementing partners to submit periodic and final financial and performance reports and data.
10. Assess and approve implementing partners' periodic and financial/performance reports and financial/performance data by agency	Assess and approve implementing partners' periodic financial/performance reports and data. Assessments should recommend program adjustments, if necessary.
11. Validate implementing partners' performance through site visits and other means of verification	Establish procedures to validate implementing partners' performance, through site-visits or other means.
12. Document that the monitoring plans were executed	Document results of ongoing monitoring activities to identify if differences between the results and established baselines are due to internal control deficiencies.
13. Establish procedures to close out program/project	Establish program/project close-out procedures for all required work and administrative actions completed by the implementing partner.[a]
14. Consider performance information in making management decisions	Use monitoring data (performance and financial data) to guide management decisions, including identifying problems, taking corrective actions, and identifying and sharing leading practices.

Source: GAO analysis of U.S. government documents and professional organization reports. | GAO-19-466

[a]Close-out procedures can include implementing partners documenting they have met all financial requirements, submitted final reports, and returned any unspent balances. In addition, these procedures also involve a number of tasks, such as making final payments to the non-Federal entity and liquidating all obligations incurred under the Federal award.

Table 3 lists the evaluation practice and corresponding definition.

Table 3: GAO Leading Practices for Evaluating Foreign Assistance

	Leading Practice	Definition
1.	Develop an evaluation plan or agenda	Identify annual and long-term evaluation plans with defined program goals, objectives, and timetables.
2.	Identify a source of funding for evaluations	Identify source(s) of funding and resources to cover the cost of evaluation for programs or projects and professional capacity building.
3.	Include all topics or programs subject to evaluation	Identify program or project-level topics that are subject to evaluation, including the timing of evaluations.
4.	Describe how to select evaluation topics	Describe how to select evaluation topic(s) to be appropriate for program stewardship and useful for decision-making.
5.	Coordinate and collaborate when planning evaluations across agencies with overlapping or complementary missions	Establish coordination and communication requirements on evaluation efforts across agencies with overlapping or complementary missions and/or interagency funds.
6.	Allow a choice of methods appropriate to the context	Establish requirements to select a choice of methods for the evaluation is contextually appropriate and assess program effectiveness and cost.
7.	Assign personnel with appropriate training and experience to conduct evaluations	Establish requirements for the evaluation team to have the appropriate education, abilities, skills, and experiences required to complete the evaluation competently.
8.	Ensure evaluator independence	Establish requirements for the evaluators' independence by safeguarding the independence of program or policy evaluations with respect to study design, conduct, and results.
9.	Develop staff skills regarding evaluating and using evidence	Establish requirements for staff to undertake continual and relevant education, training, or supervised practice to learn new concepts, techniques, and skills.
10.	Establish procedures to assure evaluation quality	Establish procedures to assure evaluation quality by adopting quality standards to guide the evaluation functions.
11.	Describe methods and data sources in evaluation reports	Describe use of methods and data sources in evaluation reports.
12.	Use evaluation findings in management decisions or reforms	Establish mechanisms for leadership and relevant internal and external stakeholders to use evaluations findings to inform management decisions or reforms.
13.	Establish mechanisms for following up on recommendations	Establish mechanisms to determine whether the recommendation is accepted and if management or program actions are needed to address the recommendation.
14.	Disseminate evaluation findings/results	Disseminate evaluation findings and methods to internal staff, policy makers, and public.

Source: GAO analysis of U.S. government documents and professional organization reports. | GAO-19-466

OMB's Foreign Assistance Monitoring and Evaluation Guidelines Incorporate Most but Not All of GAO's Leading Practices

Based on our review, the Guidelines incorporate most of GAO's leading practices for monitoring and evaluation. However, they do not incorporate practices on developing monitoring plans that are based on risks, ensuring that staff are appropriately qualified to conduct monitoring, establish procedures to close out programs, developing staff skills for evaluation, and following up on evaluation recommendations. OMB indicated that it intended the Guidelines to focus on elements required by the FATAA legislation. Nevertheless, incorporating these leading practices in the Guidelines can help ensure that all agencies address impediments, effectively manage foreign assistance, and meet their assistance goals.

The Guidelines Incorporate Most of the GAO's Leading Practices for Monitoring, but Do Not Include Risk Assessments, Staff Qualifications, or Close-Out Procedures

Based on our review, OMB incorporates 11 of 14 GAO's leading practices. Figure 1 shows our assessment of the Guidelines with regard to monitoring foreign assistance.

Figure 1: Office of Management and Budget Guidelines Incorporating GAO Leading Practices for Monitoring Foreign Assistance

Monitoring practice	Office of Management and Budget Guidelines
1. Develop monitoring plan(s) with program goals and objectives.	●
2. Develop monitoring plan(s) to address risk.	○
3. Develop relevant performance goals, output and outcome performance indicators, and milestones at the program or project level.	●
4. Identify a source(s) for resources to support monitoring.	●
5. Periodically collect, review, and analyze monitoring data.	●
6. Implement procedures for ensuring quality of data on performance indicators.	●
7. Assign staff with appropriate qualifications for monitoring.	○
8. Establish roles and responsibilities of personnel responsible for monitoring.	●
9. Submit periodic and final financial and performance reports and data.	●
10. Assess and approve implementing partners' periodic and financial/performance reports and financial/performance data by agency.	●
11. Validate implementing partners' performance through site visits and other means of verification.	●
12. Document that the monitoring plans were executed.	●
13. Establish procedures to close out program/project.	○
14. Consider performance information in making management decisions.	●

● The Guidelines incorporate this practice.

○ The Guidelines do not incorporate this practice.

Source: GAO analysis of U.S. government documents and international standards. | GAO-19-466

The OMB Guidelines do not incorporate practices on developing monitoring plans that are based on risks, ensuring that staff are appropriately qualified to conduct monitoring, and establishing close-out procedures for projects and programs.

- **Developing monitoring plans based on an assessment of risk.** The Guidelines do not incorporate GAO's leading practice of developing monitoring plans based on as assessment of risks related to achieving the defined objectives. Identifying and assessing risks can help agencies determine if impediments exist that they might need to mitigate in order to manage their foreign assistance more

effectively.[17] Additionally, determining which activities warrant greater oversight and which require less can also help agencies ensure the appropriate allocation of foreign assistance.[18]

- **Ensuring Staff qualifications for monitoring.** The Guidelines do not incorporate GAO's leading practice for agencies to ensure that staff members responsible for monitoring programs or projects have the relevant knowledge, skills, and training. By having qualified staff for monitoring programs or projects, agencies can help ensure they meet their foreign assistance goals. By hiring qualified staff and providing them the right training, tools, structure, incentives, and responsibilities, agencies can make operational success possible.[19]

- **Establishing close out procedures for projects and programs.** The Guidelines do not incorporate GAO's leading practice for agencies to establish program closeout procedures for all required work and administrative actions completed by the implementing partner. By establishing such procedures, agencies can help ensure their foreign assistance is less susceptible to fraud, waste, and mismanagement; addresses increases to potential costs in fees for maintaining foreign assistance; and increases their ability to redirect foreign assistance to other projects.[20]

The Guidelines Incorporate Most of the GAO's Leading Practices for Evaluation, but Do Not Include Developing Staff Skills and Following Up on Recommendations

Based on our review, OMB incorporates 12 of 14 GAO's leading practices. Figure 2 shows our assessment of the Guidelines with regard to evaluating foreign assistance.

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[17]See GAO, *State Department: Implementation of Grants Policies Needs Better Oversight*, GAO-14-635 (Washington, D.C.: Jul. 21, 2014).

[18]GAO-14-635.

[19]See GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sep. 10, 2014).

[20]See GAO, *Grants Management: Action Needed to Improve the Timeliness of Grant Closeouts by Federal Agencies*, GAO-12-360 (Washington, D.C.: Apr. 16, 2012).

Figure 2: Office of Management and Budget Guidelines Incorporating GAO Leading Practices for Evaluating Foreign Assistance

Evaluation practice	Office of Management and Budget Guidelines
1. Develop an evaluation plan or agenda.	◉
2. Identify a source of funding for evaluations.	◉
3. Include all topics or programs subject to evaluation.	◉
4. Select evaluation topics appropriate for stewardship and useful for decision making.	◉
5. Coordinate and collaborate when planning evaluations across agencies with overlapping or complementary missions.	◉
6. Allow a choice of methods appropriate to the context.	◉
7. Assign personnel with appropriate training and experience to conduct evaluations.	◉
8. Ensure evaluator independence.	◉
9. Develop staff skills regarding evaluating and using evidence.	◯
10. Establish procedures to assure evaluation quality.	◉
11. Describe methods and data sources in evaluation reports.	◉
12. Use evaluation findings in management decisions or reforms.	◉
13. Establish mechanisms for following up on recommendations.	◯
14. Disseminate evaluation findings/results.	◉

◉ The Guidelines incorporate this practice.

◯ The Guidelines do not incorporate this practice.

Source: GAO analysis of U.S. government documents and professional organization reports. | GAO-19-466

The OMB Guidelines do not incorporate some practices such as developing staff skills for evaluation and following up on evaluation recommendations.

- **Developing staff skills regarding evaluating.** The Guidelines do not incorporate GAO's leading practice for agencies to establish requirements that the staff responsible for overseeing and using evaluations should continually undertake the relevant education, training, or supervised practice needed to learn new concepts, techniques, and skills. By having their staff continually undertake such

education, training, or supervised practice, agencies can benefit more fully from program evaluations.[21]

- **Following up on recommendations.** The Guidelines do not incorporate GAO's leading practice for agencies to determine whether management or programs have accepted the recommendations made in evaluation reports and taken the actions needed to address them. By developing mechanisms to track recommendations, agencies can better address inefficient, mismanaged, or costly programs or projects.

OMB Notes the Guidelines for Monitoring and Evaluation Include Elements Required in the FATAA Legislation

The FATAA requires the President to set forth guidelines "according to best practices of monitoring and evaluation" but does not define these best practices.[22] Specifically, FATAA states, "the President shall set forth guidelines, according to best practices of monitoring and evaluation studies and analyses, for the establishment of measurable goals, performance metrics, and monitoring and evaluation plans that agencies can apply with reasonable consistency to covered United States foreign assistance."

OMB staff told us that the Guidelines were intended to focus on elements required by the FATAA legislation but noted that agencies are free to add additional requirements to their own M&E policies. However, we have previously reported that while some of these agencies have incorporated these leading practices, others have not.[23] Furthermore, agencies that have incorporated these practices would not necessarily continue to include them if they are not required in the Guidelines.

Regarding leading practices, officials noted that while these practices are important, there is no singular established standard for best monitoring practices. Nevertheless, both OMB's circulars and recent legislation note the importance of leading practices for M&E. For example, Circular A-123 notes that management should identify internal and external risks that

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[21]American Evaluation Association, *AEA Guiding Principles (2018 Update)* (Washington, D.C.: American Evaluation Association, 2018), 2.

[22]See Pub. L. No. 114-191, § 3(b).

[23]In 2016, we reviewed the extent to which six agencies—DOD, HHS, MCC, State, USAID and USDA—incorporated GAO's leading practices. For additional information on this report, see GAO-16-861R.

may prevent the organization from meeting its objectives.[24] Additionally, the Foundations for Evidence-Based Policymaking Act of 2018 requires OPM, in consultation with the OMB, to identify skills and competencies needed for program evaluation, establish a new occupational series or update an existing one for program evaluation, and establish a new career path for program evaluation.[25]

Most Agencies Have Incorporated OMB's Guideline Requirements in Their Policies, and All Have Taken Initial Steps to Implement Them

Based on our review, most agencies incorporated all of OMB's Guidelines for monitoring in their policies. However, DOD did not include the requirement to establish roles and responsibilities among agencies that participate in funding transfers or ensure that verifiable, reliable, and timely information is collected and available to monitoring personnel. We also found that agencies incorporate most of OMB's Guideline requirements for evaluation in their policies, but some did not include the requirement to conduct impact evaluation on all pilot programs. Without incorporating these Guideline requirements, agencies risk losing accountability over their funding and monitoring and evaluating activities. They also risk replicating programs without fully understanding their effectiveness. We also found that all of the agencies we reviewed have taken initial steps to implement their M&E policies.

Most Agencies Have Incorporated OMB's Guideline Requirements for Monitoring

Based on our review of agency monitoring policies, all the agencies except DOD incorporated relevant Guideline requirements.

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[24]In addition, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, promulgated by OMB, requires that a federal agency or pass-through entity will close out the federal award when it determines that all applicable administrative actions and all required work of the award have been completed by the nonfederal entity. 2 C.F.R. § 200.343.

[25]Pub. L. No. 115-435, § 101(e)(3).

Figure 3: Assessment of Agencies Monitoring Policies against Office of Budget and Management's Guidelines

Do the agencies' policies address/require the following Guildeline elements:	Agencies					
	DOD	**HHS**	**MCC**	**State**	**USDA**	**USAID**
Establish a foreign assistance monitoring policy	◉	◉	◉	◉	◉	◉
Define key terms used in monitoring activities such as "program," "project," and "activity"	◉	◉	◉	◉	◉	◉
Apply the findings and conclusions of monitoring information to proposed projects/programs	◉	◉	◉	◉	◉	◉
Roles and responsibilities for monitoring among agencies that participate in funding transfers	◯	◉	Not Applicable	◉	Not Applicable	◉
Establish annual monitoring objectives and timetables	◉	◉	◉	◉	◉	◉
Develop specific project monitoring plans	◉	◉	◉	◉	◉	◉
Apply rigorous monitoring methodologies to such programs	◉	◉	◉	◉	◉	◉
Disseminate guidelines for the development and implementation of monitoring programs to all personnel	◉	◉	◉	◉	◉	◉
Establish methodologies for the collection of data and monitoring of results, including baseline data	◉	◉	◉	◉	◉	◉
Ensure verifiable, reliable, and timely data are available to monitoring personnel	◯	◉	◉	◉	◉	◉

◉ The policy incorporates this practice as a requirement.

◯ The policy does not incorporate this practice as a requirement.

Not Applicable = agency noted they do not participate in funding transfers.

Legend: Department of Defense (DOD); Department of Health and Human Services (HHS); Millennium Challenge Corporation (MCC); Department of State (State); Department of Agriculture (USDA); and the U.S. Agency for International Development (USAID).

Source: GAO analysis of U.S. government documents and professional organization reports. | GAO-19-466

Note: The table does not include Guidelines that OMB encouraged but did not required agencies to follow in monitoring activities, such as undertaking collaborative partnerships, developing a clearinghouse capacity for collecting, disseminating and preserving knowledge, and beneficiary engagement. According to MCC and USDA officials, they do not participate in any funding transfers with other agencies. For example, MCC provide funds directly to eligible countries through multiyear compact agreements to fund specific projects aimed at reducing poverty and stimulating economic growth.

All six agencies we reviewed incorporated the requirement to establish monitoring policies that apply to their major foreign assistance programs. For example, State, USAID, and MCC have agency-wide policies for foreign assistance M&E. USDA and HHS have policies relevant to their major foreign assistance programs—for USDA, the Foreign Agriculture Service's food aid programs, and for HHS, the President's Emergency Plan for AIDS Relief (PEPFAR). All of the agencies with relevant monitoring policies—DOD, HHS, MCC, State, USAID, and USDA— incorporate the requirement to develop, collect, analyze, and report data on performance indicators. These policies help ensure the measurement

of project implementation and progress, and promote the timely analysis and reporting of results that could identify any needed corrections.

- **DOD did not incorporate Guideline requirements to establish agencies' roles and responsibilities and ensure verifiable data for monitoring activities.**

  - **Establishing agencies' roles and responsibilities when funds are transferred.** DOD did not include the Guideline requirement for agencies to establish roles and responsibilities in funding transfers. Without defined roles and responsibilities, agencies risk losing accountability over funding and monitoring activities. In addition, agencies could miss opportunities to collaborate and leverage interagency efforts to facilitate decision-making and address barriers across agency boundaries.

  - **Ensuring verifiable, reliable, and timely data.** DOD did not include the Guideline requirement for agencies to ensure they collect and provide verifiable, reliable, and timely data to monitoring personnel. Without ensuring that such data are available to monitoring personnel, agencies risk employing inappropriate methods, continuing ineffective programs or projects, and making uninformed decisions.

DOD officials told us these practices are currently not required because they are still in the process of fully aligning their policy with the Guidelines. Officials explained that working on prioritizing and directing resources towards M&E efforts has been a challenge. Officials noted they expect to update the policy to include these requirements in the future, but they have no specific timelines in place.

Agencies Incorporate Most but Not All of OMB's Guideline Requirements on Evaluation

The agencies we reviewed incorporated nearly all relevant Guideline requirements on evaluation. Three of the six agencies—DOD, HHS and USDA—did not include a requirement to conduct impact evaluations on all pilot programs or projects. Figure 4 shows our assessment of agencies' evaluation policies against the Guidelines.

Figure 4: Assessment of Agencies Evaluation Policies against Office of Management and Budget's Guidelines

Do the agencies' policies address/require the following Guideline elements:	Agencies					
	DOD	HHS	MCC	State	USDA	USAID
Establish a foreign assistance evaluation policy	●	●	●	●	●	●
Define key terms used in evaluation activities such as "program," "project," and "activity"	●	●	●	●	●	●
Apply the findings and conclusions of evaluation information to proposed projects/programs	●	●	●	●	●	●
Roles and responsibilities for evaluation among agencies that participate in funding transfers	○	●	Not Applicable	●	Not Applicable	●
Establish annual evaluation objectives and timetables	●	●	●	●	●	●
Develop specific project evaluation plans	●	●	●	●	●	●
Apply rigorous evaluation methodologies to such programs	●	●	●	●	●	●
Disseminate guidelines for the development and implementation of evaluation programs to all personnel	●	●	●	●	●	●
Evaluate, at least once in their lifetime, all programs whose dollar value equals or exceeds the median program size for the relevant office or bureau or an equivalent calculation	○	●	●	●	●	●
Conduct impact evaluations on all pilot programs before replicating, or conduct performance evaluations and provide a justification for not conducting an impact evaluation	○	○	●	●	○	●
Develop a clearinghouse capacity for the collection, dissemination, and preservation of knowledge and lessons learned	●	●	●	●	●	●
Internally distribute evaluation reports	●	●	●	●	●	●
Publicly report each evaluation	●	●	●	●	●	●
Ensure verifiable, reliable, and timely data are available to evaluation personnel	●	●	●	●	●	●

● The policy incorporates this practice as a requirement.

○ The policy does not incorporate this practice as a requirement.

Not Applicable = agency noted they do not participate in funding transfers.

Legend: Department of Defense (DOD); Department of Health and Human Services (HHS); Millennium Challenge Corporation (MCC); Department of State (State); Department of Agriculture (USDA); and the U.S. Agency for International Development (USAID).

Source: GAO analysis of U.S. government documents and professional organization reports. | GAO-19-466

Notes: The table does not include Guidelines that OMB encouraged but did not require agencies to follow, such as undertaking collaborative partnerships and beneficiary engagement in evaluation activities. According to MCC and USDA officials, they do not participate in any funding transfers with other agencies. For example, MCC provide funds directly to eligible countries through multiyear compact agreements to fund specific projects aimed at reducing poverty and stimulating economic growth.

All the agencies we reviewed have established project-specific evaluation plans. For example, HHS implements PEPFAR's evaluation plan which indicates specific requirements for describing the evaluation component, strategy, or intervention, the reason for the evaluation, the type of evaluation, the key evaluation questions, the data sources, the methods by question, and the dissemination and utilization plan. All the agencies

we reviewed also had policies on distributing their evaluation reports internally and publicly reporting them. For example, State and USAID have a web-based, customized Evaluation Registry system that they jointly maintain for bureaus and independent offices to record and track planned, ongoing, and completed evaluations.

- **Conduct impact evaluations for pilot programs or projects.** DOD, HHS, and USDA did not include the Guideline requirement for agencies to conduct impact evaluations for pilot programs or to conduct only a performance evaluation and to provide a justification for not conducting an impact evaluation. Without a requirement to conduct impact evaluations of pilot programs, agencies risk duplicating or scaling up programs without fully understanding the factors that could lead to their success or failure.

  - **DOD.** DOD officials told us they do not require this practice because they are still in the process of fully aligning their policy with the Guidelines. According to DOD, it has determined that impact evaluations are impractical and inappropriate for the planned evaluations; instead, it plans to conduct only performance evaluations and provide justifications for not conducting impact evaluations, as required by the OMB Guidelines. DOD plans to address the evaluation methodology of pilot programs in future updates, according to officials. However, DOD has no specific timelines in place for these updates.

  - **HHS.** PEPFAR's M&E documents indicate that PEPFAR teams are encouraged but not required to evaluate all current pilot programs to see which should be taken to scale for specific populations. Officials from HHS and the Office of the U.S. Global Aids Coordinator[26] noted that they conduct their own evaluation of pilot programs and use routine program data to inform scaling of programs. However, PEPFAR policies do not specifically require that such evaluations be like the impact evaluations described in the Guidelines.

  - **USDA.** FAS's M&E documents indicate that when selecting projects to undergo impact evaluation the agency will consider pilot projects. USDA officials told us they have no requirement to conduct impact evaluations on all pilot projects because impact

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[26]Department of State's Office of the U.S. Global AIDs Coordinator administers (provides funding) for the PEPFAR program and HHS and other agencies use those funds to globally implement the program.

evaluations may be cost prohibitive and project lifecycles are short (i.e., 3 to 5 years). Officials further noted that implementing partners can conduct an impact evaluation on pilot programs, but are not required to do so. Although the Guideline requirement indicates that agencies can forgo impact evaluations, they must provide a justification in their M&E policy. USDA officials have not provided such a justification provided in their M&E policy.

- **Establish agencies' roles and responsibilities for evaluation activities when funds are transferred.** DOD did not include the Guideline requirement for agencies to define roles and responsibilities when there are funding transfers between or among U.S. government agencies to ensure accountability for evaluation activities. Without defined roles and responsibilities, agencies risk losing accountability over funding and evaluation activities. In addition, they could miss opportunities to collaborate and leverage interagency efforts to facilitate decision-making and address barriers across agency boundaries.

- **Evaluate all programs at least once whose dollar value equals or exceeds that of a median sized program within the agency.** DOD did not include the Guideline requirement for agencies to evaluate all programs, at least once during their existence, whose dollar value equals or exceeds that of a median sized program in the agency. Without a mechanism to evaluate all these types of programs, agencies risk continuing inefficient, mismanaged, or costly projects.

DOD officials told us they do not currently require these practices because they are still in the process of fully aligning their policy with the Guidelines. They noted that they expect to update the policy to include these requirements, but they have no specific timelines in place.

Agencies Have Taken Initial Steps to Implement Their M&E Policies

Since the six agencies we reviewed recently updated their M&E policies to align with the OMB Guidelines, many existing assistance projects and programs may not be governed by these requirements. Nonetheless, the agencies we reviewed have taken initial steps to help ensure implementation of agency M&E policies. In interviews, agencies provided us with the following examples of such steps.

- **State.** State developed a guidance document and tool-kit to operationalize and oversee its M&E policy to ensure it implements the Guidelines. According to State officials, they provide classroom training on the M&E policy and are piloting a revised online and classroom evaluation courses for staff. Officials also noted that they

have dedicated staff to assist bureaus in implementing the Guidelines, among other agency policies.

- **USAID.** USAID has an approval process to ensure key deliverables include Activity plans that meet Guideline requirements. Additionally, USAID's policy requirements indicate that each mission program office must identify a point of contact for monitoring and evaluation to ensure that USAID and its partners are complying with the agencies policies and foreign assistance M&E guidelines.

- **MCC.** MCC also has an approval process through their Department of Policy and Evaluation to ensure implementation of the Guidelines. As part of the process, the MCC Board of Directors or the appropriate partner country must approve initial M&E plans.

- **HHS.** Within HHS, the Centers for Disease Control and Prevention (CDC) are responsible for implementing the monitoring and evaluation guidance for their PEPFAR programs. CDC officials told us that they have existing mechanisms and supervisory structures in place to ensure that the Guidelines' requirements are met in PEPFAR programs.

- **USDA.** USDA officials told us that the current M&E policy applies only to food assistance programs within FAS and not for other USDA programs. Officials explained they are trying to develop a structure that allows FAS to ensure all USDA components are implementing the OMB Guidelines.

- **DOD.** DOD developed guidance for fiscal year 2020 on implementing its M&E policy. DOD officials we spoke to noted they are working on identifying resources, skills, and capabilities to fully implement DOD's M&E policy.

Conclusions

OMB's Guidelines set forth key principles to guide agencies and to specify requirements, where appropriate, which they must cover in their own policies on M&E of foreign assistance. However, they do not include key leading practices for M&E that GAO identified for ensuring agencies meet their foreign assistance goals and objectives. While OMB allows agencies discretion to include these or other best practices, it is unknown if the agencies will do so. By ensuring that OMB's government-wide Guidelines include these best practices, agencies can help address impediments, effectively manage foreign assistance, and meet their goals. Although all agencies we reviewed developed or updated their M&E policies to align with the Guidelines, not all of them include important requirements. DOD, HHS, and USDA did not include the requirement for agencies to conduct impact evaluations for pilot programs

or to conduct performance evaluations and provide a justification for not doing an impact evaluation. Without a requirement to conduct impact evaluations of pilot programs, agencies risk duplicating or scaling up programs without fully understanding the causes that could lead to their success or failure.

Recommendations for Executive Action

We are making the following seven recommendations, including one to OMB, four to DOD, one to State, and one to USDA.

Specifically:

The Director of the Office of Management of Budget should update the Guidelines to include GAO's leading practices of developing monitoring plans that are based on risks, ensuring that monitoring staff have appropriate qualifications, establishing procedures to close-out programs, developing staff skills regarding evaluations, and establishing mechanisms for following up on evaluation recommendations. (Recommendation 1)

The Secretary of Defense should update the Department's monitoring and evaluation policies to define roles and responsibilities among agencies that participate in interagency funding transfers. (Recommendation 2)

The Secretary of Defense should update the Department's monitoring and evaluation policies to ensure verifiable, reliable, and timely data are available to monitoring personnel. (Recommendation 3)

The Secretary of Defense should update the Department's monitoring and evaluation policies to ensure that it evaluates all programs, at least once in their lifetimes, whose dollar value equals or exceeds that of the median program in the agency. (Recommendation 4)

The Secretary of Defense should update the Department's monitoring and evaluation policies to require the agency to conduct impact evaluations on all pilot programs before replicating or expanding, or conduct performance evaluations for those programs and provide a justification for not conducting an impact evaluation. (Recommendation 5)

The Department of State's U.S. Global AIDS Coordinator, in collaboration with HHS and other implementing agencies, should update the PEPFAR monitoring and evaluation policies to require these agencies to conduct

impact evaluations on all pilot programs before replicating or expanding, or conduct performance evaluations for those programs and provide a justification for not conducting an impact evaluation. (Recommendation 6)

The Secretary of Agriculture, in collaboration with the Foreign Agriculture Service, should update their monitoring and evaluation policies to require USDA to conduct impact evaluations on all pilot programs before replicating or expanding, or conduct performance evaluations for those programs and provide a justification for not conducting an impact evaluation. (Recommendation 7)

Agency Comments and Our Evaluation

We provided a draft of this product to the DOD, HHS, MCC, OMB, State, USDA, and USAID for comment. OMB commented on the draft report in an email from the staff responsible for economic policy, federal financial management, and international affairs. In the email, OMB disagreed with the recommendation to revise the Guidelines. It emphasized that an interagency group had developed the Guidelines and had consulted a number of expert sources on monitoring and evaluation policies and practices, including GAO's leading practices. OMB also developed the guidelines to achieve the objectives contained in the Foreign Aid Transparency and Accountability Act of 2016 within the context of other existing OMB guidance. OMB suggested that it would be more effective to remind agencies that, in addition to the Guidelines specified in M-18-04, they should follow all guidance OMB had issued affecting monitoring and evaluation activities. This guidance includes policies for closeout procedures in the Uniform Guidance, for the Enterprise Risk Management and Internal Control in A-123, and for the Foundations for Evidence-Based Policymaking Act on using evaluation information and monitoring and evaluation staff skills and qualifications.

We acknowledge that relevant monitoring and evaluation guidance is available to agencies in other forms beyond the Guidelines. However, we believe it is important for OMB to incorporate this guidance into its Guidelines, if only by reference, in order to emphasize the importance of these practices in the context of monitoring and evaluation of foreign assistance. This step would help ensure that OMB had integrated this guidance into the management of foreign assistance programs as appropriate.

DOD concurred with our recommendations and indicated that it would address many of them in the next iteration of its M&E policy for security assistance (see appendix IV for written comments). DOD noted that two

of our recommendations had limited applicability to DOD for security assistance, but described how it would implement them. First, DOD stated that it has not used its authority to transfer funds for security cooperation assistance to other departments and agencies. However, DOD indicated it would implement our recommendation to define roles and responsibilities among agencies that participate in interagency funding transfers, should such transfers become necessary. Second, DOD stated that conducting impact evaluations was not a feasible in the context of security assistance. Instead, DOD plans to conduct only performance evaluations, but it would provide justifications for not conducting impact evaluations, as required by the Guidelines. By documenting these approaches in its M&E policies, DOD would help ensure that those departments conducting M&E for DOD security assistance initiatives implement them as required.

State agreed with the intent of the recommendation (see appendix V for written comments). State explained that impact evaluations are often not feasible in the context of assistance provided under PEPFAR and described its alternative approach to evaluating new initiatives. State indicated it would update appropriate PEPFAR policies to clarify when agencies should conduct impact and/or performance evaluations. These clarifications will reflect how State evaluates PEPFAR programs in practice in accordance with OMB guidance and legislation, according to State.

USAID provided written comments (see appendix VI). HHS and USDA provided technical comments, which we incorporated as appropriate. MCC did not provide comments.

We are sending copies of this report to the appropriate congressional committees, the Director of the Office of Management and Budget; Secretaries of Agriculture, Defense, Health and Human Services, and State; Administrator of the U.S. Agency for International Development; and the Executive Officer of the Millennium Challenge Corporation and other interested parties. In addition, this report will be available at no charge on the GAO website at http://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-3149 or GootnickD@gao.gov. Contact points for our Offices 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.

Sincerely yours,

David B. Gootnick
Director, International Affairs and Trade

List of Committees

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

The Honorable Lindsey Graham
Chairman
The Honorable Patrick Leahy
Ranking Member
Committee on Appropriations
Sub-committee on State, Foreign Operations and Related Programs
United States Senate

The Honorable Eliot Engel
Chairman
The Honorable Michael McCaul
Ranking Member
Committee on Foreign Affairs
House of Representatives

The Honorable Nita Lowey
Chairwoman
The Honorable Hal Rogers
Ranking Member
Committee on Appropriations
Sub-committee on State, Foreign Operations and Related Programs
House of Representatives

Appendix I: Objectives, Scope, and Methodology

This report examines the extent to which (1) the Office of Management and Budget's (OMB) monitoring and evaluation (M&E) Guidelines incorporate GAO leading practices and (2) agencies incorporate the OMB Guidelines in their M&E policies and plans.

To address objective one, we examined the OMB Guidelines against GAO's 28 leading practices—14 for monitoring and 14 for evaluation—identified in GAO-16-861R.[1] In 2016, GAO developed the 28 leading practices. In 2019, we provide specific definitions for each of the practices noted. We made slight modifications to the language to align with the definitions provided.[2] For monitoring, we developed this list of leading practices based on our review of the GPRA Modernization Act of 2010;[3] OMB's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards;[4] GAO's Standards for Internal Control in the Federal Government (Greenbook);[5] and others. The list of leading practices for monitoring includes developing monitoring plans; collecting, reviewing, and analyzing monitoring data; and establishing roles and responsibilities of personnel responsible for monitoring.

For evaluation, we developed a list of leading practices based on the American Evaluation Association's (AEA) 2016 *An Evaluation Roadmap for a More Effective Government*[6] (AEA Roadmap) and Preface to Evaluators' Ethical Guiding Principles.[7] The list of leading practices for evaluation include developing evaluation plans; ensuring evaluator

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[1]GAO*, Foreign Assistance: Selected Agencies' Monitoring and Evaluation Policies Generally Address Leading Practices*, GAO-16-861R (Washington, D.C.: Sep. 27, 2016).

[2]In 2019, we reviewed and included additional sources for each of the practices. For example, we reviewed international standards such as those of the Organisation for Economic Co-operation and Development (OECD) to ensure alignment with the leading practices.

[3]The GPRA Modernization Act of 2010, Pub. L. No 111–352, amended the Government Performance and Results Act of 1993, Pub. L. No. 103-62.

[4]U.S. Office of Management and Budget, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,* 2 C.F.R. § 200.

[5]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sep. 10, 2014).

[6]American Evaluation Association, *An Evaluation Roadmap for a More Effective Government*, accessed August 6, 2018, http://www.eval.org/d/do/472.

[7]American Evaluation Association, Preface to Evaluators' Ethical Guiding Principles), accessed August 14, 2018, https://www.eval.org/d/do/4220.

independence; developing staff skills regarding evaluation and use of evidence; and establishing roles and responsibilities of personnel responsible for evaluation. To perform these analyses, two analysts assessed if the Guidelines incorporated specific GAO leading practices. The analysts worked iteratively, comparing notes and reconciling differences at each stage of the analysis. In addition, GAO staff independent of the two analysts reviewed the final analysis, and made modifications as appropriate. We also interviewed relevant OMB officials in Washington D.C. involved in developing the memorandum and inquired about specific requirements and plans to ensure the implementation of these Guidelines.

To address our second objective, we examined U.S. agency M&E policies against the requirements noted in the OMB Guidelines. We identified the six major agencies administering the most foreign assistance funds.[8] The six agencies are the U.S. Agency for International Development (USAID), the Department of State (State), the Millennium Challenge Corporation (MCC), the Department of Health and Human Services (HHS), the U.S. Department of Agriculture (USDA) and the Department of Defense (DOD). We asked these agencies to identify or provide all relevant policies and guidance relating to foreign assistance M&E, including,

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[8]Our review focuses on the six federal agencies that administer most of foreign assistance. According to the U.S. Overseas Loans and Grants (Greenbook) these six agencies obligated over 95 percent of the foreign assistance in fiscal year 2016, the most recent year available.

where appropriate, standard operating procedures or other guidance.[9]
For USDA, we reviewed the Foreign Agricultural Service's food
assistance; for HHS, the President's Emergency Program for AIDS Relief;
and for DOD, security cooperation programs. To perform these analyses,
two analysts assessed agency M&E policy documents against the
requirements in the OMB Guidelines. We identified requirements as
phrases that included the following language "required," "must,"
"mandatory," or "should." The analysts worked iteratively, comparing
notes and reconciling differences at each stage of the analysis. In
addition, other GAO staff independent of the two analysts reviewed the
final analysis, and made modifications as appropriate. We also
interviewed relevant OMB staff and agency officials in Washington D.C.
involved in developing and implementing the M&E policies and inquired
about specific requirements, and plans to ensure their M&E policies are
implemented.

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[9]U.S. Department of Defense, *DoD Instruction 5132.14 Assessment, Monitoring, And
Evaluation Policy for The Security Cooperation Enterprise,* (January 2017); U.S.
Department of State, *PEPFAR Evaluation Standards of Practice*, (December 2017); U.S.
Department of Health and Human Services, *Guidance for Revising Logic Models and
Developing and Evaluation and Performance Measurement Plan*, (July 2018); U.S.
President's Emergency Plan for AIDS Relief, *Monitoring, Evaluation, and Reporting (MER
2.0) Indicator Reference Guide*, (January 2018); U.S. President's Emergency Plan for
AIDS Relief, *PEPFAR 2018 Country Operational Plan Guidance for Standard Process
Countries*, (January 2018); U.S. President's Emergency Plan for AIDS Relief, *PEPFAR
2019 Country Operational Plan Guidance for all PEPFAR Countries*, (January 2019); U.S.
Department of State, *PEPFAR FY 2017 Monitoring and Reporting Guidance*, (January
2017); U.S. President's Emergency Plan for AIDS Relief, *Update on Impact Evaluations*,
(March 2017); Millennium Challenge Corporation, *Policy for Monitoring and Evaluation*,
(March 2017); U.S. Department of State, *Department of State Program and Project
Design, Monitoring, and Evaluation Policy*, (November 2017); U.S. Department of State,
Guidance for the Design, Monitoring and Evaluation Policy at the Department of State,
(January 2018); U.S. Department of State, *Program Design and Performance
Management Toolkit*, (March 2017); U.S. Department of State, *Guidelines for Application
and Administration for Federal Assistance Awards Issued By the Department Of State*,
(November 2015); U.S. Department of State, *U.S. Department of State Federal
Assistance Policy Directive*, (March 2015); U.S. Agency for International Development,
*ADS 201 Additional Help: Staff Roles and Responsibilities for Monitoring, Evaluation, and
Learning*, (September 2016); U.S. Agency for International Development, *ADS Chapter
201 Program Cycle Operational Policy*, (May 2018); U.S. Agency for International
Development, *ADS Chapter 306 Interagency Agreements*, (November 2015); U.S. Agency
for International Development, *Performance Indicator Reference Sheet (PIRS) Guidance
& Template: A Mandatory Reference for ADS Chapter 201*, (September 2016); U.S.
Agency for International Development, *USAID Evaluation Report Requirements: A
Mandatory Reference for ADS Chapter 201*, (September 2016); U.S. Department of
Agriculture Foreign Agricultural Service-Food Assistance Division, *Monitoring and
Evaluation Policy*, (February 2019).

We conducted this performance audit from July 2018 to July 2019 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: The Office of Management and Budget Monitoring and Evaluation Guidelines (OMB Memorandum M-18-04)

In January 2018, the Office of Management and Budget (OMB) released (M-18-04) *Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance* (the "Guidelines")[1] in response to the Foreign Aid Transparency and Accountability Act of 2016 (FATAA).[2] Table 4 shows the complete description of the requirements noted in the Guidelines.

Table 4: Complete Description of the Requirements Noted in the Office of Management and Budget's (OMB) 2018 Foreign Assistance Monitoring and Evaluation Guideline Requirements (M-18-04)

Type of Activity	Guideline Requirement	Full Description
Monitoring and Evaluation	Establish a foreign assistance monitoring and evaluation policy	All federal departments and agencies that administer covered United States foreign assistance must put in place or establish specific policies and procedures for monitoring and evaluation of covered foreign assistance no later than one year after these guidelines are published.
Monitoring and Evaluation	Define key terms used in monitoring and evaluation activities such as "program," "project," and "activity"	Other than the term "evaluation," which is specifically defined in Foreign Aid Transparency and Accountability Act of 2016 (FATAA), agency policies should define key terms within the agency context as necessary, such as "program," "project," and "activity," and be clear about how monitoring and evaluation requirements apply to each level.
Monitoring and Evaluation	Apply the findings and conclusions of monitoring and evaluation information to proposed projects/programs	Policies must include mechanisms and requirements for applying the findings and conclusions of monitoring and evaluation information to proposed projects and programs and, where appropriate, to ongoing projects and programs.
Monitoring and Evaluation	Define roles and responsibilities for monitoring and evaluation among agencies that participate in funding transfers	Policies must address funding transfers between or among U.S. government agencies and ensure accountability for monitoring and evaluation, including in cases where one agency leads or coordinates an overall program, but multiple agencies implement activities under that program. Monitoring and evaluation roles and responsibilities should be considered and documented when funds are transferred, and policies may also address funding transfers to third party institutions or funds. Policies should define roles and responsibilities for monitoring and evaluation when other agencies will be implementing activities that support a multi-agency project for a lead agency; ensure monitoring and evaluation responsibilities are clearly defined in interagency agreements on covered foreign assistance; and ensure that lead agencies share necessary assessments, past evaluations, and other information with supporting agencies to assist with the supporting agency's monitoring and evaluation.

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[1]OMB Memorandum M-18-04.

[2]Pub. L. No. 114-191. The required objectives for the guidelines are set forth at section 3 of this act.

Type of Activity	Guideline Requirement	Full Description
Monitoring and Evaluation	Establish annual monitoring and evaluation objectives and timetables	Establish annual monitoring and evaluation objectives and timetables: Agencies may do this centrally, or when decentralized, agency policies should require that operating units annually document their monitoring and evaluation objectives and timetables, as well as other key aspects of managing monitoring and evaluation and using the resulting information for learning. Agencies should plan to use monitoring data and evaluation findings for making decisions about policies, strategies, program priorities, and delivery of services, as well as for planning and budget formulation processes. Evaluation findings may be used by agency staff to course-correct a project or program. When evaluators themselves provide course-correction recommendations, the responsible agency should explicitly consider how to efficiently balance the potentially competing values of the course corrections and the evaluator's independence.
Monitoring and Evaluation	Develop specific project monitoring and evaluation plans	Develop specific project monitoring and evaluation plans: Monitoring and evaluation plans should be developed as part of program, project, and activity design, and should include measurable goals. Policies should require establishing and documenting a baseline data collection methodology and a plan for regular monitoring of all programs and projects. Monitoring plans should document all of the indicators, including baselines and milestones or targets for each indicator. They should also include data collection methodology and frequency for each indicator, which should be a time interval that is feasible and necessary to effectively manage and monitor progress and results, conduct internal learning, and meet external reporting or communication requirements. Policies should require that monitoring plans be updated or adjusted as necessary to reflect new or better information that becomes available as learning occurs (e.g., additional indicators if new data sources become available). Policies should require that the responsible organizational units establish evaluation plans and provide guidance about what the plans should include and when and how to submit them. Evaluation costs should be planned and accounted for as part of the overall program budget.
Monitoring and Evaluation	Apply rigorous monitoring and evaluation methodologies to such programs	Apply rigorous monitoring and evaluation methodologies to such programs: Guidance should require that evaluations be "evidence based," meaning they should be based on verifiable data and information that have been gathered using the monitoring and evaluation principles established in these guidelines. Evaluation design and data collection methodologies should be appropriate to answer the key questions posed by the evaluation, including both qualitative and quantitative data. The timing of evaluation data collection should be driven by the relevant program logic. Considerations for selecting a methodological approach include the information needs of management, timeline, availability of data, and resources. Evaluations should include an assessment and disclosure of assumptions and limitations. Guidance on monitoring methodologies should include the use of logic models and definition of the program inputs, activities, outputs, intermediate outcomes, and end or long-term outcomes. Logic models set the foundation against which progress can be monitored and evaluated. Logic model documentation should include the assumptions upon which the model is based, i.e., the conditions that need to exist in order for one step in the logic model to succeed, and lead to the next step. Documentation may also include a theory of change, if applicable, which explains why it is believed that the stated program activities will lead to the desired outcomes. Logic models should be appropriate for the type of program, context, existing evidence for the theory of change, and implementation modalities.

Type of Activity	Guideline Requirement	Full Description
Monitoring and Evaluation	Disseminate guidelines for the development and implementation of monitoring and evaluation programs to all personnel	Disseminate guidelines for the development and implementation of monitoring and evaluation programs to all personnel: Guidelines should be disseminated to all personnel, including those in the field, and should include:
		a) Roles and responsibilities for monitoring and evaluation, and for ensuring monitoring and evaluation are informed by and/or inform program design;
		b) Requirements for when and how to monitor and evaluate programs, including timing and frequency;
		c) Statement of the expected use of monitoring and evaluation, including processes for the use of findings for policy and program improvement;
		d) Public and internal dissemination of evaluation reports and results; and
		e) How the agency will ensure the collection, dissemination, and preservation of knowledge and lessons learned.
Monitoring	Establish methodologies for the collection of data including baseline data	Establish methodologies for the collection of data, including baseline data: Policies should cover the standards for data collection, including:
		a) Establish expectations for developing performance indicators to monitor progress and results for all programs;
		b) Establish expectations for fully defining appropriate use of the indicator, such as its scope, acceptable data sources, or other terms of use;
		c) Establish expectations for identifying or collecting baseline data, as appropriate and feasible, at the start of a program to provide a basis for planning or assessing subsequent progress;
		d) Establish expectations for collecting subsequent results and at what frequency;
		e) Ensure targets are set for each performance indicator to indicate the expected change over the course of each period of performance; and
		f) Outline expected procedures for reporting on and using monitoring data, which could include reviewing and analyzing progress and results, adaptive management, internal learning, meeting external reporting or communication requirements, and any relevant reporting or sharing of data to agency stakeholders.
Evaluation	Evaluate, at least once in their lifetime, all programs whose dollar value equals or exceeds the median program size for the relevant office or bureau or an equivalent calculation	Evaluate, at least once in their lifetime, all programs whose dollar value equals or exceeds the median program size for the relevant office or bureau or an equivalent calculation: A key consideration in selecting a program for evaluation should be the information needs of the agency or office managing the program to inform future decisions. At a minimum, agencies that directly manage foreign assistance program funds should direct their responsible organizational units to evaluate, at least once in their lifetimes, all programs whose dollar value equals or exceeds the median program size for the relevant bureau or office, or an equivalent calculation, such that the majority of program resources are evaluated. This determination should reflect the Practical and Efficient principle, taking into account the scope of their portfolio, size of their budget, anticipated needs of management, and appropriate programmatic level at which to evaluate. Evaluating a subset or component of a program may be acceptable provided the evaluation is sufficient to address key uncertainties and critical questions related to the program's intended outcomes.

Type of Activity	Guideline Requirement	Full Description
Evaluation	Conduct impact evaluations on all pilot programs before replicating, or conduct performance evaluations and provide a justification for not conducting an impact evaluation	Conduct impact evaluations on all pilot programs before replicating, or conduct performance evaluations and provide a justification for not conducting an impact evaluation: Agency policies should include the expectation that pilot programs or interventions (defined above) should be evaluated for impact before being replicated or expanded. Pilot interventions should be identified during project or activity design, and the impact evaluation should be integrated into the design of the project or activity. An impact evaluation (defined above) requires a specialized design, and must be carried out by evaluators with the expertise and knowledge to properly implement such a design and analyze the resulting data. Its timing must also be coordinated with the implementation of the intervention and so must be planned accordingly. If an impact evaluation is deemed to be impracticable or inappropriate for a particular pilot program or intervention, a performance evaluation must be conducted with a justification of the methodological choice.
Evaluation	Develop a clearinghouse capacity for the collection, dissemination, and preservation of knowledge and lessons learned	Develop a clearinghouse capacity for the collection, dissemination, and preservation of knowledge and lessons learned: Agencies should make information on program plans, monitoring data, and evaluation findings available to the public, other foreign assistance agencies, implementing partners, the donor community and aid recipient governments. Agencies may develop a new website or house this information on an existing one in a way that is easily accessible to the public. Evaluation reports must be included on each agency's clearinghouse website, except those exempted under clearly specified criteria in agency polices under the guidelines to "Publicly report each evaluation." Other documents published may include: a) Strategies that guide foreign assistance; b) Planning information on how programs are developed; c) Monitoring information and reports; d) Tools and resources used to manage programs; e) Summaries of lessons learned; f) Budget information; and g) Links to related data required by OMB Bulletin 12-01, Guidance on Collection of U.S. Foreign Assistance Data, to be reported to FA.gov or other relevant websites.
Evaluation	Internally distribute evaluation reports	Internally distribute evaluation reports: Evaluation reports, program summaries, and other relevant documents should be made available internally for learning and analysis. At minimum, the clearinghouse described above should be easily accessible by internal staff, and agencies are encouraged to use additional strategies for distributing evaluation reports and related information. These strategies may include a range of options, such as using newsletters or listservs, distributing abstracts or summaries of recently completed evaluations, videos, blogs, podcasts, and other events, according to the resources and context of the agency.

Type of Activity	Guideline Requirement	Full Description
Evaluation	Publically report each evaluation	Publicly report each evaluation: Evaluation reports should be clear, concise, and empirically grounded. They should include an executive summary, a succinct description of the program, evaluation purpose and questions, evaluation design and data collection methods and their limitations, key findings, and conclusions or recommendations.
		For transparency and accountability, final evaluation reports should be made available to the public within 90 days of completion of the evaluation as defined by the agency. Agencies may have additional requirements for completion such, as required internal and stakeholder reviews, and must establish guidelines that clearly delineate these requirements and processes. To the extent possible, findings should be made available to communities involved in the program implementation or related evaluation efforts in an appropriate format. If the evaluations are classified, sensitive, law enforcement sensitive, or commercially sensitive, agencies should have policies in place spelling out an exemption for public disclosure. Summaries of results from classified or sensitive evaluations, including a description of the methodology, key findings and recommendations, may be made available instead.
Monitoring and Evaluation	Ensure verifiable, reliable, and timely data are available to monitoring and evaluation personnel	Ensure verifiable, reliable, and timely data are available to monitoring and evaluation personnel: Monitoring and evaluation should employ methods appropriate to context and population to ensure that verifiable, reliable, and timely quantitative and qualitative information is collected, included, and considered, with appropriate provisions for the protection of human subjects in the collection and use of this information.

Source: Office of Management and Budget Memorandum M-18-04 Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance. | GAO-19-466

Note: The table does not include Guidelines that OMB encouraged but did not require agencies to follow in monitoring and evaluation activities, such as undertaking collaborative partnerships and beneficiary engagement.

Appendix III: Assessment of the Foreign Aid Transparency and Accountability Act of 2016 and the Office of Management and Budget Monitoring and Evaluation Guidelines

The Foreign Aid Transparency and Accountability Act of 2016 (FATAA) has required objectives on monitoring and evaluation for the Office of Management and Budget (OMB) to include in the Guidelines.[1] We compared the 13 required objectives for the Guidelines set forth in the FATAA legislation with those in the OMB Guidelines. We found that all of the monitoring and evaluation requirements set forth in the legislation are included in the OMB Guidelines. Table 5 shows the FATAA legislation requirements, OMB Guidelines, and our assessment of the alignment between the legislation and OMB's Guidelines.

Table 5: Assessment of the Foreign Aid Transparency and Accountability Act (FATAA) Requirements and the Office of Management and Budget (OMB) Foreign Assistance Monitoring and Evaluation Guidelines (Guidelines)

	2016 FATAA Legislation	OMB Guidelines	2016 FATAA Requirement Included in the OMB Guidelines (Yes/No)
1	Establish annual monitoring and evaluation objectives and timetables to plan and manage the process of monitoring, evaluating, analyzing progress, and applying learning toward achieving results;	Establish annual monitoring and evaluation objectives and timetables [Sec.3(c)(2)(A)]: Agencies may do this centrally, or when decentralized, agency policies should require that operating units annually document their monitoring and evaluation objectives and timetables, as well as other key aspects of managing monitoring and evaluation and using the resulting information for learning. Agencies should plan to use monitoring data and evaluation findings for making decisions about policies, strategies, program priorities, and delivery of services, as well as for planning and budget formulation processes. Evaluation findings may be used by agency staff to course-correct a project or program. When evaluators themselves provide course-correction recommendations, the responsible agency should explicitly consider how to efficiently balance the potentially competing values of the course corrections and the evaluator's independence.	YES

[1]Pub. L. No. 114-191. The required objectives for the guidelines are set forth at section 3 of this act.

**Appendix III: Assessment of the Foreign Aid
Transparency and Accountability Act of 2016
and the Office of Management and Budget
Monitoring and Evaluation Guidelines**

	2016 FATAA Legislation	OMB Guidelines	2016 FATAA Requirement Included in the OMB Guidelines (Yes/No)
2	Develop specific project monitoring and evaluation plans, including measurable goals and performance metrics, and to identify the resources necessary to conduct such evaluations, which should be covered by program costs;	Develop specific project monitoring and evaluation plans [Sec.3(c)(2)(B)]: Monitoring and evaluation plans should be developed as part of program, project, and activity design, and should include measurable goals. Policies should require establishing and documenting a baseline data collection methodology and a plan for regular monitoring of all programs and projects. Monitoring plans should document all of the indicators, including baselines and milestones or targets for each indicator. They should also include data collection methodology and frequency for each indicator, which should be a time interval that is feasible and necessary to effectively manage and monitor progress and results, conduct internal learning, and meet external reporting or communication requirements. Policies should require that monitoring plans be updated or adjusted as necessary to reflect new or better information that becomes available as learning occurs (e.g., additional indicators if new data sources become available). Policies should require that the responsible organizational units establish evaluation plans and provide guidance about what the plans should include and when and how to submit them. Evaluation costs should be planned and accounted for as part of the overall program budget.	YES
3	Apply rigorous monitoring and evaluation methodologies to such programs, including through the use of impact evaluations, ex-post evaluations, or other methods, as appropriate, that clearly define program logic, inputs, outputs, intermediate outcomes, and end outcomes;	Apply rigorous monitoring and evaluation methodologies to such programs [Sec.3(c)(2)(C)]: Guidance should require that evaluations be "evidence based," meaning they should be based on verifiable data and information that have been gathered using the monitoring and evaluation principles established in these guidelines. Evaluation design and data collection methodologies should be appropriate to answer the key questions posed by the evaluation, including both qualitative and quantitative data. The timing of evaluation data collection should be driven by the relevant program logic. Considerations for selecting a methodological approach include the information needs of management, timeline, availability of data, and resources. Evaluations should include an assessment and disclosure of assumptions and limitations. Guidance on monitoring methodologies should include the use of logic models and definition of the program inputs, activities, outputs, intermediate outcomes, and end or long-term outcomes. Logic models set the foundation against which progress can be monitored and evaluated. Logic model documentation should include the assumptions upon which the model is based, i.e., the conditions that need to exist in order for one step in the logic model to succeed, and lead to the next step. Documentation may also include a theory of change, if applicable, which explains why it is believed that the stated program activities will lead to the desired outcomes. Logic models should be appropriate for the type of program, context, existing evidence for the theory of change, and implementation modalities.	YES

Appendix III: Assessment of the Foreign Aid
Transparency and Accountability Act of 2016
and the Office of Management and Budget
Monitoring and Evaluation Guidelines

	2016 FATAA Legislation	OMB Guidelines	2016 FATAA Requirement Included in the OMB Guidelines (Yes/No)
4	Disseminate guidelines for the development and implementation of monitoring and evaluation programs to all personnel, especially in the field, who are responsible for the design, implementation, and management of covered United States foreign assistance programs;	Disseminate guidelines for the development and implementation of monitoring and evaluation programs to all personnel [Sec.3(c)(2)(D)]: Guidelines should be disseminated to all personnel, including those in the field, and should include: a) Roles and responsibilities for monitoring and evaluation, and for ensuring monitoring and evaluation are informed by and/or inform program design; b) Requirements for when and how to monitor and evaluate programs, including timing and frequency; c) Statement of the expected use of monitoring and evaluation, including processes for the use of findings for policy and program improvement; d) Public and internal dissemination of evaluation reports and results; and e) How the agency will ensure the collection, dissemination, and preservation of knowledge and lessons learned.	YES
5	Establish methodologies for the collection of data, including baseline data to serve as a reference point against which progress can be measured;	Establish methodologies for the collection of data, including baseline data [Sec.3(c)(2)(E)]: Policies should cover the standards for data collection, including: a) Establish expectations for developing performance indicators to monitor progress and results for all programs; b) Establish expectations for fully defining appropriate use of the indicator, such as its scope, acceptable data sources, or other terms of use; c) Establish expectations for identifying or collecting baseline data, as appropriate and feasible, at the start of a program to provide a basis for planning or assessing subsequent progress; d) Establish expectations for collecting subsequent results and at what frequency; e) Ensure targets are set for each performance indicator to indicate the expected change over the course of each period of performance; and f) Outline expected procedures for reporting on and using monitoring data, which could include reviewing and analyzing progress and results, adaptive management, internal learning, meeting external reporting or communication requirements, and any relevant reporting or sharing of data to agency stakeholders.	YES

**Appendix III: Assessment of the Foreign Aid
Transparency and Accountability Act of 2016
and the Office of Management and Budget
Monitoring and Evaluation Guidelines**

	2016 FATAA Legislation	OMB Guidelines	2016 FATAA Requirement Included in the OMB Guidelines (Yes/No)
6	Evaluate, at least once in their lifetime, all programs whose dollar value equals or exceeds the median program size for the relevant office or bureau or an equivalent calculation to ensure the majority of program resources are evaluated;	Evaluate, at least once in their lifetime, all programs whose dollar value equals or exceeds the median program size for the relevant office or bureau or an equivalent calculation [Sec.3(c)(2)(F)]: A key consideration in selecting a program for evaluation should be the information needs of the agency or office managing the program to inform future decisions. At a minimum, agencies that directly manage foreign assistance program funds should direct their responsible organizational units to evaluate, at least once in their lifetimes, all programs whose dollar value equals or exceeds the median program size for the relevant bureau or office, or an equivalent calculation, such that the majority of program resources are evaluated. This determination should reflect the Practical and Efficient principle, taking into account the scope of their portfolio, size of their budget, anticipated needs of management, and appropriate programmatic level at which to evaluate. Evaluating a subset or component of a program may be acceptable provided the evaluation is sufficient to address key uncertainties and critical questions related to the program's intended outcomes.	YES
7	Conduct impact evaluations on all pilot programs before replicating, or conduct performance evaluations and provide a justification for not conducting an impact evaluation when such an evaluation is deemed inappropriate or impracticable;	Conduct impact evaluations on all pilot programs before replicating, or conduct performance evaluations and provide a justification for not conducting an impact evaluation [Sec.3(c)(2)(G)]: Agency policies should include the expectation that pilot programs or interventions (defined above) should be evaluated for impact before being replicated or expanded. Pilot interventions should be identified during project or activity design, and the impact evaluation should be integrated into the design of the project or activity. An impact evaluation (defined above) requires a specialized design, and must be carried out by evaluators with the expertise and knowledge to properly implement such a design and analyze the resulting data. Its timing must also be coordinated with the implementation of the intervention and so must be planned accordingly. If an impact evaluation is deemed to be impracticable or inappropriate for a particular pilot program or intervention, a performance evaluation must be conducted with a justification of the methodological choice.	YES

**Appendix III: Assessment of the Foreign Aid
Transparency and Accountability Act of 2016
and the Office of Management and Budget
Monitoring and Evaluation Guidelines**

	2016 FATAA Legislation	OMB Guidelines	2016 FATAA Requirement Included in the OMB Guidelines (Yes/No)
8	Develop a clearinghouse capacity for the collection, dissemination, and preservation of knowledge and lessons learned to guide future programs for United States foreign assistance personnel, implementing partners, the donor community, and aid recipient governments;	Develop a clearinghouse capacity for the collection, dissemination, and preservation of knowledge and lessons learned [Sec.3(c)(2)(H)]: Agencies should make information on program plans, monitoring data, and evaluation findings available to the public, other foreign assistance agencies, implementing partners, the donor community and aid recipient governments. Agencies may develop a new website or house this information on an existing one in a way that is easily accessible to the public. Evaluation reports must be included on each agency's clearinghouse website, except those exempted under clearly specified criteria in agency polices under the guidelines to "Publicly report each evaluation." Other documents published may include: a) Strategies that guide foreign assistance; b) Planning information on how programs are developed; c) Monitoring information and reports; d) Tools and resources used to manage programs; e) Summaries of lessons learned; f) Budget information; and g) Links to related data required by OMB Bulletin 12-01, Guidance on Collection of U.S. Foreign Assistance Data, to be reported to FA.gov or other relevant websites.	YES
9	Internally distribute evaluation reports;	Internally distribute evaluation reports [Sec.3(c)(2)(I)]: Evaluation reports, program summaries, and other relevant documents should be made available internally for learning and analysis. At minimum, the clearinghouse described above should be easily accessible by internal staff, and agencies are encouraged to use additional strategies for distributing evaluation reports and related information. These strategies may include a range of options, such as using newsletters or listservs, distributing abstracts or summaries of recently completed evaluations, videos, blogs, podcasts, and other events, according to the resources and context of the agency.	YES

Appendix III: Assessment of the Foreign Aid
Transparency and Accountability Act of 2016
and the Office of Management and Budget
Monitoring and Evaluation Guidelines

	2016 FATAA Legislation	OMB Guidelines	2016 FATAA Requirement Included in the OMB Guidelines (Yes/No)
10	Publicly report each evaluation, including an executive summary, a description of the evaluation methodology, key findings, appropriate context, including quantitative and qualitative data when available, and recommendations made in the evaluation within 90 days after the completion of the evaluation;	Publicly report each evaluation [Sec.3(c)(2)(J)]: Evaluation reports should be clear, concise, and empirically grounded. They should include an executive summary, a succinct description of the program, evaluation purpose and questions, evaluation design and data collection methods and their limitations, key findings, and conclusions or recommendations. For transparency and accountability, final evaluation reports should be made available to the public within 90 days of completion of the evaluation as defined by the agency. Agencies may have additional requirements for completion such, as required internal and stakeholder reviews, and must establish guidelines that clearly delineate these requirements and processes. To the extent possible, findings should be made available to communities involved in the program implementation or related evaluation efforts in an appropriate format. If the evaluations are classified, sensitive, law enforcement sensitive, or commercially sensitive, agencies should have policies in place spelling out an exemption for public disclosure. Summaries of results from classified or sensitive evaluations, including a description of the methodology, key findings and recommendations, may be made available instead.	YES
11	Undertake collaborative partnerships and coordinate efforts with the academic community, implementing partners, and national and international institutions, as appropriate, that have expertise in program monitoring, evaluation, and analysis when such partnerships provide needed expertise or significantly improve the evaluation and analysis;	Undertake collaborative partnerships, as appropriate [Sec.3(c)(2)(K)]: Agencies should undertake collaborative partnerships or otherwise coordinate with other agencies, operating units, academic institutions, implementing partners, or international or national institutions and organizations to conduct monitoring and evaluation of programs, projects, or interventions when such partnerships can be expected to provide needed expertise or significantly improve the evaluation and analysis. These partnerships or collaborative arrangements may provide needed expertise to significantly improve monitoring, evaluation, and analysis, and may or may not involve the transfer of funds. In such cases where the transfer of funds is involved, agencies should: a) Determine roles and responsibilities for monitoring and evaluation as part of the agreement accompanying the provision of funds, and b) Ensure the responsible organization carries out evaluations of programs consistent with the agency's policy and disseminates a final evaluation report.	YES

Appendix III: Assessment of the Foreign Aid
Transcription and Accountability Act of 2016
and the Office of Management and Budget
Monitoring and Evaluation Guidelines

	2016 FATAA Legislation	OMB Guidelines	2016 FATAA Requirement Included in the OMB Guidelines (Yes/No)
12	Ensure verifiable, reliable, and timely data, including from local beneficiaries and stakeholders, are available to monitoring and evaluation personnel to permit the objective evaluation of the effectiveness of covered United States foreign assistance programs, including an assessment of assumptions and limitations in such evaluations; and	Ensure verifiable, reliable, and timely data are available to monitoring and evaluation personnel [Sec.3(c)(2)(L)]: Monitoring and evaluation should employ methods appropriate to context and population to ensure that verifiable, reliable, and timely quantitative and qualitative information is collected, included, and considered, with appropriate provisions for the protection of human subjects in the collection and use of this information.

Agency policies should encourage engagement of beneficiaries, partner country governmental or non-governmental stakeholders, and implementing partners in monitoring and evaluation processes where feasible. Agency policies should encourage alignment of monitoring and evaluation efforts with those of partner countries and other donors wherever feasible in order to promote aid effectiveness.

Agency policies should ensure that agreements with third party partners (including, for example, evaluators, implementing partners, host country partners, and other stakeholders) include a requirement for activity, project, and/or program data be made available to agency personnel as well as relevant country stakeholders, while adhering to the principle of ethical conduct of monitoring and evaluation.

Evaluations should include an assessment and disclosure of assumptions and limitations. | YES |
| 13 | Ensure that standards of professional evaluation organizations for monitoring and evaluation efforts are employed, including ensuring the integrity and independence of evaluations, permitting and encouraging the exercise of professional judgment, and providing for quality control and assurance in the monitoring and evaluation process. | Ensure that standards of professional evaluation organizations for monitoring and evaluation efforts are employed [Sec.3(c)(2)(M)]: Agency policies should incorporate relevant standards developed by professional organizations for monitoring and evaluation to ensure appropriate independence of evaluations, guide the selection of monitoring and evaluation methodologies, permit the exercise of professional judgment, and provide for quality control in the monitoring and evaluation process.

Professional standards are intended to improve the quality of evaluation processes and products and to facilitate collaboration. For example, the American Evaluation Association publishes standards and guidelines on evaluation (see American Evaluation Association's An Evaluation Roadmap for More Effective Government). The Organisation for Economic Cooperation and Development (OECD) also has published standards that outline the key quality dimensions for each phase of a typical evaluation process (see OECD's Quality Standards for Development Evaluation). Other national and international organizations also publish evaluation standards. Critical among these standards are the need for informed peer reviews, transparency, and ensuring that findings are supported by all the relevant data. | YES |

Sources: Foreign Aid Transparency and Accountability Act of 2016 and Office of Management and Budget Memorandum M-18-04 Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance. | GAO-19-466

Appendix IV: Comments from the Department of Defense

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE JUL 0 2 2019
2200 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-2200

STRATEGY, PLANS
AND CAPABILITIES

Mr. David B. Gootnick
Director, International Affairs and Trade
U.S. Government Accountability Office
441 G Street, NW
Washington DC 20548

Dear Mr. Gootnick:

This letter with attachment is the Department of Defense (DoD) response to the GAO Draft Report GAO-19-466, "Foreign Assistance: Federal Monitoring and Evaluation Guidelines Incorporate Most but Not All Leading Practices," dated May 21, 2019 (GAO Code 102938). I appreciate GAO's review of the Department's Monitoring and Evaluation (M&E) Policy. However, I would like to explain why some of GAO's recommendations are not applicable to DoD security cooperation initiatives.

DoD Instruction 5132.14 on Assessment, Monitoring, and Evaluation (AM&E) was released prior to the Office of Management and Budget's (OMB) Monitoring and Evaluation Guidelines. As a result, some aspects of the OMB Guidelines are not yet incorporated into DoD policy. For example, while it has not been articulated explicitly in DoD policy, the Department is committed to ensuring that verifiable, reliable, and timely data are available to monitoring personnel. When DoD refreshes AM&E guidance documents, we will be sure to specifically address many of the GAO recommendations.

Regarding the OMB Guideline on roles and responsibilities for M&E among agencies in funding transfers, I note that DoD has not utilized funding transfers for security cooperation. Specifically, the Department has not utilized the authority provided by 10 U.S.C 385 which allows DoD to transfer funds to other departments and agencies of the U.S. Government for the purpose of implementing or supporting foreign assistance programs and activities that meet certain criteria and that advance DoD security cooperation objectives. Should such transfers become necessary, we will ensure there is clarity with respect to roles and responsibilities.

DoD also does not consider impact evaluations to be a feasible methodological choice in the security cooperation context, as it is not practical to identify a counterfactual. DoD plans to conduct only performance evaluations of security cooperation initiatives and will provide a justification for not conducting impact evaluations, as required by OMB's Monitoring and Evaluation Guidelines.

Finally, I would recommend using "Secretary of Defense" in the report, instead of "Secretary of the Department of Defense" (10 U.S.C. 113).

Sincerely,

Gregory S. Pollock
Deputy Assistant Secretary of Defense
for Security Cooperation (Acting)

GAO DRAFT REPORT DATED MAY 21, 2019
19-466 (GAO CODE 102938)

"FOREIGN ASSISTANCE: FEDERAL MONITORING AND EVALUATION GUIDELINES INCORPORATE MOST BUT NOT ALL LEADING PRACTICES"

DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATION

RECOMMENDATION 1 addressed to OMB

RECOMMENDATION 2: The GAO recommends that the Secretary of the Department of Defense should update the Department's monitoring and evaluation policies to define roles and responsibilities among agencies that participate in interagency funding transfers. (Recommendation 2)

DoD RESPONSE: DoD concurs with comment. DoD has not utilized the authority provided by Section 385 of Chapter 16 of the FY17 NDAA which allows DoD to transfer funds to other departments and agencies of the U.S. Government that advance security cooperation objectives.

RECOMMENDATION 3: The GAO recommends that the Secretary of the Department of Defense should update the Department's monitoring and evaluation policies to ensure verifiable, reliable, and timely data are available to monitoring personnel. (Recommendation 3)

DoD RESPONSE: DoD concurs.

RECOMMENDATION 4: The GAO recommends that the Secretary of the Department of Defense should update the Department's monitoring and evaluation policies to ensure that it evaluates all programs, at least once in their lifetimes, whose dollar value equals or exceeds that of the medium program in the agency. (Recommendation 4)

DoD RESPONSE: DoD concurs.

RECOMMENDATION 5: The GAO recommends that the Secretary of the Department of Defense should update the Department's monitoring and evaluation policies to require the agency to conduct impact evaluations on all pilot programs, or conduct performance evaluations for those programs and provide a justification for not conducting an impact evaluation. (Recommendation 5)

DoD RESPONSE: DoD concurs with comment; impact evaluations are not feasible for security cooperation evaluations, because impact evaluations require a counterfactual. The Department plans to conduct performance evaluations and will provide a justification of methodological choice for all security cooperation evaluations.

Appendix V: Comments from the Department of State

United States Department of State

Comptroller

Washington, DC 20520

JUN 1 4 2019

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, "FOREIGN ASSISTANCE: Federal Monitoring and Evaluation Guidelines Incorporate Most but Not All Leading Practices" GAO Job Code 102938.

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

Sincerely,

Jeffrey C. Mounts (Acting)

Enclosure:
    As stated

cc: GAO – David Gootnick
        S/GAC – Brendan Garvin
        OIG - Norman Brown

Department of State Comments on GAO Draft Report

**FOREIGN ASSISTANCE: Federal Monitoring and Evaluation Guidelines
Incorporate Most but Not All Leading Practices
(GAO-19-466, GAO Code 102938)**

The Department of State thanks GAO for its draft report, *Foreign Assistance:
Federal Monitoring and Evaluation Guidelines Incorporate Most but Not All
Leading Practices.*

**Recommendation 6: The Department of State's U.S. Global AIDS
Coordinator, in collaboration with HHS and other implementing agencies,
should update the PEPFAR monitoring and evaluation policies to require
these agencies to conduct impact evaluations on all pilot programs before
replicating or expanding, or conduct performance evaluations for those
programs and provide a justification for not conducting an impact evaluation.**

The Department agrees with the intent of this recommendation. S/GAC, who leads
and coordinates the President's Emergency Plan for AIDS Relief (PEPFAR), uses
routine granular site and age/sex program data to manage its programs and, in
doing so, is aligned with the approaches outlined in the OMB circular. When a
new intervention is needed for a particular population or program area, PEPFAR
carries out those interventions and uses routine granular site level age/sex data to
determine the intervention's effectiveness and make real-time changes. PEFPAR
has robust longitudinal data by site and age/sex that supports the use of these data
for program evaluation. In the context of PEPFAR, impact evaluations as defined
in the OMB circular are often not practical operationally, financially, or ethically
since they require a counterfactual. Often times other programmatic changes or
guidance have been implemented in the meantime which affect the usefulness of
the results. S/GAC will update appropriate PEPFAR policies to clarify when
agencies are or are not required to conduct impact and/or performance evaluations.
These clarifications will reflect how we evaluate programs in practice in
accordance with OMB guidance and legislation.

Appendix VI: Comments from the United States Agency of International Development

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

Re: Foreign Assistance: Federal Monitoring and Evaluation Guidelines Incorporate Most but
        Not All Leading Practices (GAO-102938)

Dear Mr. Gootnick:

        I am pleased to provide the formal response by the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, *Foreign Assistance: Federal Monitoring and Evaluation Guidelines Incorporate Most but Not All Leading Practices* (GAO-102938). We are pleased the report has no recommendations for USAID. We are proud that the GAO recognized USAID for incorporating into our policies the entire Guidelines for Monitoring and Evaluation (Circular M-18-04) published by the Office of Management and Budget (OMB), and for taking steps to implement them.

        USAID is committed to implementing leading practices in monitoring and evaluation, including those related to the Foreign Aid Transparency and Accountability Act of 2016 (FATAA). Recently, we have published new guidance on conducting site visits to improve the oversight of our activities; included expectations on active award-management in Executive Messages from the Administrator and the Letters of Instruction to our Mission Directors and Senior Development Advisors; and launched an Agency-wide Self-Reliance Learning Agenda, designed to marshal evidence from evaluations and other analyses to answer the most-important questions for how best to foster national self-sufficiency. We are honored that Results for America recognizes USAID as a leader among Federal Departments and Agencies for using evidence to inform decision-making, including data and information derived from the monitoring and evaluation of our programs.

        I am transmitting this letter and the enclosed comments from USAID for inclusion in the GAO's final report. Thank you for the opportunity to respond to the draft report, and for the courtesies extended by your staff while conducting this engagement.

                   Sincerely,

                   Frederick M. Nutt
                   Assistant Administrator
                   Bureau for Management

Enclosure: a/s

**COMMENTS BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT ON
THE DRAFT REPORT PRODUCED BY THE U.S. GOVERNMENT
ACCOUNTABILITY OFFICE TITLED, *FOREIGN ASSISTANCE: FEDERAL
MONITORING AND EVALUATION GUIDELINES INCORPORATE MOST BUT NOT
ALL LEADING PRACTICES* (GAO-102938)**

The U.S. Agency for International Development (USAID) would like to thank the U.S.
Government Accountability Office (GAO) for the opportunity to respond to this draft report. We
appreciate the extensive work of the GAO engagement team, who found that USAID has
incorporated the guidelines on monitoring and evaluation (M&E) published by the Office of
Management and Budget (OMB) into our policies, and that the Agency has taken initial steps to
implement them. The draft report had no recommendations for USAID.

USAID's M&E requirements appear in our Program Cycle Operational Policy, Automated
Directive System (ADS) Chapter 201. In this Policy, the Agency emphasizes the following
principles relevant to M&E:

1. **Apply Analytic Rigor to Support Evidence-Based Decision-Making**: USAID should
   base its decisions about where and how to invest foreign-assistance resources on analyses
   and conclusions supported by evidence; and

2. **Manage Adaptively through Continuous Learning**: USAID must be able to adapt
   programs, in real time, in response to changes in context and new information. Learning
   can take place through a range of processes and use a variety of sources, such as
   monitoring data, evaluation findings, research findings, analyses, lessons from
   implementation, and observation.

Based on these principles, the Agency's policy on the Program Cycle includes a range of M&E
requirements integrated throughout the Cycle's components, such as country-level strategic
planning; the design and implementation of projects and activities; programmatic M&E; and
Collaborating, Learning, and Adapting (CLA). These steps include creating and using Mission-
wide Performance-Management Plans to track progress toward country-level strategic
objectives; ensuring Plans for Monitoring, Evaluation, and Learning (MEL) for projects and
activities are in place prior to the start of major implementation actions; using performance
indicators to monitor measurable progress toward results; mandating regular site visits; and
requiring an external evaluation of each project during its lifespan. As the GAO found in this
engagement, the policy requirements for USAID's Program Cycle, updated in September 2016,
incorporate OMB's M&E Guidelines. To strengthen the management of our awards even
further, the Agency recently issued guidance on conducting site visits; included expectations on
active award-management in Executive Messages from the Administrator and the Letters of
Instruction to our Mission Directors and Senior Development Advisors; and published a new
template for MEL Plans. Finally, USAID released the Self-Reliance Learning Agenda in May of
this year to marshal evidence from evaluations and other analyses to answer the most-important
questions for how best to foster national self-sufficiency.

Appendix VII: GAO Contact and Staff Acknowledgments

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Staff Acknowledgments

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