US TRANSPARENCY:

An Assessment of US Foreign
Assistance Documents

Publish WhatYouFund
The Global Campaign for Aid Transparency

Introduction

Since the release of the US fiscal year (FY) 2019 budget request, Publish What You Fund has been working to assess the impact of President Trump's proposed budget cuts in four countries: Cambodia, Liberia, Senegal, and Nicaragua. The objectives are twofold. One, to provide a robust analysis of the potential impacts of the budget cuts and then share those findings with key stakeholders during both the FY 2019 budget debate and budget preparations for FY 2020. Two, from a user perspective, to document specific challenges faced by users of publicly available US aid information and then make recommendations on how US agencies can improve the quality and availability of its data.

We have previously produced a comprehensive assessment of US International Aid Transparency Initiative Data. Working with the Modernizing Foreign Assistance Network, we also produced a summary paper and separate detailed analysis documenting the data quality issues of having two separate dashboards – ForeignAssistance.gov and Foreign Aid Explorer – both of which report the same type of information but often publish vastly different figures.

This analysis, our third and final assessment of US aid information, is part of the second objective and will focus exclusively on the availability of US government documents related to foreign assistance. It is primarily based on our user-experience of exploring the data for the four chosen countries published by the Department of State (State),[1] the United States Agency for International Development (USAID), and the Millennium Challenge Corporation (MCC). This report focuses primarily on documents and other web-based pages which provide information on what a project is about, what approach has been taken, and what it has achieved, including pre-project impact appraisals, annual or quarterly reports, and evaluations.

In summary, all three agencies publish strategic level documentation about their foreign assistance, although most of it is relatively high level. Project level documents – critical for understanding what a project is about, what approach it has taken, and what it has achieved – is unevenly provided. State's project level documentation is limited largely to evaluations, although it is difficult to determine how complete the set is. USAID provides a significant number of project documents of all kinds, although it is not clear that all required documents are being posted. MCC provides the most complete set of documents, but information about sub-compact work is often not detailed.

Department of State

Partly in response to the Foreign Aid Transparency and Accountability Act of 2016, State recently launched the State Foreign Assistance Resource Library, which publishes information about planning, managing, budgeting, and evaluating its foreign assistance.

The site provides a picture of State's overall foreign assistance programming. Using this website, individuals can find the Joint Strategic Plan, Joint Regional Strategies, Functional Bureau Strategies, and Integrated Country Strategies (ICS).[2] Although these documents provide overall strategic and organizational information, none of them are a useful resource for understanding State's individual projects. The ICS best illustrates State's intentions at a country level. The public version of this document is, however, very high level and resembles a State version of USAID's Country Development Cooperation Strategy (CDCS), albeit with significantly less detail.[3]

State's Foreign Assistance Manual (FAM) stipulates that staff must maintain documentation of program and project design, evaluability assessments, and quarterly reports, among other documentation. Despite this, with the exception of evaluation documents, State does not provide any dedicated function to access more detailed documents or information about its foreign assistance projects. There is no ability to access pre-impact assessments, documents that outline project objectives, or periodic reports. Published programs or project evaluations can be accessed through its evaluation page, which lists just over 80 documents for all of State's programs or projects worldwide for the seven years between FY12 and FY18. Some of these are summaries only – State's evaluation policy allows for a summary in lieu of publishing the full document if it contains sensitive information. While it appears that evaluation documents are missing, the lack of overall project level documentation makes it challenging to determine how many evaluations should be published.

State's main platform for aid data is foreignassistance.gov, which is a government-wide platform for all US foreign assistance spending. It has no dedicated section for project documents and rarely links activities to project documentation.

USAID

USAID publishes comprehensive Country Development Cooperation Strategies (CDCS) for every country in which it meaningfully operates. These documents outline the context in which foreign assistance is operating and USAID's medium-term strategy for its programs in that country. These documents can be found on USAID's CDCS site.[4]

USAID hosts over 240,000 project related documents on the Development Experience Clearinghouse (DEC) website, an online repository for materials documenting nearly half a century of USAID's work.[5] Although DEC is not the only source of US documents, it is the most comprehensive source of project level documents.[6] Using DEC, individuals are able to filter by country, sector, or document type – such as quarterly progress reports or project evaluations. DEC is also the main source USAID uses to link project documents to its Foreign Aid Explorer dashboard and IATI data.

While 240,000 is a significant number of documents, it does not indicate their relative utility. For example, a significant portion of these are historical. In two of our four case studies, over 50% of the documents relate to projects before 2000, with a sizable portion dating to the 1970s and 1980s. While these historical documents are useful for research purposes, they are less valuable to help development actors understand, and learn from, what USAID currently is doing and what impact their projects are having.

It appears that a number of recent or current project documents may be missing from the DEC. When a search is narrowed – for example to one sector, one country, and the last five years (2014 - 2018) – there are often very few results. For Nicaragua, there are just 14 democracy and civil-society related documents, which appears low.[7] This result is not unique to Nicaragua – there were few documents for every case-study we used.

Further, in all case-studies we found that the majority of available documents relate to a small number of projects, which suggests that USAID's transparency challenges vary between implementers. For Nicaragua, for example, all published periodic reports relate to just one project. Similarly, in Liberia all periodic reports relate to just two of many recent or ongoing projects. In both Senegal and Cambodia, a variety of projects are publishing a very limited number of documents. In Cambodia, the vast majority of quarterly reports are for Feed the Future's HARVEST programs, although there is just one annual report for the five-year project.

USAID's Acquisition Regulation (AIDAR) sets forth the documents that are required to be published to the DEC. Following approval from the USAID contracting officer's representative,[8] the contractor must submit to the DEC one copy of each of its reports and information which "describe, communicate or organize program/project development assistance activities, methods, technologies, management, research, results and experience".[9] The AIDAR stipulates that this includes assessments, evaluations, studies, technical and period reports, annual and final reports, and development experience documents. Similar provisions are in place for non-governmental organization recipients of USAID funds.[10] Our experience suggests, however, that there are gaps in what is actually posted on the DEC. It is unclear whether there is a lack of documentation being provided by implementers or inconsistent posting by USAID, or both.

Finally, USAID has a dedicated evaluations policy, which provides that evaluation final reports and their summaries are to be submitted within three months of completion to the DEC. We understand that USAID tracks the number of evaluations posted on an internal website and as of the end of January 2019, there were 210 evaluations for FY 2018. For our case-study countries/sectors, we found nine for Cambodia (agriculture), one for Liberia (democracy and governance), one for Senegal (agriculture) and two for Nicaragua (democracy and civil society). It is, however, difficult to determine what number of evaluations we should expect to see.

Millennium Challenge Corporation

MCC hosts its documents and other web-based information on a variety of platforms including a dedicated resources page (an online repository of its compact documents), on its market, where procurement notices and tenders are shared, and on its evaluations catalogue, where evaluation documents are shared.[11] There is also an open data list, as well as individual country pages for MCC compact countries, which contains key compact and threshold documents.

MCC's sites allow users to get a clear picture of its overall activities. Using the resources page, for example, individuals can find documents relating to the overall compact agreement, country analysis, formal correspondence, and general MCC governance documents – such as its organization-wide policies. The compact "intent to sign" supplemental document also provides summary information on projects within a compact. These documents are comprehensive and outline the context for the compact, the reasoning for the approach, and the ultimate outcome, successes, and challenges of the initiative. MCC provides compact and project level evaluations on its evaluations catalogue.

Ultimately, users should be able to understand MCC's strategy and reasoning, as well as broadly understand what the compact intends to do and how success will be measured. However, MCC shares only some project level data or documents. As an example, under Senegal's previous compact (2010 - 2015), there were at least three major component projects relating to land tenure, roads, and irrigation. MCC documents and information posted to its dedicated country page, however, relate mostly to pre-compact analysis and the overall compact. MCC will be moving towards sharing more comprehensive compact and project level information for each of its compacts in its soon to be launched Star Report. However, this comprehensive report will only be available after the close of the compact.

When a country is awarded an MCC compact, it establishes its own Millennium Challenge Account (MCA), a separate entity created to administer the MCC compact funds. The MCAs have their own separate websites. There is no consistency as to what information or documents are shared by the MCAs on their respective sites. The Senegal MCA website, for example, includes a brief explanation of the work being done in the MCC compact, but does not contain links to any documents. The Liberia MCA has a document section but very few documents are posted.

Although MCAs are independent entities, it should be possible for MCC to explore how they can encourage publication of sub-compact information. Without this, users are left with little detailed information on how potentially very large grants are being spent and evaluated at the sub-compact level.

Overall Recommendations

STATE

- **Open by default:** Guidance on what project documents State employees must produce or request are included in the Foreign Assistance Manual (FAM). The FAM stipulates that unclassified portions of the documents should be made available. As such, State should institute a policy that assumes the project documents will be made available, but which allows for the redaction of sensitive information. In instances of restriction or redaction, State should specify why the document has not been made available.

- **Create a platform specifically for project documents:** State's current platforms are not suited for a larger library of documents, as they simply provide links as a straightforward list and a limited search function. A more complex platform should be designed to make the basic documents described above available.

- **Join-Up Transparency:** All available documents should be systematically linked to all aid information platforms, including IATI and foreignassistance.gov. We understand that strategic documents from FARL will be added to the joint State-USAID IATI organization file and encourage that step.

USAID

- **Ensure comprehensive publication of documents on the DEC:** At present, there appear to be gaps in current project documentation available on the DEC. This is at odds with USAID's own guidance, which notes that available documents should include assessments, evaluations, studies, technical and period reports, annual, and final reports. In particular, periodic reports are an important way for users to understand how the project is being implemented, whether the original approach has changed, and what impact it is having. Despite the importance of these documents, it does not appear that they are systematically published. USAID should internally review its document posting processes, including enforcing responsibilities for publication, to ensure prompt and complete publication of documents to the DEC.

MCC

- **Project level documents and information:** MCC should add more comprehensive information to its country pages during the life of the compact. Additionally, it should either publish information generated by the MCAs on their behalf or encourage, incentivize, or obligate MCAs to begin sharing their project level information directly. Until this information is systematically made available, it is hard for individuals to learn how very large grants are being spent and evaluated.

Notes

1   Although the Office of the Global AIDS Coordinator (OGAC), which is responsible for coordinating the President's Emergency Plan for AIDS Relief (PEPFAR), is part of State, this analysis does not include an assessment of PEPFAR's documents. Publish What You Fund is working separately with PEPFAR, which is also treated as a separate publisher in the Aid Transparency Index.

2   The Joint Strategic Plan and Joint Regional Strategies are joint State and USAID strategy documents.

3   Due to the sensitive nature of some of State's work, not everything is publicly available. Parts of the ICS, however, contain detailed planning information, which is not necessarily sensitive. This information is not available in the public version of the ICS.

4   USAID's CDCS documents are also available in their International Aid Transparency Initiative (IATI) data and on the DEC.

5   The DEC is being continually updated with roughly 1,300 documents being added per month. USAID's Acquisition Regulation (AIDAR) defines what documents are to be submitted to the DEC.

6   Other sources of documents include the ADS site, USAID Environmental Compliance Database, Contracts (Malaria), FedBizOpps, and Grants.gov.

7   An analysis found at least three recently closed democracy & governance projects and at least two on-going projects.

8   The contracting officer's representative (COR) is responsible for ensuring that contractors supply all the required documents to the DEC. Contracting officers are responsible for inserting the appropriate language into the contract (or grant) requiring this.

9   AIDAR at pp. 116-117.

10 As outlined in USAID's Standard Provisions for U.S. Nongovernmental Organizations.