MEMORANDUM

DATE: April 24, 2016

TO: John F. Sopko
    Special Inspector General for
    Afghanistan Reconstruction (SIGAR)

FROM: Art Brown, Acting Mission Director

SUBJECT: Mission Response to Draft SIGAR Report titled
"Primary and Secondary Education in Afghanistan:
Comprehensive Assessments Needed to Determine the
Progress and Effectiveness of Over $759 Million in
DOD, State, and USAID Programs" (SIGAR Report
16-XX under Code 104A)

REF: SIGAR Transmittal email dated 03/17/2016

USAID thanks SIGAR for the opportunity to comment on this report.

Building the capacity and legitimacy of the Afghan government is a key
component of our strategy and providing access to quality education is an
important way for the government to prove its worth to the Afghan
people and a prerequisite for economic growth and stability. Support to
the education sector in Afghanistan remains a key component of our
strategy and has been a critical component of U.S. Foreign Assistance for
Afghanistan since 2002. While we have always strived to increase
access to education, USAID and other development partners are now
increasingly focused on enhancing educational quality. In our efforts to
support a high quality nationwide education system in Afghanistan, we
will continue to partner closely with the Afghan government and to
harmonize our assistance with other donors.

The Office of Education Development’s programming is currently guided
by the USAID/Afghanistan Plan for Transition 2015-2018
(www.usaid.gov/afghanistan). USAID is reviewing current performance
indicators in the education sector and refining how we report on
performance to bring greater coherence and a systematized global
approach to reporting. Additionally, in the future, the indicators used by
OED will be better aligned to the metrics used by the Afghan Ministry of Education as they move forward with their new National Education Strategic Plan.

We are proud of our accomplishments in the education sector, as a partner with the Ministry of Education, and as part of the greater donor community.

**RESPONSE TO SIGAR’S RECOMMENDATIONS**

*To enhance USAID/Afghanistan’s future education strategy, as the lead U.S. agency for development efforts, we recommend that the USAID Administrator:*

1. Update, as appropriate, USAID/Afghanistan’s strategic education plan to provide clear descriptions of other U.S. agencies’ roles, responsibilities, and accountability for helping to implement the strategy.

**USAID Comments:** The Mission concurs with Recommendation 1.

**Actions Taken/Planned:** USAID will update its strategic education plan in coordination with other agencies to define the roles and contributions of the Department of Defense (DoD) and Department of State (DoS). While in the past the roles of USAID, DoD, and DoS have not always been explicitly defined in writing, there have been working group meetings and regular communications to clarify roles and coordinate ongoing activity.

DoD’s United States Forces-Afghanistan (USFOR-A) acknowledges USAID’s lead role for education development for the USG in Afghanistan. Commander’s Emergency Response Program (CERP) project managers are familiar with USAID’s education strategy, and are not in conflict with this strategy. Military commanders execute CERP projects to achieve specific effects within their area of responsibility. CERP projects are characterized as grass-roots, urgent, small-in-scale, and designed for near-term impact. While advancing the cause of education is often a secondary benefit, the primary purpose of CERP activities is not principally designed for education per se, and therefore should not be considered a primary tool for advancing the strategic educational goals for Afghanistan.
The U.S. Embassy in Afghanistan, through the Public Affairs Section (PAS), provides limited support to the basic education sector in Afghanistan. The U.S. Embassy acknowledges USAID's lead role for defining the U.S. basic education development strategy in Afghanistan. USAID and PAS will work together to ensure any Department of State basic education programs are planned and implemented in a manner that supports the overall U.S. basic education strategy for Afghanistan.

**Target Closure Date: July 31, 2016**

To determine how USAID’s efforts have directly contributed to reported gains in Afghanistan’s education system, we recommend that the USAID Administrator:

3. Use existing program-level monitoring and evaluation data and reports, as well as annual Performance Plan and Report submissions and portfolio review information, to develop and issue a sector-wide assessment of the agency’s efforts to support education in Afghanistan, including primary and secondary education, with specific consideration of outcomes and impacts.

**USAID Comments:** The Mission concurs with Recommendation 3.

**Actions Taken/Planned:** USAID will conduct a sector-wide assessment as SIGAR recommends. The assessment will be conducted by a contractor using independent evaluators with the requisite expertise. The assessment will rely on extant data, activity level assessments, and other relevant information. The assessment will emphasize progress in the education sector attributable to USAID interventions.

**Target Closure Date: January 31, 2017**

To ensure that government decision makers and the general public have an accurate understanding of progress in the Afghan education sector, we recommend that the USAID Administrator:

4. When reporting on progress, acknowledge the source and reliability of data, focus on the direct results of USAID’s efforts, and clearly explain whether there is a causal connection between USAID efforts and documented progress.

**USAID Comments:** The Mission concurs with Recommendation 4.
Actions Taken/Planned: USAID will continue to rely on context indicators, as is recommended in the ADS, but will cite data sources. In cases in which USAID relies on data from the MoE or other independent sources, the data sources will be identified. When direct attribution to USAID activities can be made, it will be so stated. When results are not directly attributed to USAID but achieved by the efforts of USAID, other development partners, and the MoE, that will be explicitly stated.

We anticipate that the preparation of the education sector-wide assessment, planned in response to Recommendation 3, will help clarify the causal connection between USAID’s investments and contributions to progress in the sector.

Target Closure Date: December 31, 2016

Attachments:
1. USAID response to SIGAR Inquiry Letter 15-62 on Afghanistan Education Data Reliability, June 30, 2015

Appendix:
1 - Technical Comments

cc: U.S. Embassy/Kabul Coordination Directorate
APPENDIX 1

USAID TECHNICAL COMMENTS

*Draft SIGAR Report titled “Primary and Secondary Education in Afghanistan: Comprehensive Assessments Needed to Determine the Progress and Effectiveness of Over $759 Million in DOD, State, and USAID Programs”* (SIGAR Report 16-XX under Code 104A)

USAID respectfully requests that SIGAR consider the following clarifications and suggested corrections to the report.

**SIGAR Statement, Introduction, Page i - . These efforts have focused on areas such as constructing and refurbishing schools, developing curricula, distributing textbooks, and training teachers.**

**USAID Comment:** USAID’s basic education program has not supported activities to develop curriculum. Please remove the words “developing curricula”.

**SIGAR Statement, Page 3, Para. 2 - Lower Secondary Education: Grades 7 through 9, where students ages 13 to 15 must pass an examination at the end of grade 9 to continue their education.**

**USAID Comment:** This statement is incorrect. There is no examination at the end of grade 9.

**SIGAR Statement, Page 15, Para. 4 and 5 - We have previously reported on the risks associated with the U.S. government relying on unverified Afghan government-provided data…. USAID uses education statistics that are not always based on USAID performance data and that cannot be linked to its specific education programs.**

**USAID Comment:** As stated in USAID’s response to SIGAR Special Projects Inquiry Letter 16-52-SP, “USAID has been working with the Ministry of Education for over a decade, has a good understanding of the challenges of working in Afghanistan, and has developed monitoring systems for our projects that do not rely solely on data from the MoE.”

While data are not fully reliable, the government has steadily improved its verification of education data with the assistance of USAID and other development partners. Additionally, USAID does not rely solely on

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1 USAID/Afghanistan Response Letter of June 30, 2015 to SIGAR Special Projects Inquiry Letter 15-62-SP on Education Data Reliability
government data but uses these data as context indicators of progress in the sector. As in all developing countries, context indicators, such as enrollment rates, are important measures of the overall health of the education system.

**SIGAR Statement, Page 18, Para. 3** - We selected primary and secondary education as the scope of our audit because of its importance within the larger reconstruction effort in Afghanistan... We focused specifically on activities that directly support formal instruction on basic skills, such as numeracy and literacy to students in a classroom setting. We included the following activities:...curricula development.

**USAID Comment:** USAID’s basic education program has not supported activities to develop curricula.