

**OFFICE OF INSPECTOR GENERAL**  
U.S. Agency for International Development

# Counter-Trafficking in Persons: Improved Guidance and Training Can Strengthen USAID's C-TIP Efforts in Asia

Audit Report 5-000-23-001-P  
September 11, 2023

Audit



Office of Audits, Inspections, and Evaluations



## OFFICE OF INSPECTOR GENERAL U.S. Agency for International Development

**DATE:** September 11, 2023

**TO:** USAID, Deputy Administrator for Management and Resources, Paloma Adams-Allen  
USAID, Deputy Administrator for Policy and Programming, Isobel Coleman

**FROM:** Assistant Inspector General for Audits, Inspections, and Evaluations, Toayoa Aldridge /s/

**SUBJECT:** Counter-Trafficking in Persons: Improved Guidance and Training Can Strengthen USAID's C-TIP Efforts in Asia

This memorandum transmits our final audit report. Our audit objectives were to assess the extent that selected Asia missions (1) adhered to USAID's counter-trafficking in persons programming objectives, (2) adhered to USAID's guidance to designate and use counter-trafficking in persons coordinators, and (3) monitored and enforced implementer compliance with trafficking in persons requirements for selected awards. In finalizing the report, we considered your comments on the draft and included them in their entirety, excluding attachments, in Appendix C.

The report contains five recommendations to strengthen USAID's adherence to C-TIP Policy programming objectives, designation and use of C-TIP coordinators, and use of controls to monitor and enforce implementer compliance with TIP prevention and detection requirements. After reviewing information you provided in response to the draft report, we consider four resolved but open pending completion of planned activities (Recommendations 1, 3, 4, and 5) and one open and unresolved (Recommendation 2).

For Recommendations 1, 3, 4, and 5, please provide evidence of final action to the Audit Performance and Compliance Division.

For Recommendation 2, within 30 days please provide us with a revised management decision that includes planned or completed corrective actions along with a target completion date to improve training for Contracting and Agreement Officers (COs/AOs) on their roles and responsibilities for monitoring and enforcing implementer compliance with trafficking in persons requirements in acquisition and assistance awards, copying the Audit Performance and Compliance Division.

We appreciate the assistance you and your staff provided to us during this audit.

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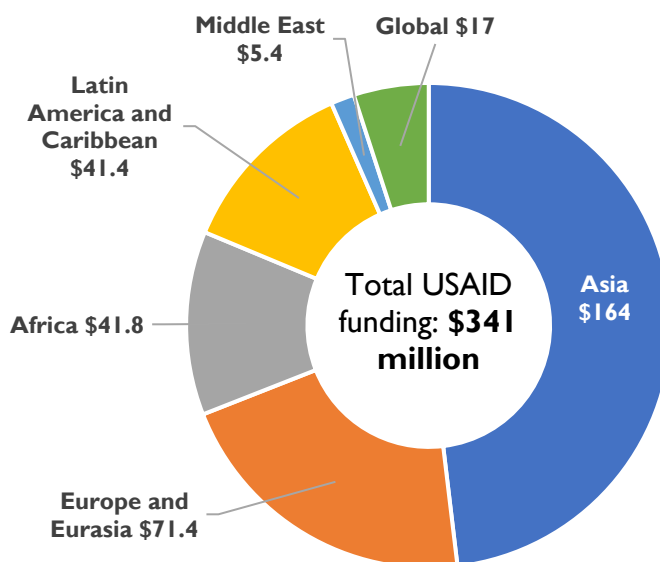
Pursuant to the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 5274, which amends the Inspector General Act of 1978, USAID OIG provides nongovernmental organizations and/or business entities specifically identified in this report, if any, 30 days from the date of report publication to review the final report and submit a written response to USAID OIG that clarifies or provides additional context for each instance within the report in which the nongovernmental organization and/or business entity is specifically identified. Any comments received to this effect are posted for public viewing on <https://usaid.oig.gov> with USAID OIG’s final report. Please direct related inquiries to [oignotice\\_ndaa5274@usaid.gov](mailto:oignotice_ndaa5274@usaid.gov).

## Introduction

Trafficking in persons (TIP) is a modern form of slavery and a crime that preys on vulnerable populations by using force, fraud, or coercion for the purpose of profit through sex and labor exploitation. The U.S. National Action Plan to Combat Human Trafficking states that sex and labor exploitation of any kind is counter to U.S. core values, and the U.S. government is committed to eradicating TIP in all its forms. TIP is the second largest criminal industry worldwide and affects at least 25 million victims with Asia as the region with the largest number of trafficking victims.<sup>1</sup> In a 2014 report, the International Labour Organization estimated that human trafficking is a \$150 billion annual global industry, and Asia is the region with the highest profit for traffickers.<sup>2</sup>

In response to the pervasiveness of human trafficking, Congress has enacted legislation and appropriations for USAID to combat TIP in origin, transit, and destination countries worldwide since FY 2001. USAID's financial resources, technical expertise, and extensive field presence position the Agency to play a key role in combating TIP across Asia. USAID's C-TIP Policy states that from FY 2001-2020, the Agency has initiated counter-trafficking in persons (C-TIP) programs with roughly 50 percent of its funding obligated to Asia. Figure I shows the allocation of USAID funding by region during this period.

**Figure I. USAID Funding for C-TIP Programs by Region in Millions (FY 2001-2020)**



Source: USAID's C-TIP Policy, January 2021 edition.

USAID's approach to combating TIP through mission-led development programs is detailed in the Agency's C-TIP Policy, which emphasizes the use of five programming objectives to guide

<sup>1</sup> USAID, *C-TIP Policy*, January 2021, and USAID, *USAID Asia Counter Trafficking in Persons*, October 2020.

<sup>2</sup> International Labour Organization, *Profits and Poverty: The Economics of Forced Labour*, May 2014.

mission C-TIP initiatives.<sup>3</sup> USAID's C-TIP Code of Conduct and C-TIP Policy state that missions should designate and use C-TIP coordinators as their primary points of contact for human trafficking and implementing the C-TIP Policy, such as assessing C-TIP needs in a country or region, providing input on the annual State Department TIP Report, and designing C-TIP projects and activities. Additionally, regulations and provisions have codified the U.S. government's zero tolerance posture to combating TIP through prevention and detection requirements for implementers receiving acquisition and assistance awards.

To determine whether USAID has effectively integrated C-TIP requirements into selected Asia missions' programming and awards, OIG initiated this audit to assess the extent that selected Asia missions (1) adhered to USAID's C-TIP programming objectives, (2) adhered to USAID's guidance to designate and use C-TIP coordinators, and (3) monitored and enforced implementer compliance with TIP requirements for selected awards.<sup>4,5</sup>

We selected a nonstatistical sample of the following three (out of nine) missions in Asia for testing based on the size of each mission's C-TIP portfolio, consideration of country TIP rankings in the State Department's annual TIP Reports, and prior OIG audit coverage in the region during the period FY 2019-2021:

- USAID/Regional Development Mission for Asia (RDMA)
- USAID/Central Asia Regional (CAR)
- USAID/Philippines, Pacific Islands, and Mongolia (PPIM)

To answer audit objective 1, we reviewed mission strategies, project and activity design, and implementation documentation and interviewed USAID, State Department, and implementer officials to assess the extent that each mission adhered to the Agency's five C-TIP Policy programming objectives. To answer audit objective 2, we reviewed mission orders on delegations of authority, C-TIP coordinator position descriptions, and C-TIP coordinator annual work objectives and interviewed mission officials to assess the extent that each mission adhered to Agency guidance to designate and use C-TIP coordinators. To answer audit objective 3, we used a dollar threshold to select a nonstatistical sample of 27 (out of 99) acquisition and assistance awards managed by the 3 missions to review award files and interview USAID officials, prime implementers, and subimplementers to assess the extent that

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<sup>3</sup> USAID issued its C-TIP Policy in 2012 and updated the C-TIP Policy in January 2021 and December 2021 based on new legislation and White House priorities. We used the 2012 and January 2021 editions of the C-TIP Policy to conduct our audit testing. The DRG Center oversees USAID's C-TIP efforts and investments and issued the C-TIP Field Guide in 2013 as a practical resource for Agency staff to implement the C-TIP Policy.

<sup>4</sup> References to Asia in this report are in accordance with the Bureau for Asia's geographic responsibilities designated in USAID's Automated Directives System, Chapter 101, "The Bureau for Asia provides leadership for the Agency's programs across a vast and diverse region that covers East, Southeast, South, and Central Asia, Afghanistan, Pakistan, and the Pacific Island countries."

<sup>5</sup> References to implementer or prime implementer in this report are in accordance with USAID's ADS Glossary definition of implementing partner, which is "[a]ny individual or organization that receives an acquisition or assistance award from USAID." References to subimplementer in this report are in accordance with USAID's ADS Glossary definition of subcontractor, which is "[a]ny organization or individual that receives a subcontract under acquisition award made by USAID," and subrecipient, which is "[a] non-Federal entity that receives a subaward from a recipient to carry out part of an assistance program."

each mission monitored and enforced implementer compliance with Federal Acquisition Regulation (FAR)<sup>6</sup> and Automated Directives System (ADS) Chapter 303 TIP requirements.<sup>7</sup> Due to COVID-19 restrictions, we performed testing through desk reviews and virtual interviews at OIG's Asia Regional Office and suboffices. We conducted our work in accordance with generally accepted government auditing standards. Appendix A provides more detail on our scope and methodology.

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## Summary

**Selected Asia Missions Adhered to Programming Objectives for Learning, Consultation, and Coordination but Did Not Fully Adhere to Aspects of Program Design.** USAID/RDMA, USAID/CAR, and USAID/PPIM took steps to adhere to C-TIP Policy programming objectives 3, 4, and 5 by applying systematic approaches to C-TIP learning and research and using C-TIP standard indicators, ensuring implementers coordinated closely with host country and international stakeholders, and collaborating with interagency colleagues at their respective embassies. However, we found that the selected missions did not fully adhere to C-TIP Policy programming objectives 1 and 2 to consistently integrate C-TIP across development sectors or engage with trafficking survivors through a deliberate process during strategy, project, and activity design. In addition, missions took steps to adhere to programming objective 3, but mission officials and implementers reported that USAID and the State Department's C-TIP standard indicators lacked clear definitions and were not useful in measuring the impact of their C-TIP activities.

**Selected Asia Missions Did Not Fully Adhere to USAID's Guidance to Designate and Use C-TIP Coordinators, and C-TIP Coordinator Roles and Responsibilities Were Unclear.** USAID/RDMA, USAID/CAR, and USAID/PPIM did not fully use C-TIP coordinators as a resource to implement the C-TIP Policy, and mission C-TIP coordinators said that they did not fully understand their roles and responsibilities. None of the missions designated C-TIP coordinators through a mission order or inserted C-TIP responsibilities in their coordinators' position descriptions and annual work objectives. The C-TIP coordinators at each mission said that they did not fully understand their role because they did not receive training on their responsibilities and did not have C-TIP coordinator responsibilities listed in their position descriptions and/or annual work objectives.

**Selected Asia Missions Did Not Consistently Monitor and Enforce Implementer Compliance With Trafficking in Persons Prevention and Detection Requirements for Selected Awards.** We reviewed a sample of 27 acquisition and assistance awards for USAID/RDMA, USAID/CAR, and USAID/PPIM and identified TIP prevention and detection deficiencies with all of them. Specifically, we found that (1) missions did not consistently implement controls to monitor and enforce implementer compliance with TIP prevention and detection requirements, and (2) implementers did not consistently comply with FAR and ADS Chapter 303 TIP prevention and detection requirements. The majority of USAID mission officials we interviewed said they had limited familiarity with TIP requirements, and their

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<sup>6</sup> The FAR is located at Title 48 of the Code of Federal Regulation, Chapter 1.

<sup>7</sup> We selected our sample from the universe of mission awards, regardless of sector or whether awards had C-TIP activities. We used a nonstatistical method to select our sample, and the results are not generalizable.

missions lacked mechanisms to monitor and enforce implementer compliance with TIP requirements. Further, USAID did not provide guidance and training to all COs/AOs and Contracting and Agreement Officer Representatives (CORs/AORs) on their roles and responsibilities to monitor and enforce implementer compliance with TIP requirements.

**Recommendations:** We made five recommendations to strengthen USAID’s adherence to C-TIP Policy programming objectives, designation and use of C-TIP coordinators, and use of controls to monitor and enforce implementer compliance with TIP prevention and detection requirements. USAID agreed with all five recommendations.

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## Background

In 2000, Congress passed the Trafficking Victims Protection Act (TVPA), as amended, which articulates a definition of TIP and recognizes TIP as an assault on human rights and a significant threat to public health, gender equality, and good governance.<sup>8</sup> The U.S. National Action Plan to Combat Human Trafficking identifies sex and labor trafficking as the two main variants of TIP, though it notes that these activities take many forms, and the distinguishing characteristic of trafficking is not movement but rather the use of force, fraud, or coercion. The U.S. government’s efforts to combat TIP are built on the “4Ps” paradigm of preventing opportunities for trafficking, protecting victims, prosecuting offenders, and promoting partnerships among key stakeholders.

A key element of the TVPA’s foreign policy objectives is a requirement for the State Department to produce an annual TIP Report that ranks foreign governments by tier on their progress toward meeting the TVPA’s minimum standards.<sup>9</sup> The 2021 TIP Report ranked 37 countries in Asia as failing to fully meet TVPA minimum standards and stated that Asia had almost 200,000 victims over the 5-year period 2016-2020, representing 40 percent of the global total. USAID’s mission C-TIP activities and initiatives prioritize addressing TIP Report recommendations and focusing on countries where the Agency can have the most impact, particularly in regard to TIP foreign assistance restrictions for countries ranked Tier 3 (countries not complying with standards) and Tier 2 Watch List (countries under warning for declines in rank). Table 1 shows TIP Report tier rankings by country where USAID/RDMA, USAID/CAR, and USAID/PPIM designed and/or managed C-TIP activities during the scope of

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<sup>8</sup> Section 103(8) of the TVPA defines “severe forms of trafficking in persons” as, “(A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age or (B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.” Public Law 106-386, 114 U.S.C. § 1464, enacted October 2000.

<sup>9</sup> Section 108(a) of the TVPA states that the minimum standards are “(1) The government of the country should prohibit severe forms of trafficking in persons and punish acts of such trafficking. (2) For the knowing commission of any act of sex trafficking involving force, fraud, coercion, or in which the victim of sex trafficking is a child incapable of giving meaningful consent, or of trafficking which includes rape or kidnapping, or which causes a death, the government of the country should prescribe punishment commensurate with that for grave crimes, such as forcible sexual assault. (3) For the knowing commission of any act of a severe form of trafficking in persons, the government of the country should prescribe punishment that is sufficiently stringent to deter and that adequately reflects the heinous nature of the offense. (4) The government of the country should make serious and sustained efforts to eliminate severe forms of trafficking in persons.”

our audit. From FY 2019-2021, only one country in the selected missions managing C-TIP activities remained Tier 1 in the State Department’s annual TIP Report, indicating that the host government fully complied with TVPA’s minimum standards.

**Table 1. State Department TIP Report Tier Rankings by Country Where Selected Missions Managed C-TIP Activities (FY 2019-2021)**

<b>Tier Ranking</b>	<b>Tier Description</b>	<b>Country</b>
<b>Tier 3</b>	Countries with governments that are neither fully complying with the TVPA’s minimum standards nor making significant efforts to do so.	Turkmenistan (2019-2021)
<b>Tier 2 Watch List</b>	Serves as a warning to governments that their statuses might be in decline for a variety of reasons, including a significant increase in TIP victims or a lack of evidence of increased efforts to combat the problem. Countries that remain on the Tier 2 Watch List have a limited time before the State Department must either upgrade them to Tier 2 or downgrade them to Tier 3.	Kazakhstan (2019-2020) Kyrgyz Republic (2019-2020) Marshall Islands (2021) Papua New Guinea (2021) Thailand (2021) Uzbekistan (2019-2020)
<b>Tier 2</b>	Countries that do not fully comply with the TVPA’s minimum standards but are making significant efforts to do so.	Fiji (2021) Kazakhstan (2021) Kyrgyz Republic (2021) Thailand (2019-2020) Tajikistan (2019-2021) Uzbekistan (2021)
<b>Tier 1</b>	Countries that are meeting the TVPA’s minimum standards.	Philippines (2019-2021)

Source: OIG analysis of USAID/RDMA, USAID/CAR, and USAID/PPIM C-TIP award documents and State Department FY 2019-2021 TIP Reports.

Note: USAID/RDMA managed C-TIP activities in Thailand. USAID/CAR managed C-TIP activities in Kazakhstan, Kyrgyz Republic, Tajikistan, Turkmenistan, and Uzbekistan. USAID/PPIM managed C-TIP activities in Fiji, Marshall Islands, Papua New Guinea, and Philippines.

## USAID’s Approach to C-TIP Programming

USAID advances C-TIP in U.S. foreign assistance through its extensive field presence, technical expertise, and partnerships with governments, private sector employers, and civil society organizations. In response to the development challenge of human trafficking in Asia, USAID obligated \$46.3 million for C-TIP activities in nine missions for the period FY 2019-2021.<sup>10</sup> According to the C-TIP Policy, Agency leadership ensures that (1) appropriate oversight of the implementation and enforcement of the C-TIP Policy takes place and (2) sufficient resources are available to staff the C-TIP portfolio and carry out programming, learning, evaluation, and research. USAID’s Deputy Administrator for Policy and Programming is responsible for overseeing the C-TIP programming efforts of the Center for Democracy, Human Rights, and Governance (DRG Center), regional bureaus, and field missions. Table 2 identifies the five C-TIP Policy programming objectives.

<sup>10</sup> We identified this information through a review of Phoenix financial data for the Asia Bureau.



**Table 2. USAID’s C-TIP Policy Programming Objectives**

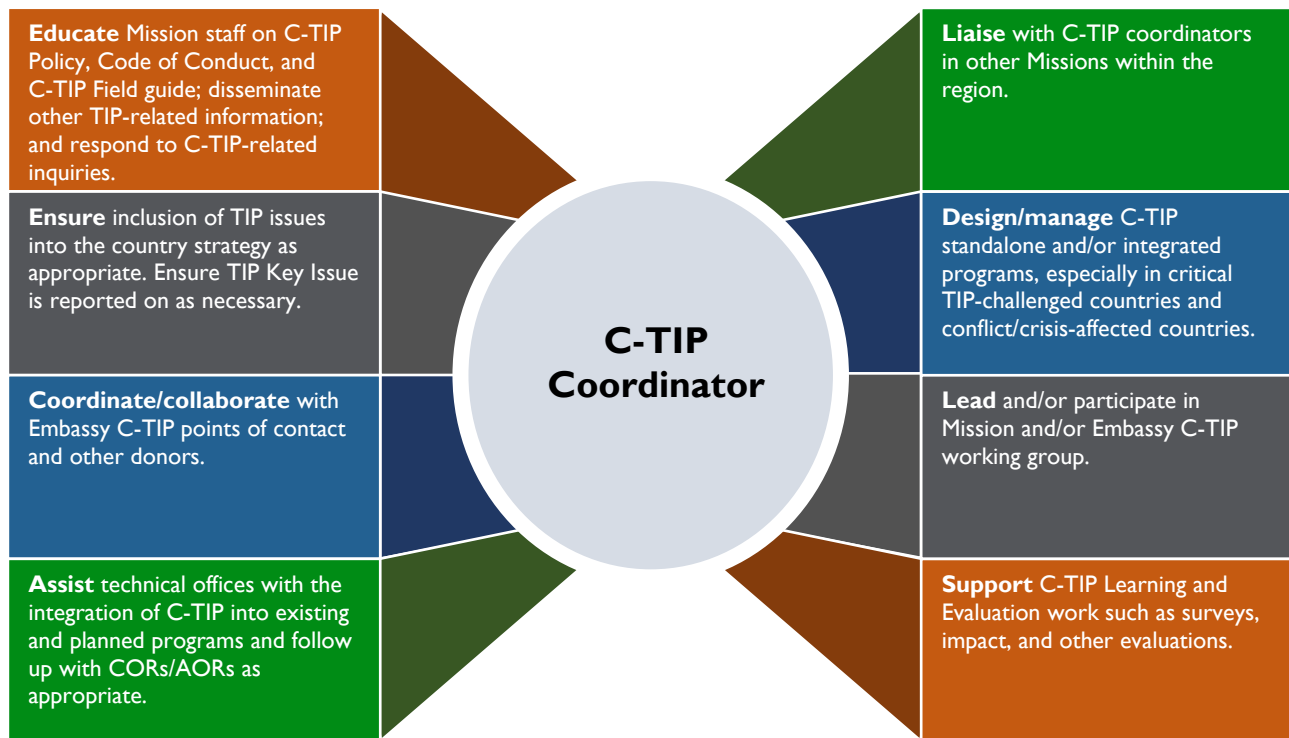
<b>Programming Objective</b>	<b>Description</b>
<b>1) Increased Integration of C-TIP into USAID’s initiatives and programs</b>	C-TIP activities should endeavor to demonstrate a linkage to, or be integrated into, specific sector portfolios, such as agriculture, education, and health.
<b>2) Enhanced technical support and coordination to combat modern slavery</b>	Missions should leverage the resources, tools, and technical expertise of regional bureaus and the DRG Center in the design of their C-TIP activities, including pursuing survivor-informed training and engaging with survivors on activity design and implementation.
<b>3) Improved application of learning, evaluation, and research in C-TIP</b>	Missions should ensure implementers apply systematic approaches to monitoring, evaluation, and learning in their C-TIP activities and promoting C-TIP research. Missions and implementers should use standard indicators to measure the performance and impact of their C-TIP activities.
<b>4) Increased impact on host-government partners; civil society organizations, including faith-based organizations; the private sector; and beneficiaries</b>	Missions should develop their C-TIP activities in consultation with partner governments, civil society organizations, and the private sector. This includes seeking opportunities to work with new, underutilized, and local partners on C-TIP matters.
<b>5) Strategic C-TIP investments in targeted countries</b>	USAID prioritizes C-TIP investments in countries where the Agency’s assistance can have the most impact. Missions should coordinate with their U.S. Embassy colleagues in the design of C-TIP activities.

Source: USAID’s C-TIP Policy, January 2021 edition.

Note: C-TIP standard indicators are used by USAID and the State Department. The State Department has final authority to approve any changes to the C-TIP standard indicators.

To strengthen the Agency’s efforts to implement the C-TIP Policy, the DRG Center issued guidance on Mission C-TIP Coordinator Responsibilities to further detail the roles and responsibilities expected of C-TIP coordinators, which are summarized in Figure 2.

**Figure 2. USAID C-TIP Coordinator Key Roles and Responsibilities**



Source: USAID’s Mission C-TIP Coordinator Responsibilities guidance (undated).

## USAID’s Approach to Preventing TIP in Acquisition and Assistance Awards

USAID’s C-TIP Code of Conduct and Risk Appetite Statement promote ethical standards that align with the U.S. government’s zero tolerance posture to combating TIP in all federally funded activities. Table 3 identifies and summarizes the key regulations, policies, and procedures that collectively establish (1) TIP requirements that implementers must comply with in USAID-funded acquisition and assistance awards and (2) controls for Agency COs/AOs and CORs/AORs to monitor and enforce implementer compliance. USAID’s Deputy Administrator for Management and Resources is responsible for overseeing the TIP guidance and training efforts of the Bureau for Management’s Office of Acquisition and Assistance (OAA) and the Bureau for Policy, Planning, and Learning (PPL). OAA is responsible for issuing guidance to COs/AOs and PPL is responsible for issuing guidance to CORs/AORs, which is complemented by the DRG Center’s C-TIP Code of Conduct training that is mandatory for all Agency personnel. USAID and implementers must promptly report TIP allegations to USAID OIG, and the Agency has remedies to hold implementers accountable for noncompliance with TIP requirements, such as terminating awards and pursuing suspension or debarment actions.

**Table 3. Summary of TIP Regulations, Policies, and Procedures Relevant to USAID Acquisition and Assistance Awards**

Regulations, Policies, and Procedures	Description
<b>FAR Subpart 22.17, 52.222-50, and 52.222-56; ADS Chapter 303.3.32, ADS 303mav Part I, 303maa Provision M20, 303mab Provision M15, and 303mat Provision M6</b>	Provides mandatory TIP requirements for all Federal acquisition awards and USAID assistance awards, such as prohibiting forced sex and labor practices and reporting TIP violations to USAID OIG.
<b>USAID Procurement Executive Bulletins 2016-01 and 2019-03</b>	Provides guidance to USAID COs/AOs and CORs/AORs on controls to monitor and enforce implementer compliance with TIP requirements in acquisition and assistance awards, such as tracking receipt of implementer TIP compliance certifications and discussing TIP requirements with implementers at the post award briefing.
<b>USAID C-TIP Code of Conduct and C-TIP Standard Operating Procedure</b>	Provides guidance to USAID staff on ethical behavior and the Agency’s roles and responsibilities to combat TIP, including requirements to complete C-TIP training.

Source: Federal and USAID regulations, policies, and procedures.

## Past OIG Oversight of USAID’s C-TIP Efforts

In 2013, OIG conducted a review of USAID’s C-TIP program and identified several findings, including the following:

- C-TIP coordinator roles and responsibilities were unclear;
- C-TIP coordinators were not provided training to implement the C-TIP Policy;
- The DRG Center lacked data to monitor implementation of the C-TIP Policy; and
- The DRG Center did not adequately share best practices and resources.

USAID agreed with and reported corrective actions to address OIG’s 11 recommendations, including issuing guidance on C-TIP coordinator roles and responsibilities, creating a strategic training plan for C-TIP coordinators, and implementing a mechanism to share C-TIP information, tools, and best practices.<sup>11</sup>

In addition, OIG conducted several reviews in FY 2010-2015 that included testing on implementer compliance with TIP requirements in acquisition and assistance awards. These reports made recommendations to improve USAID’s use of controls to monitor and enforce implementer compliance with TIP requirements. For example, a 2011 report recommended that USAID/Egypt verify the use of TIP clauses in acquisition awards; a 2014 report recommended that USAID/Nicaragua provide all implementers a copy of the C-TIP Field Guide and guidance for reporting TIP allegations to OIG; and a 2015 report recommended that

<sup>11</sup> USAID OIG, [Review of USAID’s New Counter-Trafficking in Persons Program](#) (9-000-14-001-S), November 2013.

USAID/Eastern and Southern Caribbean provide C-TIP training to its staff. USAID agreed with and reported corrective actions to address OIG's recommendations.<sup>12</sup>

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## **Selected Asia Missions Adhered to Programming Objectives for Learning, Consultation, and Coordination but Did Not Fully Adhere to Aspects of Program Design**

USAID/RDMA, USAID/CAR, and USAID/PPIM took steps to adhere to C-TIP Policy programming objectives 3, 4, and 5. However, the selected missions did not fully adhere to programming objectives 1 and 2 to consistently integrate C-TIP across development sectors or engage with trafficking survivors during strategy, project, and activity design. In addition, missions adhered to programming objective 3, but mission and implementer officials reported that C-TIP-prescribed standard indicators lacked clear definitions and were not useful in measuring the impact of their C-TIP activities.

## **Selected Asia Missions Took Steps to Improve C-TIP Learning and Research, Engage Host Country and Multilateral Stakeholders on C-TIP Initiatives, and Partner With the State Department on C-TIP Programs**

USAID/RDMA, USAID/CAR, and USAID/PPIM took steps to adhere to three of USAID's C-TIP Policy programming objectives (3, 4, and 5). Through our review of mission documents (such as C-TIP activity work plans; C-TIP activity annual reports; C-TIP activity monitoring, evaluation, and learning plans; and mission correspondence with the State Department) and interviews with mission and State Department officials and C-TIP implementers, we determined the following:

- The selected missions applied systematic approaches to C-TIP learning and research and incorporated quantitative and qualitative methodologies in their C-TIP programs. Each mission ensured that C-TIP implementers established monitoring, evaluation, and learning plans and initiated innovative studies to inform USAID's C-TIP programming. For example, USAID/RDMA funded regional research into topics such as the nexus of climate change with migration patterns and TIP vulnerability, while USAID/PPIM funded the first ever nationwide survey of human trafficking awareness and attitudes in the Philippines.
- The selected missions ensured that C-TIP implementers coordinated closely with host country and international stakeholders and funded new, underutilized, and local partners through a subaward program. For example, USAID/CAR's C-TIP implementer provided training to host government officials in Kazakhstan on the nature of TIP and the

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<sup>12</sup> USAID OIG, [Review of USAID/Egypt's Contractors Compliance With the Trafficking Victims Protection Reauthorization Act of 2008](#) (6-263-12-001-S), December 2011; USAID OIG, [Audit of USAID/Nicaragua's HIV/AIDS Prevention Program](#) (1-524-14-011-P), July 2014; and USAID OIG, [Audit of USAID/Eastern and Southern Caribbean's Youth-Related Projects](#) (1-534-15-007-P), August 2015.

interventions needed from frontline personnel (such as health, education, social services, and labor inspectors) and implemented a survivor-centered approach training curriculum for criminal justice actors in the Kyrgyz Republic. In Thailand, USAID/RDMA's C-TIP implementer established partnerships with private sector firms to promote ethical supply chains and fair labor practices in the fishing and farming industries.

- The selected missions collaborated with interagency colleagues, particularly State Department officials at their respective embassies. Each mission ensured that C-TIP implementers used the annual TIP Report to inform and guide their C-TIP programs, contributed to the preparation of the annual TIP Report narrative, and assisted with diplomatic engagements. For example, USAID/PPIM invited a State Department colleague to participate on a selection committee for a C-TIP award and USAID/RDMA provided feedback to State Department colleagues on the annual TIP Report. USAID/CAR officials participated on an interagency C-TIP working group at Embassy Astana and coordinated to host a regional C-TIP Hero event that recognized host country TIP champions and efforts by local partners to combat human trafficking. State Department officials that we interviewed reported positive working relationships with the missions and strong collaboration on interagency C-TIP efforts.

## **Selected Asia Missions Did Not Fully Adhere to USAID's C-TIP Policy Programming Objective to Integrate C-TIP Into Sector Portfolios**

USAID/RDMA, USAID/CAR, and USAID/PPIM did not consistently integrate C-TIP through a deliberate process during strategy, project, and activity design. USAID's C-TIP Policy programming objective 1 states that mission C-TIP efforts should endeavor to demonstrate a linkage to, or be integrated into, specific sector portfolios, such as education, health, and economic growth throughout strategy, project, and activity design. The policy says that missions managing programs in countries designated as Tier 2 Watch List and Tier 3 in the State Department's annual TIP Report should incorporate C-TIP approaches across development sectors into their strategies.

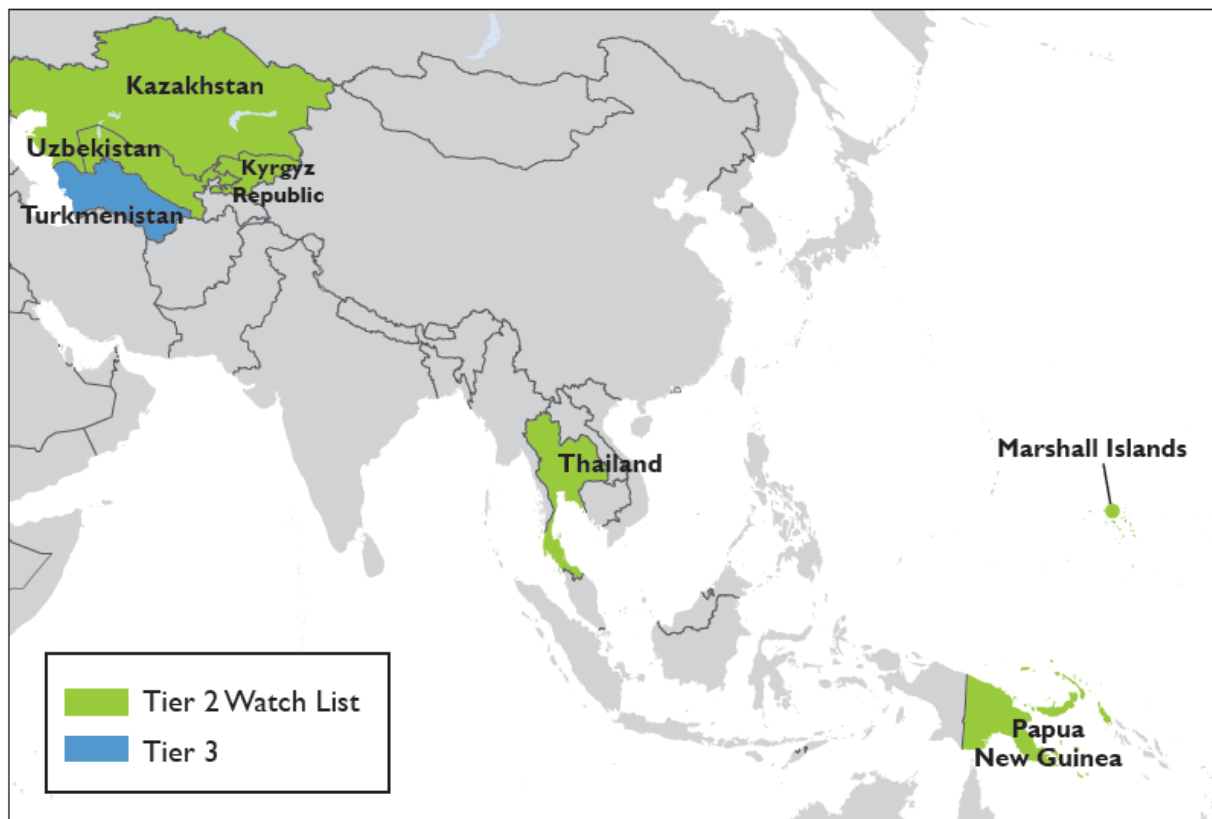
Each mission's strategies identified TIP as a development challenge and incorporated C-TIP efforts under one of their development objectives, but none of the strategies identified cross-sectoral C-TIP integration approaches for countries designated as Tier 2 Watch List or Tier 3 in the State Department's annual TIP Report.<sup>13</sup> For example, USAID/CAR's regional strategy included C-TIP as a component to achieve the development objective "Resilience to regional vulnerabilities advanced." However, the strategy did not assess or identify opportunities for C-TIP integration in other sectors, such as customs and border management, in Tier 2 Watch List or Tier 3 countries like Turkmenistan. Figure 3 identifies Tier 2 Watch List and Tier 3

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<sup>13</sup> USAID/RDMA Regional Development Cooperation Strategy, December 2020 – December 2025. USAID/CAR Regional Development Cooperation Strategy, December 2020 – December 2025. USAID/PPIM Country Development Cooperation Strategy for Philippines, November 2019 – November 2024. USAID/PPIM Strategic Framework for Pacific Islands, March 2022 – March 2027. USAID/PPIM's Strategic Framework for Pacific Islands was designed during the scope of our audit.

countries that missions managed C-TIP activities in but did not incorporate cross-sectoral C-TIP integration approaches for in their respective strategies.<sup>14</sup>

**Figure 3. Map of Tier 2 Watch List and Tier 3 Countries With Programs Managed by USAID/RDMA, USAID/CAR, and USAID/PPIM (FY 2019-2021)**



Source: OIG analysis of USAID/RDMA, USAID/CAR, and USAID/PPIM strategies, C-TIP award documents, and State Department FY 2019-2021 TIP Reports. Countries highlighted were either Tier 2 Watch List or Tier 3 at least one year between FY 2019-2021. The depiction and use of boundaries and geographic names used on this map do not imply official endorsement or acceptance by the U.S. government.

Sixteen out of 25 design documents from the selected missions that we reviewed did not consider or analyze how to integrate C-TIP into sector portfolios. Instead, mission officials reported that C-TIP integration efforts primarily occurred while implementing project activities, such as providing C-TIP training to beneficiaries or distributing C-TIP informational materials. For example, USAID/PPIM did not assess C-TIP integration in its education, health, or environmental design documents and USAID/RDMA did not assess C-TIP integration in its economic growth, health, or climate change design documents. In contrast, USAID/PPIM officials said a democracy and governance activity incorporated training to frontline responders

<sup>14</sup> We did not identify any deficiencies with mission strategies for cross-sectoral C-TIP integration approaches for Tajikistan (USAID/CAR) or Fiji and the Philippines (USAID/PPIM). During the scope of our audit, Tajikistan and Fiji were ranked as Tier 2 and the Philippines as Tier 1 by the State Department. While the State Department's country tier rankings can change from year to year, USAID officials did not identify annual fluctuations as a significant factor in the design of their strategies, projects, and activities.

to prevent child soldier recruitment in combat areas in the Philippines, while USAID/RDMA officials said a sustainable fisheries activity incorporated technologies to prevent forced labor on fishing vessels in Thailand.

We reviewed the DRG Center's C-TIP Field Guide and determined that it did not fully provide guidance on current C-TIP Policy programming objectives and related requirements, and it had not been updated since 2013.<sup>15</sup> In addition, none of the selected missions' procedures on strategy, project, and activity design provided guidance on C-TIP integration. Twenty-eight out of 40 USAID officials that we interviewed said that C-TIP is somewhat or not integrated across their mission's sector portfolios, citing a lack of clear guidance from the DRG Center and mission procedures as contributing factors.<sup>16</sup>

Missions may have missed opportunities to leverage resources and programs to combat TIP through a deliberate process during strategy, project, and activity design. Further, USAID may not be applying C-TIP knowledge toward addressing broader country and regional development challenges, such as efforts to address the impacts of climate change, deliver healthcare services, and improve basic and higher education.

## **Selected Asia Missions Did Not Fully Adhere to USAID's C-TIP Policy Programming Objective to Engage Trafficking Survivors**

Thirty-nine out of the 40 USAID/RDMA, USAID/CAR, and USAID/PPIM officials we interviewed reported that they had not engaged trafficking survivors during C-TIP activity design and implementation. USAID's C-TIP Policy programming objective 2 states that missions should take a survivor-informed approach to C-TIP activity design and implementation. This includes obtaining survivor feedback during co-creation and on design documents, enlisting survivors to serve on selection committees consistent with applicable law and USAID policy, encouraging implementers to consult with survivors during activity implementation, and meeting with survivors during site visits.

Mission officials cited a lack of DRG Center training and guidance to address engagement challenges such as navigating host country legal restrictions, survivor safety and privacy concerns, and techniques for encouraging survivors to participate.<sup>17</sup> Instead, each mission's C-TIP activities funded subimplementers to support trafficking survivors (such as providing legal counsel or improving access to shelters) and engaged survivors through public outreach events (such as annual TIP Heroes recognition or raising awareness of survivor stories).

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<sup>15</sup> USAID issued an update to the C-TIP Field Guide in January 2023, which we did not assess, as it was after audit field work had been completed.

<sup>16</sup> For audit objective 1, the USAID officials we interviewed included mission leadership, program office representatives, technical office representatives, and C-TIP coordinators.

<sup>17</sup> For example, the 2021 TIP Report stated that the government of Thailand required trafficking survivors in Thailand to be detained in government-run or sanctioned shelters with limited access to support services. USAID/RDMA officials stated that they could not engage survivors detained in shelters due to government of Thailand restrictions on survivor freedom of movement.

We reviewed the DRG Center’s C-TIP Field Guide and determined that it did not provide guidance on current C-TIP Policy programming objective requirements for engagement with trafficking survivors, and it had not been updated since 2013. In addition, none of the missions had received survivor-informed training from the DRG Center, and mission officials reported that they were unaware that the DRG Center offered this training. DRG Center officials said survivor-informed training was a new approach for the Agency and confirmed that the training has not been provided to missions as of FY 2021. DRG Center officials stated that the C-TIP Field Guide update and roll out of survivor-informed training had not been completed due to a lack of staffing resources.

The DRG Center may not be equipping missions to maximize their C-TIP investments through effective guidance and training to engage trafficking survivors during C-TIP activity design and implementation. For example, USAID/RDMA officials said engaging survivors could provide valuable insight to improve service delivery, such as the quality of shelters or legal advice, but the mission is unsure how to navigate significant legal restrictions from the government of Thailand. In another example, USAID/PPIM officials said they were concerned that engaging survivors could retraumatize them or expose them to privacy risks, particularly in Pacific Island countries with small populations and tight-knit communities.

## **Selected Asia Missions and Implementers Reported That C-TIP Standard Indicators Lacked Clear Definitions and Did Not Measure Impact**

USAID/RDMA, USAID/CAR, and USAID/PPIM took steps to measure the performance of their C-TIP activities by using C-TIP standard indicators, but mission officials and implementers reported that the C-TIP standard indicators lacked clear definitions and did not measure impact. USAID’s C-TIP Policy programming objective 3 states that (1) missions should use standard indicators to measure the performance and impact of their C-TIP activities, improve the monitoring and evaluation of C-TIP activities, and increase research into what can reduce TIP, and (2) the DRG Center, PPL, and the State Department are responsible for creating and updating the standard indicators.<sup>18</sup>

We reviewed USAID and the State Department’s 13 C-TIP standard indicators in effect for FY 2019-2021 and determined that none of them were outcome indicators to assess the impact of C-TIP activities. Twenty-three out of 29 mission C-TIP coordinators, mission program office officials, and implementers that we interviewed said that the C-TIP standard indicators lacked clarity on subjective terms that were difficult to interpret and lacked indicators to measure impact. Further, all six of the mission C-TIP coordinators and five out of six mission program office officials that we interviewed said that C-TIP standard indicators were not useful for

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<sup>18</sup> For FY 2019-2021, USAID and the State Department issued annual guidance on performance reporting that included 13 C-TIP standard indicators that missions were required to use, as applicable, in accordance with USAID and State Department’s Managing for Results Framework. The Framework’s Program Design and Performance Management Toolkit states that (1) subjective terms should be clearly defined so that missions and implementers use and interpret the indicator correctly and consistently, and (2) indicators should have a clear utility for learning, tracking, informing decisions, or addressing ongoing program needs. The Toolkit states that impact is “a result or effect that is caused by or attributable to a program, project, process, or policy. Impact is often used to refer to higher-level effects that occur in the medium or long term.”



determining the impact of C-TIP activities because they focused on assessing short-term outputs rather than long-term outcomes. For example, current standard indicators capture the number of first responders trained on identifying TIP survivors, but do not capture if that training resulted in the first responders ever identifying survivors. See Appendix B for a list of the 13 C-TIP standard indicators.

DRG Center officials stated that in FY 2018-2019, they solicited feedback from missions to create the C-TIP standard indicators. However, the DRG Center has not solicited missions to obtain their input on updates to the C-TIP standard indicators since then. Additionally, DRG Center officials said that they meet annually with the State Department to review the C-TIP standard indicators, but the State Department has final authority to approve any changes.

The DRG Center may be missing an opportunity to enhance USAID's ability to accurately measure the performance and impact of its C-TIP investments because mission officials and implementers did not think the indicators were clear for learning, informing decisions, or addressing strategic goals. For example, a mission official and an implementer said attempts to conduct virtual outreach events during the COVID-19 pandemic were challenging due to difficulties in determining whether targeted beneficiaries qualified as trafficking survivors or first responders under C-TIP standard indicator definitions. Mission officials and implementers noted that the standard indicators emphasized short-term outputs, such as the number of people or organizations trained or reached, rather than long-term impact, such as sustainable capacity building.

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## **Selected Asia Missions Did Not Fully Adhere to USAID's Guidance to Designate and Use C-TIP Coordinators, and C-TIP Coordinator Roles and Responsibilities Were Unclear**

USAID/RDMA, USAID/CAR, and USAID/PPIM did not fully use C-TIP coordinators as a resource to implement the C-TIP Policy, and mission C-TIP coordinators said that they did not fully understand their roles and responsibilities. Specifically, we found the following:

- While each mission named individuals—three for USAID/RDMA, two for USAID/CAR, and one for USAID/PPIM—in the DRG Center's global central directory as C-TIP coordinators, none of the missions designated C-TIP coordinators through a mission order or inserted C-TIP responsibilities in their coordinators' position descriptions and annual work objectives. Mission leadership cited a lack of awareness around the requirement to formally designate and use C-TIP coordinators.
- The C-TIP coordinators at each mission said that they did not fully understand their role because they did not receive training on their responsibilities and did not have C-TIP coordinator responsibilities listed in their position descriptions and/or annual work objectives. For example, one C-TIP coordinator stated that before this audit, she was not aware that her mission had named her as C-TIP coordinator, and she was unsure what the role required. Another C-TIP coordinator said that her mission peers knew she was the AOR for C-TIP activities but were not aware that they could consult with her on their

project and activity designs. DRG Center officials confirmed that they did not provide training to mission C-TIP coordinators during the period FY 2019-2021.

The C-TIP Code of Conduct, C-TIP Policy, and the DRG Center's Mission C-TIP Coordinator Responsibilities direct missions to (1) designate a C-TIP coordinator to serve as the primary point of contact on the implementation of the Agency's C-TIP Policy; (2) insert C-TIP responsibilities in their coordinators' position descriptions and annual work objectives; and (3) use the C-TIP coordinator to provide guidance to mission technical and program staff to ensure successful implementation of the C-TIP Policy, including assisting with C-TIP integration during project and activity design. The C-TIP Policy requires missions to name their C-TIP coordinators in the DRG Center's global central directory, and the DRG Center's Mission C-TIP Coordinator Responsibilities states that missions should designate C-TIP coordinators within the mission through a mission order. Further, the C-TIP Policy states that the DRG Center is responsible for field support, including advising on training.

Without a training program in place, the DRG Center may not be preparing C-TIP coordinators to understand their roles and responsibilities. Additionally, USAID/RDMA, USAID/CAR, and USAID/PPIM may have missed opportunities to facilitate implementation of the C-TIP Policy by failing to empower their C-TIP coordinators through clear assignment of responsibilities. In our interviews, 16 out of 27 USAID mission technical and program office officials said that they had never engaged with their mission's C-TIP coordinator and/or did not know the C-TIP coordinator at their mission.<sup>19</sup> For example, Office of Health officials at each mission said that they had never engaged their mission's C-TIP coordinator to discuss integration during project and activity design or implementation. In another example, Program Office officials at one mission said that their mission did not prioritize engagement with the C-TIP coordinator as it did with other crosscutting initiatives like environmental and gender advisors.

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## **Selected Asia Missions Did Not Consistently Monitor and Enforce Implementer Compliance With Trafficking in Persons Prevention and Detection Requirements for Selected Awards**

We reviewed a nonstatistical sample of 27 (out of 99) acquisition and assistance awards for USAID/RDMA, USAID/CAR, and USAID/PPIM to assess each mission's oversight of implementer compliance with FAR and ADS 303 TIP prevention and detection requirements. We found that (1) missions did not consistently implement controls to monitor and enforce implementer compliance with TIP prevention and detection requirements, and (2) implementers did not consistently comply with TIP prevention and detection requirements.<sup>20</sup> Table 4 summarizes our testing results for all 27 awards.

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<sup>19</sup> For audit objective 2, the USAID officials we interviewed included mission leadership, program office representatives, technical office representatives, and C-TIP coordinators.

<sup>20</sup> We reviewed 15 assistance awards and 12 acquisition awards.

**Table 4. OIG Audit Testing Results for 27 Selected Acquisition and Assistance Awards for Selected USAID Missions in Asia**

Controls and Requirements	Description	What We Found
<b>MISSION TIP CONTROLS<sup>21</sup></b>		
Award Clauses and Provisions	Mission COs/AOs must ensure that clauses with TIP requirements are included in each applicable notice of funding opportunity and award.	Seven out of 27 awards we reviewed did not include the correct clause in the notice of funding opportunity and/or award.
Preaward Risk Assessments	Mission COs/AOs must consider the likelihood that the award or subaward will involve services or supplies susceptible to TIP and the number of non-U.S. citizens expected to be employed.	None of the 27 awards we reviewed included consideration of the likelihood that the awards involved services or supplies susceptible to TIP and the number of non-U.S. citizens expected to be employed.
Compliance Certification Tracking	Mission COs/AOs should develop a method of tracking to ensure receipt of implementer TIP compliance certifications.	None of the 27 awards we reviewed included a documented mechanism to track implementer submission of TIP compliance certifications.
Compliance Plan Review	At their discretion, mission COs/AOs can request implementers to submit their TIP compliance plans for review.	None of the 27 awards we reviewed included a documented review of the TIP compliance plan.
Post Award Briefings	Mission COs/AOs are strongly encouraged to discuss TIP requirements with implementers at the post award briefing.	None of the 27 awards we reviewed included a documented discussion of TIP requirements with implementers at the post award briefing.
<b>IMPLEMENTER TIP REQUIREMENTS<sup>22</sup></b>		
TIP Compliance Plan	Implementers must maintain a compliance plan during the performance of the award that includes all of the required elements. <sup>23</sup>	Ten out of 27 awards we reviewed did not have a TIP compliance plan. Seventeen out of 27 awards had a TIP compliance plan that did not include all of the required elements. For 13 of the 17 TIP compliance plans that we

<sup>21</sup> USAID’s Procurement Executive Bulletins 2016-01 and 2019-03 provide guidance to missions on controls to monitor and enforce implementer compliance with TIP requirements.

<sup>22</sup> FAR and ADS Chapter 303 detail the TIP prevention and detection requirements for prime and subimplementers receiving acquisition and assistance awards. For acquisition awards with an estimated value greater than \$550,000, implementers must (1) implement a TIP compliance plan and (2) submit preaward and annual certifications of compliance with TIP requirements. All requirements flow down to acquisition subawards, including TIP compliance plan and certification requirements for subawards with an estimated value greater than \$550,000. For assistance awards, the requirements are the same as acquisition awards, except the dollar threshold for TIP compliance plans and certifications is \$500,000. Assistance subawards must have provisions that prohibit forced sex and labor practices and authorize termination for noncompliance but are not required to implement a TIP compliance plan or submit certifications.

<sup>23</sup> Required elements include: a TIP awareness program, a process for employees to report TIP allegations, a recruitment and wage plan, a housing plan (if the implementer provides or arranges housing), and procedures to (1) prevent agents and subimplementers from engaging in TIP and (2) monitor, detect, and terminate agents, subimplementers, and subimplementer employees who engage in TIP. TIP compliance plans must be appropriate to the size and complexity of the award and appropriate to the nature and scope of the activities to be performed, including the number of non-U.S. citizens expected to be employed.

Controls and Requirements	Description	What We Found
TIP Compliance Certifications	Implementers must submit preaward and annual certifications that they have implemented a compliance plan and that neither they nor their subimplementers have engaged in TIP.	reviewed, we found that implementers did not address TIP in the context of the award because the TIP compliance plans were broad, corporate documents outlining the implementer’s general TIP policies. Eighteen out of 27 awards we reviewed did not have all required preaward and annual TIP certifications.
Oversight of Subimplementer TIP Compliance	Implementers must insert TIP clauses into their subawards. For acquisition awards, subimplementers must submit TIP certifications and maintain a TIP compliance plan.	Three out of 27 awards we reviewed did not contain a TIP clause in a subaward. Further, 8 out of 12 acquisition awards we reviewed had subimplementers that failed to consistently comply with TIP requirements. Specifically, 6 out of 8 acquisition awards did not have subimplementer TIP certifications and 5 out of 8 acquisition awards did not have subimplementer TIP compliance plans.

Source: OIG analysis of 27 selected acquisition and assistance awards for USAID/RDMA, USAID/CAR, and USAID/PPIM.

Our testing results were compounded by lack of implementer and USAID staff awareness of TIP requirements, USAID’s lack of experience in responding to TIP allegations, and the high risk of TIP in the countries and sectors for some selected awards. Specifically:

- Sixty-seven out of 135 prime implementers and subimplementers (or almost 50 percent) that we interviewed said that they had either no familiarity or only some familiarity with TIP requirements. Ninety-two out of 135 prime implementers and subimplementers (or 68 percent) said that they did not know that TIP allegations must be reported to USAID OIG by the prime implementer.
- Twenty-six out of 38 USAID officials (or 68 percent) that we interviewed said that they had either no familiarity or only some familiarity with TIP requirements. Further, 22 out of 38 USAID officials (or almost 58 percent) that we interviewed said that their mission lacked mechanisms to monitor and enforce implementer compliance with TIP requirements.
- During the period FY 2019-2021, OIG received six hotline complaints related to potential TIP violations in Asia. Mission and USAID Responsibility, Safeguarding, and Compliance Division officials said that allegations of TIP violations are likely significantly underreported in the region.
- Some selected awards that we reviewed included programming at high risk for TIP violations. The State Department’s 2021 TIP Report identified China as a Tier 3 country due to state-sponsored trafficking abuses and identified the Philippines fishing industry as a sector of significant concern for forced labor. For example, one implementer operating in the Tibetan region in China did not comply with any TIP requirements, such as preparing a

TIP compliance plan, submitting annual compliance plan certifications, or including TIP clauses in subawards with Chinese organizations. Similarly, an implementer managing an activity in the Philippines fishing sector did not comply with any USAID TIP requirements, such as preparing a compliance plan, submitting annual compliance plan certifications, or including TIP clauses in subawards with Filipino organizations.

USAID/RDMA, USAID/CAR, and USAID/PPIM officials had limited awareness of monitoring and enforcement controls and did not fully implement them. Twenty-two out of 25 CORs/AORs and 4 out of 7 COs/AOs said they were either not familiar or somewhat familiar with TIP requirements and controls and 22 out of 25 CORs/AORs said they did not know that TIP allegations must be reported to USAID OIG.<sup>24</sup> Further, Procurement Executive Bulletins 2016-01 and 2019-03 provide guidance on CO/AO responsibilities but do not provide guidance on COR/AOR responsibilities. OAA and PPL officials said that PPL assumed responsibility for COR/AOR professional support and development in 2019, but PPL has not issued guidance on COR/AOR responsibilities for oversight of implementer TIP compliance in acquisition and assistance awards.

USAID's C-TIP Policy and C-TIP Code of Conduct require all Agency personnel to attend C-TIP Code of Conduct training while onboarding and subsequently every three years to understand ethical conduct to prevent TIP. We reviewed the Agency's C-TIP Code of Conduct training and noted that it does not provide detailed information on CO/AO and COR/AOR roles and responsibilities for monitoring and enforcing TIP in acquisition and assistance awards. USAID officials attending the training reported mixed results regarding its effectiveness and need for improvement.

- Eleven out of 38 USAID officials that we interviewed reported that they did not attend the C-TIP Code of Conduct training or said that the training was ineffective as it did not improve their knowledge of TIP requirements, or they could not recall any details.
- Twenty out of 38 USAID officials said that the C-TIP Code of Conduct training was somewhat effective but needed improvement such as guidance on reviewing prime implementer TIP compliance plans, tracking prime implementer TIP certifications, and verifying TIP compliance in subawards.

Additionally, USAID's C-TIP Standard Operating Procedure states that training on a detailed explanation of the roles and responsibilities for CO/AO and COR/AOR is available through the Federal Acquisition Institute but does not prescribe mandatory attendance. None of the 32 COs/AOs and CORs/AORs that we interviewed attended TIP-related acquisition and assistance courses at the Federal Acquisition Institute.

Since COs/AOs and CORs/AORs were not familiar with their roles and responsibilities to combat TIP in USAID's acquisition and assistance awards, it is possible that they are failing to implement controls that ensure implementer compliance with TIP requirements. As a result, Agency and implementers' safeguards to prevent and detect TIP violations could be weakened and not only increase the risk of TIP happening but also expose USAID to increased legal and

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<sup>24</sup> For audit objective 3, the USAID officials we interviewed included COs/AOs, CORs/AORs, and C-TIP coordinators.

reputational risks. Further, because USAID officials and implementers are not familiar with requirements to report credible TIP allegations to USAID OIG immediately, we are constrained in our ability to initiate an investigation into credible TIP allegations.

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## Conclusion

TIP is a grave violation of human rights, and USAID is authorized by Congress to combat forced sex and labor worldwide. Given that the U.S. government is committed to fully eradicating TIP, it is critical that USAID provide guidance and training to missions regarding how to fully integrate C-TIP across development sectors, empower C-TIP coordinators, and engage trafficking survivors during program design and implementation. While USAID took steps to improve C-TIP learning, consultation, and coordination, without fully implementing controls to prevent and detect TIP in acquisition and assistance awards as well as updating standard indicators to better measure the impact of C-TIP investments, the Agency may miss the opportunity to strengthen its safeguards to curb TIP and set up its workforce for success in their roles. By ensuring sufficient resources are allocated to prioritize corrective action, Agency senior leadership can address recurring C-TIP deficiencies identified in past OIG oversight and mitigate legal and reputational risks.

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## Recommendations

We recommend that the Deputy Administrator for Policy and Programming take the following action:

1. Coordinate with regional bureaus and the Center for Democracy, Human Rights, and Governance to develop and implement an action plan to improve guidance and training for missions on implementing C-TIP Policy programming objectives and using C-TIP Coordinators. This plan should include incorporating current C-TIP Policy programming objectives into the C-TIP Field Guide, developing training for mission C-TIP Coordinators, improving availability and awareness of survivor engagement training for missions, and assessing opportunities to strengthen C-TIP standard indicators in coordination with missions and the State Department.

We recommend that the Deputy Administrator for Management and Resources take the following action:

2. Coordinate with the Bureau for Policy, Planning, and Learning and the Office of Acquisition and Assistance to develop and implement an action plan to clarify guidance and improve training for Contracting and Agreement Officers and Contracting and Agreement Officer Representatives on their roles and responsibilities for monitoring and enforcing implementer compliance with trafficking in persons requirements in acquisition and assistance awards.

We recommend that the Bureau for Asia take the following actions:

3. Coordinate with USAID/Regional Development Mission for Asia, USAID/Central Asia Regional, and USAID/Philippines, Pacific Islands, and Mongolia to review and revise each

mission's procedures to incorporate guidance on integrating C-TIP during strategy, project, and activity design.

4. Coordinate with USAID/Regional Development Mission for Asia, USAID/Central Asia Regional, and USAID/Philippines, Pacific Islands, and Mongolia to review and revise each mission's mission orders to incorporate guidance on designating C-TIP Coordinators, assigning responsibilities, and using C-TIP Coordinators. As part of this review, each mission should (1) designate C-TIP Coordinator(s) in its mission orders and (2) insert C-TIP Coordinator responsibilities into the position descriptions and annual work objectives for designated C-TIP Coordinators.
5. Coordinate with USAID/Regional Development Mission for Asia, USAID/Central Asia Regional, and USAID/Philippines, Pacific Islands, and Mongolia to develop and implement an action plan to bring each mission's monitoring and enforcement practices for acquisition and assistance awards into compliance with trafficking in persons regulations, policies, and procedures.

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## OIG Response to Agency Comments

We provided our draft report to USAID on May 24, 2023. On June 30, 2023, we received the Agency's response, which is included as Appendix C of this report. USAID also provided technical comments, which we considered and incorporated as appropriate. We corresponded with the Agency to clarify its management comments, including identifying a target completion date for planned corrective actions for Recommendation 1 and corrective actions for Recommendation 2.

The report included five recommendations. The Agency agreed with all five recommendations. We acknowledge management decisions on Recommendations 1, 3, 4, and 5 and consider these recommendations resolved but open pending completion of all planned activities.

For Recommendation 2, USAID identified completed corrective actions to clarify guidance for COs/AOs and CORs/AORs and improve training for CORs/AORs. However, the Agency did not identify planned or completed corrective actions or a target completion date to improve training for COs/AOs. Accordingly, we do not acknowledge a management decision on Recommendation 2 and consider this recommendation open and unresolved.

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## Appendix A. Scope and Methodology

We conducted our work from November 2021 through May 2023 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.

Our audit objectives were to assess the extent that selected Asia missions (1) adhered to USAID's C-TIP programming objectives, (2) adhered to USAID's guidance to designate and use C-TIP coordinators, and (3) monitored and enforced implementer compliance with TIP requirements for selected awards.

In planning and performing the audit, we gained an understanding and assessed internal controls that were significant to the audit objectives. Specifically, we designed and conducted procedures related to three of the five components of internal control as defined by the U.S. Government Accountability Office.<sup>25</sup> These included Control Activities (Principle 10), Information and Communication (Principles 13-15), and Monitoring (Principles 16-17).

Due to COVID-19 restrictions, we did not conduct site visits and performed audit work at OIG offices in Bangkok, Thailand; Manila, Philippines; and Islamabad, Pakistan, through desk reviews of documentation and virtual interviews. We reviewed USAID's financial and award data to determine the size of each mission's C-TIP portfolio in Asia and used it, along with consideration of country TIP rankings captured in the State Department's annual TIP Reports and prior OIG audit coverage in Asia, to select a nonstatistical sample of three (out of nine) Asia missions—USAID/RDMA, USAID/CAR, and USAID/PPIM—for testing to answer the audit objectives. We selected a nonstatistical sample, so results and conclusions are limited to these three missions and are not generalizable.

The audit scope for audit objectives 1 and 2 was the period October 1, 2018, through September 30, 2021. This timeframe encompassed the development of mission strategies across the region and the rollout of USAID's revisions to the C-TIP Policy. The audit scope for audit objective 3 was selected mission acquisition and assistance awards that were active as of September 30, 2021. This timeframe allowed the audit team to test USAID's active acquisition and assistance awards as of FY 2021.<sup>26</sup>

To answer the first and second objectives, we did the following:

- Reviewed USAID's C-TIP Policy (editions issued in 2012, January 2021, and December 2021), C-TIP Field Guide (issued in 2013), C-TIP Code of Conduct (issued in 2015), and Mission C-TIP Coordinator Responsibilities (undated) to obtain an understanding of guidance for missions to adhere to the five C-TIP programming objectives and to designate and use C-TIP coordinators to facilitate implementation of the C-TIP Policy.

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<sup>25</sup> U.S. Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), September 2014.

<sup>26</sup> For each audit objective, we assessed documentation relevant to our scope prepared after October 1, 2021.



- Reviewed USAID documents to assess each mission’s adherence to the five C-TIP Policy programming objectives as well as the designation and use of C-TIP coordinators. Key documents we reviewed included Country and Regional Development Cooperation Strategies; project and activity design documents; C-TIP activity monitoring, evaluation, and learning plans; mission correspondence with the State Department and the DRG Center; mission orders on delegations of authority; and C-TIP coordinator position descriptions and annual work objectives.
- Interviewed USAID, State Department, and implementer officials using a semistructured questionnaire to understand how each mission adhered to the five C-TIP Policy programming objectives as well as the designation and use of C-TIP coordinators. We met with mission leadership, technical office representatives, program office representatives, and C-TIP coordinators. We met with State Department officials from the political sections and/or Bureau of International Narcotics and Law Enforcement Affairs in the embassies in Bangkok, Astana, and Manila. We met with officials from implementers receiving mission funding for C-TIP activities. In total, we conducted 41 interviews (with 62 interviewees): 28 with USAID, 4 with the State Department, and 9 with implementers. We also discussed our audit results with Washington, DC-based stakeholders from the Asia Bureau, DRG Center, OAA, PPL, and Bureau for Management’s Responsibility, Safeguarding, and Compliance Division.
- Analyzed the collective results of our document and interview reviews to determine the extent that USAID/RDMA, USAID/CAR, and USAID/PPIM adhered to USAID’s guidance on the five C-TIP programming objectives and designation and use of C-TIP coordinators. We did not assess the effectiveness of each mission’s C-TIP activities or efforts to implement C-TIP Policy programming objectives.

To answer the third objective, we:

- Reviewed U.S. government and USAID regulations, policies, and procedures to obtain an understanding of guidance for preventing and detecting TIP in acquisition and assistance awards. Key documents we reviewed included FAR Subpart 22.17, 52.222-50 and 52.222-56; ADS Chapter 303.3.32, ADS Chapter 303mav, and ADS Chapter 303 mandatory standard provisions for assistance awards to U.S. and non-U.S. nongovernmental organizations; USAID’s Procurement Executive Bulletins 2016-01 and 2019-03; USAID’s C-TIP Code of Conduct; and USAID’s C-TIP Standard Operating Procedure.
- Selected a nonstatistical sample of 27 (out of 99) USAID/RDMA, USAID/CAR, and USAID/PPIM awards active as of September 30, 2021, for testing. For each mission, we selected 4 acquisition awards with each award having a total estimated cost greater than \$550,000 and 4 assistance awards with each award having a total estimated cost greater than \$500,000 (8 awards per mission, 24 total awards). We selected awards using a random number generator to ensure coverage of the universe. For each selected award, we tested all acquisition subawards exceeding \$550,000 in total estimated cost and all assistance subawards exceeding \$500,000 in total estimated cost. Based on deficiencies identified through testing, we judgmentally selected and reviewed an additional three USAID/RDMA assistance awards for activities to support Tibetan communities in China, including subawards. The generalizability of our sample testing is limited to results and conclusions

based on 27 acquisition and assistance awards, since it was selected using a nonstatistical methodology.

- Reviewed USAID award files to assess each implementer’s compliance with TIP prevention and detection requirements in their awards as well as each mission’s implementation of TIP monitoring and enforcement controls. Key documents we reviewed included preaward and annual TIP certifications, TIP compliance plans, solicitation and award clauses, post award briefing materials, preaward risk assessments, and subaward files.
- Interviewed USAID officials, prime implementers, and subimplementers using a semistructured questionnaire to understand implementer compliance with TIP requirements and mission oversight controls. We met with mission COs/AOs, CORs/AORs, and C-TIP coordinators. We met with representatives from 27 prime implementers and 37 subimplementers.<sup>27</sup> In total, we conducted 101 interviews (with 173 interviewees): 38 with USAID and 63 with prime and subimplementers. We also discussed our audit results with Washington, DC-based stakeholders from the Asia Bureau, DRG Center, OAA, PPL, and Bureau for Management’s Responsibility, Safeguarding, and Compliance Division.
- Analyzed the collective results of our document and interview reviews to determine the extent that USAID/RDMA, USAID/CAR, and USAID/PPIM monitored and enforced implementer compliance with TIP requirements for selected awards.

We used computer-processed data to conduct our work, as detailed in the following bullets:

- We obtained C-TIP obligation data from USAID’s Phoenix financial system and C-TIP award data from the DRG Center’s proprietary tracking spreadsheet.<sup>28</sup> We determined that this data was reliable through reconciliations to supporting documentation such as award files and verification of USAID’s Phoenix financial system controls detailed in the annual Agency Financial Report. We used this data as a key factor in our mission sample selection to answer both audit objectives.
- We obtained USAID/RDMA, USAID/CAR, and USAID/PPIM award data from proprietary tracking spreadsheets maintained by each mission. We determined that this data was reliable through reconciliations to award files and discussions with mission officials. We used this data to select a sample of acquisition and assistance awards for each mission to answer audit objective 3.
- We obtained USAID/Human Capital and Talent Management training data for the Agency’s “C-TIP Code of Conduct: Accountability and Action” course from USAID University. We determined that this data was reliable through discussions with USAID officials and reconciliations to training certificates. We used this data to determine whether USAID officials we interviewed for audit objective 3 attended C-TIP Code of Conduct training in accordance with the C-TIP Policy and C-TIP Code of Conduct.

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<sup>27</sup> One subimplementer was wholly owned by its prime implementer, and we interviewed an individual who represented both organizations.

<sup>28</sup> Phoenix is the accounting system of record for USAID and the core of USAID’s financial management systems framework.

We did not rely extensively on computer-processed data to determine the audit objective conclusions, results, or findings.

## Appendix B. USAID and State Department C-TIP Standard Indicators

For the period FY 2019-2021, USAID and State Department used 13 standard indicators to measure performance and impact in their C-TIP activities, as detailed in the following table.

**Table 5. USAID and State Department C-TIP Standard Indicators (FY 2019-2021)**

Indicator Number and Name	Indicator Definition	Indicator Type
<b>PS.5-I: Number of strategic roundtables convened by the State Department Office to Monitor and Combat Trafficking in Persons to coordinate antitrafficking programming with inter- and intra-agency partners.</b>	This new indicator will measure how many times the State Department Office to Monitor and Combat Trafficking in Persons convenes strategic roundtable discussions at our office in Washington, DC, to coordinate antitrafficking assistance.	Output
<b>PS.5.I-24: Number of service providers that receive training, technical assistance, or capacity building in victim-centered and trauma-informed services for victims of human trafficking.</b>	This indicator will measure the total number of individuals that complete training, technical assistance, or capacity building on the provision of protection services for victims of human trafficking. This could include a formal learning event with a curriculum; ongoing, as-needed technical assistance; an embedded mentor; or other models to bolster capacity. "Protection services" refers to the provision of protection services to victims of trafficking, such as the provision of shelter, and the types of services that human trafficking shelters typically provide such as mental or physical healthcare, repatriation assistance, vocational training, education, legal assistance, etc. Individuals trained could include government officials, civil society, educators, religious or community leaders, etc.	Output
<b>PS.5.I-25: Number of victims of human trafficking receiving services (medical, repatriation, legal, transportation, etc.).</b>	This indicator will measure the total number of victims of human trafficking receiving protection services provided by State Department and USAID implementing partners.	Output
<b>PS.5.I-26: Number of victim identification and referral procedures (such as Standard Operating Procedures and/or a National or local Referral Mechanism) updated or finalized through foreign assistance funds to ensure all relevant service</b>	This indicator will measure improvements in victim identification and referral by counting how many Standard Operating Procedures and/or National Referral Mechanisms have been updated or finalized through the work of State Department and USAID implementing partners.	Output

Indicator Number and Name	Indicator Definition	Indicator Type
providers and identification stakeholders are included.		
<b>PS.5.1-27: Number of survivors of human trafficking who have gained sustainable livelihoods through State Department and USAID foreign assistance.</b>	This is a protection-focused output indicator. It measures the number of survivors of human trafficking who participated in activities that generated a sustainable income, resulting in the need to no longer receive financial support from a third party. This could include, for example, income as a result of job placement, support from a legal settlement, etc.	Output
<b>PS.5.2-22: Number of police, border patrols, prosecutors, and judges trained on the investigation and prosecution of trafficking cases.</b>	This indicator will measure the number of police, border patrols, prosecutors, and judges who completed a learning event using a curriculum in the identification, investigation, and prosecution of human trafficking cases.	Output
<b>PS.5.2-23: Number of final anti-TIP policies, laws, or international agreements passed, enacted, or amended.</b>	This indicator will measure the number of antitrafficking policies, laws, or international agreements that have been strengthened through U.S. government implementing partners' provision of technical support. It includes assistance with drafting and reviewing new or revised laws, as well as advocacy work to encourage the passage of new or amended antitrafficking legislation.	Output
<b>PS.5.2-24: Number of projects working on databases.</b>	This indicator will measure how many State Department Office to Monitor and Combat Trafficking in Persons projects in a given fiscal year are working to develop or strengthen a country's antitrafficking database.	Output
<b>PS.5.3-15: Number of people trained in the prevention of human trafficking.</b>	This indicator will measure how many people completed a learning event with a curriculum on the prevention of human trafficking.	Output
<b>PS.5.3-16: Number of unique awareness materials designed or adapted through foreign assistance.</b>	This indicator will measure how many unique awareness-raising materials are designed or revised through the work of implementing partners. Awareness-raising materials could include T-shirts, banners, billboards, videos, radio segments, community dramas, brochures, etc.	Output

<b>Indicator Number and Name</b>	<b>Indicator Definition</b>	<b>Indicator Type</b>
<b>PS.5.3-17: Number of times awareness materials broadcasted or published.</b>	This new indicator will measure how many times awareness-raising materials are broadcasted or published.	Output
<b>PS.5.1-28: Number of first responders trained on victim identification.</b>	This indicator will measure the total number of first responders who completed a learning event with a curriculum using USAID funds to identify victims of human trafficking. First responders could include, but are not limited to, personnel from healthcare, emergency response services, social services, and community or faith-based organizations.	Output
<b>PS.5.1-29: Number of TIP victims referred for protection services.</b>	This indicator will measure the total number of victims of human trafficking referred by USAID implementing partners to protection services. Protection services are defined as healthcare, law enforcement, emergency response services, legal services, social services, and community or faith-based organizations.	Output

Source: USAID and State Department FY 2019-2021 C-TIP standard indicators.

Note: Standard indicator numbers PS.5.1-28 and PS.5.1-29 were not used in FY 2019, as they were implemented in FY 2020. Standard indicator definitions are as of FY 2021.

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## Appendix C. Agency Comments



### MEMORANDUM

**TO:** Toayoa Aldridge, Assistant Inspector General for Audits, Inspections, and Evaluations

**FROM:** Ann Marie Yastishock, Senior Deputy Assistant Administrator,  
USAID/Asia Bureau /s/

**DATE:** June 16, 2023

**SUBJECT:** Management Comments to Respond to the Draft Report Produced by the Office of Inspector General (OIG) titled, *“Counter-Trafficking in Persons: Improved Guidance and Training Can Strengthen USAID’s C-TIP Efforts in Asia.”* (5-000-23-001-P) (Task No. 55100321)

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The U.S. Agency for International Development (USAID) would like to thank the Office of Inspector General (OIG) for the opportunity to provide comments on the subject draft report. The Agency agrees with the recommendation(s), herein provides plans for implementing them, and reports on significant progress already made.

**COMMENTS BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID) ON THE REPORT RELEASED BY THE USAID OFFICE OF THE INSPECTOR GENERAL (OIG) TITLED, “Counter-Trafficking in Persons: Improved Guidance and Training Can Strengthen USAID’s C-TIP Efforts in Asia” (5-000-23-001-P) (Task No. 55100321)**

Please find below the management comments (Corrective Action Plan) from the U.S. Agency for International Development (USAID) on the draft report produced by the Office of the USAID Inspector General (OIG), which contains 5 recommendation(s) for USAID:

**Recommendation 1:** That the Deputy Administrator for Policy and Programming coordinate with regional bureaus and the Center for Democracy, Human Rights, and Governance to develop and implement an action plan to improve guidance and training for missions on implementing C-TIP Policy programming objectives and using C-TIP Coordinators. This plan should include incorporating current C-TIP Policy programming objectives into the C-TIP Field Guide, developing training for mission C-TIP Coordinators, improving availability and awareness of survivor engagement training for missions, and assessing opportunities to strengthen C-TIP standard indicators in coordination with missions and the State Department.

- **Management Comments:** USAID agrees with this recommendation and released its updated C-TIP Field Guide in January 2023. This updated document is publicly available on the USAID website and can be found [here](#). Pages 11-15 provide a summary on how to operationalize the C-TIP Policy programming objectives and Annex E provides detailed examples of how these activities could be incorporated into a project design framework.
  - Additionally, the DRG Center has designed a training module for C-TIP coordinators to understand the responsibilities required and resources available for this role. As of May 22, 2023, the training has been provided to C-TIP POCs across all regions where USAID operates. The full list of virtual trainings, by region, and the date completed is below:
    - April 5, training provided in person to C-TIP POCs across Asia-based missions.
    - May 11, training provided virtually to C-TIP POCs across Africa-based missions.
    - May 18, training provided virtually to C-TIP POCs across Europe and Eurasia-based missions.
    - May 22, training provided virtually to C-TIP POCs across Latin America and Caribbean missions.
  - To address survivor engagement, the DRG Center has a draft survivor engagement training which can be made available to missions upon request. The final



training is anticipated to be available in the late fall.

- Finally, the DRG Center is working with State Department colleagues to streamline C-TIP standard indicators based on feedback from Missions and aims to have updated indicators at the end of the year.

- **Target Completion Date:** USAID recommends closure upon final report issuance.

**Recommendation 2:** That the Deputy Administrator for Management and Resources coordinate with the Bureau for Policy, Planning, and Learning and the Office of Acquisition and Assistance to develop and implement an action plan to clarify guidance and improve training for Contracting and Agreement Officers and Contracting and Agreement Officer Representatives on their roles and responsibilities for monitoring and enforcing implementer compliance with trafficking in persons requirements in acquisition and assistance awards.

- **Management Comments:** USAID agrees with this recommendation. Guidance is available for staff on this and M/OAA has issued two Procurement Executive's Bulletin (PEB) on this, available on the PEBS landing page: [PEB 19-03](#) (Reissued 11/2022): Guidance on FAR Rules - "Ending Trafficking in Persons" (FAR Case 2013-001), "Combating Trafficking in Persons - Definition of Recruitment Fees" (FAR Case 2015-017), and "Inflation Adjustment of Acquisition Related-Thresholds" (FAR Case 2019-013), and [PEB 16-01](#) (Reissued 11/2022): "Trafficking in Persons Guidance for Assistance"
- **Target Completion Date:** Recommending closure upon final report issuance.

**Recommendation 3:** That the Bureau for Asia coordinate with USAID/Regional Development Mission for Asia, USAID/Central Asia Regional, and USAID/Philippines, Pacific Islands, and Mongolia to review and revise each mission's procedures to incorporate guidance on integrating C-TIP during strategy, project, and activity design.

- **Management Comments:** The Bureau for Asia agrees with the recommendation.

**[USAID/RDMA]** USAID/RDMA agrees with the recommendation. USAID/RDMA reviewed future awards to ensure that the C-TIP guidance was incorporated and that all partners are aware of the requirement. The Regional Office of Acquisition and Assistance (ROAA) also presented this requirement at an all partner Implementing Partner meeting on March 8, 2023. USAID/RDMA will review and revise the Project/Activity Design Mission Order to ensure it incorporates guidance on integrating C-TIP.

**[USAID/Philippines, Pacific Islands and Mongolia]** PPIM hosted M/MPBP/RSC from USAID headquarters who provided training to AOR and COP staff at the Mission on a variety of compliance and misconduct issues, which included C-TIP requirements in USAID awards. USAID/PPIM will review and revise its Mission Order(s) to incorporate guidance on integrating C-TIP during strategy, project, and activity design.

**[USAID/CAR]** USAID/Central Asia Regional will review future awards to ensure that C-TIP guidance is incorporated. During the Mission's Mid-course stocktaking meeting of its Regional Development Cooperation Strategy with regional implementing partners in May 2023, the Mission agreed to add C-TIP as a cross-cutting issue. This is in addition to its place within one development objective intermediate result. C-TIP requirements will also be discussed during the Mission's fall implementing partners meeting. USAID/CAR will also review and update its design mission order to ensure guidance on C-TIP integration is included.

- **Target Completion Dates:** 4/30/2024

**Recommendation 4:** That the Bureau for Asia coordinate with USAID/Regional Development Mission for Asia, USAID/Central Asia Regional, and USAID/Philippines, Pacific Islands, and Mongolia to review and revise each mission's mission orders to incorporate guidance on designating C-TIP Coordinators, assigning responsibilities, and using C-TIP Coordinators. As part of this review, each mission should (1) designate C-TIP Coordinator(s) in its mission orders and (2) insert C-TIP Coordinator responsibilities into the position descriptions and annual work objectives for designated C-TIP Coordinators.

- **Management Comments:** The Bureau for Asia agrees with the recommendation.

**[USAID/RDMA]** USAID agrees with the recommendation. USAID/RDMA has identified a C-TIP Coordinator and added these responsibilities to their annual work objectives. USAID/RDMA will develop a mission order around implementing the C-TIP policy, including designation of a C-TIP Coordinator and detailing their responsibilities.

**[USAID/PHILIPPINES, Pacific Islands and Mongolia]** USAID agrees with the recommendation. PPIM has designated a C-TIP Coordinator and added the responsibilities to their annual work objectives. On June 2, 2022, the Mission issued a

notice via email to announce the designation and the responsibilities. PPIM will develop a mission order on the implementation of C-TIP policy, including the designation and responsibilities of the C-TIP Coordinator. In the interim, the C-TIP Coordinator sent out a call to action via email dated February 21, 2023 on the use of the updated Counter-Trafficking in Persons Field Guide including a C-TIP Quick TIPs by ROAA and RLO.

**[USAID/CAR]** USAID/CAR has a C-TIP Coordinator in place, and nearly all C-TIP Coordinator responsibilities outlined by the DRG Center are included in the Position

Description. USAID/CAR will make sure that C-TIP Coordinator responsibilities are also explicitly incorporated into their annual work objectives each year. USAID/CAR will update the delegation of authority mission order with a designation of a C-TIP coordinator and detailing their responsibilities.

- **Target Completion Dates:** 03/31/2024

**Recommendation 5:** That the Bureau for Asia coordinate with USAID/Regional Development Mission for Asia, USAID/Central Asia Regional, and USAID/Philippines, Pacific Islands, and Mongolia to develop and implement an action plan to bring each mission's monitoring and enforcement practices for acquisition and assistance awards into compliance with trafficking in persons regulations, policies, and procedures.

- **Management Comments:** The Bureau for Asia agrees with the recommendation.

**[USAID/RDMA]** USAID/RDMA agrees with the recommendation. An action plan detailing standard operating procedures for AO/CO review of awards to ensure compliance and review of C-TIP policy and requirements with implementing partners and USAID staff, will be included in the USAID/RDMA mission order implementing C-TIP. To date, USAID/RDMA has conducted a comprehensive compliance review of all awards managed by ROAA in the region, including RDMA, Timor-Leste, and Laos. The ROAA team is implementing standard operating procedures to facilitate compliance in the areas identified as weaknesses, including (a) modifying all existing awards and including in all new contracts the annual certification as an explicit deliverable in Section F; (b) modifying all existing awards and including in all new assistance awards the annual certification as a required submission in the Plans and Reports section; (c) discussing C-TIP compliance during the post-award orientation, while emphasizing the need for tailored compliance plans, and documenting it in the meeting minutes. Between February 2023 and June 2023, ROAA also held capacity building sessions for the ROAA

team, the USAID/RDMA Implementing Partner community and USAID staff including Agreement/Contracting Officer's Representatives (A/CORs), and OAA professionals based in Southeast Asia, Pakistan, and Central Asia Republic via the ASEAN+ Acquisition & Assistance Innovation Lab. ROAA is planning a briefing for Implementing Partners working in Laos and Timor-Leste by July 15, 2023. ROAA will be sending noncompliance letters to implementing partners that are not in compliance with the applicable assistance or acquisition awards (i.e. failure to submit annual certification in previous years, lack of compliance plans posted on organizational websites, and/or lack of activity-specific compliance plans). Implementing Partners will have 10 business days to remedy the identified areas of noncompliance.

**[USAID/Philippines, Pacific Islands and Mongolia]** PPIM agrees with the recommendation. We are developing an action plan detailing standard operating procedures for AO/CO post-award briefings, review of existing awards, addressing awards, post awards, and partner non-compliance. PPIM/ROAA will also create a CTIP slide deck to present at initial design meetings.

**[USAID/CAR]** USAID/CA will review and update the Monitoring, Evaluation and Learning mission order and ensure it includes updates to site visit guidance to include application of C-TIP integration. An action plan detailing standard operating procedures for AO/CO review of awards to ensure compliance and review of C-TIP policy and requirements with implementing partners and USAID staff, will be included in the USAID/CA mission order implementing C-TIP. To date, USAID/OAA has conducted a comprehensive compliance review of all awards managed by ROAA in the region, including USAID/CA, Tajikistan, Uzbekistan, and Kyrgyz Republic. The ROAA team is implementing standard operating procedures to facilitate compliance in the areas identified as weaknesses, including (a) maintaining a database of all awards, with the cognizant A&A Specialist ensuring the C-TIP requirement is included (and initiating modification if it is not) and whether or not the IP has submitted the required compliance plan—IPs that have not submitted the plan will be required directly to do so by the CO/AO, and (b) discussing C-TIP compliance as part of our PowerPoint presentations during the post-award orientation, while emphasizing the need for tailored compliance plans, documenting it in the meeting minutes, and providing IPs with slides.

- **Target Completion Dates: 5/31/2024**

In view of the above, we request that the OIG inform USAID when it agrees or disagrees with a recommendation's management comment (correct action plan).

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## Appendix D. Major Contributors to This Report

Members of the audit team include:

- Christine Byrne, Audit Director
- Rhonda Horried, Audit Assistant Director
- Christopher Walker, Lead Auditor
- Fawad Aslam, Auditor
- Rachel Holub, Auditor

The audit team would also like to acknowledge contributions from Lincoln Dada, Saifuddin Kalolwala, Esther Park, and Jesusa Tarun.



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