

Hungry for Change: Holding USDA McGovern-Dole Food for Education and Child Nutrition Program Accountable for Commitments to Monitoring and Evaluation

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Executive Summary:

The Food Assistance Division (FAD or ‘the Division’) of the US Department of Agriculture (USDA) is charged with a mandate to demonstrate accountability for achieving results and meeting the goals laid out by its Congressionally-supported McGovern-Dole Food for Education and Child Nutrition Program (MGD, ‘the Program’ or ‘McGovern-Dole) and Food for Progress Programs (FFPr). This mandate is grounded in the extensive findings of the lack of effectiveness of development assistance programs around the world. FAD is pursuing a combination of actions to meet these requirements including the establishment of a Results Oriented Management (ROM) system and the institutionalization of a Division-wide Monitoring and Evaluation (M&E) Policy. The extent to which these initiatives promise to deliver the changes necessary for responding to this mandate appear limited and feeble. Most important, the Division staff lacks the technical capacity to embrace and support these initiatives while at the same time certain aspects of the ROM process have served to undermine essential tenets of FAD programs. In order to effectively respond to the mandate for greater accountability and demonstration of program results, FAD needs to ensure that the logical frameworks reflect each of the underlying goals and tenets of the programs as well as commit to hiring new staff with competencies in program monitoring and evaluation who can take on the full responsibility of implementing the ROM system and M&E Policy.

Introduction:

In 2002, the Farm Securities and Rural Investment Act formally authorized the McGovern-Dole Food for Education and Child Nutrition Program. The Program is administered by the Food Assistance Division of the Office of Capacity Building and Development (OCBD) within the Foreign Agricultural Service (FAS) of the United States Department of Agriculture. The legislation of the McGovern-Dole Food for Education and Child Nutrition Program requires independent, third party, midterm and final evaluations of all programs, unless otherwise specified in a project agreement.¹ However, since 2002, the Program has operated in the absence of a monitoring and evaluation policy. Several external reviews of USDA food assistance programs have been conducted, out of which FAD has received strong criticism for its failure to effectively manage several aspects of its programs. The lack of a monitoring and evaluation policy, systems, and procedures lies at the base of these criticisms.

Seeking to address these criticisms, in 2009 FAD began a process to develop and institute a comprehensive Results Oriented Management (ROM) System to support the achievement of Division and Agency-wide program goals. FAD has recently taken steps to devise an M&E Policy to guide the establishment of the ROM system and institute robust monitoring and evaluation of all programs managed under the Division. The M&E Policy was launched in June 2011 at the International Food Aid and Development Conference (IFAD) in Kansas City, Missouri. It sets forth an extremely ambitious agenda for FAD to institutionalize a ROM system and requires all

¹ CFR Part 1499.13 and 7 CFR Part 1599.13 available from:
<http://www.fas.usda.gov/info/fr/2009/032609McGovDole.asp>.

implementing partners to conduct midterm and final evaluations of programs using the most rigorous evaluation methodology possible, with a focus on impact evaluation.

Background:

The last twenty years have witnessed the advancement of program evaluation into a professionalized field of study, policy and practice as the need for accountability and learning within the international development field has gained greater attention. The evolution of this discipline is built upon a significant effort to understand, effectively respond to, and ultimately resolve the direct, short-term and underpinning, long-term, causes of poverty and protracted underdevelopment. As a result, the field of program evaluation has rapidly expanded with the development of numerous frameworks, strategies and more recently policies designed to assist donors and implementing organizations seeking to launch effective development programs.

The expansion of international development assistance over the last decade² combined with increased scrutiny on the use of United States Government (USG) funds for international development has raised awareness of the need to better understand if and how programs impact the problems they seek to alleviate. The Organization for Economic Cooperation and Development's Development Assistance Committee (OECD DAC) has conducted a series of assessments on aid effectiveness and the progress of member countries on implementing the Paris Declaration and the Accra Agenda For Action.³ DAC surveys of aid effectiveness from 2006, 2008 and 2011 reveal not only a significant dearth of effective programming, but also several decisive failures. Findings from these surveys as well as other evaluations of

² http://stats.oecd.org/Index.aspx?DatasetCode=ODA_DONOR

³ http://www.oecd.org/document/44/0,3746,en_2649_3236398_43385196_1_1_1_1,00.html

development assistance have helped to catalyze an appeal to develop and implement more effective development strategies and interventions as well as to determine how best to measure the results of development programs.

Since the early 1990's, numerous strategic reviews and meta-evaluations of programs have been conducted in attempting to understand program outcomes, discern a role for evaluation in this field, and improve the effectiveness of development aid. This process has helped to refine thinking on how best to design and implement development programs, stressing the need to place greater attention on understanding the underlying dynamics of the operational context and linking these dynamics directly to the planning and design of the intervention. Simultaneously, the reviews⁴ have shown that program evaluation must also be linked to the core aspects of pre-program design such as the needs analysis, baseline assessment, logical framework and program indicators.

The strong focus on evaluation in international development aid has spurred the advancement of specific tools and methodologies that are intended to facilitate the evaluation of development programs. Despite the heightened attention placed on improving the evaluation of development programs, the literature⁵ still draws attention to a critical gap in the capacity of organizations to effectively monitor and evaluate their programs.

In response to growing international attention to the importance of monitoring and evaluating development assistance, the U.S. Government Accountability Office (GAO) conducted

⁴ Diana Chigas and Peter Woodrow. *Demystifying Impacts in Evaluation Practice*. "New Routes" Vol. 13, March, 2008.

⁵ For example see: "When Will We Ever Learn? Improving Lives Through Impact Evaluation". The Center for Global Development. Report of the Evaluation Gap Working Group. May, 2006.

assessments of the effectiveness and efficiency of USG food assistance programs in 2007 and again in 2011.⁶ These reports strongly noted the need for improvements in monitoring and evaluating USDA's food assistance programs. In response to these reports and previous reports conducted by GAO and the USDA Office of the Inspector General (OIG), FAS established a Monitoring and Evaluation Unit within OCBD in FY 2007. The Monitoring and Evaluation Unit (M&ES) is responsible for managing and providing technical assistance in performance management and evaluation of OCBD programs, including food assistance programs. The FAD Monitoring and Evaluation Policy also seeks to address the findings and criticisms from these external reviews.

In theory, FAD's Monitoring and Evaluation Policy should improve management and program implementation because it requires actions that are designed to strengthen program accountability and transparency, encourage appropriate and effective programming, and support organizational management and learning. In practice, FAD management and staff are faced with a substantial lack of capacity to undertake the full set of measures that are critical for implementing a Results Oriented Management system and upholding the standards and practices laid out in the FAD Monitoring and Evaluation Policy.

Statement of current policy:

The FAD Monitoring and Evaluation Policy presents the Division's commitment to accountability - requiring that programs are implemented in compliance with rules and standards and accurately reported against performance goals, and to learning. It also requires that evaluation

⁶ For more information see: <http://www.gao.gov/new.items/d07560.pdf> and <http://www.gao.gov/new.items/d11491.pdf>.

findings be used to inform changes in the design and implementation of programs and program management.

The purpose of the Monitoring and Evaluation Policy is to institutionalize Results Oriented Management into the programs administered by OCBD, in particular the McGovern-Dole International Food for Education and Child Nutrition and the Food for Progress Programs managed by the Food Assistance Division. The M&E Policy aims to guide the integration and implementation of monitoring and evaluation systems and processes into FAD programs and serves to inform USDA staff and program stakeholders of its expectations regarding program monitoring and evaluation. The M&E Policy outlines the purpose of monitoring and evaluation, the range of methods used to monitor and evaluate programs, the roles and responsibilities of FAD staff, implementing partners, and other key stakeholders, and the ways in which monitoring and evaluation information will be used and disseminated to inform decisions regarding program management and implementation.

Results Oriented Management focuses on higher-level program results such as outcomes and impact, while also monitoring program activities, inputs and outputs. For example, FAD program outcomes and impacts can include improved food security and nutritional status of program beneficiaries, increased school enrollment and attendance, and improved educational performance. ROM promotes management decision-making at a more strategic level than can be achieved through tracking activities, collecting anecdotes and documenting individual success stories. ROM can help to improve internal and external program coordination and to ensure that funds are allocated to programs that achieve results and have the greatest impact.

To this end, FAD's ROM System is integrated into key management structures and processes within the Division, including strategic planning, performance and accountability reporting, policy formulation, project management, financial and budget management and human resource management.

Reasons for suggested changes:

In 2007, and again in 2011, the U.S. Government Accountability Office (GAO) conducted assessments of the effectiveness and efficiency of USG food assistance programs, among which the McGovern-Dole Food for Education and Child Nutrition program was strongly criticized for failing to meet basic requirements for program monitoring and evaluation.⁷ At the most basic level, criticism targeted the absence of policies and procedures for results monitoring and program evaluation and the deficiency in oversight of food aid programs in the field. Specific accounts of limitations within the agency include the absence of reporting requirements for implementing partners, a lack of analysis of program reports and the failure of USDA analysts to provide implementing partners with feedback on programs, the failure of USDA analysts and Foreign Service Officers to conduct systematic and useful site visits to monitor programs, and the absence of impact evaluations of completed MGD Programs.

Internal observation and experience working with the McGovern-Dole Food for Education and Child Nutrition Program reveals several additional weaknesses in program monitoring and

⁷ USGAO. "Various Challenges Limit the Effectiveness and Efficiency of US Food Aid." May, 2007 and "USDA's Oversight of the McGovern-Dole Food For Education Program Needs Improvement." May, 2011.

evaluation as well as structural inadequacies within the Division that, if not addressed, will lead to certain failure to implement and uphold the new FAD Monitoring and Evaluation Policy.

- Implementation of the Results Oriented Management system has taken a prohibitively narrow focus on the development of program logical frameworks and indicators. This singular focus on frameworks and indicators has led to a significant divergence away from critical, underlying program goals of McGovern-Dole, including improved food security and nutrition. These goals are more difficult to capture using McGovern-Dole's program theory and causal logic of school-based meals and take-home rations and therefore have been almost entirely removed from the logical frameworks that guide the programs. The simplification of the logical frameworks reflects a broader failure to bring about a comprehensive shift in the Division necessary to fully implement a Results Oriented Management system. In light of FAD's lack of existing capacity to support the ROM system and M&E Policy, changes in the roles, responsibilities and competencies of management and staff are fundamental.
- On the opposite extreme, the Monitoring and Evaluation Policy sets forth an unrealistically large and overly optimistic agenda that the Division is presently unequipped to fulfill. The Division is not prepared to undertake the responsibilities laid out in the new Monitoring and Evaluation Policy as it does not have sufficient staff with the time and skills required or the financial resources to hire additional staff given current budgets. To this end, the Division will remain unable to improve the effectiveness of food aid programs to alleviate hunger and will fail to properly direct limited USG food aid resources to those populations most in need.

- In response to the reports conducted by GAO and the USDA Office of the Inspector General, FAS established a Monitoring and Evaluation Unit (M&ES) within the Office of Capacity Building and Development in 2007. M&ES is responsible for providing technical assistance in performance management and evaluation of OCBD programs. However, the 2011 GAO report criticize M&ES for its predominant focus on program closeout and lack of attention to the monitoring and evaluation of MGD programs. Internal observation and experience working with M&ES exposes significant challenges to their ability to carry out their mandate. Most important, M&ES does not have a clear mandate regarding the extent to which it must provide M&E support to FAD. The primary focus of its work is to support the evaluation of USDA programs in Pakistan and Afghanistan, and the current policy does not help to clarify the roles and responsibilities of M&ES, in relation to and as distinct from FAD staff, with regard to supporting the FAD Monitoring and Evaluation Policy.
- The *Government Performance and Results Act* (GPRA) passed in 1993 and the subsequent *GPRA Modernization Act* passed in January 2011 require agencies to develop and regularly report on Agency goals and objectives, including outcome oriented goals, performance indicators, targets and their links to U.S. Government priorities.⁸ In order to meet the requirements laid out in these pieces of legislation, FAD must fully commit to integrating the ROM system and the FAD M&E Policy into FAD programs. To this extent, commitment involves informing USDA staff and stakeholders of FAD's expectations regarding program monitoring and evaluation, the purpose of

⁸ For more information see: <http://www.gpo.gov/fdsys/pkg/BILLS-111hr2142enr/pdf/BILLS-111hr2142enr.pdf>.

monitoring and evaluation, the range of methods used to monitor and evaluate programs, the roles and responsibilities of USDA staff, program participants, and other key stakeholders, and the ways in which monitoring and evaluation information will be used and disseminated to inform decisions regarding program management and implementation. As explained above, the policy serves these purposes as written, but is not yet being fully implemented as part of FAD programs.

Policy options to be considered:

- FAD should commit to fully implementing the range of processes and structures that are critical to supporting a Results Oriented Management system. To this end, FAD should develop a policy implementation plan detailing when and how each member of the Division will make internal changes to support the new policy.
- FAD should also transition away from working within a program analyst framework in which FAD staff focus almost exclusively on proposal review, agreement negotiation and commodity management, and towards working within a program management framework in which FAD staff oversee and are involved with programs beyond the agreement stage, through the implementation stage and ending in the closeout and evaluation stage. FAD should make certain that all staff members are well equipped with technical skills and overseas experience working on food aid, international development, program management and monitoring and evaluation in order sufficiently manage all stages of the international development program cycle.

- To ensure that the Results Oriented Management system takes into consideration and supports each of the McGovern-Dole Program goals, including nutrition, FAD should reconfigure the program logical frameworks to include activities, intermediate results and outcomes that focus on improved food security, nutrition and cognitive function in addition to the educational outcomes that presently dominate the logical model of the McGovern-Dole Program.
- To make sure that the Monitoring and Evaluation Policy is not only properly implemented, but also properly maintained, FAD should invest in regular training for staff members on how to apply monitoring and evaluation processes and tools to adjust program plans and maximize program results in the management of McGovern-Dole Programs.
- To ensure that M&ES plays a helpful and supporting role in the deployment of the ROM system and the monitoring and evaluation of FAD programs, it is essential that a mandate with clearly defined roles and responsibilities is established to guide the work of M&ES.