



SIGAR

Office of the Special Inspector General
for Afghanistan Reconstruction

July 25, 2016

The Honorable John F. Kerry
Secretary of State

The Honorable Gayle E. Smith
Administrator, U.S. Agency for International Development

The Honorable Anne C. Richard
Assistant Secretary of State
Bureau of Population, Refugees, and Migration

The Honorable P. Michael McKinley
U.S. Ambassador to Afghanistan

I am writing to share our observations on U.S. and Afghan government efforts to assist internally displaced persons (IDP) in Afghanistan. We compiled this information as part of our audit work examining issues related to Afghan IDPs, refugees living in Iran and Pakistan, and returnees in Afghanistan.¹

In August 2015, we issued a report on Afghan refugees and returnees.² We found that the United Nations High Commissioner for Refugees (UNHCR) and the Department of State (State) could not independently verify the number of Afghan refugees reported by the Iranian and Pakistani governments. We also found that despite international assistance, the Afghan government had made only limited progress in implementing the *Solutions Strategy for Afghan Refugees, to Support Voluntary Repatriation, Sustainable Reintegration and Assistance to Host Countries (Solutions Strategy)*.³ This was because the Afghan Ministry of Refugees and Repatriation (MORR)—the ministry responsible for coordinating refugee and returnee affairs with other ministries and international organizations, and addressing the problem of internal displacement—has limited capacity to fulfill its obligations under the *Solutions Strategy* or to work with other ministries, and had been beset by allegations of corruption. In that report, we recommended that the Assistant Secretary of State, Bureau of Population, Refugees, and Migration (PRM) monitor the Afghan administration's efforts to increase capacity and reduce corruption within the MORR. Should State determine that the MORR has made the necessary progress and that future U.S. assistance to the ministry is warranted, we recommended that such assistance include working with (a) the MORR, in coordination with UNHCR and other implementing partners, to conduct an assessment that identifies the needs and challenges of returnees and develop a timeframe to address those needs and

¹ The 1951 Convention Relating to the Status of Refugees, as modified by the 1967 Protocol Relating to the Status of Refugees, defines a refugee as someone who, "owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his or her nationality and is unable to or, owing to such fear, is unwilling to avail himself or herself of the protection of that country. . . ." The United Nations High Commissioner for Refugees defines returnees as refugees who have returned to their country of origin, and internally displaced persons as people who have been forced to leave their homes or places of habitual residence, in particular as a result of or in order to avoid, the effects of armed conflict, situations of generalized violence, violations of human rights or natural- or human-made disasters, but who have not crossed an international border.

² SIGAR, *Afghan Refugees and Returnees: Corruption and Lack of Afghan Ministerial Capacity Have Prevented Implementation of a Long-term Refugee Strategy*, SIGAR 15-83-AR, August 21, 2015.

³ The governments of Afghanistan, Iran, and Pakistan developed the *Solutions Strategy* in May 2012 to address the problems that Afghan refugees and returnees face. In it, they agreed to work toward providing a minimum standard of living and livelihood opportunities for returnees, and preserving asylum space for refugees.

challenges, as called for in the Solutions Strategy; (b) the Afghan administration to ensure that other ministries incorporate the returnee needs the MORR identifies into Afghanistan's national development priorities; and (c) the Afghan administration to hold the MORR, and other relevant ministries, accountable for implementing the Land Allocation Scheme, as required by Afghan law and presidential decree.⁴

The objectives of this review were similar to our prior audit on Afghan refugees and returnees, but specifically focused on assessing the extent to which (1) the Afghan government has implemented its *National Policy on Internally Displaced Persons*, and (2) the U.S. Agency for International Development (USAID) and State-funded non-governmental organizations (NGO) and international organizations coordinate and share information on IDP assistance.

In summary, we found that resistance from some Afghan provincial governments and limitations within key ministries have delayed support for IDPs and limited the full implementation of the Afghan government's IDP policy. We also found that NGOs and international organizations funded by USAID and State did not fully coordinate their efforts. Fully implementing the recommendation in our August 2015 audit report would help address some of the issues we identified with the MORR and other ministries responsible for managing IDP issues.

Background

According to the Internal Displaced Monitoring Centre (IDMC)—an independent NGO that is part of the Norwegian Refugee Council—Afghanistan's history of displacement by conflict dates back to the late 1970s.⁵ During the war between the Soviet-backed government and mujahideen opposition fighters, and the subsequent Soviet invasion and occupation, up to 5 million people were forced to flee the country. After the communist government fell in 1992, civil war between mujahideen factions broke out along ethnic lines, and by the mid-1990s more than 400,000 IDPs were living in camps near Herat, Jalalabad, and Mazar-i-Sharif. Following the Taliban's rise to power in 1996, approximately 1 million more people were displaced by conflict between the Taliban and the Northern Alliance.⁶

The U.S.-led intervention in Afghanistan led to more large-scale internal displacement, which reached its peak in 2002 at 1.2 million people. Because of the reduced conflict and violence in the immediate aftermath of the intervention, the number of IDPs in Afghanistan fell to a total of approximately 130,000 by 2006. Since then, due to continuous and escalating conflict, the number of Afghan IDPs increased to more than 230,000 in 2008 and reached an estimated total of 650,000 in 2013. According to IDMC, as of June 2015, at least 948,000 people were displaced as a result of conflict and violence. That figure includes around 103,000

⁴ As we previously reported, the Land Allocation Scheme is an Afghan law established in 2005 to provide land to returning refugees. In commenting on a draft of this letter, State noted that "in fiscal year 2015, PRM funded a project implemented by the International Organization for Migration (IOM) seeking to support the Ministry of Refugees and Repatriation (MORR) to best assess the needs and challenges of returnees and effectively communicate returnees' needs with relevant line ministries." State went on to say that this "two-year project aims to increase the technical capacity of the MORR in returnee information management and coordinate a reintegration referral mechanism." According to State, the project "is in the last few months of its first year," and "quarterly reports and updates from IOM indicate that the project is on schedule and meeting its objectives." In addition, "IOM reports that the MORR has been fully engaged in the implementation of the project."

⁵ Norwegian Refugee Council, IDMC, *Afghanistan: New and long-term IDPs risk becoming neglected as conflict intensifies*, July 16, 2015.

⁶ According to IDMC, the Northern Alliance was made up of former mujahideen fighters from the Tajik, Uzbek, and other ethnic groups.

people newly displaced in the first 6 months of 2015, among them more than 36,600 individuals who were displaced in Kunduz province since April 2015 due to increased insurgency.⁷

In addition to violent conflict, repeated natural disasters, such as landslides, earthquakes, and severe droughts, have displaced thousands of Afghans.⁸ For example, in 2011, the International Organization for Migration (IOM) stated that more than 40,000 Afghans were displaced as a result of severe drought in 14 provinces. In 2013, it estimated that more than 9,000 people (or about 1,600 families) were displaced by natural disasters. According to IDMC, more than 13,300 people were forced to flee their homes in 2014 as a result of disasters triggered by landslides, flash floods, and avalanches in northern and central provinces.

U.S. Government Assistance to IDPs

The U.S. government provides humanitarian assistance to both conflict- and disaster-induced IDPs in Afghanistan primarily through programs funded by USAID and State. USAID's Office of Foreign Disaster Assistance (OFDA) serves as the U.S. government's lead coordinator on internal displacement issues. According to USAID data, between 2010 and 2014, the agency provided more than \$67 million to 16 implementing partners to provide humanitarian assistance to IDPs in Afghanistan. Most of this assistance is used to provide IDPs with logistics support and relief supplies, such as emergency shelter, hygiene kits, and winter clothing, while the rest is spent on improving humanitarian assistance coordination and information management; providing access to health care; strengthening risk management policy and practice; providing access to water, sanitation, and hygiene; and enhancing nutrition.

One USAID program is the Afghanistan Rapid Humanitarian Assistance Program, which is implemented by IOM and is intended to pre-position, mobilize, and distribute nonfood items and shelter supplies throughout the country. Another program, Building a Culture of Resilience in Afghanistan's Provinces, is implemented by Save the Children; it aims to strengthen the capacity of communities, local NGOs, and relevant government ministries at the provincial and district levels in eight provinces to better protect children from psychosocial shocks and build resiliency after disasters.

State, through PRM, provides contributions and grants to international organizations—such as UNHCR, IOM, and the International Committee of the Red Cross—and NGOs—such as Save the Children and Tearfund—that assist vulnerable populations, which include IDPs.⁹ According to State, between 2010 and 2014, the department provided more than \$325 million to these organizations for humanitarian assistance in Afghanistan. This includes \$191.5 million provided to UNHCR, \$63 million to the International Committee of the Red Cross, and more than \$71 million to other NGOs providing humanitarian assistance in Afghanistan.¹⁰

State's programs focus on improving education or infrastructure; providing vocational training and business development linked to job opportunities; and supporting extremely vulnerable people by, for example, seeking to respond to and prevent gender-based violence. One program, Livelihood and Protection Activities in Kabul and Nangarhar, was established to improve conditions for the sustainable reintegration of IDPs through

⁷ According to IDMC, because return options are limited by the ongoing conflict, conflict-induced IDPs tend to be displaced for a longer time.

⁸ Disaster-induced IDPs generally are displaced for shorter periods of time and remain closer to where they came from than conflict-induced IDPs.

⁹ State's funding does not target IDPs specifically, but rather focuses on vulnerable populations, such as individuals affected by conflict, which could include IDPs. We could not identify how much of State's funding went specifically to IDP programs.

¹⁰ State awarded \$40 million of the \$71 million to 12 implementing partners. The remaining \$31 million was awarded to various NGOs, and each award was less than \$1 million.

livelihood programs, support counseling to prevent and aid victims of gender-based violence, and provide legal aid.¹¹

The Afghan Government's Approach toward IDPs

According to UNHCR, historically the Afghan government's solution to crises resulting in large numbers of IDPs was to return the displaced people to their homes. However, those homes were often inhospitable, located in remote districts near areas of ongoing conflict, and had little access to any humanitarian assistance. As a result, many displaced people moved again, thus experiencing a second displacement.¹² In a 2008 report, UNHCR wrote that 20 to 30 percent of returning IDPs experienced secondary displacement.

A separate report by the Norwegian Refugee Council estimated that approximately 40 percent of IDPs move from rural areas to major cities in search of better living conditions.¹³ When they arrive in the cities, the IDPs often have difficulty finding jobs, lack rights to the land they live on, and live under constant threat of eviction. In addition, these urban areas and informal settlements generally lack basic services, such as sanitation, water, health care, and schools, making the IDPs vulnerable to disasters and harsh weather. For example, during the winter of 2011, more than 100 IDPs—some of them children—died in Kabul as a result of the harsh weather.

In response to this situation, in early 2012, the Afghan president directed the MORR to develop a comprehensive national policy to address the IDP situation in Afghanistan. The MORR's responsibilities are to (1) act as the institutional focal point and provider of last resort in all matters related to internal displacement at the national level; (2) develop an implementation plan for the national policy; and (3) coordinate the implementation of the policy with other ministries, provincial and municipal governments, IDPs, communities affected by displacement, civil society, the United Nations (UN), other international organizations, and donor countries.

In accordance with the president's directive, the MORR produced the *National Policy on Internally Displaced Persons*, which outlines the responsibilities of national and provincial governments.¹⁴ The policy's objectives include:

- Ensuring that approaches to internal displacement respect, protect, and fulfill the rights of IDPs throughout the displacement process;
- Addressing the emergency needs and concerns of both IDPs and communities affected by displacement;
- Addressing the longer-term needs of IDPs for economic and livelihood opportunities; and
- Identifying and promoting efforts to prevent or reduce, and manage new internal displacement.

The Afghan government enacted the policy in November 2013.

Coordination of IDP Assistance in Afghanistan

Coordination is a central component of both USAID's *Assistance to Internally Displaced Persons Policy* and State PRM's humanitarian assistance guidance. The former states, "USAID will coordinate financial and staff

¹¹ The livelihood programs aimed to train 700 beneficiaries in vocational skills, place 100 beneficiaries directly into work assignments or paid apprenticeships, and provide 100 financial grants as start-up capital to fund small enterprise groups.

¹² UNHCR, *National Profile of Internally Displaced Persons (IDPs) in Afghanistan*, adopted on November 10, 2008.

¹³ Norwegian Refugee Council, IDMC, *Afghanistan: As Humanitarian space shrinks, IDP policy must be implemented*, June 19, 2014.

¹⁴ MORR, *National Policy on Internally Displaced Persons*, November 25, 2013.

resources to ensure that bureaus, missions, other U.S. government agencies, and other partners work together with a unified strategic plan to achieve clearly stated strategic objectives that offer post conflict societies the best possible opportunity to overcome serious harm suffered.”¹⁵ PRM’s guidance states that the bureau places a high priority on coordination and collaboration in project design and implementation.¹⁶ In their proposals submitted to the bureau, NGOs must demonstrate the extent to which they coordinate and cooperate with the national and local governments of the host country; UN agencies, especially UNHCR; relevant international organizations; other U.S. government agencies; other donor countries; and other NGOs. Projects also must target the critical gaps in assistance identified and agreed upon through this coordination effort.

Donor organizations and their implementing partners in Afghanistan can coordinate their efforts through various formal channels. These include:

- UN Office for the Coordination of Humanitarian Affairs (UNOCHA) headquarters: UNOCHA holds regular donor briefings on Afghanistan approximately every 3 to 5 months. These briefings serve as the main forum for formal coordination among multiple donors, during which UNOCHA provides information on its efforts in Afghanistan and receives feedback. UNOCHA uses its Financial Tracking Service to track financial expenditures for humanitarian efforts across the world. Both donors and recipients provide the data to UNOCHA, which then compares the data information to get a more accurate understanding of what is occurring at any given time. Donors generally provide their data when they commit funding, while recipients provide data once they have spent the funds.
- UNOCHA Kabul: UNOCHA’s office in Kabul is responsible for developing the *Common Humanitarian Action Plan*, which requires the office to collect data from humanitarian organizations and prioritize humanitarian action. UNOCHA Kabul also produces 3W (“Who, What, Where”) reports that show the geographic distribution of humanitarian organizations and what they do.
- UN Cluster System: The main mechanism for coordinating and sharing information among the various entities that provide IDP assistance is the UN cluster system. The UN creates the clusters when (1) clear humanitarian needs exist within a sector, such as emergency needs for shelter and health services; (2) there are numerous entities working within the sector; and (3) national authorities need coordination support. In Afghanistan, the cluster system has been active since August 2008. It brings together the Afghan government and civil society, donor countries such as the United States, international organizations, and NGOs. There are eight clusters operating, along with two sub-clusters, one working group, and a communications network.¹⁷

Cluster meetings occur monthly and are organized by the respective cluster leads, which also are responsible for information management within their clusters. During the meetings, cluster members aim to strategize and coordinate humanitarian activities within the cluster, and share information on any operational challenges they may be facing in accomplishing their missions. Some clusters have established working groups at the field levels. The clusters work together through the inter-cluster meetings, having representatives participate in meetings held by other clusters, and holding bilateral discussions concerning individual projects and issues.

¹⁵ USAID, *USAID Assistance to Internally Displaced Persons Policy*, October 2004.

¹⁶ State PRM, *General NGO Guidelines for Overseas Assistance*, updated January 14, 2014, <http://www.state.gov/j/prm/releases/factsheets/2014/219758.htm>.

¹⁷ The eight clusters are: (1) Education, (2) Emergency Shelter and Non-Food Items, (3) Emergency Telecoms, (4) Food Security and Agriculture, (5) Health, (6) Nutrition, (7) Protection, and (8) Water, Sanitation and Hygiene. The two sub-clusters are Child Protection in Emergencies and Gender-Based Violence. There is also the Logistics Working Group and an Early Recovery Network.

- **Humanitarian Country Team:** The humanitarian country team is composed of heads of the UN's humanitarian agencies and international NGOs, with observers from donor countries, the International Committee of the Red Cross, and the UN Resident Coordinator's Office. The team is chaired by the UN humanitarian coordinator and meets monthly. It focuses on humanitarian strategy, decision-making, and policy direction in Afghanistan.
- **Humanitarian Regional Teams:** At the regional level, humanitarian coordination is done through a number of mechanisms that include humanitarian regional teams, clusters, and technical working groups. The humanitarian coordination mechanisms at the regional level are determined largely by the existing capacities and coordination needs of participating organizations.
- **Provincial Disaster Management Committee:** The Afghanistan Natural Disaster Management Authority (ANDMA) manages provincial disaster management committees under various secretariats that coordinate and implement the national policies and plans at the provincial level. Provincial governors chair these committees.

Resistance from Some Provincial Governments and Limitations within Key Afghan Ministries Have Delayed Support for IDPs and Limited Full Implementation of National IDP Policy

The Afghan government has not fully implemented its national IDP policy because of resistance from provincial governments to supporting IDPs and limitations within key ministries. The IDP policy requires provincial governments to take action to assess and provide for the needs of IDPs in their provinces. However, some provincial governments have rejected this requirement. For example, according to State, some provincial governments have not accepted that IDPs have a right to stay in their provinces and were more inclined to regard the IDPs as economic migrants who do not have the same rights, such as the right to food, water, adequate shelter, and health care, as other Afghans. Furthermore, according to a Norwegian Refugee Council report, the some provincial governments generally insisted that settlements established to house the IDPs were only temporary and demolished them.¹⁸ In some cases, this was done to make room for urban development and infrastructure projects, such as building public housing, roads, government offices, parks, and private housing developments.

Delays in implementing actions required by the national IDP policy, corruption, and lack of internal capacity within the Afghan ministries— particularly the MORR—also affected the government's implementation of the policy. In our August 2015 report on assistance to Afghan refugees and returnees, we found that the MORR, which is responsible for managing land distribution under the Land Allocation Scheme—a central aspect of the policy—has been slow to distribute land to applicants, including IDPs.¹⁹ The Independent Joint Anti-Corruption Monitoring and Evaluation Committee (MEC) reported that as of October 2013, 54,782 plots had been distributed to 500,000 families who applied. This represented only about 11 percent of total applicants. The MEC found that the process of distributing land under the scheme was afflicted by “complicated and meaningless bureaucracy” and that applicants were obligated to go through no fewer than 63 administrative steps to obtain a plot of land.²⁰

Lack of capacity within the MORR also undermined its relationships with other Afghan ministries that are responsible for implementing the national policy and assisting IDPs. According to the policy, the MORR is required to coordinate with ANDMA. ANDMA is responsible for managing the Afghan government's response to natural disasters during the first 72 hours of an event, and the MORR is responsible for managing the

¹⁸ Norwegian Refugee Council, IDMC, *Still At Risk: Security of tenure and forced eviction of IDPs and refugee returnees in urban Afghanistan*, February 2014.

¹⁹ SIGAR, *Afghan Refugees and Returnees*, SIGAR 15-83-AR, August 21, 2015.

²⁰ Independent Joint Anti-Corruption Monitoring and Evaluation Committee, *VCA Report on the Process of Land Distribution for Repatriations and Displaced People*, October 2013.

response afterward. However, according to ANDMA officials, the MORR did not have the budget and lacked proper planning and procedures to manage such responses. The officials told us that, as a result of these things, ANDMA strained its resources providing prolonged services for IDPs that normally would be the MORR's responsibility. Similarly, State officials told us that as a result of the MORR's history of not producing required expenditure reports, the Afghan Ministry of Finance is reluctant to release additional funds for MORR projects.

Some of the other ministries tasked with assisting IDPs also have capacity limitations that have prevented implementation of the national IDP policy. For example, ANDMA does not have the necessary technical and budgetary resources to implement disaster preparedness and management measures, such as contingency planning, disaster risk reduction intervention, and development of early warning systems—all of which are called for in the policy. Additionally, a June 2014 internal report on the Ministry of Rural Rehabilitation and Development—a ministry tasked with developing a disaster management strategy required by the IDP policy—noted several shortcomings, including a lack of coordination and communication between national and local levels of government; poor human capital in remote or insecure districts, as well as struggles in these locations to attract and retain capable staff; inadequate knowledge management and research for effective emergency preparedness and response programming; and funding gaps.

According to State, the Afghan national unity government has expressed its commitment to addressing IDP needs and dealing with capacity and corruption issues within the MORR, but it is too soon to tell how effective it will be.

NGOs and International Organizations Funded by USAID and State Did Not Fully Coordinate Their Efforts

We also found that, despite the emphasis on coordination in both USAID's and State's humanitarian assistance guidance, and the availability of various mechanisms to coordinate IDP assistance efforts, USAID- and State-funded NGOs and international organizations did not fully coordinate their efforts to assist Afghan IDPs.²¹ Neither agency required the NGOs or international organizations to coordinate their IDP efforts in all sectors—for example, education, food security and agriculture, health, and nutrition—with each other, UN agencies, or the Afghan government. For example, USAID officials told us the agency's implementing partners participate, as appropriate, in various coordination mechanisms, such as the monthly Humanitarian Country Team meetings led by UNOCHA, and provincial disaster management committees managed by ANDMA and chaired by provincial governors. However, their coordination with each other or with other humanitarian organizations is inconsistent and not specifically required in their agreements with USAID.

Further, the level of coordination between USAID- and State-funded NGOs and international organizations implementing IDP assistance efforts varies. Based on responses we gathered through questionnaires and interviews with 15 of the agencies' implementing partners, we determined that some shared the raw data they collect,²² while others only shared their summary-level information. Even when implementing partners did share some of the information they collected, the process was often based on personal relationships between officials, and the amount of information shared varied.

Officials from a number of organizations we interviewed reported that at the operational level, they used their personal relationships to facilitate rapid responses to crises. However, because of frequent personnel turnover within NGOs, international organizations, and donor countries operating in Afghanistan, coordination that relies on personal relationships may result in a lack of coordination between USAID and State implementing partners operating in the same sectors. According to USAID and State officials in Washington, D.C., their primary reason for not requiring the NGOs and international organizations they fund to coordinate their IDP assistance efforts

²¹ See *USAID Assistance to Internally Displaced Persons Policy* and PRM's *General NGO Guidelines for Overseas Assistance*.

²² Examples of the information collected include the number of IDPs assisted, the type of assistance provided, and the locations of the assistance.

is to ensure that those organizations can focus on their humanitarian work, rather than attending coordination meetings.

In commenting on a draft of this letter, both USAID and State reiterated their commitment to improving coordination and information sharing in their efforts to assist Afghan IDPs by encouraging their implementing partners to participate in all relevant coordination bodies and share information to the greatest degree possible.

This work was conducted under the authority of Public Law No. 110-181, as amended, and the Inspector General Act of 1978, as amended. Please contact Ms. Gabriele Tonsil, Assistant Inspector General for Audits & Inspections, at [REDACTED], if you have any questions or concerns regarding this work.

Sincerely,



John F. Sopko
Special Inspector General
for Afghanistan Reconstruction

Enclosures:

- I. Objectives, Scope, and Methodology
- II. Comments from the Department of State
- III. Comments from the U.S. Agency for International Development

ENCLOSURE I: OBJECTIVES, SCOPE, AND METHODOLOGY

Previously, we reported on the results of our audit of U.S. efforts to assist Afghan refugees living in Iran and Pakistan and returnees in Afghanistan.²³ The objectives of this review were similar to the prior audit, but specifically focused on assessing the extent to which (1) the Afghan government has implemented its *National Policy on Internally Displaced Persons*, and (2) the U.S. Agency for International Development (USAID) and the Department of State (State)-funded non-governmental organizations (NGO) and international organizations coordinate and share information on IDP assistance. Our scope was U.S. assistance for Afghan IDPs provided from 2010 through September 2014, as well as data from 2001 through 2014 on conflict-induced IDPs and from 2008 through 2014 on disaster-induced IDPs.

To assess the extent to which the Afghan government has implemented the IDP policy, we analyzed that policy and other related Afghan government strategies, such as the *Afghanistan National Development Strategy*. We reviewed international organizations' strategies for providing IDP assistance in Afghanistan and prior reports and assessments of the IDP situation in Afghanistan. We also obtained data from the United Nations High Commissioner for Refugees (UNHCR) on conflict-induced Afghan IDPs from 2001 through 2014, and data from the International Organization for Migration (IOM) on disaster-induced IDPs from 2008 through 2014. In addition, we met with officials from USAID's Office of Foreign Disaster Assistance (OFDA), State's Bureau of Population, Refugees, and Migration (PRM), UNHCR, the United Nations Office for the Coordination of Humanitarian Affairs (UNOCHA), IOM, the Ministry of Rural Rehabilitation and Development, and the Afghanistan National Disaster Management Authority (ANDMA).

To assess the mechanisms in place for USAID- and State-funded NGOs to coordinate and share information on IDP assistance, we reviewed grants and contribution agreements for the USAID OFDA and the State PRM implementing partners that worked on humanitarian programs benefitting Afghan IDPs from 2010 through September 2014. We also reviewed USAID, State, Afghan government, and international organizations' plans, agreements, and other program documentation relevant to U.S.-funded IDP assistance programs in Afghanistan. We examined USAID's *Assistance to Internally Displaced Persons Policy* and State PRM's humanitarian assistance guidance.

Additionally, we created and sent a questionnaire to 11 implementing partners that had active USAID- or State-funded programs worth more than \$1 million in 2012, 2013, or both.²⁴ The questionnaire inquired about the way the organizations track their IDP assistance and the information management systems they used. We also interviewed officials from four other international organizations to obtain answers to the questions included in our questionnaire. We interviewed officials from OFDA; PRM; Afghan government entities, such as ANDMA and the Ministry of Rural Rehabilitation and Development; UNHCR; UNOCHA; and IOM in Kabul, Afghanistan, and Geneva, Switzerland, to discuss the different coordination and information sharing mechanisms used for IDP assistance in Afghanistan and the information management systems containing data on the assistance provided.

We did not use computer-processed data for the purpose of the objectives. With respect to internal controls, we reviewed USAID and State policies and guidance to determine the extent to which requirements exist for their implementing partners to coordinate their IDP efforts. The results of our analysis are presented in the letter.

²³ See SIGAR, *Afghan Refugees and Returnees: Corruption and Lack of Afghan Ministerial Capacity Have Prevented Implementation of a Long-term Refugee Strategy*, SIGAR 15-83-AR, August 21, 2015.

²⁴ Some implementing partners asked us not to name them in the report as they often operate in areas with an active insurgency, and their direct affiliation with the U.S. government could endanger their personnel.

This letter is based on audit work we conducted on U.S. efforts to assist Afghan refugees living in Iran and Pakistan, and returnees in Afghanistan.²⁵ We conducted this work in Kabul, Afghanistan; Geneva, Switzerland; and Washington, D.C., from March 2014 through July 2016, in accordance with generally accepted government auditing standards. Those standards and policies 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. SIGAR conducted this audit under the authority of Public Law No. 110-181, as amended and the Inspector General Act of 1978, as amended.

²⁵ See SIGAR, *Afghan Refugees and Returnees*, SIGAR 15-83-AR, August 21, 2015.

ENCLOSURE II: COMMENTS FROM THE DEPARTMENT OF STATE



United States Department of State

Washington, D.C. 20520

July 5, 2016

Gabriele A. Tonsil
Assistant Inspector General for Audits and Inspections
Special Inspector General for Afghanistan Reconstruction
1550 Crystal Drive Suite 900
Arlington, VA 22202

Re: SIGAR 15-83-AR Observation Letter

Dear Ms. Tonsil:

This letter conveys comments from the Bureau of Population, Refugees, and Migration (PRM) in response to SIGAR's draft observation letter on "Afghan Refugees and Returnees: Corruption and Lack of Afghan Ministerial Capacity Have Prevented Implementation of a Long-term Refugee Strategy."

Below please find responses to SIGAR's specific recommendation: *... we recommended that the Assistant Secretary of State, Bureau of Population, Refugees, and Migration (PRM) monitor the Afghan administration's efforts to increase capacity and reduce corruption within the MORR.*

PRM largely concurs with this recommendation and has been actively supporting the MORR. We assessed that the initial efforts that the Ministry of Refugees and Repatriation (MORR) and Minister Balkhi have made in tackling corruption would be best supported by increasing their technical capacity.

To that end, in fiscal year 2015, PRM funded a project proposal from the International Organization for Migration (IOM) seeking to support the Ministry of Refugees and Repatriation (MORR) to best assess the needs and challenges of returnees and effectively communicate returnees' needs with relevant line ministries. The two-year project aims to increase the technical capacity of MORR in returnee information management and coordinate a reintegration referral mechanism. The project is in the last few months of its first year. Quarterly reports and updates from the field show the project is on schedule and meeting its objectives. In addition, IOM reports that MORR has been fully engaged in implementation of the project.

We continue to engage with MORR through our Refugee Coordinator in Kabul to support the MORR in their work and also to assess the implementation of their mandate for refugee returnees and internally displaced persons (IDPs).

With regard to the coordination of our humanitarian assistance to returning refugees and IDPs, PRM remains confident that our IO and NGO partners coordinate effectively to avoid

duplication in efforts. As stated in the letter, there are multiple avenues for coordination, including cluster meetings, various UN assistance meetings, donor meetings and regional team meetings. We encourage all our funding partners to actively participate in all relevant bodies. In addition, every PRM NGO funding decision includes a critical review of the coordination plans and capabilities of each organization.

On the issue of the number of refugees, we recognize the potential variations in refugee figures in Pakistan. However, we note that Pakistan has an established registration system, through the Proof of Registration cards, developed in coordination with UNHCR, which includes individual-level biometric data. When appropriate registration and verification measures are in place, as they are in Pakistan, a secondary, redundant verification system is unnecessary; however PRM will continue to work with our partners to identify and resolve any variations.

We appreciate SIGAR's work on this report. We also appreciate the audit review team's willingness to receive feedback throughout the development of this report.

Sincerely,

Anne Richard
Assistant Secretary
Bureau of Population, Refugees, and Migration

ENCLOSURE III: COMMENTS FROM THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT



MEMORANDUM

DATE: 7/1/2016

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

FROM: James H. H. Fleming

SUBJECT: Mission Response to Draft SIGAR Audit Letter on
SIGAR's observations on U.S. and Afghan
Government efforts to assist Internally Displaced
Persons in Afghanistan,
(SIGAR Report 16-XX-AR under Code 096A-2)

REF: SIGAR Transmittal email dated 6/14/2016

USAID has received and reviewed SIGAR's draft letter of June 14, 2016. We appreciate SIGAR's observations and recommendations on efforts by U.S. Government, Afghan Government, and the international community to assist internally displaced persons in Afghanistan.

As outlined by our staff members previously, we reiterate that USAID/OFDA agrees that information sharing among humanitarian partners helps improve coordination and efficiency and strongly encourages all partners to share information to the greatest degree possible. USAID/OFDA's "Guidelines for Proposals" require applicants in each sector to describe all sector-level coordination in their Program Proposals. These Proposals, in turn, when approved for funding, are then incorporated into the formal grant agreements.

USAID is steadfast in its commitment to continue to improve effective coordination of life-saving work and to implement our projects as effectively and efficiently as possible.

cc: U.S. Embassy/Kabul Coordination Directorate

U.S. Agency for International Development
Great Massoud Road
Kabul, Afghanistan

Tel: 202-216-6288 / 0700-108-001
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