



*Embassy of the United States of America*

***Kabul, Afghanistan***

November 19, 2014

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

Dear Ms. Tonsil:

The U.S. Embassy in Kabul welcomes the opportunity to comment on the SIGAR draft audit report titled *Afghan Women: Comprehensive Assessments Needed to Determine and Measure DOD, State, and USAID Progress*.

This letter conveys consolidated comments from the U.S. Department of State (State) and from the U.S. Agency for International Development (USAID). It includes input from the State's Bureau of International Narcotics and Law Enforcement Affairs (INL), from Embassy Kabul's Public Affairs section, and from Embassy Kabul's Interagency Gender Working Group.

We agree with the draft audit's assertion that "Afghan women continue to face challenges and that many gains may be difficult to sustain." However, the draft audit inaccurately asserts that gains for Afghan women cannot be confirmed. Over the last thirteen years, Afghan women and girls have achieved significant progress, and it is important to accurately convey this to the American people. This progress is not accidental. Support to Afghan women and girls has been one of the key goals of the development community and our Afghan partners. It is also one of the most important legacies of development efforts in Afghanistan since 2001. Innumerable people have contributed to the effort and many have made tremendous sacrifices to achieve this progress.

We respectfully disagree with the draft audit suggestion that State's and USAID's 'mainstreaming' or 'integration' of gender limits insight into specific efforts to assist women. Gender mainstreaming or integration is an internationally-



recognized mechanism for promoting gender equality and the advancement of women, and requires the inclusion of a gender perspective in all policy and program design and decision-making. Integration, or mainstreaming, is mandated under State's and USAID's complementary gender policies, as both agencies recognize the robust body of evidence correlating improved gender equality with more equitable and sustainable development and security outcomes.

State and USAID plan to continue to integrate gender and to track funding for both primary and secondary activities. In our judgment, gender integration will not diminish oversight. To the contrary, the conceptual framework SIGAR's report adopts would appear to discount the majority of U.S. efforts to promote gender equality in cases where that work benefits women and men, or girls and boys.

The draft audit further suggests that the U.S. government has failed to "demonstrate the outcomes of U.S. efforts or link between those efforts and the reported improvements made in the lives of Afghan women." We respectfully disagree and can demonstrate a strong link between U.S. investments and the dramatic gains of women and girls. Some of these notable achievements include:

**Basic Education:** Girls were not officially enrolled in school in 2001. Today, there are nearly 3 million girls enrolled in primary and secondary school. USAID is improving the quality of basic education by helping train more than 74,000 Ministry of Education teachers, nearly one-third of whom are women. For example, to address girls' access to a quality education, USAID has distributed 7906 scholarships to disadvantaged but academically capable women enrolled in Teachers Training Colleges in 23 provinces with low female enrollment levels. The scholarships are aimed at recruiting and retaining promising female students and encouraging them to become teachers. They provide deserving female students with financial support to continue their education, resulting in more female teachers for the schools and contributing to more girls enrolled.

**Higher Education:** Today 40,000 young women attend public and private universities, technical or vocational training institutes, with more enrolling each year. Women account for approximately 30 percent of the student body at the American University of Afghanistan (AUAF).



USAID and the Department of State, through the Bureau of Public Affairs, support Afghan women's higher education. Since 2012, the Department of State has provided 211 scholarship opportunities for women to attend AUAF, and 56 for women to attend the American University of Central Asia. AUAF offers an American-style education with classes in English. Thanks to these scholarships, in 2013 women for the first time constituted half of AUAF's freshman class. Not only will the female graduates of AUAF be competitive for leadership positions in the future, their male counterparts will also have been socialized to working in a gender-mixed environment.

The Embassy Public Affairs Section is supporting several years of programming at AUAF's International Center for Afghan Women's Economic Development with the goal of building the capacity of Afghan women to participate and contribute to their economy. The Center is the first of its kind and serves as a national hub for training, research, business facilitation, networking, and association building for the economic empowerment of Afghan women.

**Economic Growth:** In 2002, virtually no businesses were owned by women. Today, women-owned businesses number over 3,000. Since 2011, USAID has facilitated 1,315 loans for Afghan women enterprises, with the loan amount totaling \$2,490,704. Also, USAID has facilitated \$18 million in loan applications for the private sector that are currently in the pipeline. These financing activities are expected to create 6,221 new jobs, of which 2,555 are for women.

**Healthcare:** Since 2002, USAID and the wider donor community have significantly contributed to rehabilitating Afghanistan's healthcare system, resulting in substantial gains. These investments have increased access to healthcare tenfold. Today, nearly 90 percent of the population lives within a two-hour walk of a health facility, compared with 9 percent in 2002. This—coupled with an improvement in the quality of services offered—has led to tremendous changes in maternal and child mortality indicators in Afghanistan. For example, women's life expectancy has increased from 42 years in 2002 to 62 years today.

**Maternal and Newborn Care:** Increased access to skilled birth attendants is essential to improving maternal and child health, and more than 2,050 midwives



have graduated from USAID-supported programs. With the support of USAID and other donors, the number of midwives increased from 467 during Taliban rule to about 4,000 today. These midwives are now respected members of their communities. In 2013, skilled birth attendants delivered more than 150,000 babies as a direct result of U.S. government assistance. USAID's and other donors' contributions have contributed to a drop in the maternal mortality rate from 1,600 deaths per 100,000 childbirths in 2002 to 327 deaths per 100,000 childbirths in 2010, while the infant mortality rate has fallen from 165 per 1,000 births in 2002 to 74 per 1,000 births in 2011.

**Justice & Gender-Based Violence:** Women's access to justice and responses to gender-based violence in Afghanistan have improved substantially since 2001. The Department of State has contributed materially to these achievements, particularly through efforts to expand the number and geographic reach of Elimination of Violence Against Women (EVAW) prosecution units and women's shelters. INL has provided substantial assistance to the Attorney General's Office to establish and train EVAW prosecution units. A 2013 United Nations report found that provinces with an EVAW unit register, try, and convict more cases of violence against women than those without and, as of this year, the Afghan government has expanded the units to 18 provinces. INL continues to fund training and mentoring for these units throughout the country.

The Department of State, through INL, is the single largest donor to women's shelters in Afghanistan. As SIGAR notes, the number of women's shelters has grown from one in 2002 to 28 today. INL-funded shelters provided legal, health, psychosocial counseling education, and vocational services to approximately 2,000 women in both 2012 and 2013. Moreover, shelter attorneys have worked with Afghan government prosecutors to secure landmark convictions under the EVAW law.

### **On SIGAR Recommendations**

**SIGAR Recommendation 1:** *Develop and implement agency-wide mechanisms to track the number and funding—both obligated and disbursed—of projects, programs, and initiatives that, either wholly or in part, support Afghan women.*



We do not concur with this recommendation because the approach SIGAR calls for would place an unnecessary burden on existing information technology processes and account management systems. The State Department's Office of U.S. Foreign Assistance Resources (F) and all current budget, project design, procurement, monitoring, and reporting systems at post provide sufficient information on both the number and funding of projects that support Afghan women. Following this SIGAR recommendation would either require creation of a largely duplicative system unique to Afghanistan, or require massive changes to State's and USAID's internal structures, potentially causing severe disruption to the daily work of providing both granular analysis of gender programming at a country level, as well as consolidated analysis globally.

Development programs that support Afghan women and girls are cross cutting and do not fall exclusively under any one budget category. Rather, gender equality and women's empowerment efforts in Afghanistan, and globally, are tracked through a mechanism known as a Key Issue. The Key Issue process allows the U.S. government to track quantitative and qualitative gender programming data and information through various phases of the budget and program management cycles, including while developing Mission Resource Requests, Operational Plans (OP), and Performance Plans and Reports.

All Agencies utilizing Foreign Assistance resources must follow the F OP Guidance in order to align all new obligating authority resources for the Fiscal Year (FY) with the programs that they will support. From FY 2011 through FY 2013, the period covered by SIGAR's report, resources that supported the Gender Key Issue were broken down into the following areas:<sup>1</sup>

- Gender Equality/Women's Empowerment (primary)
- Gender Equality/Women's Empowerment (secondary)
- Gender-Based Violence
- Women, Peace, and Security

Once these figures were recorded in the F-managed FACTS Info, the FY OP was approved, and Congressional Notification satisfied, these resources were released to operating units and obligated into individual mechanisms. All foreign

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<sup>1</sup> For more information on Key Issues and the types of programs and activities see F's Key Issues Guidance and Definitions.



assistance agencies identified projected resources that would be used in support of Gender and Women's Programs in the OP; however, as resources are not coded for women at the allowance or obligation stage, each agency must ensure during project design and procurement that the plan is followed so that the intended use of funds remains the same through disbursement.

We believe that USAID's and State's existing planning, budgeting, monitoring and reporting mechanisms provide sufficient information for tracking the number and funding of projects, programs, and initiatives that, either wholly or in part, support Afghan women.

We therefore respectfully request Recommendation 1 be removed.

**SIGAR Recommendation 2:** *Use existing program-level monitoring and evaluation data, and reports to conduct agency-wide assessments of each agency's efforts to support Afghan women, which can be used as benchmarks for future programming and assessments.*

We do not believe that agency-wide assessments of each agency's efforts would add value to the extensive work already being done at the program levels. As a matter of policy all agencies at post use existing program-level monitoring and evaluation data and reports to inform decision making. USAID has very detailed monitoring and evaluation policies at the agency-level, as well as detailed methodologies at the mission level for implementing these policies. State conducts monitoring and evaluation at the program level. State does not believe an additional bureaucratic layer of agency-wide analysis using program-level information would add value to future programming in this regard.

USAID alone has conducted more than 40 gender analyses in Afghanistan, most of which took place during the SIGAR reporting period. Findings from these assessments are routinely incorporated into new project designs (documented in Project Appraisal Documents) and used to inform implementation decision making. USAID's Automated Directive System (ADS) 201 requires gender analysis at the Project level and ADS 205 provides the authority by which USAID contracting offices can stop procurements in process that do not address the gaps identified by these mandated gender analyses.



Sectors such as agriculture and infrastructure have benefited significantly from in-depth analyses, which highlight potential programming gaps for women. For example, in response to analysis on women's workforce engagement for the Afghan Engineering Support Project, USAID successfully designed and implemented a women's engineering internship, resulting in job placement for several women engineers. In addition, a new Women in Government internship program used past assessments to overcome many of the challenges it has faced during implementation. This program used the gender analysis prepared for USAID's Economic Growth and Governance Initiative (EGGI) to set clear parameters for selection of interns, especially women, in order to increase their ability to access the internship.

We request SIGAR's concurrence to the closure of Recommendation 2.

**SIGAR Recommendation 3:** *Develop a plan and timeframes for assessing each agency's efforts to support Afghan women on an ongoing basis that accounts for the changing operational environment in Afghanistan, and implement the plan going forward.*

We do not concur with this recommendation. Extensive program-level monitoring and data evaluation already inform planning and decision making at State and USAID. Creation of agency master plans with fixed timeframes based on unpredictable future changes in Afghanistan's operational environment would impose an impractical and counterproductive rigidity on a well-functioning system. The existing Interagency Gender Working Group and Gender Task Force provide appropriately flexible mechanisms for coordination of programming efforts to support Afghan women.

We respectfully request SIGAR's removal of Recommendation 3.

Our commitment to support Afghan women and girls is and will remain steadfast, as most recently evidenced by the launch of the Promoting Gender Equity in National Priority Programs (Promote) project in Kabul on November 8, 2014. Promote—a collaborative effort of the U.S. government, the government of Afghanistan, international donors, and Afghan civil society—represents the largest gender project in USAID history. This \$216 million effort will enable the empowerment of Afghan women at the highest levels of government, business, and

society. Promote builds on success in improving girls' access to education, health, and social services since 2001, and will help ensure that women and girls can use these foundations to serve as part of the next generation of leaders in Afghanistan.

We appreciate your advice on the challenge of measuring U.S. government assistance for Afghan women, and your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles Randolph". The signature is fluid and cursive, with a long horizontal stroke at the end.

Charles Randolph  
Program Coordinator  
Coordination Directorate



## **Annex I: Technical Comments and Corrections**

- Please note that the listing of members of the Gender Task Force chaired by the U.S. Ambassador-at-Large for Global Women's Issues and the Assistant Chief of Mission for Afghanistan is incomplete in the draft report (page 10). Its membership includes but is not limited to the Secretary of State's Office of Global Women's Issues, the State Department's Office of the Special Representative for Afghanistan and Pakistan, the State Department's Bureau of International Narcotics and Law Enforcement Affairs, the Political Section and the Public Affairs Section at Embassy Kabul, USAID, and DOD.
  
- Please note that on page 20 of the draft report, SIGAR cites four INL grants as examples of awards through USASpending.gov that could not be reconciled with information INL provided. INL notes this characterization is misleading to the public, insofar as INL had submitted the complete award packages for the four grants in question as part of the larger INL Access to Justice small grants program. The information submitted included the name of the program and grantee, which matched the information on USASpending.gov, as SIGAR has previously acknowledged. As such INL requests that SIGAR remove mention of these four grants from this section.