

MID-TERM EVALUATION OF THE LABOR LAW COMPLIANCE PROGRAM IN CAFTA-DR



“CUMPLE Y GANA III – INSPECTION”



USDOL Cooperative Agreement
IL-17784-08-75-K

 sergio cambronero
May 2011

Acknowledgements

The report presented in the sections to follow, describes the details of the mid-term evaluation, conducted between February and April 2011, of the Cumple y Gana III-Inspection project. The project is being implemented by the Foundation for Peace and Democracy (FUNPADEM), a private nonprofit organization based in Costa Rica, and Abt Associates, a US consulting firm. This report was prepared in accordance with the Terms of Reference developed by the U.S. Department of Labor (USDOL) and reflects the evaluation of the Cumple y Gana III-Inspection project activities in Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua and the Dominican Republic. Sergio Cambroner, an independent evaluator contracted for this purpose, developed the methodological approach, conducted all field activities and produced the final deliverables. Notable credit must be also granted to the technical support and contribution provided by Ms. Ana Laura Murillo, throughout the multiple stages of this complex process.

Nonetheless, the breadth and details of the work accomplished would have not been possible without the decisive support and collaboration of USDOL staff, the senior colleagues at FUNPADEM and the members of the project core and field teams. The evaluator would like to express his sincere appreciation to all parties involved in this effort. Moreover, a final and special expression of gratitude and admiration for their endeavor and contribution goes to the numerous project stakeholders reached in all six countries.

Funding for this evaluation was provided by the United States Department of Labor under Cooperative Agreement IL-17784-08-75-K. Points of view or opinions expressed in this evaluation report do not necessarily reflect the views or policies of the United States Department of Labor, nor does the mention of trade names, commercial products, or organizations imply endorsement by the United States Government.

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ACRONYMS

GENERAL

CF	Country Facilitator, Cumple y Gana
CAFTA-DR	Central American and Dominican Republic Free Trade Agreement
C&G3	Cumple y Gana Phase III-Inspection Project
ECMS	Electronic case management system
FUNPADEM	Foundation for Peace and Democracy
IDB	Inter-American Development Bank
ILO	International Labor Organization
IO	Immediate Objective
M&E	Monitoring and Evaluation
MOL	Ministry of Labor
LOP	Life of the Project
OAS	Organization of American States
PMP	Performance monitoring plan
TOR	Terms of Reference
USAID	United States Agency for International Development
USDOL	United States Department of Labor

COSTA RICA

CTRN	Confederación Costarricense de Trabajo Rerum Novarum (<i>Labor Federation Rerum Novarum of Costa Rica</i>)
DNI	Dirección Nacional de Inspección de Costa Rica (<i>Inspection Department Costa Rica</i>)
MTSS	Ministerio de Trabajo y Seguridad Social de Costa Rica (<i>Ministry of Labor Costa Rica</i>)

DOMINICAN REPUBLIC

DR	Dominican Republic
SET	Secretaría de Estado de Trabajo (<i>Ministry of Labor of the Dominican Republic</i>)
CASC	Confederación Autónoma Sindical Clasista (<i>Class-based Autonomous Labor Federation</i>)
COPARDOM	Confederación Patronal de la República Dominicana (<i>Employer Federation of the Dominican Republic</i>)
CNTD	Confederación Nacional de Trabajadores Dominicanos (<i>National Confederation of Dominican Workers</i>)

EL SALVADOR

ANEP	Asociación Nacional de la Empresa Privada
MTPS	Ministerio de Trabajo y Previsión Social (<i>Ministry of Labor El Salvador</i>)
STRAISPES	Sindicato de Trabajadores de la Industria de Seguridad Privada (<i>Labor Union of the Private Security Industry</i>)

GUATEMALA

AMCHAM	American Chamber of Commerce in Guatemala
CACIF	Comité Coordinador de Asociaciones Agrícolas, Comerciales, Industriales y Financieras (<i>Coordinating Committee of Agricultural, Commercial, Industrial, and Financial Associations</i>)
CGTG	Confederación Central General de Trabajadores de Guatemala (<i>Central Confederation of Guatemalan Workers</i>)
IGT	Inspectoría General del Trabajo de Guatemala (<i>Inspection Department Guatemala</i>)
MTPS	Ministerio de Trabajo y Previsión Social (<i>Ministry of Labor Guatemala</i>)
UASP	Unión de Asociaciones Sindicales Populares, Guatemala (<i>Association of Popular Labor Unions</i>)
VESTEX	Comisión de la Industria de Vestuario y Textiles de Guatemala (<i>Guatemala Apparel and Textile Industry Commission</i>)

HONDURAS

AHM	Asociación Hondureña de Maquiladores (<i>Honduran Association of Maquiladoras</i>)
COHEP	Consejo Hondureño de la Empresa Privada (<i>Honduras Private Business Council</i>)
CGT	Central General de Trabajadores de Honduras (<i>General Confederation of Honduran Workers</i>)
CTH	Confederación de Trabajadores de Honduras (<i>Honduras Workers Confederation</i>)
CUTH	Central Unitaria de Trabajadores de Honduras (<i>United Confederation of Honduran Workers</i>)
STSS	Secretaría de Trabajo y Seguridad Social (<i>Ministry of Labor in Honduras</i>)

NICARAGUA

MITRAB	Ministerio del Trabajo de Nicaragua (<i>Ministry of Labor Nicaragua</i>)
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EXECUTIVE SUMMARY

Throughout the past eight years, the Cumple y Gana initiative has contributed to strengthening compliance with labor laws in six countries of the region, including Central America, Panama and the Dominican Republic. In its first two stages and through a tripartite approach, involving stakeholders from the employer and labor sectors, as well as the Ministries of Labor (MOL), the program activities focused on areas such as labor dispute mediation, information dissemination, gender-focused activities, as well as direct assistance to the inspection process in seven countries. In October 2008, a third phase of program implementation, Cumple y Gana III – Inspection (C&G3), was launched with continued support from USDOL and through a Cooperative Agreement awarded to the Fundación para la Paz y la Democracia (FUNPADEM), based in Costa Rica. Program activities are aimed at supporting labor law enforcement and strengthening of labor inspection systems in participant countries of the United States- Dominican Republic - Central American Free Trade Agreement (CAFTA-DR).

The current activities specifically focus on working with MOLs in the six participant countries (Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua and the Dominican Republic) in order to improve their internal technical and organizational capacities. C&G3 was therefore propelled on the driving premise that building capacity through a range of products that are relevant and useful to the labor inspection efforts of each country will yield a better quality of inspection and increased effectiveness of the MOLs in both, promoting and enforcing labor law compliance. The project design rests on the fundamental assumption that the success of the program logic is the product of a compound effect achieved by the upgraded systems and tools, in tandem with more effective planning and communication approaches. This principal outcome of the program logic is assumed to be particularly evident in the improved effectiveness of specific operations and the pertinence of decision-making processes across the MOL, all of which are critical to the operations of the Inspections Office.

...the success of the program logic is the product of a compound effect achieved by the upgraded systems and tools, in tandem with more effective planning and communication approaches.

This mid-term evaluation reviews and assesses all activities carried out by C&G3 through March 2011, tracking six key issues and their respective questions, as posed by the Terms of Reference (TOR) developed by USDOL. The evaluation focuses on the ability of the project to advance towards its proposed objectives and its achievements in relation to the stated targets. Although its contents center on the more recent implementation supported by USDOL, under the Cooperative Agreement awarded in 2008, the analysis of the project's outcomes should always acknowledge an inherent overlap into two previous implementation phases and the foundational aspects drawn from them. Compliant with the TOR, the report presented in the sections to follow, identifies project strengths and weaknesses while examining the benefits accrued to the MOLs in six countries. At the same time, it assesses the challenges and opportunities that relate to the remainder of the life of the project (LOP).

Progress has been achieved on four different program components...

C&G3 is structured as a progression of technical inputs generated by specialists (project subcontractors) to match country-specific requirements. Its four program components include: (1) Capacity building for inspection services; (2) Strategic planning/monitoring and evaluation; (3) Special sectors and targeted labor violations; and (4) Social dialogue and strategic communications). Throughout its ten-week span, the evaluation process revealed that, having completed its first 30 months (over 60% of LOP) of implementation, the strategic planning and communications components are nearing 100% completion of intended targets, while Capacity Building and Special Sectors lag behind at under 65% and 25%

respectively. However, findings for the Capacity Building and Strategic Communications components point to the need for added levels of effort in the fourth and final year of implementation.

Despite delays faced in the original subcontract timelines, along with slight changes to contractual terms, no significant cost overruns (greater than 10% of line item allocations) or major line item adjustments have been reported in the budget implementation to date. Project financial resources provided by USDOL have been used efficiently, where non-critical variances have been fully documented and explained. Overall budget execution remains consistent with the originally planned activities considered in the project document and the details included in the country plans currently implemented. A historical advantage of C&G3 in “*knowing the inner workings of the MOLs and working with them for over five years*” accounts for a quick turnaround and responsiveness in the implementation of program activities, the execution of financial transfers and procurement actions.

C&G3 originally proposed and has since implemented a program logic that introduces specialized inputs and technical activities, directly related to the day-to-day operations of the inspection offices, into the six particular functional environments of each MOL. Outcomes under this program logic will be associated with critical changes in means, opportunity and focus, reflected in the number and better quality of inspections. However, important risks have been identified in association with this program logic, since target audiences have often not been able to ensure the necessary levels of readiness. Moreover, institutional changes promoted by C&G3 have sometimes not been well aligned with mainstream MOL policies or the views and aspirations of senior officials.

Products and technical assistance has been well received...

On the whole, the project strategy, objectives and assumptions are appropriate for achieving planned results, in as much as the program logic assumes a direct causal linkage between internal capacity improvements of MOLs and measurable improvements in overall country compliance with national labor laws. Products including management systems, strategic planning tools and communication materials are perceived as relevant by the MOL and well-centered in the assessed needs to improve critical capabilities. Moreover, there were various instances found of methodological replication, a multiplier effect, which clearly denotes both appropriate and effective transfer of knowledge and skills. However, stakeholders outside the MOLs appear to have a very limited understanding of how the four-year support provided by C&G3 is expected to affect the capabilities of the MOLs and how its expected outcomes could change their present concerns and views on labor law compliance.

Stakeholders have deemed the role of country facilitators as key in ensuring MOL involvement and concurrence in all project activities.

Within the MOLs, many of the officials interviewed at various levels were somewhat unclear on the specific project objectives. Nevertheless, most of them were aware of the expected outcomes relating to capacity improvements reflected in the internal processes and competencies pertaining to inspections. Likewise, interviews showed a high awareness and support at various levels for its focus on

maximizing the use of available resources and targeting of special sectors and country-specific labor violations. Overall, stakeholders view personnel roles and levels of effort as appropriate, effective and commensurate with project requirements. Communications with stakeholders track a very fluid and sustained pattern, with close and daily follow-up by the country facilitators. The role of the country facilitators has been deemed as key in ensuring MOL involvement and concurrence in project activities. Interviews with MOL officials point to their successful mediation capability, while senior project staff acknowledges a critical lobbying function that they undertake at various levels, as a sustained and sound practice in all six countries.

Despite a seemingly homogenous technical approach for all six countries, C&G3 has successfully implemented significant adjustments to fit client needs and country-specific conditions. This particular flexibility and responsiveness in the technical approach (as opposed to a rigid implementation of an original plan) is especially apparent in the increasing focus on regional versus central capacity building. Accordingly, the project’s resolve to strengthen inspection operations outside main headquarters has translated into significant product design changes, seeking to remediate a more limited consideration of regional needs in the original design.

Sustainability will require additional program efforts...

In addressing the issue of sustainability and the relevance of new skills honed by the labor inspection office staff in each country, the evaluation has identified a critical need for C&G3 to move beyond the initial knowledge transfer processes. To this end, the project needs to further promote the emergence of better-integrated functionalities, both within the specific inspection units and among other vital areas of operations of the MOLs. Despite its inherent technical complexities, the Electronic Case Management System (ECMS) and its related inputs driven on a recently acquired connectivity in all five participant countries, is possibly the most sustainable of all products. However, products such as protocols, guides and other resources will continue to be substantially linked to the use of ECMS and therefore benefit from the increased demand and continued use of its integration and connectivity features.

Monitoring and ongoing evaluation procedures and tools need to improve

Reporting by C&G3 should not only track hindrances and progress made towards expected targets, but also render greater detail on a unique learning curve achieved.

There is sufficient documentary evidence of periodic follow-up, mainly focused on quarterly progress reports supported by more frequent reporting from the field, as well as a mid-year in-depth review of “progress status to final program goals.” Bi-annual reporting provides some detail regarding hindrances and delays alongside corrective measures applied. However, inconsistencies in the data tracking under

several of the specific indicators have been found throughout reporting documents produced to date. What is of special concern are not the minor variances and errors found in target accruals for the different periods of performance but rather, the fact that these mistakes have been carried through several reporting periods. Nonetheless, the more pressing issue is that of quality control over final tabulations of accruals, meriting also a higher level of analysis, beyond the mere statements of shortfalls towards final target totals. In this respect, it is essential that milestones be set to reflect conditions achieved by partial progress. Therefore, reporting on corrective measures should not only track hindrances faced in the progress made to targets, but also render greater detail on the unique learning curve achieved.

Conclusions and recommendations have been offered under each of the six key issues addressed by the findings, in accordance with the requirements noted in the evaluation TOR. Recommendations presented address areas where additional program efforts or corrective measures have been deemed necessary, feasible and timely. These areas include better-documented outcomes and a related focus on the emergence of *champions* or *early adopters*. Likewise, the report addresses the need to review data collection and tabulation procedures utilized by C&G3, seeking to ensure more reliable and possibly automated linking of data collection efforts in the field to the periodic compilation of accruals in the completion of targets produced by the core staff. A final recommendation has been included regarding the need to consider upgrading M&E procedures and tracking instruments, thereby yielding more qualitative analysis and precision-targeted information on the factors for success or failure (what works, what does not and why?) identified when furthering the institutional development and capabilities of the MOLs.



Mid-Term Evaluation Report

In the latter months of 2008, as a result of a competitive bidding process, the United States Department of Labor (USDOL) awarded an \$8.8 million Cooperative Agreement to the Fundación para la Paz y la Democracia (FUNPADEM) in support of labor law enforcement and the strengthening of labor inspection systems in participant countries of the United States- Dominican Republic - Central American Free Trade Agreement (CAFTA-DR). Based in Costa Rica, FUNPADEM is a private nonprofit organization that has partnered with the U.S firm Abt Associates and a number of other specialized subcontractors to carry out the proposed project activities. The report included in the sections to follow, describes the outcomes of a midterm evaluation conducted between March and April of 2011, covering the project activities specifically supported by USDOL under the Cooperative Agreement IL-17784-08-75-K for the Labor Law Compliance Program in Central America and the Dominican Republic, hereon referred to as the **Cumple y Gana III – Inspection Project (C&G3)**.

“It is a continuum, one has led to the other, and seven years is unusual. Staying the course has being the greatest challenge.”

Ronald Venezia
Abt Associates Inc.

I. BACKGROUND AND PROJECT DESCRIPTION

Since its origins in 2003, with support from USDOL, the Cumple y Gana initiative has contributed to strengthening compliance with labor laws in six countries of the region, including Central America, Panama and the Dominican Republic. Program activities covered a number of related areas such as labor dispute mediation, information dissemination, gender-focused activities and assistance, as well as direct assistance to the inspection process in seven countries. In the context of these previous efforts, FUNPADEM engaged activities supporting labor law compliance through a tripartite approach, involving stakeholders from the employer and labor sectors, as well as the Ministries of Labor (MOL).

Towards the end of 2008, a third phase of program implementation was launched with continued support from USDOL. However, this third phase of activities focuses specifically on working with MOLs in six participant countries (Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua and the Dominican Republic) to improve their internal technical and organizational capacities. Program activities are expected to bolster their ability to reach out to their stakeholders and further promote their particular inspection functions as fundamental means for ensuring labor law compliance.

C&G3 builds on the accomplishments of the two previous Cumple y Gana phases, implemented in six countries. Different from previous efforts, C&G3 does not include a tripartite approach, directly involving the labor and employer sectors in each country. C&G3 is thus solely aimed at providing technical assistance in areas such as strategic planning and communications with stakeholders while also continuing the work of previous phases, regarding the development of inspection protocols and state-of-the-art tools to support the inspection process. Furthermore, C&G3 is also expected to reach out and assist selected regional offices in each country, while strengthening the capacity of MOLs to address labor inspection requirements in sensitive social and economic sectors (referred to as Special Sectors).

Accordingly, this third phase of program implementation will endeavor to:

- Improve the capacity of the **MOLs’ internal processes and inspection competencies** to more effectively manage and oversee the inspection and mediation functions (associated to **Capacity Building** activities under Intermediate Objective 1 of the Cooperative Agreement);

- Improve the capacity of the MOLs to **better target labor inspections in order to maximize scare resources** via planning, monitoring and evaluation (associated to **Strategic Planning** activities under Intermediate Objective 2 of the Cooperative Agreement);
- Improve the **MOLs’ technical capacity to carry out inspections and other enforcement initiatives in targeted sectors and/or labor violations** (associated to **Special Sectors** under Intermediate Objective 3 of the Cooperative Agreement);
- Improve **Social Dialogue and Strategic Communications with Stakeholders** regarding the MOL inspection function (associated with Strategic Communications under Intermediate Objective 4 of the Cooperative Agreement).

a. Principal Program Logic and Design Limitations on Impact Measurement

C&G3 has defined a program logic (see detailed Logic Map in **Annex P**) based on elements that constitute the building blocks of the original proposal submitted to USDOL. The initial working hypothesis for this logic refers to a *supply focus*¹ (a service delivery capacity) centered in the ability of the MOLs to increase the number and improve the quality of inspections in the six participant countries. The program rationale follows what FUNPADEM has referred to as an approach “that combines top-down technical direction with bottom-up responsiveness to local conditions²”.

Hence, a number of USDOL supported technical and financial inputs are expected to generate outputs that are instrumental to promoting and achieving higher levels of compliance in each country. While project **outputs** are drawn and measured from the progress achieved in the four technical areas, identified in the Immediate Objectives (namely, Capacity Building, Strategic Planning, Special Sectors and Strategic Communications), project related **outcomes** are expected from the increased effectiveness of MOLs to carry out their institutional plans and programs. Project outcomes will therefore be measured by a specific set of indicators in each country, monitored through the tools provided to the MOLs by the project’s strategic planning and capacity building activities. The monitoring of project outcomes will relate to elements of efficiency (targeting), transparency and content in the operations of the Inspection Offices serviced by the project. On a parallel track, MOLs are assumed to engage a set of project activities in the realm of strategic communications that seek to augment their outreach efforts, aimed towards their primary stakeholders, as well as communities and citizens at large. These efforts are expected to build on the enhanced information management capabilities afforded by C&G3 and the resulting improved capacity in the planning and operations of the inspection offices in the six participant countries.

The target populations of the program activities in Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua and the Dominican Republic are the labor inspectors at the MOLs (central and regional offices) and the MOL employees directly involved with the Inspection offices (Planning officials, IT Directors and Staff, Communication Officers). Concurrently, the project anticipates fostering ongoing consultations and encouraging feedback from key stakeholder groups such as employer organizations and/or individual employers; and worker organizations (labor unions or the larger federations).

¹ A useful and detailed definition on impact attributed to project outcomes is found in the May 2010 Impact Plan document included in **Annex E**.

² Cumple y Gana III version 15AUG08 Technical Final (Original Response to the RFP by FUNPADEM)

b. Considerations on Assessing Impact

In terms of the expected **impact**, the project anticipates gradual incremental changes in the statistics related to labor law (and *White Paper*) compliance in all six countries. Changes are also expected in the perception of stakeholders regarding the role of the inspection and the overall capacity of MOLs to ensure labor law compliance. The technical intervention logic of the Cumple y Gana III Project originates in the incentives and sanctioning effect propelled by increased inspections. Therefore, impact also relates to the ability of MOLs to reach specific targets of inspection, based on better informed decisions and strategically positioned resources. Ultimately, impact relates to the factors of timing and opportunity that are inherent to a more effective response, alongside an improved follow-up MOL capacity, assumed to eventually lead to significant and positive changes in labor law compliance.

However, in terms of impact it is important to note that the Cumple y Gana III Project is not structured to gauge or directly relate its project outcomes to large scale changes, since **there is no specific and rigorously defined counterfactual**³ offered in its original proposal. This would be a necessary condition to enable C&G3 to substantiate its progress along markers or benchmarks associated with country-wide improvements to previously documented levels of compliance. Consequently, although useful inferences **are possible** regarding the association between improvements in the internal capacity of the MOLs, their enhanced ability to reach out to their stakeholders and the country-specific achievements that may emerge in terms of labor law compliance, **there are no clearly related and applicable baseline considerations** for the Cumple y Gana III- Inspection project to base measurements of a broader impact achieved.

c. Management Structure, Project Operations and Reporting

C&G3 is structured as a progression of technical inputs generated by specialists (project subcontractors) to match country-specific requirements. Overall, direction and management of project operations is provided by the Project Director and specific technical direction for each of the four program components is provided by a coordinator, who in turn is a member of the core team based in Costa Rica. Components include: (1) Capacity building for inspection services; (2) Strategic planning/monitoring and evaluation; (3) Special sectors and targeted labor violations; and (4) Social dialogue and strategic communications). Coordinators are expected to monitor their specific activities while building a regional perspective from the overall progress of the program activities. Such perspective is assumed to be instrumental in gauging comparative progress in each country and dealing with both hindrances and opportunities that may emerge along the way.

The majority of the work in the field is undertaken, managed and supported by six country facilitators, based inside the MOL offices and working in close daily contact with project stakeholders. Support staff (one assistant per country) has been assigned to each country facilitator and administrative staff has been secured at FUNPADEM’s headquarters in Costa Rica to handle logistics and financial management aspects. Project staff was contracted under a joint operational setup between FUNPADEM and its main subcontractor Abt Associates, based in Bethesda, Maryland. Four additional subcontractors, [Master Lex](#) and [Van der Leer](#) in Costa Rica, [Social Accountability International](#) in New York and [Pizzolante](#) in Venezuela have assisted the development specialized products under the four program components. Additionally, subcontractors and consultants provide short-term technical assistance in specialized topics. Periodic country progress reviews are scheduled and led by the Project Director and the Coordinators of each program component. Several comprehensive team meetings have been convened and led by the Project Director throughout the current period of program implementation.

³ Reference to the differences between Impact and Performance Evaluations described in the 2011 USAID Evaluation Policy document, published by the Bureau for Policy, Planning, and Learning.

Reporting inputs flow-up from the field, based on monthly activity reports submitted by each country facilitator, complemented by reporting actions developed by core staff based in Costa Rica. These combined inputs enable and substantiate a comprehensive reporting product submitted to USDOL on a quarterly basis and developed by the project director. Quarterly reports include tabulations of progress for the period compared against overall accrual and original PMP targets. Quarterly reporting has included a narrative review of the activities undertaken, with brief references to problems encountered and solutions applied. Reporting has consistently followed the quarterly schedule and, where necessary, content adjustments to bridge gaps in any given country. The latter have mostly dealt with the suspension of program activities in Honduras in 2009 or the significant setbacks faced in Nicaragua.

II. PURPOSE OF EVALUATION

This midterm evaluation provides USDOL, FUNPADEM and its subcontractors, as well as other key stakeholders with an overall assessment of the progress-to-date achieved in the implementation of project activities. In adherence to USDOL requirements for this report, the findings, conclusions and recommendations track six principal issues included in the Terms of Reference (TOR):

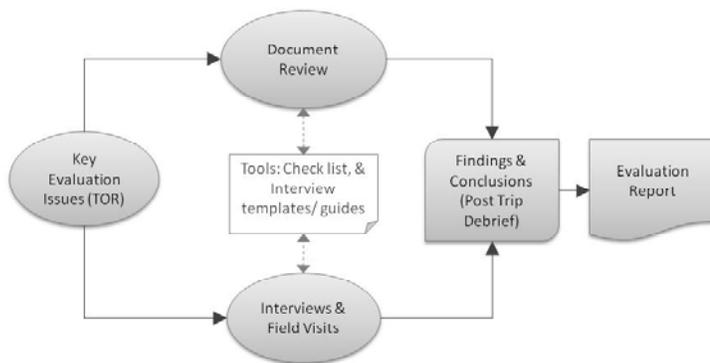
1. Validity of the project strategy, objectives and assumptions;
2. Potential Benefits/impact to be accrued by target groups;
3. Implementation status (activities, schedule and budget);
4. Sustainability of project products or results;
5. Staffing and Communications;
6. Effectiveness of project performance monitoring.

Specifically, the TOR provided by USDOL for the mid-term evaluation cite two initial purposes that relate to the appropriateness and sustainability of project outputs and achievements, as well as to their ability to reach and impact the target groups. Therefore, the mid-term evaluation aims to:

- a. Determine if the project’s products and activities are appropriate for achieving its stated objectives, explaining why or why not; and
- b. Evaluate the capacity of the Project to obtain (accrue) benefits/impact to the target groups, implementation status and likelihood of sustainability, project management and performance monitoring.

Finally, the mid-term evaluation is also responsive to **a third purpose** noted by USDOL, soliciting “recommendations on how to improve project performance through possible modifications to the strategy or work plan.” To this end, this evaluation aims at providing additional feedback that may be instrumental to identify areas of program strengthening (following the principal program logic), alongside any possible, useful and timely adjustments to the monitoring activities.

III. EVALUATION METHODOLOGY



An independent evaluator with specific skills in international project evaluation and experience in Central America was contracted in the latter part of February 2011 to carry out the mid-term evaluation. As required by the TOR (**Annex A**) at the outset of the process, an Evaluation Team Meeting was conducted in early March, involving DOL’s Project Manager and the Project Director. Since the evaluator was responsible for developing the methodology, information collection instruments and evaluation sequence,

this meeting was programmed and conducted to reach a common understanding regarding the priority evaluation questions, the available data sources and data collection instruments, as well as the outline for the final report.

Data and Information Collection Approach

A rationale and criteria for the information collection approach was discussed and a series of excel-based collection instruments were reviewed, tracking the proposed criteria, as well as the questionnaire structure and topic sequence.

Supplementary questions were developed for each one of the original questions grouped under the six key issues defined in the TOR. These additional questions were geared to assist and enrich the breadth of responses collected both in written format from the project staff and through notes and video collected in the interviews scheduled and conducted in six countries. The agenda and complete set of materials reviewed during the Evaluation Team Meeting have been included in **Annex F**.

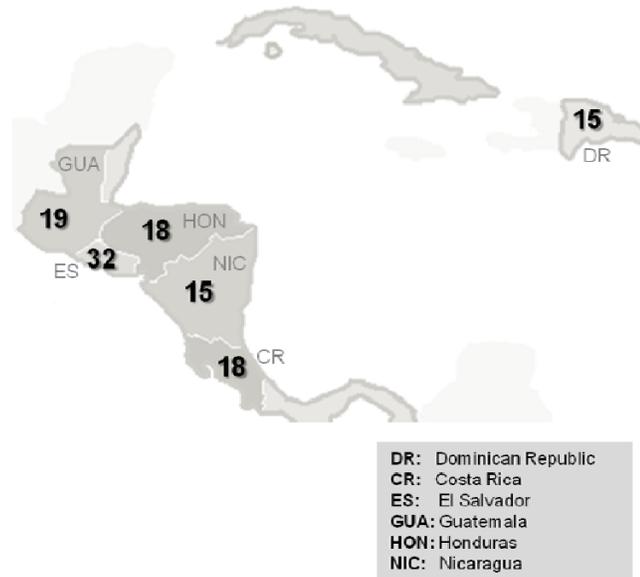
Process Support and Follow-up

In order to support the implementation and follow-up required regarding the evaluation activities in six countries throughout a period of approximately ten weeks, the evaluator set up a **shared virtual workspace** containing an interactive work plan and a shared knowledge base of documents and intermediate products, developed along the period of implementation. All senior staff and country facilitators were granted access to the shared space. Most communications regarding the progress of the evaluation process were routed through its email interface to establish a working communications log and automated system alerts were assigned to ensure follow up of task completion and timely content review.

Scope and Sample Characteristics

Travel and corresponding field activities were undertaken between March 9th and April 8th, 2011. All six countries receiving project’s services were visited and a total of 130 interviews were scheduled with the assistance of the country facilitators and conducted by the evaluator. Meetings were scheduled in advance by the Country Facilitators, following the evaluator’s guidance and consistent with the requirements of the TOR.

MOL Stakeholders:	
▪ Labor Minister	3
▪ MOL officials who have policy and decision-making authority over project focus areas	34
▪ MOL Inspectors & MOL officials who have received training	33
Other Sources:	
▪ Employer groups and unions that have worked with the project	20
▪ Representatives of other similar projects	6
▪ ILO representatives	3
▪ US Embassy representatives	4
▪ Other organizations representatives (OEA)	1
▪ External Consultants	1
Cumple y Gana Core Project Staff	3
Cumple y Gana Country Facilitators	6
FUNPADEM/ Abt	4
Total	130



As required by the TOR, interviews were scheduled and conducted to include the following individuals:

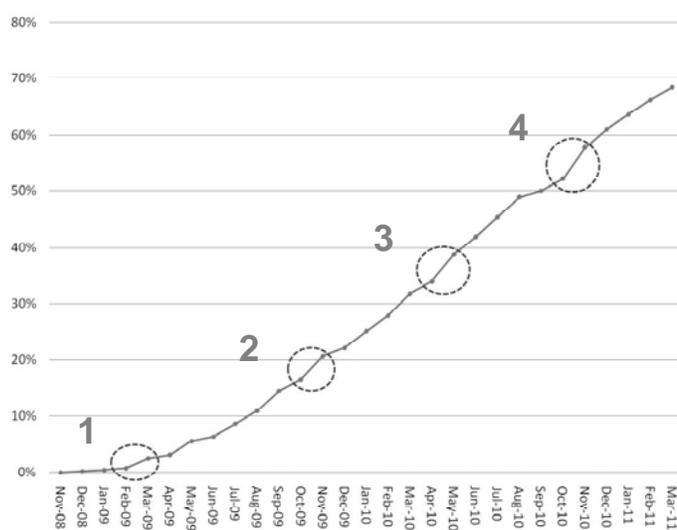
- a. Abt Project Staff in Bethesda
- b. FUNPADEM Project staff in Costa Rica
- c. FUNPADEM Country Facilitators
- d. DOL Project Manager and other relevant DOL staff
- e. Selected individuals from the following groups:
 - Ministry of Labor officials who have received training.
 - Ministry of Labor officials who have policy and decision-making authority over project focus areas.
 - Employer groups and unions that have worked with the project.
 - US Embassy
 - Other projects that have been involved with the project (possibilities include ILO, USAID, IDB, etc.)

In compliance with the TOR, project staff did not participate in the interview process and only were present at meetings with stakeholders to provide initial introductions when necessary. As suggested by the TOR, this trip debrief meeting enabled the evaluator to discuss preliminary evaluation findings, conclusions, and recommendations with country facilitators, senior program and management staff. Due to unforeseen federal restrictions on travel and the resulting logistic complications, the USDOL Program Manager was unable to attend this meeting in Costa Rica, neither was he able to engage in the day-and-half work agenda at a distance.

Although the TOR also required the involvement of an expert on inspection systems to provide specific technical input to the evaluator, significant constraints were faced in recruiting and contracting a consultant with the necessary professional experience. Candidates identified with suitable qualifications were unable to commit to dates set for preparatory work and subsequent travel between the months of April and March 2011. Eventually, in light of a continued lack of availability, the evaluator proceeded to complete the field activities without the assistance of the inspection expert.

IV. GENERAL DISCUSSION OF FINDINGS ON PROJECT STATUS

Overall, funds have been used efficiently, along a consistent curve of use (burn rate) where only four significant variances were found. These variances have been fully documented and explained by the financial management and accounting staff assigned to the project, as reflected in the Graph and Table included below. For the most part, these variances are consistent with the originally planned activities considered in the project document and the subsequent details included in the country plans.



Period of Variance	Amount of Variance	Comments on identified Cashflow Variances
1. Feb-Mar 2008	\$ 88,525	<ul style="list-style-type: none"> Started salary payments to project staff; Initial procurement of computer equipment is completed for project staff;
2. Oct-Nov 2009	\$ 244,996	<ul style="list-style-type: none"> Payments associated with subcontractor fees begin; Increased travel expenditures due to KICK OFF activities in six countries; This period also includes a number of payments in consultant fees.
3. Mar-May 2010	\$ 340,028	Significant payments were made during these period to consultants and subcontractors and registers an increase in the Abt Associates.
4. Set-Nov 2010	\$ 408,172	

Despite delays faced in the original subcontract timelines, along with slight changes to contractual terms, no significant cost overruns (greater than 10% of line item allocations) or major line item adjustments have been reported in the budget implementation to date. Cash-in-hand balances, reported alongside quarterly line item accruals, have remained consistently low. Likewise, no underperformance in budget execution has been reported in any major line item of the original budget.

a. Significant Delays and Setbacks

Critical delays faced in Honduras and Nicaragua modified the original rate of disbursement projected for these countries. Changes in original project design specifications, responsive to MOL requests, were set in place in several of the participant countries. Some of these dealt with broader coverage of regional offices (El Salvador), additional technical assistance inputs (Costa Rica) or even the functional specifications of ECMS (Dominican Republic). However, none of these adjustments required additional line item allocations or significant contractual modifications with any of the subcontractors involved.

Likewise, an overlap between activities for Phases Two and Three seemed to hold back the full launching of initial activities until the first quarter of 2009 (second quarter of C&G3 implementation). Nonetheless, interviews with financial management and accounting project staff pointed to the advantage of “knowing the inner workings of the MOLs and working with them for over five years”. Response time, to and from MOL counterparts, as well as financial transfers and procurement actions were thus rid of the normal pitfalls that come about when dealing with six different public sector bureaucracies. This quick turnaround has also been referenced by senior staff in the inspection offices in the six countries and is often associated by project stakeholders to a high responsiveness in project implementation. Regardless of the usual changes in key staff brought about by new administrations (Nicaragua, El Salvador and Costa Rica), many

of them taking place in the threshold between the end of the previous implementation phase and the beginning of C&G3, the familiarity with inner workings of the six MOLs and the mechanics of program implementation played an important role in facilitating continued operations in the six countries.

Pertaining efficiency in the use of project funds, interviews with project staff have highlighted savings achieved in line items that were particularly critical to the operations of the two previous phases, such as travel and communications.

b. Standard Operating Context

Project operations of C&G3 have been based on a more intensive and better-structured (meaning less localized and more systemic; better integrated to task completion) use of Internet-based communications, benefiting routine operations and enabling better targeted follow-up with specific MOL counterparts. Likewise, core senior project staff speaks to a deliberate effort to better “layer tasks” to ensure cost-effective use of the travel schedule and a streamlined practice of sharing task assignments in the field. This appears to be reflected in the interaction with country facilitators and made evident in the range of tasks and issues addressed by any given core staff field visit. Albeit cost-effective, country facilitators view this practice as sometimes overextending time allocations along too many different field activities.

...country facilitators view the practice of "layered operations" as sometimes overextending time allocations along too many different field activities

Procurement procedures also benefited from the breadth and nature of the experience accrued in two previous phases of implementation, where the purchases and delivery of commodities (mainly computer equipment in Phase II) in accordance to proposed budgetary allocations, were a significant input in each phase. Interviews of both field and core staff provide evidence of a clear and effective division of labor in the identification, specification and supply of requisite equipment for the MOLs.

Mirroring previous phases, the role of the country facilitators has been a key element in ensuring MOL involvement and concurrence, constituting a sustained practice throughout the six countries. Thereon, procurement specifications and timing are reviewed by the project coordinators, approved by the project director and implemented by the backstopping and administrative staff assigned to the project in Costa Rica. All procurement actions to date have been reported by project staff to be in compliance with applicable source and origin or international carrier requirements.

c. Considerations on Project Implementation Sequence and Timing

During this period, most of the project activities have been devoted to implementing or complementing activities in the four components that encompass the Project (Capacity Building, Strategic Planning and Monitoring, Special Sectors and Social Dialogue and Strategic Communication), in accordance with Cooperative Agreement IL-17784-08-75-K and the country plans for Guatemala, Costa Rica, El Salvador, Honduras and the Dominican Republic, as well as the Letter of Agreement with the Ministry of Labor in Nicaragua. Although some significant delays have been documented regarding the expected implementation, especially with regards to the ECMS and the development of Special Protocols, these seem to track necessary adjustments to real time or emerging conditions for implementation. In some cases, the corresponding ability of counterparts to achieve the desired levels of readiness has been a major delay factor. This latter condition is often associated with political will and the final approval required from higher levels of authority than with technical hindrances and shortcomings within the MOLs.

The Subcontractors	
Abt Associates Inc	Sustained ongoing activities in six countries in accordance to country plans (Guatemala, El Salvador, Dominican Republic, Costa Rica and Nicaragua).
Van Der Leer	Completed its activities in five countries (Guatemala, El Salvador, Honduras, Dominican Republic, and Costa Rica) in accordance to country plans.
Pizzolante Strategic Communications	Completed its activities in five countries (Guatemala, El Salvador, Honduras, Dominican Republic, and Costa Rica) in accordance to country plans.
Master Lex	Completed or continued their activities in five countries (Guatemala, El Salvador, Dominican Republic and Costa Rica).
Social Accountability International (SAI)	Has partially completed its work in the development of special labor protocols for inspectors. Currently working in four countries (Guatemala, El Salvador, Honduras and Dominican Republic).

Overall, the Project is currently conducting activities as planned, including some program adjustments, yet supported by the original line item budget allocations in six countries. Wherever adjustments lowered the level of effort in one country (the case of ECMS in Nicaragua, for example), the project redistributed to corresponding LOEs in other countries. In light of changing conditions for the implementation of ECMS in Nicaragua, for example, 10% of the total allocation was redistributed between Guatemala and Costa Rica.

Documentary review of a broad sample of reporting products, covering multiple implementation periods, reflect a fairly even implementation pace for the program components of Strategic Planning and Special Sectors. Despite an early lead in the rate of progress of the Strategic Planning activities, delays in Honduras and Costa Rica set back its completion through the latter part of 2010. Similarly, Special Protocols awaits completion of its intended outputs in the third quarter of 2011.

Situated now beyond the first 30 months (over 60% of LOP) implementation of C&G3, strategic planning and communications are nearing 100% completion of intended targets while Capacity Building and Special Sectors lag behind at under 65% and 25%⁴ respectively. However, both Capacity Building and Strategic Communications may require added levels of effort in the fourth and final year of implementation. In terms of Strategic Communications, the 2009 implementation delay in Honduras and the restrictive policies and conditions affecting its activities in Nicaragua have forced variations on the original assumptions regarding both outputs and outcomes. Overall, communication plans laid out for five countries lack specific details on how to engage and advance significant changes required to truly bolster a sustained outreach capability of the MOLs in their respective country environments. Nonetheless, despite the hindrances faced throughout the 30-month period of implementation through March 2011, most of the protocols and ethic codes in five countries are in process and several have been already completed. Only Costa Rica faces continued delays on the Freedom of Association Protocol and Code of Ethics for Inspectors. In a separate attached section (**Supplementary Section-SSPF.1: Additional Program Findings**) some useful additional highlights on program accomplishments are discussed with an analysis of standing gaps found in the country-specific progress of all components.

⁴ It must be noted that these percentages do not reflect finished products that may have been already submitted to the MOLs but that have not been validated or still lack final approval.

V. MID-TERM EVALUATION FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

Key Issue 1:

Validity of the project strategy, objectives and assumptions

“Its not only about supplying inputs and products, we had to wait 12 years to see a change in the organizational culture...the ability to listen [developed over the years] has strengthened the Project; it is a virtue that enables it to be responsive to its stakeholders.

Cecilia Cortez
Executive Director, FUNPADEM

C&G3 was designed on the premise that building capacity through a range of products that are relevant and useful to the labor inspection efforts of each country will yield a better quality of inspection and increased effectiveness of the MOLs in both, promoting and enforcing labor law compliance. This *supply focus* (service delivery oriented) is meant to address key aspects of institutional development of participant MOLs such as opportunity, widespread access and transparency, by applying context-specific approaches that benefit their operations. Strategic planning and technological improvements have thus been designed and implemented to be instrumental to this institutional development process and **are assumed to yield an increased ability to hone good practices and target more frequent violations of the labor law.**

Furthermore, the strategy driving the project draws on capacity building inputs, aimed at promoting desired changes in the perceived presence and performance of inspectors. Inputs such as the development of codes of ethics and inspection protocols, alongside enhanced communication channels and effective messages in reaching out to stakeholders are therefore assumed to assist such changes. Ultimately, the project seeks to promote their professional development through a heightened awareness and a renewed understanding of purpose and mandate.

Key Questions Considered under this Issue

- *Were the project strategy, objectives and assumptions appropriate for achieving planned results? Why or why not?*
- *Were the activities and products adapted for the needs of each Ministry of Labor?*
- *Were the activities appropriately adapted for the needs of each country?*
- *Do the MOLs/ employers/ unions/ project advisory committee members understand the project's objectives and approach? Do they understand the distinct objectives of this project vs. the other Cumple y Gana phases? Do they support the objectives?*
- *How are the projects main products (Protocols, case management systems, strategic planning tools, Leylaboral.com, etc.) perceived by the MOLs? How relevant are they for the direct beneficiaries?*

Finding: A fundamental assumption and central argument for the success of the program logic is **the compound effect achieved** by the upgraded systems and tools, in tandem with more effective planning and communication approaches. This major outcome of the program logic is assumed to become particularly evident in the improved effectiveness of specific operations and the pertinence of decision-making processes across the MOL, all of which are critical to the operations of the Inspections Office.

C&G3 originally proposed and has since implemented a program logic that introduces specialized inputs and technical activities, directly related to the day-to-day operations of the inspection offices, into the six particular functional environments of each MOL. Outcomes under this program logic will be associated with critical changes in means, opportunity and focus, reflected in a number and better quality of inspections.

However, there are important risks inherent to this program logic. Target audiences are assumed to be ready and able to introduce changes that may not be aligned with mainstream MOL policies or its senior officials. On the other hand, inspection offices implementing these changes may not benefit from the necessary political will and a congruent allocation of resources, human and material. Moreover, there is not yet a strong enough commitment of many of the MOL stakeholders to sustaining project-driven improvements at the desired levels or monitor their progress through indicators that effectively and specifically relate to the intended outcomes.

Finding: In all five countries where it was applied, MOL stakeholders have deemed The Balance Scorecard (BSC) approach selected by C&G3 for the implementation of the Strategic Planning Component useful and appropriate.

“We have taken the model of strategic planning and we extrapolated it to the complete institutional context...The strategic planning component was developed on the basis of our direct support. We work on both the quality and reliability of the information managed by the tool, as well as in ensuring its functionality across the Ministry.

The BSC approach allows for a progressive and multi-stage development, which in turn facilitates a smoother absorption of critical methodological principles, as well as a better-targeted and relevant participation of key MOL staff.

Allan Cruz
MOL Director of Planning,
Honduras

Conclusion: The project strategy, objectives and assumptions are appropriate for achieving planned results, in as much as the program logic assumes a direct causal linkage between internal capacity improvements of MOLs and measurable improvements in overall country compliance with national labor laws. Products including management systems, strategic planning tools and communication materials are perceived as relevant by the MOL and well-centered in the assessed needs to improve critical capabilities. Moreover, there were various instances found of methodological replication, a *multiplier effect*, which clearly denotes both appropriate and effective transfer of knowledge and skills.

Recommendation: A greater effort needs to be made to better document changes (outcomes) taking place inside the MOLs, directly associated with the elements of the program logic and dealing with new practices and behaviors emerging from project-supported interventions. **Better linkages between groups and subgroups of MOL staff** leading these changes have to be at the forefront of program analysis undertaken by C&G3. A focus on the effect and consequence in **the emergence of champions or early adopters** can be useful in better associating inputs and activities to emerging and positive institutional trends. Finally, the advantages lent by the project’s regional scope seems a prime opportunity to engage and emphasize **a community of practice (CoP) approach** to the remaining follow-up activities (See details of a CoP approach in **Annex Q**)

Finding: Despite a seemingly homogenous technical approach for all six countries, C&G3 has successfully implemented **significant adjustments in its focus to fit client needs and country-specific conditions**. There is also evidence of significant flexibility in the adaptation of products to benefit strategic areas of growth of MOLs in all six countries.

Evaluation interviews at various levels with MOL stakeholders addressed to the ability of C&G3 to consider the singularities of each country setting and any specific requirements identified by each MOL. Feedback confirms a sense of ownership that is common among stakeholders, based on their direct involvement in the development of the products and tools provided by the project. Adjustments to the original platform specifications for the ECMS are a good example of product adaptation to fit context and client needs. Original production timeframes have been adjusted to enable additional consultations and in

some cases, such as the final specification of the ECMS in the Dominican Republic, these supplementary consultations have lasted several months.

The noted flexibility and responsiveness in the technical approach (as opposed to a rigid implementation of an original plan) is especially apparent in **the progressive focus on regional vs. central capacity building**. Accordingly, the project’s resolve to strengthen inspection operations outside main headquarters has even translated in significant product design changes, seeking to remediate a limited consideration of regional needs in the original design. In this respect, stakeholders refer to the feedback opportunities surfacing in country-specific discussions with stakeholders, as well as in multi-country meetings, often featuring the participation of subcontractors and thereby facilitating useful variants or enhancements in product design.

...most of the products [under the] Master Lex’s umbrella agreements have been completed...a new task order was signed to include new key process indicators and a new version of the module that will permit regional offices to follow up their own results. [C&G3] realized that the module, as it was designed and developed, only allowed to see national statistics, but with the input received during the regional seminar in September, (San Salvador)[suggested the need to] switch to a regional solution for the dashboard.

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Finding: MOL stakeholders consider the products, developed under previous or current project implementation, both relevant and appropriate (protocols, case management systems, strategic planning tools, leylaboral.com, etc.). However, most **stakeholders outside the MOLs** have a very limited understanding of how the four-year support provided by C&G3 is expected to affect the capabilities of the MOLs and how its expected outcomes could change their present concerns and views on labor law compliance.

In general, interviews with MOLs, employer associations and labor unions in each country acknowledged the fact that the current phase of implementation was focused on the MOLs and did not have the previous tripartite approach. However, most persons interviewed were unclear as to the specific objectives or expected outcomes of the C&G3 implementation. There was a common concern among people interviewed outside the MOL regarding the loss of an important measure of accountability and “a reality check capability” when the labor and employer sectors are not offered a more active role in efforts to strengthen the MOLs’ technical capabilities regarding labor law compliance.

Understanding of the project’s objectives and approach

Within the MOLs, although many of the officials interviewed at various levels (see a detailed breakdown of all persons interviewed inside the MOLs in **Annex I**) were somewhat unclear on the specific project objectives, most of them were aware of the expected outcomes relating to capacity improvements reflected in the internal processes and competencies pertaining to inspections (Intermediate Objective 1). Likewise, these interviews showed a high awareness and support at various levels for its focus on maximizing the use of available resources and targeting of special sectors and country-specific labor violations (Intermediate Objective 2). Throughout the interviews, MOL staff (including inspectors) expressed a sufficiently clear understanding of the capacity building rationale harbored by the project, seeking to enhance their technical ability to better target sectors and/or labor violations (Intermediate Objective 3). Stakeholders **outside** the MOL were unfamiliar with the project’s rationale for working in capacity building, strategic planning, special sectors or strategic communications. Overall, these interviews showed little clarity on the project strategy and its bearing on intended outcomes.

Finding: There is also a palpable sentiment in several countries, drawn off both the employer and labor organizations interviewed, that they are being involved in the validation products at a point in which content variations are no longer possible and hence their input and recommendations have little bearing on the final product.

Conclusions: There is need for refreshed contact and more frequent updates for stakeholders **outside** of the MOLs. Moreover, there is sound basis to the argument posed by employer and labor organizations regarding the loss of an important measure of accountability and “a reality check capability”, ascribed to a more active role in efforts to strengthen the MOL’s capabilities and decision-making regarding labor law compliance.

Recommendation: As the project nears its final year of implementation, the strategic communications component should consider a more direct and continuous involvement of former employer and labor stakeholders as *sounding boards* of MOL improvements achieved. Included in this effort, it might be useful and feasible also to find higher levels of involvement and more effective feedback loops for *strategic and natural allies* with whom the project has cultivated a working (yet not necessarily formal) relationship. These are mostly individuals associated with other international assistance projects, US Embassy staff, academics and key opinion leaders in each country. Even though the dimension of an advisory group was not formally embraced and implemented by C&G3, it may be important and timely to consider a more formal association of the project to individuals and entities that can contribute to furthering a positive public perception of the MOLs and assist in an ongoing review of emerging opportunities for their continued institutional development, beyond the LOP.

Key Issue 2:

Potential Benefits/impact to be accrued target groups

The sustainability and relevance of new skills honed by the labor inspection office staff in each country seem to vary greatly and depend directly on the ability of C&G3 to move beyond the initial knowledge transfer processes. To this end, the Project will need to successfully promote the emergence of better-integrated functionalities, both within the specific inspection units and among other vital areas of operations of the MOLs such as communications, planning, statistics, comptroller, budget and others.

Key Questions Considered under this Issue

Describe any impacts that the project has had on the following:

- *New skills among labor inspection office staff to improve inspections and increase labor law compliance*
- *New skills among labor inspection office staff to improve inspections and increase labor law compliance.*
- *Likelihood that all the new skills will be sustained beyond the current circumstances (project still active, current administrations, key officials working at the ministries, etc.)*

...regarding the role of technology-driven integration

Finding: Technology-driven resources introduced by C&G3 will be central to achieving **higher levels of integration between different areas of competence and functionality** within the MOLs, which in turn, are critical to sustained improvements in the performance of the inspection offices.

The introduction of new technology-driven solutions is a key project-supported input that will be instrumental in furthering functional and strategic integration in the majority of the countries (the only exception may possibly be Nicaragua), enabling a critical capability and opportunity to build greater transparency and better information flows among different MOL departments. Hence, MOL planning departments also appear to play a critical role in this process towards enhanced functional integration.

Nonetheless, departments such as statistics and communications seem to closely track agendas that counter this integration and often circumvent the strengthening of a more central role of the inspection office in the overall MOL decision-making process. It is important to note that this not solely a characteristic (or a generalization) of the role of these two departments throughout the region. Nonetheless, integration in these departments is essential because of their natural roles and contribution in shaping the institutional vision, priorities and sense of accountability that should flow down from the higher echelons of authority, into the different inspection units in all six countries.

[There is] a link between the [MOL] Annual Operations Plan and the Country Plan Law [which constitutes the Honduras]...multi-year Plan of Government. The fact that we had [access to] a more robust and integrated system affects our decision-making and changes the way we work. We are [now engaged with the Labor Inspection Office] with the new applications of the system, taking on complementary roles...

Ramon Cruz
Senior Advisor to the MOL Planning Director
Honduras.

Implications of Technology-Driven Integration for Honduras

Honduras has a fully engaged planning department that not only has adopted the tools provided by the project but also has become instrumental in facilitating other integration processes within the MOL. Moreover, it is interesting to note that the person leading this effort, and central to its success, comes from a very strong IT background. Separate interviews with his team make it is very evident that there is thinking beyond the streamlining of current internal processes.

Accordingly, the MOL in Honduras has managed to establish a visionary focus on the added value of content drawn from the work of the office of inspection to, in turn, propel its outreach capacity and influence. In doing so, the Director of the Planning Department articulately conveys the ministry's intention to use resources enabled by the recently enhanced connectivity (supported by the project) to build on locally based processes, anchored in the expanding capabilities of the MOL's regional offices throughout Honduras.

“...The new monitoring module is very important to us [since it tells us]where we are, what have we accomplished and what we need to do to improve...it will enable us to better steer in accordance with [occurring labor] violations and search case files accordingly. When we achieve full network connectivity among 10 of the 16 regional offices, I trust that the systematized processes will be especially useful...we (the Honduras MOL) are a centralized system, all case files are processed here...however, an interconnected system will provide us with a better idea what we are handling and where violations are occurring”

Donaldo Martínez
Deputy Director of Inspections
Honduras

However, in terms of the new skills and capabilities afforded by the project to the MOL and in particular to the inspectors, a critical element is anchored in the work and guidance of the senior staff of the labor inspection office. Beyond the obvious appropriation of the ECMS by the inspectors (ECMS remained in place and was routinely used throughout the year of project suspension), there is a tangible intention of the senior staff to connect their progressively proficient use of project supported inputs, both at headquarters and at the regional level, with an increasing institutional awareness regarding the advancement of inspections, nestled in a better integrated system. Beyond the advantages of access to information granted by the ECMS, they speak of more effective and better supported decision making processes

Implications of Technology-Driven Integration for El Salvador

In El Salvador, where the project provided an ECMS during Phases I and II, a different version of a similar effect drawn from the introduction of new technologies, carried through the political threshold and changes brought about by the 2009 elections. In El Salvador, C&G3 has been able to upgrade and expand the ECMS to eight regional offices, including the most important urban centers beyond San Salvador and other key regional localities. While interviews with MOL officials in El Salvador readily asserted stakeholder satisfaction with the ECMS, they emphasized the need for continued expansion to full nationwide coverage—something that was not considered in the C&G3 original design, goals or budget allocations.

...we have been able to appropriate the ECMS...nonetheless, we need to consolidate the appropriation and use of protocols. The first ones we designed included training...but new inspectors have been brought in...originally we were 150, today we are 284...

Javier Rivas
Senior Advisor and former General
Director of Inspection
El Salvador

A perceived related need for additional Capacity Building

On the other hand, senior staff interviews repeatedly emphasized the efforts of the present administration to increase the number of inspectors who will be accessing the network and working with the integrated tools and products provided by C&G3 (which has almost doubled through the incorporation of the technicians previously working in the Occupational Health and Safety unit). In this respect, MOL officials and inspectors argue that **additional training is necessary to thereby ensure full use of products** such as the protocols, which are not familiar to the new staff brought into the labor inspection settings.

Regional Office Leadership in Early Adoption of Technology-Driven Solutions

In terms of capacity building, the greatest change detected has been propelled by the connectivity between the central office and the eight regional offices. Interviews and some limited on-the-job observation conducted in the MOL regional office in Santa Ana, provided evidence of sustained and proficient use of the ECMS. Indeed, observations made in Santa Ana pointed to levels of proficiency that seemed higher than some of those noted from central office inspectors. Furthermore, there was a clear indication that the enhanced connectivity and tools had sparked a locally based process of appropriation and customization, specifically focused on needs and requirements of the Santa Ana social and economic context. Despite the still significant limitations in terms of hardware (15 inspectors share three working screens), inspectors speak of added dimensions to their work, which are best supported through the use of the ECMS.

...we really have two systems, one is helpful in handling the scheduling of inspections and the other one enables us to input all inspection-related information and maintain the historical account of our work. Why two systems? Because the File Master does not have a module for handling the scheduling of inspections that can provide supervisors with a comprehensive list of workplaces to target with inspections. We therefore had to ask a colleague to develop this specific software solution [to use as a parallel tool to the ECMS provided by C&G3]...Hence, the need for repetitive information input for all inspections undertaken.

Juan Carlos Videz
IT Technician, Santa Ana Regional Office
El Salvador

Specifically, inspectors in Santa Ana are already sensing the need to better integrate the programming and scheduling of their inspections into their use of the File Master Software that drives the ECMS provided by C&G3. Currently, and by their own initiative, they have enabled a third party software to

support this function, despite the fact that the use of a second application requires every inspector to input inspection information twice, thus adding to the burden of an already constrained screen-to-user ratio.

Implications of Technology-Driven Integration for the Dominican Republic

“...So where are we headed? We are moving towards a “one stop” approach that allows the MOL to obtain updated information of employer and labor law enforcement records, sharing information also with the National Treasury, the SIUBEN [a unified registry for eligibility to public assistance] and the General Tax Office...[this also means] a reduced level of [tax] evasion. We want this “one stop” approach to also assist [better-targeted] job placement resources...it is no longer about creating a service, but rather, it is now about consolidating a national system. The bubble that generated this change within the MOL was the ECMS; this was the first step.”

Pedro Rodríguez Velásquez
Executive Director, National
Employer Federation
Dominican Republic

In the Dominican Republic, enabling technology-driven integration furthers a number of significant changes, hosted under the larger umbrella of the modernization of the public sector and enlisting greater budgetary allocations and international funding support. Although other countries of the region (El Salvador and Costa Rica, for example) are strongly endorsing digital government programs, the Dominican Republic has specifically brought the Cumple y Gana supported ECMS into the larger context of public sector reform. Both the MOL and outside stakeholders speak to a cross-referencing and database integration in the near future that supports efficiency and better coordination among different government agencies.

Integration Offshoot Encouraging Private Sector Collaboration

This inter-agency collaboration is also being strongly supported by the business sector, as a way to assist the mapping of the job market and the “leveling of the playing field” for compliant employers. In this respect and in no uncertain terms, the CEO of the largest federation of employers in the Dominican Republic states that it is precisely the successful implementation of the ECMS, provided to the MOL by C&G3, that opens the way to larger gains in public and private sector collaboration, based on tangible advantages drawn from labor law compliance.

Key Issue 3:

Implementation status (activities, schedule and budget)

Although a previous section of this report provides ample details to the questions considered by the evaluation TOR under this issue, some findings that merit highlighting are included in this section. To track the sequence of all other Key Issues addressed, the conclusions and its recommendations have been placed in this section.

Key Questions Considered under this Issue

- *To what extent have planned activities been implemented on time and within budget, in relation to the original project document and Country Plans? What obstacles were encountered?*
- *Were activities adapted to project needs and the country situation? Were they well received and well produced? Were they coordinated with other government, donor, or private sector activities where appropriate?*
- *Is the project utilizing funds efficiently? Are there specific areas for improvement?*

Finding: Project funds have been used efficiently, with no reported cost overruns, budgetary underperformance or ineligible costs incurred. No large balances have been reported in-hand and no reallocations have been necessary.

Finding: In Nicaragua and Honduras, the implementation curve and rate of progress was drastically distorted by overarching political factors that significantly changed the program implementation context. Overall, these changes accrued a considerable delay (9 months in Honduras and 12 months in Nicaragua) to achieving a full program implementation pace.

Finding: Implementation delays documented by the project concentrate on ECMS and the development and adoption of Special Sector Protocols. These delays track necessary adjustments to real time conditions or emerging contextual changes affecting C&G3 implementation. In some cases, the ability of counterparts to achieve the desired levels of readiness has been a major delay factor. This latter condition is often associated with political will and validation in higher levels of authority than with technical hindrances and shortcomings within the MOLs.

Finding: A review of the progress reports developed by the project between 2009 and 2010 shows inconsistencies in the data tracking under several of the specific indicators. These include incongruences between period-specific data and overall accruals. Specific detail included in reporting appears insufficient to better understand country-specific conditions leading to hindrances and the corresponding corrective measures.

Conclusion: Financial management and administrative practices appear adequate and responsive to project implementation requirements. Major implementation issues surrounding delays and major adjustments did not impact on line item allocation or annual cash flow projections. Undoubtedly, program and resource management activities equally benefited from the previous work experience and extensive understanding of the stakeholder context, including key actors in the six countries. However, it also enhanced the ability of FUNPADEM and its subcontractors to adopt a flexible approach and establish viable working grounds through effective consultations and negotiation with stakeholders, which has proven to be its greatest strength. This ability has not only enabled an unusual expediency in working within the public sector dynamics of six different countries, but it also has been a keystone to handle emerging changes and significant setbacks in program implementation.

Recommendation: The establishment of intermediate milestones and the definition of partial program benchmarks for each one of the four program components, even at this stage of implementation, would correct the ambiguities regarding actual progress present in current reporting contents. Moreover, the main focus of new progress markers should be to assist a better assessment of **internal changes** in the MOLs that can be associated to the compound impact of tools and practices supported by C&G3.

Key Issue 4:

Sustainability of project products or results

Key Questions Considered under this Issue

- *Does the project have a sustainability plan? If so, how was it developed?*
- *What project components or results appear likely to be sustained after the project and how?*

Sustainability will need to rely on a continued and evolving use of resources provided by the project that must eventually translate into a routine practice environment for the various MOL tasks and operations associated with labor inspections. Comments from interviews across six countries phrase sustainability as the institutional commitment of the MOLs to expand and strengthen the groundwork that has been laid.

Stakeholder comments also speak of creating the conditions for sustainability by convincing the people involved that a *point of no return* has been reached, forever changing the notions of personal productivity and institutional achievement inside the MOL walls.

Finding: A concrete sustainability plan has not been developed as yet by C&G3. It is worth noting however, that a formal sustainability plan was not a specific requirement of the design and implementation process supported by the USDOL award.

Finding: Despite its inherent technical complexities, the ECMS and the related inputs that will benefit from the more recently acquired connectivity in all five participant countries is possibly the most sustainable of all products. However, it is important to keep in mind that, in as much as protocols, guides and other resources continue to be substantially linked to the use of ECMS, these products will benefit from the increased demand and use of the ECMS integration and connectivity features.

Conclusion: In light of the setbacks and delays faced, four years may not be sufficient to adequately follow-up on the sustainable elements that need to be strengthened across the products and resources that C&G3 managed to put in place. Regardless of previous achievements in prior implementation phases, C&G3 did not start out with a “leveled playing field.” Political will and receptive conditions to fully engage the proposed technical interventions were not assured in participant countries. Moreover, progress made by previous C&G phases, assumed in place by the beginning of the C&G3 initiative in countries like Nicaragua, were irremediably discarded and an alternate approach had to be devised. This yielded a high degree of uncertainty in terms of the cohesiveness and effectiveness of its outcomes through the LOP.

Recommendation: The development and validation of a mechanism by which the project can demonstrate its actions and intent towards fostering the sustainability of project achievements should be pursued in the final year of implementation. This sustainability plan should mirror an action plan and be seamlessly incorporated into the management/monitoring module of the ECMS, with similar dashboard and “snapshot” capabilities. The plan should outline specific mechanisms and activities that lead to the achievement of the established progress markers for sustainability. Hence a set of milestones and benchmarks must be developed in association to a timeline that can be reviewed periodically, to support a progress monitoring process, where specific responsibilities would be gradually delegated and assumed by MOL officials, working in key relevant areas.

Key Issue 5:

Staffing and Communications

Findings regarding this issue cover both core staff based in Costa Rica and field staff based in each of the six countries.

Overall stakeholders view personnel roles and levels of effort as appropriate, effective and commensurate with project requirements. Communications with stakeholders track a very fluid and sustained pattern, with close and daily follow-up by the country facilitators. Despite the complexity and amplitude of the technical and logistic issues involved in the implementation of the four program components, all country facilitators appeared to have a precise and updated grasp of both progress to-date and corrective measures applied. MOL stakeholders were especially eager to single out the value of their contribution and point to them as a major project strength.

Key Questions Considered under this Issue

- *How well does the project manage its personnel and communicate with stakeholders?*
- *Is staff time spent in the most effective and efficient manner to accomplish the project’s objectives?*
- *Does the organizational structure of the project reflect effective and efficient staffing decisions? Are there areas for improvement?*
- *Is the communication between the donor and the project perceived as open and productive? Are there areas for improvement?*

Finding: The role of the country facilitators is key in ensuring MOL involvement and concurrence in project activities. Interviews with MOL officials point to their mediation capability and senior project staff acknowledges a critical lobbying function that they undertake at various levels, as a sustained and sound practice in all six countries.

Finding: Core staff has adopted a practice of “layered tasks” to ensure cost-effective use of the travel schedule and budget allocations. Drawing from their extensive work experience (as well as a team/peer familiarity) of previous project phases, they have managed to streamline a practice of shared task assignments in the field. This is reflected in the interaction with country facilitators and made evident in the range of tasks and issues engaged during any given core staff field visit. Albeit cost-effective, country facilitators view this practice as sometimes tending to overextend time allocations across too many different field activities.

Finding: Donor-project communications have been deemed not only fluid and effective, but also particularly helpful and supportive in steering through the complexities and hindrances faced, which have forced significant changes to the original design. In this respect, the senior and field project staff based in the six countries have cited such collaboration as vital to their ability to remain responsive and timely throughout the current implementation process.

Conclusion: Despite the seemingly uniform approach of the project activities, there is an evident measure of *customization* that C&G3 has achieved in each country through the personal leverage and influence of the country facilitators. Equally vital has been the flexibility and latitude that senior management and program staff have vested on their colleagues in the field. Moreover, clear roles and task distribution between field and core staff have greatly contributed to avoid the usual pitfalls of a complex regional operation. In this respect, it is timely to express a measure of concern for the **significant changes in the operational set-up** anticipated for the fourth and final year of implementation.

Recommendation: Before releasing the country coordinators, at the end of the third year of implementation (September 2011), it may be useful to engage a joint and strategic exercise, where both core and field staff map out⁵ challenges and determine clear priorities for the remainder of the work in the six countries. There must also be a cost-benefit aspect to this exercise, tracking the *state of play* in each country, aimed at enabling C&G3 review and possibly adjust its resource allocation ratios and thereby, best tap into the present opportunities afforded in each individual context. The suggested exercise must also assess at the **highest possible value-added** derived from the project’s regional scope.

Key Issue 6:

Effectiveness of project performance monitoring

Key Questions Considered under this Issue

- *Is the monitoring system practical, useful and cost effective for project management?*
- *Will the project be able to capture key information based on the results monitoring tools that are being developed?*

Two levels of performance monitoring were considered within the evaluation activities. **One level** refers to the means and proficiency attained by the MOLs through C&G3 to monitor progress made towards the desired improvements in enforcing and promoting labor law compliance in their respective countries. The

⁵ See reference material on Outcome Mapping, included in Appendix R.

second level of performance monitoring refers to the ability of the project itself to monitor the progress of the implementation process (inputs, activities and outputs), assess the range, effectiveness and relevance of the resulting changes and enhancements in the MOL capacity (outcomes). As has been addressed in a previous section, the absence of a well-defined baseline (a rigorous counterfactual) prevents the consideration of impact as a measured state of progress achieved solely from the C&G3 intervention.

...regarding the first level of performance monitoring

Documentary evidence and field observations confirm that the monitoring module provided under the ECMS is fully operational in all five countries where it was installed. The strategic plan processes completed have yielded a participatory determination of the indicators that are contained in each of the five modules.

Finding: Throughout the five countries implementing the ECMS monitoring module, there is a **lack of congruence** between progress reported in the technical development of the ECMS, particularly regarding the monitoring tool and the familiarity expressed by MOL senior staff with regards to its use, specific features and concrete contribution.

The [C&G3] products were all designed with the [MOL] context in mind and the participation of the staff of the Inspection Office. Just like with the ECMS, an expert developed it, benefiting from our participation and contribution.

Many of these senior officials interviewed, leading critical decision-making and organizational development processes within the MOL, still appear unclear or uninformed regarding the foundational principles of the strategic planning process already completed by the inspection offices. Accordingly, observations made in the Guatemalan setting are useful in exemplifying a broader-ranging situation, relevant to the appropriation and full use of the ECMS-based tools, thus requiring further attention by C&G3 in the final stages of project implementation. In Guatemala, for example, the MOL director of planning has expressed a lack of understanding of the strategic planning process undertaken by the Inspection Department, even though her current senior advisor was the previous lead contact for C&G3 in the development of all project supported activities and products currently in place.

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Guatemala

Furthermore, in Guatemala two seemingly opposing conditions were found in relation to the use of the monitoring tools availed to the MOL within the strategic planning process:

The first condition is a result of the MOL’s decision in Guatemala to delay the start-up of the data input process relevant to the indicators tracked by the monitoring module of the ECMS. This delay (and related decision to exclude from the monitoring tool any information prior to January 2011) is considerably setting back the MOL’s ability to incorporate the system’s dashboards into its decision-making processes. Likewise, corrective actions regarding its use of the rest of the ECMS functionality are devoid of the intended system-driven understanding of progress made towards the established goals in the advancement of labor law compliance.

The second condition found is a young group of support staff that has been recruited to mainly assist in the implementation of the activities related to the strategic communication plan. These junior staff members have quickly developed a level of skill in working with the ECMS interface and in particular, with the monitoring tool it houses. In addition, there is an effective and ongoing skills building and knowledge transfer process between these staff members and the IT specialist, who was originally hired by C&G3 to assist the initial implementation of the ECMS and now extended through the end of 2011. No doubt, the

professional collaboration and synergy between the members of this young team constitutes a prime opportunity to advance the effective implementation of MOL monitoring activities.

...regarding the second level of performance monitoring

Finding: The progress reports developed by C&G3 between 2009 and 2010 show **inconsistencies in the data tracking** under several of the specific indicators.

There is sufficient documentary evidence of periodic follow-up (mainly focused on quarterly progress reports supported by more frequent reporting from the field, as well as, a mid-year in-depth review of “progress status to final program goals.” Bi-annual reporting provides some detail regarding hindrances and delays alongside corrective measures applied.

However, inconsistencies in the data tracking under several of the specific indicators have been found throughout its reporting to date. What is of special concern are not the variances and errors found in target accruals for the different periods of performance but rather the fact that these mistakes have been carried

Intermediate Objective/ Product	PMP target at the end	March 2011	Status % of advance	Comments
Development of Freedom of Association & Collective Bargaining Protocols 3.4.a	83% / 5 countries	3	72.22%	
		3	72.22%	
Costa Rica	1#	0	0%	
El Salvador	1#	1	66.66%	Investigation and draft of protocol are ready. New is changed the scope for this protocol irements during validation workshop.
		1	66.66%	
Guatemala	1#	1	50%	Investigation and draft of protocol are ready. Tripartite be done by a Guatemalan consultant. then SAI resumes training.
		1	50%	
Honduras	1#	0	0%	
Nicaragua	N/A	N/A	0%	
Dominican Republic	1#	1	100%	This Inspection Protocol was validated with MOL, the Unions and the Employers representatives. In only needs Mol final and official approval by written to proceed to printing.

Source: Status vs. Goal March 2011

through several reporting periods. The example inserted in this finding shows how country tabulations that equal completions (100%) are expressed as non-related percentage figures (50% and 66.66%) while total target tabulation should express 60% of completion for 3 out of five targets (not 72.22%).

Moreover, in early 2009, the project retained the services of an external consultant to undertake a periodic review of the performance of C&G3, as reflected in the progress made

towards the original PMP targets. The consultant has clearly identified and reviewed the mistakes and inconsistencies in the tracking of target accruals, making specific suggestions on how to correct the situation. There is little evidence of actual corrective measures that may prevent a recurrence, possibly by better linking ongoing data collection processes to the complete tabulation reflected in the reporting tool (Status vs. Goals Matrix). There is also no formal response from the project management side that reviewed the report, fully addressing the findings and recommendations along three cycles of review, through September 2010.

Finding: **Critical assumptions and risks** associated with the country-specific context in which the products are developed have not been adequately reflected in the project reporting. The original design also **lacks a strong definition of intermediate goals** that can measure the C&G3’s success in assisting and promoting fundamental conditions for product development and application in each country.

Although quarterly reporting does briefly mention hindrances faced in product development and overall implementation, there is a notable absence of detail in the discussion of delays and setbacks that relate to conditions that, beyond the control of C&G3, in effect change original assumptions about the feasibility or sometimes even the relevance of products included in the original design. Furthermore, these contextual

changes, that are mostly normal factors faced by any multi-year initiative, have to be assumed and addressed by the program logic, as very real and critical factors stemming from the democratic cycles of change. In addition, the turnover in public sector officials associated with a healthy balance of power needs to be specifically factored into the definition of **intermediate goals** that best reflect the actual progress of C&G3 along the program logic. Well-defined intermediate progress markers would also provide more useful context to understand program adjustments and corrective measures.

An example of this standing need for intermediate progress markers is rendered by the delays and setbacks faced in the planned development of some of the Special Sector Protocols. While delays were reported and some scant details were provided in the Status vs. Goal and corresponding Status Report in the final quarter of 2010 (see reporting details in **Annex K**), there is no discussion of the particularly sensitive issues and difficult conditions faced by the Freedom of Association and Collective Bargaining Protocols. In effect, interviews with the core project staff and country facilitators demonstrate a learning curve and adjustment capacity of C&G3 to this kind of implementation hindrance that is not sufficiently and adequately reflected in their reporting.

Intermediate Objective/ Product	PMP target at the end	March 2011	Status % of advance	Comments
Development of Freedom of Association & Collective Bargaining Protocols 3.4.a	83% / 5 countries	3	72.22%	
Costa Rica	1#	0	0%	
Guatemala	1#	1	50%	with new requirements during validation workshop Investigation and draft of protocol are ready. Tripartite validation must be done by a Guatemalan consultant. Then SAI resumes training.
Honduras	1#	0	0%	
Nicaragua	N/A	N/A	0%	
Dominican Republic	1#	1	100%	This Inspection Protocol was validated with MOL, the Unions and the Employers representatives. In only needs Mol final and official approval by written to proceed to printing.

Source: Status vs. Goal March 2011

C&G3 tracks a program logic that banks on a **compound effect** to be achieved by the upgraded systems and tools, in tandem with more effective planning and communication approaches. Hence, it is critical that it can also adequately report on intermediate actions and achievements that characterize the improvements in the response capacity of MOLs to changing conditions that affect product development and application. In this respect, project reporting seems to fall short of the

necessary detail and has not been able to effectively depict these necessary changes. The external consultant conducting the periodic reviews of progress in target completion has also repeatedly pointed this out.

Conclusion: The inconsistencies found in data tracking point to the need to review data input procedures, possibly including a more direct linking to source instruments and data tabulation in the field. However, the more pressing issue is that of quality control over final tabulation and reporting of specific and general accruals, meriting also a higher level of analysis, beyond the mere statements of shortfalls to final target totals. In this respect, it is essential that milestones be set to reflect significant conditions achieved by **partial progress**. Therefore, reporting on corrective measures should not only track hindrances to expected progress but also render greater detail on a unique learning curve achieved C&G3.

Recommendation: C&G3 should review its data collection and tabulation procedures to ensure more reliable and automated linking of data collection efforts in the field to its internal compilation of accruals in the completion of targets. C&G3 should also consider upgrading its M&E procedures and tracking instruments to yield more information on the learning curve drawn from five countries and distinct public sector contexts. Ideally, C&G3 would be able to apply more intuitive approaches to examine progress made in scenarios embedded in each context, where desirable behavioral change is occurring.



Appendices

APPENDICES

Supplementary Section-SSPF.1: Additional Program Findings

Appendix A: Terms of Reference

Appendix B: Strategic Framework

Appendix C: Project PMP and Status vs. Goal Reports

Appendix D: Project Document

Appendix E: C&G3 Impact Plan (May 2010)

Appendix F: Evaluation Team Meeting Materials

Appendix G: Post Trip Debriefing Material (Spanish)

Appendix H: Field Work Program: Country-specific agendas listing all scheduled meetings (Spanish)

Appendix I: List of Interviews (Spanish)

Appendix J: Participants registry (Spanish)

Appendix K: Notes about project status (Spanish)

Appendix L: Comparative summary of inputs obtained from the interviews (Spanish)

Appendix M: Inputs obtained from the field by key topics (Spanish)

Appendix N: Checklist & interviews templates

Appendix O Critical Path for the Evaluation Process (Spanish)

Appendix P: Logic Map (Spanish)

Appendix Q: Community of Practice Diagram

Appendix R: Additional Reference Resources

Appendix S: Comments and Changes to Draft Version