Congress of the United States Washington, DC 20515

October 5, 2007

The Honorable Mark R. Dybul U.S. Global AIDS Coordinator U.S. Department of State 2201 C Street, NW Washington, DC 20522

Dear Mr. Ambassador:

On July 16, 2007, we wrote to you regarding the implementation of abstinence and befaithful programs for youth in the President's Emergency Plan for AIDS Relief (PEPFAR). A government-commissioned evaluation found that in many ways, these programs are not meeting the needs of sexually active or at-risk youth. We asked how your office planned to respond to the findings and recommendations of the report.

On August 13, 2007, we received a response from Jeffrey Bergner, Assistant Secretary of Legislative Affairs.² In his letter, Mr. Bergner described several actions that individual programs have taken, and technical assistance that the U.S. Government is offering in various countries. However, he did not provide a plan to systematically fill the gaps that the evaluators found.

The centrally awarded abstinence grants for youth will total \$100 million over five years. More importantly, they are intended to affect the health and wellbeing of millions of young people in countries most impacted by the HIV epidemic. We continue to have serious concerns about whether participants are receiving, or being referred to, the crucial information they need.

Furthermore, we are concerned about the effectiveness of these and other U.S. funded prevention programs for youth. To date, no evaluation has assessed their actual impact on the behavior and health of participants. While we understand that such evaluations may be underway, we are concerned that U.S. policy is focusing on an unproven intervention for HIV prevention.

We therefore request a description of how each grantee in this program has responded to the evaluators' recommendations, including a description of each grantee's policy for referring youth to comprehensive programs when appropriate. We also request a description of how the President's Emergency Program for AIDS Relief will monitor the implementation of these policies. Finally, we request a description of all planned evaluations of the effectiveness of PEPFAR abstinence programs.

¹ Letter from Chairman Henry A. Waxman, Chairman Tom Lantos, and Representative Barbara Lee to Mark Dybul, U.S. Global AIDS Coordinator (July 16, 2007) (attached).

² Letter from Jeffrey T. Bergner, Assistant Secretary for Legislative Affairs, U.S. Department of State, to Chairman Henry A. Waxman (Aug. 13, 2007) (attached).

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The July 16, 2007, Letter

On July 16, we wrote to express our concern about the findings of an independent evaluation of abstinence grantees in PEPFAR.

In 2004 and 2005, the Administration announced a central award of \$100 million over five years to fourteen organizations that would conduct "ABY" programs — those that teach abstinence and be-faithful messages to youth (defined as ages 10-24). In 2006, the U.S. Agency for International Development (USAID) asked MEASURE Evaluation to conduct a "targeted evaluation" of the design and implementation of these programs. 4

The evaluators assessed the programs in reference to evidence and expert advice on effective youth programming, and did identify some strengths. However, the evaluators found that "few programs had specific activities and strategies for sexually active youth, beyond recommending a return to abstinence." Many programs lacked adequate information about partner reduction, fidelity, condom use, and cross-generational and transactional sex; and often lacked age-appropriate content, especially for older youth. In addition, despite agency recommendations that sexually active or at-risk youth be referred to more comprehensive programs, the evaluators found that the programs often failed to identify and refer these youth.

Because the stated purpose of the evaluation was to inform "mid-course" corrections for the centrally-awarded ABY program, we requested a description of how your office planned to respond to the findings of the report. We also asked how your office would apply the report's findings to other abstinence and be-faithful programs that are awarded grants at the country level.

USAID Response

The response from USAID notes several positive developments, but does not describe a comprehensive response to the significant gaps identified in the evaluation.

³ U.S. Agency for International Development, \$100 Million in Abstinence-Focused Grants for HIV/AIDS Prevention Awarded Under President Bush's Emergency Plan for AIDS Relief; Faith-Based Community Plays Key Role in Expansion (Oct. 5, 2004) (online at www.usaid.gov/press/releases/2004/pr041005.html).

⁴ The evaluators did not assess programs that were awarded grants at the country level.

⁵ MEASURE Evaluation, *Field Assessment of Emergency Plan Centrally-Funded HIV Prevention Programs for Youth*, 32 (Mar. 2007) (online at www.cpc.unc.edu/measure/publications pdf/sr-07-34.pdf).

⁶ *Id.*

⁷ *Id*.

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Mr. Bergner's letter did list several actions that have taken place subsequent to the MEASURE evaluation. He wrote that the report was shared with all ABY programs; that it was shared with all USAID field staff; and that MEASURE provided specific feedback to ABY partners. In addition, he described various examples of technical assistance that PEPFAR is providing to countries on topics related to youth sexuality and risk behaviors. 9

However, the letter does not provide a thorough account of how the ABY grantees are addressing the problems identified in the evaluation. USAID's original outline stated that after the MEASURE assessment of program quality, each grantee would create a plan of action containing "a list of actionable items for program improvement." But Mr. Bergner offered only three examples of actions that three ABY programs have taken subsequent to the MEASURE evaluation. One has developed supplemental fact sheets on condoms and sexually transmitted diseases; one has developed a curriculum on faithfulness; and one has developed wall banners with information about other local HIV services. There is no indication of whether all of the grantees are appropriately responding to the evaluation's findings. Furthermore, Dr. Bergner's letter described no improvement in programs' success in identifying youth who need referrals to more comprehensive services.

The letter also did not provide information on the effectiveness of these programs in actually reducing risk behavior and improving health outcomes. Mr. Bergner cited several examples of documented behavior change associated with declines in HIV prevalence in PEPFAR focus countries. For example, he noted that in Kenya from 1998 to 2003, the percentage of men with multiple partners decreased, the age of first sex among women rose, and HIV prevalence declined. These changes are positive, and their association supports the idea that behavior change is crucial to fighting the epidemic. However, the studies do not establish that these behavioral changes were *caused* by any specific intervention. Even if the changes were associated with interventions, these studies predate PEPFAR, and study authors note that the decreases in prevalence may reflect behavioral changes that happened even earlier. It does not appear that an impact evaluation of ABY programs has even begun, and such studies take years to complete once initiated.

⁸ Bergner, *supra* note 2, at 3.

⁹ Bergner, *supra* note 2, at 3-4.

¹⁰ U.S. Agency for International Development, *Targeted Evaluation of Abstinence and Being Faithful Programs* (Jan. 23, 2006).

¹¹ Bergner, *supra* note 2, at 3.

¹² Bergner, *supra* note 2, at 2.

¹³ Hallet, TB et al., Declines in HIV Prevalence Can Be Associated with Changing Sexual Behavior in Uganda, Urban Kenya, Zimbabwe, and Urban Haiti, Sexually Transmitted Infections (Apr. 1, 2006); Gregson et al., HIV Decline in Zimbabwe, Science (Feb. 3, 2006).

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Conclusion

For every person in the world who gains access to HIV treatment, six more become infected. A paucity of data should not paralyze prevention efforts, but does underscore the importance of implementing prevention efforts with the greatest possible fidelity to effective program standards.

We therefore reiterate our request for an explanation of how the gaps described in the MEASURE evaluation will be addressed. Please include:

- 1. A detailed list of the steps that each grantee has taken in response to the evaluators' recommendations. For each program, please describe any addition of information on partner reduction, fidelity, condom use, or cross-generational and transactional sex. In addition, for each program, describe how the grantee will ensure that sexually active youth, or those who may become sexually active, are referred to comprehensive programs as recommended in agency guidance.
- 2. A description of how PEPFAR will monitor the changes described in item 1 to ensure that sexually active youth, or those who may become sexually active, receive the comprehensive information they need.
- 3. A description of all ongoing or planned evaluations of the impact of PEPFAR AB or ABY programs on behavior and health.

We request a response by October 19, 2007.

Henry A. Waxman

Chairman

House Committee on

Oversight and Government

Reform

Sincerely,

Tom Lantos Chairman

House Committee on

Foreign Affairs

Barbara Lee

Member of Congress