



# External Evaluation of CARE’s System-Level Impact through the 2018 U.S. Farm Bill

## Final Evaluation Report

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# EXECUTIVE SUMMARY

## Evaluation of CARE's Systems-Level Impact through the 2018 U.S. Farm Bill

### Context: The U.S. Farm Bill

In a global context of rising numbers of people affected by increasingly frequent and severe food security crises, CARE advocated for essential amendments in the 2018 Farm Bill to strengthen critical international food aid programs. CARE's advocacy for the 2018 Farm Bill was rooted in its focus on gender equality and systems change, which in this case meant advocating for a shift away from monetization in support of CARE's long-term goals for transforming food aid from a commodity-centric model to one that enhances effectiveness, efficiency, and focus on systems change.

Central to CARE's asks in the 2018 Farm Bill were efforts to end the mandate of monetization and provide greater certainty in the use of the Community Development Funds. Both of these asks would strengthen Food for Peace, a program authorized in the Farm Bill that provides in-kind food aid directly to communities and supports community self-sufficiency. CARE recognized the 2018 Farm Bill reforms, including ending mandatory monetization and expanding Community Development Funds, could strengthen local food systems, empower farmers, and build community resilience by prioritizing sustainable and effective food aid delivery.

### Monetization

Monetization is the practice of U.S. commodities being sold overseas in foreign markets by NGOs who then use the proceeds to fund development programs<sup>1</sup>. Monetization has a significant impact on local markets, food systems, and farmers: selling U.S. commodities in a foreign market can cause prices to drop, ultimately hurting local farmers who are trying to sell their crops; it

can disincentivize local agriculture production and marketing; and it can eliminate opportunities for farmers and small businesses. Prior to the 2018 Farm Bill, \$350 million of Food for Peace's approximately \$1.7 billion budget was directed towards non-emergency, resilience-building programs, or Resilience Food Security Activities (RFSAs). 15% of the U.S. commodities designated for use in RFSAs had to be monetized. This 15% requirement was satisfied with three programs in Bangladesh, including CARE's SHOUHARDO program. Due to the challenges CARE faced with monetization in Bangladesh and the inherent risk of local market distortion that comes with monetization, during the 2018 Farm Bill process CARE and the NGO coalition asked Congress to remove the 15% requirement and replace it with permissive authority. This change would allow NGOs to practice monetization when it makes sense, but not force implementing partners to monetize assistance, creating a more consistent and cost-effective source of funds for Food for Peace resilience programs.

### Community Development Funds

Community Development Funds (CDF) are part of Development Assistance, a major U.S. foreign assistance account that invests in long-term development. CDF is used as supplemental funding for Food for Peace RFSAs. CDF provides cash to NGOs, which is critical for non-food program costs like staff salaries and equipment. RFSAs funded by CDF are not required to use U.S. commodities, allowing them to tailor the program to community needs without being required to use an amount of in-kind food aid that may not be useful for the community.

United States Agency for International Development

<sup>1</sup> International development programs seek to improve everyday lives around the world by reducing poverty, strengthening governance,

advancing economic opportunities, and other initiatives (<https://www.usaid.gov/what-we-do>).

However, USAID was required to seek permission every year from the Congressional Appropriations Committees<sup>2</sup> to use CDF. To reduce administrative burden and ensure Food for Peace can consistently use CDF, during the 2018 Farm Bill process, CARE and the NGO coalition asked Congress to authorize USAID's use of CDF for Food for Peace non-emergency programs. This eliminated the need to debate the issue annually and would create more certainty for non-emergency programs in the long run.

By achieving these two legislative changes through CARE's advocacy efforts, a development-oriented approach to food aid can help strengthen local food systems, empower communities, and build resilience to future shocks.

## The evaluation

CARE commissioned an independent external evaluation of its role and contributions to the 2018 Farm Bill at the system-level through policy change, and the impacts of the policy change on vulnerable populations in two recipient countries. This report presents the evaluation's findings, conclusions, and recommendations of this assessment.

### Evaluation objectives

The external evaluation comprises three main objectives, categorized into two evaluation levels: the systems level, where the policy change occurred, and the impact-level concerning recipient countries' populations. First, at the system-level, this evaluation aims to assess CARE's involvement and contribution in influencing the drafting process and passage of the 2018 Farm Bill, including the identification of unintended consequences. In addition, it evaluated CARE's role in advocating for policy change, considering its collaboration with partners and other stakeholders. Second, at the impact-level, this evaluation estimated the impact of the Farm Bill policy changes in the recipient countries of Bangladesh and Malawi, with a specific focus on vulnerable populations. Finally, the evaluation seeks to propose recommendations for CARE's future advocacy.

### Methods

The evaluation was conducted in alignment with [CARE's Vision 2030 Impact Measurement Framework](#). The methods implemented followed a theory-based approach from a systems-based perspective. While the theory-based approach served as the foundational framework guiding the evaluation process, the systems-based perspective focused on understanding how various parts of a system interact with each other. Contribution Analysis methodology was employed to assess CARE's intervention by identifying contributions and dynamics of change induced by CARE's activities within a complex system. This method does not aim to prove direct cause-and-effect relationships but rather

focuses on understanding how and why certain changes happen and what role the intervention played in those changes.

The evaluation employed a two-level systems-based approach, examining CARE's contributions to broader system-level policy change resulting from advocacy efforts, while also estimating the impact on target populations in selected recipient countries, such as Malawi and Bangladesh.

The evaluation was structured around 15 Evaluation Questions, which were addressed through a set of 42 findings. These findings were grouped into two conclusions corresponding to each level of analysis. Furthermore, each level of analysis included a set of actionable recommendations aimed at:

- Improving CARE's evidence-based advocacy for food and nutrition security.
- Ensuring better impact-level measurements of the effects of policy changes in the recipient countries.

Through a utilization-focused approach, the evaluation aimed to provide actionable recommendations to improve the effectiveness and efficiency of future advocacy strategies. Additionally, it sought to enhance the Monitoring & Evaluation (M&E) efforts of these activities.

### Data collection and analysis strategy

The evaluation utilized a mixed methods approach, drawing on both qualitative and quantitative data sources. Primary data collection for the evaluation was conducted through ten interviews, group workshops and a Theory of Change reconstruction working session with CARE's evaluation core team. Bellwether Interviews targeted current and former CARE staff members, advocacy partners, and elected officials. Key Informant Interviews were conducted with CARE's Country and Regional Focal Points in Bangladesh and Malawi. An extensive secondary data analysis, both quantitative and qualitative, was conducted. It included the analysis of CARE's programmatic documentation, legal documents, official reports from U.S. agencies on the funding structure of international food aid, international organizations' food security and funding reports, and large datasets of U.S. funding history and programmatic impact. The mixed-methods approach permitted triangulating findings from both qualitative and quantitative data to strengthen the findings validity through convergence, compensating with the strengths of one method whenever weaknesses of the other were identified.

## Conclusions and recommendations

The conclusions and recommendations below consolidate the evaluation findings, which are further detailed in the Evaluation Report.

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<sup>2</sup> These committees are responsible for appropriating funding for all the functions of the U.S. federal government.

# Conclusion 1: CARE's contribution to systems level policy change in the 2018 Farm Bill

## What was the systems-level change CARE achieved through the 2018 Farm Bill?

**CARE's advocacy contributed to driving systems-level change in the context of the 2018 Farm Bill, achieving specific legislative changes, particularly through effective lobbying and sustained coalition efforts.**

In particular, the translation of specific advocacy wins into systems-level changes was facilitated by CARE's ability to:

- Diversify the voices and perspectives included in the discussion,
- Leverage field expertise from recipient countries,
- Provide expert lobbying information, and
- Present strong evidence to different advocacy targets

The specific legislative changes to which there is evidence of CARE's contribution are:

- Ending the mandate of monetization,
- Greater flexibility on the use of the Community Development Funds (CDF).

**Related findings: F1, F2, F3, F4, F5, F6, F10, F13, F14, F15, F23, F24, F25.**

<p>1.1. CARE's role</p>	<p>CARE's role as a connector and translator among different types of stakeholders (e.g., Members of Congress and Congressional staff, NGO coalitions, faith-based organizations) was central to the success of advocacy efforts related to system-level change. In this role, CARE:</p> <ul style="list-style-type: none"><li>• Acted as a connector between Congressional stakeholders and coalition members, empowering new voices. Based on their lobbying expertise and knowledge of Congressional dynamics, CARE supported connections and tailored their communication, increasing the efficacy of the coalition's messaging.</li><li>• Served as a thought leader, providing strong evidence-based narratives and field expertise in Farm Bill conversations.</li><li>• Gave direction to the NGO coalition asks and external communications, capitalizing on extensive thematic knowledge and field evidence.</li></ul> <p><b>Related findings: F9, F11, F12, F13, F14.</b></p>
<p>1.2. Leveraging partners, networks, and resources</p>	<p>CARE effectively leveraged existing NGO coalitions and networks to amplify their advocacy message by engaging with a wide array of stakeholders and empowering new voices in the conversation, including faith-based organizations, grassroots groups, and experts. The InterAction platform played a crucial role in aligning and amplifying CARE's efforts through coordinated coalition action. Organic and informal partnerships provided flexibility but sometimes lacked strategic coherence. Additionally, effective coordination and communication between CARE and its partners led to collaborative outcomes. Improved alignment due to previous joint advocacy and coordination mechanisms promoted a cooperative advocacy environment. CARE's provision of expert lobbying information and strong data positively affected advocacy outcomes. Finally, CARE dedicated significant resources, including financial, human, and organizational to Farm Bill advocacy efforts, which enabled CARE to play an active role. CARE strategically prioritized resources for activities deemed most effective, such as direct lobbying and coalition participation.</p> <p><b>Related findings: F5, F7, F8, F10, F11, F14, F15, F16, F21, 22, F26.</b></p>
<p>1.3. Navigating the political landscape</p>	<p>Among the obstacles faced in CARE's advocacy efforts, competition for Congress's attention is most important, followed by some opposition from key figures and antagonism between Congressional committees. These obstacles were identified through conversations during 2018 Farm Bill negotiations with Members of Congress. CARE addressed these challenges by:</p> <ul style="list-style-type: none"><li>• Focusing on a set of critical advocacy areas that received the most Congressional support,</li><li>• Developing targeted tactics focused on identifying and leveraging Congressional champions,</li><li>• Engaging in continuous dialogue with all stakeholders,</li><li>• Unifying messaging within the NGO community to mitigate resistance and address fragmented communication, leveraging existing NGO platforms.</li></ul> <p><b>Related findings: F17, F18, F19, F20.</b></p>

1.4.  
Sustaining  
changes in  
the future

There are indications of positive ripple effects from CARE's advocacy wins, including improved alignment and coordination among coalition organizations, which enhance advocacy sustainability and support long-term Farm Bill outcomes. However, the sustainability of the 2018 Farm Bill's changes is challenged by political shifts, congressional turnover, and the rotation of key internal and external actors. Continuous advocacy and strong coalition support are essential to maintaining and expanding positive outcomes. Additionally, while the 2018 Farm Bill introduced significant progressive reforms, such as the elimination of the monetization requirement, long-term challenges could undermine CARE's advocacy achievements. In the 2024 Farm Bill reauthorization cycle, external stakeholders have proposed increased levels of in-kind food aid requirements in Food for Peace that could prompt USAID to revert to monetization to secure adequate funding for RFSAs. This could erode the progress made in shifting away from a commodity-centric food aid model towards a more flexible and needs-based approach.

Related findings: F26, F27, F28, F29.

## Recommendations: How can CARE improve its evidence-based advocacy on food security and nutrition?

<p>Target: CARE USG Govt Advocacy team and M&amp;E team</p>	<p><b>RECOMMENDATION 1</b> Develop a Theory of Change for CARE's U.S. Government (USG) food and nutrition security advocacy: Outline CARE's long-term vision for systemic change through CARE's USG food and nutrition security advocacy, identifying key expected outcomes, change mechanisms, activities, needed inputs, and assumptions. The Theory of Change will serve as a guide for prioritizing advocacy efforts, learning while implementing the activities, and measuring impact over time, ensuring that CARE avoids fragmentation and triggers synergies among the diverse array of advocacy activities.</p>
<p>Target: CARE USG Govt Advocacy team</p>	<p><b>RECOMMENDATION 2</b> Cultivate sustained and solid Congressional engagement: Effective Congressional engagement is a key enabler of CARE's policy achievements. To continue strengthening Congressional engagement, CARE should prioritize relationship building, dedicating time and resources to nurture relationships with key Members of Congress and their staff, particularly those on committees relevant to food security and international aid. Specifically, this includes regular communication, briefings on CARE's work and impact, and invitations to participate in field visits or events. As CARE determines which key member offices to build relationships with, they should also identify Congressional champions and empower them through information and support.</p>
<p>Target: CARE USG Govt Advocacy team</p>	<p><b>RECOMMENDATION 3</b> Continue fostering CARE's role as a key intermediary: Maintain CARE's role as a key mediator between Congress and the NGO coalitions. Continue bringing together a wide range of stakeholders and empowering diverse voices to broaden support and increase the legitimacy of CARE's advocacy agenda.</p>
<p>Target: CARE USG Govt Advocacy team</p>	<p><b>RECOMMENDATION 4</b> Sustain organizational lobbying expertise: Dedicate resources to continue building a skilled and experienced lobbying team within CARE—which in 2018 supported both CARE's direct Congressional engagement and CARE's steering role within the NGO platform. Building organizational lobbying capabilities is fundamental to ensure expertise and knowledge remains within the organization despite staff turnover.</p>
<p>Target: CARE USG Govt Advocacy team</p>	<p><b>RECOMMENDATION 5</b> Promote transition from organic partnerships to strategic partnerships: Establish formal and/or more structured agreements with priority partners to clearly define roles, responsibilities, and expectations. This will foster further alignment by a) identifying complementary expertise, resources, and networks; and b) defining tactics with expected outputs and outcomes, so that achievements can be monitored and impact measured.</p>
<p>Target: CARE M&amp;E team</p>	<p><b>RECOMMENDATION 6</b> Document advocacy activities and monitor its outcomes "by design": Utilize the existing Impact Reporting Tools to systematically and comprehensively document key advocacy activities, such as meetings, events, and publications. Additionally, track relevant policy changes and outcomes to assess the impact of advocacy efforts. Ensure a "monitoring by design" approach, defining in the program design phase a set of key indicators and baseline information to monitor</p>

### Methodological Note

- Bangladesh was selected as a case study for the end of the monetization mandate, as it is a country where this practice was implemented in the period leading up to the 2018 Farm Bill. Malawi was chosen as a case study for the newly consistent use of CDF in RFSAs, given that it has been a recipient of this funding.
- The estimations were conducted by considering all awardees under FFP programs, including, but not limited to, those where CARE was the principal awardee.
- An original dataset was created by merging several data sources (FY 2013 – 2023) for both recipient countries. This suggests that the changes in the 2018 Farm Bill may have led to an increase in beneficiaries and funding allocation. However, it is important to note that this relationship is not causal.
- This analysis acknowledges that, in addition to the Farm Bill changes, other variables and factors may also influence the outcomes.

## Conclusion 2: The 2018 Farm Bill's impact level on recipient countries' populations

How are people's lives better as a result of CARE's achievements?

**CARE successfully advocated for the elimination of the monetization mandate and greater certainty in the use of Community Development Fund (CDF) in the 2018 Farm Bill, which led to increased funding availability for programs under Food for Peace (FFP). Consequently, USAID was able to extend food assistance to a greater number of beneficiaries.**

To estimate the effects on people's quality of living, the analysis focused on FFP programs in Bangladesh and Malawi, representing two out of 12 recipient countries. These countries were selected as a sample to illustrate the broader impact of the legislative amendments in the 2018 Farm Bill.

The quantitative analysis considered two outcome variables: beneficiary reach and funding levels. Secondary data sources, such as the USAID International Food Assistance Reports from fiscal years (FY) 2013 to 2023, were utilized to estimate these effects.

**Related findings: F30, F31, F32, F33, F34, F35, F36.**

As a result of CARE's contributions, we estimate that 3.7 million people—2.43 million in Bangladesh and 1.29 million people in Malawi—have improved lives.

The independent assessment of CARE's advocacy clearly indicates that CARE contributed to passing specific provisions of the 2018 Farm Bill that enhanced the effectiveness, efficiency, and focus on systems change in Food for Peace. Thus, we quantified the impact of these changes to Food for Peace in Bangladesh and Malawi using USAID International Food Assistance Reports (IFAR) data.

### 2.1 Monetization elimination

Beneficiaries and funding allocation patterns in Bangladesh FFP programs:  
Starting in FY 2019, both beneficiaries and funding allocation patterns have shown significant increases. From FY 2019 to 2023, a total of 2.43 million people participated in RFSAs, with funding levels reaching a total of \$51.89 million. This growth can be associated with, but is not limited to, changes in the 2018 Farm Bill that ended the monetization mandate in Food for Peace.  
**Related findings: F30, F31**

### 2.2.

Beneficiaries and funding allocation patterns in Malawi FFP programs:

CDF funds consistency	<p>In Malawi, 1.29 million people participated in RFSAs, and \$72 million was allocated in funding between FY 2019 and 2023. This significant growth can be associated with, but is not limited to, the 2018 Farm Bill change that increased certainty around use of CDF.</p> <p><b>Related findings:</b> F32, F33</p>
2.3. Knowledge gap	<p>A knowledge gap regarding USAID funding mechanisms has emerged as a significant challenge for both CARE Country Offices and CARE global teams. This has led to a generalized misperception of budget shortages in programming, attributed to the implementation of the 2018 Farm Bill amendments.</p> <p><b>Related findings:</b> F34, F35, F36</p>

## Recommendations: How can CARE better estimate the potential systems-level impact of advocacy efforts?

<p>Target: CARE global technical teams, especially Food and Water Systems Team, and Country Office teams</p>	<p><b>RECOMMENDATION 1</b></p> <p>Establish regular fora on legislative updates:</p> <p>Implement regular structured platforms (fora or assemblies, workshops, webinars, etc.) for ongoing dialogue between the USG Advocacy and Country Office teams. These spaces should facilitate the sharing of legislative updates, ongoing Farm Bill negotiations, and advocacy strategies by the USG Advocacy team, while also providing a space for Country Office teams to offer insights on programmatic implications and potential impact-level consequences of policy changes. In these spaces, internal experts like the Institutional Fundraising Strategy (IFS) team can offer ad hoc training sessions or learning workshops to country office staff to familiarize them with USAID's funding processes and criteria. This will ensure better alignment between Regional and Country Offices for future advocacy objectives, Farm Bill discussions, and local advocacy efforts in recipient countries.</p>
<p>Target: CARE global technical teams, especially IFS</p>	<p><b>RECOMMENDATION 2</b></p> <p>Increase engagement with country offices and information sharing on USAID funding mechanisms and programming:</p> <p>Foster collaboration and information sharing with Country Offices to achieve a unified approach to addressing food insecurity through FFP programs and avoid misunderstandings, making sure programming leverages the opportunities arising from the flexible funding structures and facilitates financial sustainability.</p>
<p>Target: CARE USG Advocacy team, with support of CARE global technical teams, and Country Office teams</p>	<p><b>RECOMMENDATION 3</b></p> <p>Foster a continuous cycle of evidence-based advocacy:</p> <p>Maintain and promote CARE's position as a thought leader, which has proven to be one of their key differentiators, by consistently providing evidence-based insights and analysis on food security issues. On this evidence basis, the USG Advocacy team can prioritize advocacy strategies and tactics that are directly informed by policy impacts on recipient countries. For this, it is recommended to establish systematic feedback loops or consultation mechanisms to receive contributions from Country Office teams.</p>
<p>Target: CARE M&amp;E team; Country Office teams</p>	<p><b>RECOMMENDATION 4</b></p> <p>Strengthen data collection strategies:</p> <p>Establish standardized data collection protocols and data management strategies to consistently measure food security indicators for FFP programs.</p>
<p>Target: CARE M&amp;E team</p>	<p><b>RECOMMENDATION 5</b></p> <p>Conduct focused assessments on impact-level dynamics:</p> <p>Use the standardized data collected to perform detailed focused assessments and estimate the direct and indirect effects of the changes in the 2018 Farm Bill on food security in a larger number of recipient countries considering greater robustness and bias control. The collected data and insights will be helpful to advocate for necessary policy adjustments at the local and national levels, ensuring that programming remains effective and adequately funded.</p>



# INTRODUCTION

## 1.1 Background

### The 2018 U.S. Farm Bill

The United States (U.S.) Farm Bill is a comprehensive piece of legislation that regulates an array of U.S. agricultural and food programs. The Farm Bill is renewed every five years by the U.S. Congress, setting policy across all levels of the agricultural and food policy spectrum including a wide variety of regulations, from crop insurance and farm subsidies to domestic nutrition programs and international food aid. The 2018 U.S. Farm Bill, formally known as the Agriculture Improvement Act of 2018, valued at \$867 billion, structures the current agricultural policies of the U.S. and has a significant impact on both domestic and international food aid programs.

The Farm Bill is particularly important in international development and humanitarian efforts to combat global hunger because it authorizes Food for Peace Title II and the McGovern-Dole Food for Education Program. U.S. food assistance programs are in the Trade Title (Title III) of the Farm Bill. Despite being a minor part of the overall bill in comparison with the regulations on domestic food and agricultural policy, the Farm Bill's international food aid provisions have a wide impact on global hunger and malnutrition.

The 2018 Farm Bill included several key provisions affecting international food aid. Notably, the 2018 bill altered the mandate for monetization in Food for Peace, which is the practice of selling in-kind aid commodities on local markets to fund development programs. This practice can disrupt local markets by flooding them with large quantities of goods at lower prices, making it difficult for local farmers to compete and earn a fair income. Additionally, monetization can disincentivize local agricultural production and marketing, eliminating opportunities for farmers and small businesses to thrive.

The 2018 Farm Bill also ensured consistent use of Community Development Funds (CDF) in Food for Peace non-emergency programs, allowing those programs the flexibility to choose if and when to use U.S. commodities depending on community needs.

These changes reflect a continued shift from a predominantly commodity-based approach to one that allows for more flexibility and efficiency, recognizing the complex nature of global food insecurity and the need for adaptable solutions.

Community Development Funds (CDF) are part of Development Assistance, a major U.S. foreign assistance account that invests in long-term development. CDF is used as supplemental funding for Food for Peace Resilience Food Security Activities (RFSAs). CDF provides cash to NGOs, which is critical for non-food program costs like staff salaries and equipment. RFSAs funded by CDF are not required to use U.S. commodities, allowing them to tailor the program to community needs without being required to use an amount of in-kind food aid that may not be useful for the community. Prior to the 2018 Farm Bill, USAID used CDF funding to eliminate all monetization above the 15% required by law by supplementing non-food costs in RFSAs. However, USAID was required to seek permission every year from the Appropriations Committees to use CDF. To reduce administrative burden and ensure Food for Peace can consistently use CDF, during the 2018 Farm Bill process, CARE and the NGO coalition asked Congress to authorize USAID's use of CDF for Food for Peace non-emergency programs. This eliminated the need to debate the issue annually and will create more certainty for non-emergency programs in the long run.

## CARE's Advocacy on the 2018 U.S. Farm Bill

CARE's involvement in advocacy efforts regarding the 2018 Farm Bill was rooted in its focus on systems change, with long-term goals of transforming food aid from a commodity-centric model to one that enhances effectiveness, efficiency, and equity. Central to CARE's requests for the 2018 Farm Bill were efforts to end the mandate of monetization and permanent authorization of the use of CDF in Food for Peace non-emergency programs. This would protect local farmers, prevent market disruptions, and ensure they could sell their produce at fair prices.

CARE believes that, by achieving these two legislative changes through their advocacy efforts, a development-oriented approach to food aid can help strengthen local food systems, empower communities, and build resilience to future shocks.

Through a wide range of activities, CARE advocated for amendments to the 2018 Farm Bill to achieve these key changes in the approach to U.S. international food aid. CARE's advocacy activities included strategic coalition-building with other NGOs, direct lobbying of key legislators, and organizing campaigns to raise awareness. These efforts were aligned with CARE's mission to address the root causes of poverty and hunger by improving the systems that deliver aid.

Monetization is the practice of U.S. commodities being sold overseas in foreign markets by NGOs who then use the proceeds to fund development programs. Monetization has a significant impact on local markets, food systems, and farmers: selling U.S. commodities in a foreign market can cause prices to drop, ultimately hurting local farmers who are trying to sell their crops; it can disincentivize local agriculture production and marketing; and it can eliminate opportunities for farmers and small businesses.

Additionally, for every \$1 of U.S. commodities sold, NGOs only recover an average of 74 cents, making this a very inefficient practice. Prior to the 2018 Farm Bill, \$350 million of Food for Peace was directed towards non-emergency, resilience-building programs. Of that \$350 million, 15% of the U.S. commodities were required to be monetized. This 15% requirement was satisfied with three programs in Bangladesh, including CARE's SHOUHARDO program.

Due to the challenges CARE faced with monetization in Bangladesh and the inherent risk of local market distortion that comes with monetization, during the 2018 Farm Bill process CARE and the NGO coalition asked Congress to remove the 15% requirement and replace it with permissive authority.

## 1.2 Evaluation purpose, scope, and objectives

The purpose of the evaluation is to assess CARE's role and contributions to the 2018 Farm Bill through system-level policy change and estimate the impact of the bill's amendment on vulnerable populations in recipient countries, specifically in Bangladesh and Malawi.

The scope of the evaluation is two-fold:

1. At a system-level policy change, the evaluation has the following scope:
  - a. Thematic scope: It centers on CARE's policy advocacy efforts related to the 2018 Farm Bill.
  - b. Temporal scope: The evaluation focuses on the one-to-two-year period leading up to the passing of the 2018 Farm Bill.
  - c. Geographical scope: The evaluation examines the United States, where both the advocacy activity and the policy change occurred.
2. At a population impact-level, the evaluation has the following scope:
  - a. Temporal scope: The evaluation encompasses the period following the implementation of the 2018 Farm Bill through 2023 (the most recent data available at the time of this evaluation).
  - b. Geographical scope: The evaluation specifically

targets the countries of Bangladesh and Malawi.

- c. Thematic scope: It concentrates on identifying potential effects of the 2018 Farm Bill on recipient countries' populations in terms of food security and livelihood improvement.

The quantitative analysis is not aimed at anchoring the reasoning within a formal causal framework. Instead, this assessment prioritizes a statistical analysis focused on describing and analyzing data patterns through descriptive statistics, time series data visualizations, and/or multiple regressions. In other words, no causal relationships can be inferred from the variables under study. The scope of the quantitative analysis includes examining indicators particularly for the selected recipient countries: Bangladesh and Malawi. Analysis of additional recipient countries is not in the scope of the current evaluation study.

## Evaluation objectives

The external evaluation comprises three main objectives, categorized into two evaluation levels: the system level, where the policy change occurred, and the impact level of recipient countries' populations. Specifically, the evaluation aims to achieve the following:

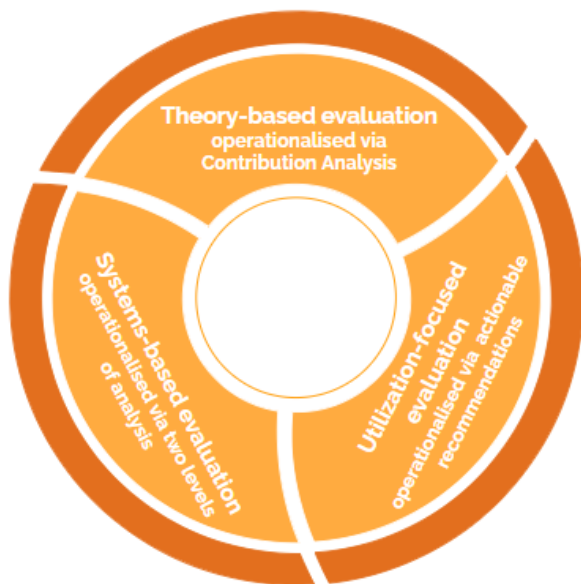
1. System-level policy change:
  - a. Assess CARE's involvement and contribution in influencing the drafting and passage of the 2018 Farm Bill, including the identification of ripple effects and/or unintended consequences.
  - b. Evaluate CARE's role in advocating for policy change in the 2018 Farm Bill, considering its collaboration with partners and other stakeholders' engagement.
2. Impact-level change:
  - a. Estimate the impact of the system-level change in the recipient countries of Bangladesh and Malawi, with a specific focus on vulnerable populations.

# METHODOLOGY & APPROACH

## 2.1 Methodology

The evaluation was conducted as a **theory-based evaluation**, designed through a **systems lens on two levels of analysis**, in accordance with the principles outlined in [CARE's Vision 2030 Impact Measurement Framework](#). The **Contribution Analysis methodology** was employed to operationalize it. Additionally, a **utilization-focused approach** oriented the identification of findings and recommendations' drafting.

Figure 1. Methodology



Source: Author's own elaboration.

## Theory-based evaluation

By establishing hypotheses about how and why CARE's advocacy activities related to the 2018 Farm Bill are expected to work, the theory-based evaluation allowed for testing and refining the contributions towards the aimed outcomes. The approach explored both the positive impacts, and the challenges CARE faced, including identifying successful strategies, barriers, ripple effects, and unintended consequences.

The theory-based method informed the overall development of the evaluation matrix, questions, and indicators by grounding them in an understanding of the advocacy intent and the context within which it operated. It sought to illustrate the underlying change theories that drove the advocacy design and implementation.

## Contribution Analysis

The evaluation methodology integrated Contribution Analysis (CA) to assess CARE's advocacy and programmatic interventions, focusing on identifying the causal contributions and the dynamics of change induced by CARE's activities within a complex system. The approach started with defining the cause-effect issues addressed by CARE's interventions, laying a foundation for evaluating the effectiveness of advocacy and policy influence. The methodology included the reconstruction and articulation of a Theory of Change for CARE's intervention, specifying the expected intermediate outcomes and the assumptions linking these outcomes.

This framework included identifying other significant factors that could influence the outcomes. The Theory of Change served as a blueprint for tracing and understanding the sequence of changes that led to the ultimate goals of CARE's advocacy and programmatic interventions. The evaluation systematically gathered evidence based on the Theory of Change, focusing on how CARE's advocacy and influencing activities linked

to policy changes and to what extent it impacted people's lives in Malawi and Bangladesh.

After testing the validity of the Theory of Change against the collected data, challenging the initial assumptions and adjusting the causal linkages, the evaluation aimed at understanding why certain results were or were not achieved, and the extent to which CARE's interventions, alongside other influencing factors, contributed to these outcomes.

The evaluation was built through an iterative process from the refinement of the contribution story to empirical evidence and reasoned analysis. The outcome was the formulation of a contribution claim articulated in evaluation findings.

## Two-level system-based design

This evaluation employed a systems-based approach that acknowledged the complexity of the environment in which CARE operates. The evaluation design, operationalized in the Evaluation Matrix (see Annex II), was based on two levels, aligned with CARE's Systems-Level Impact Measurement Framework.

First, the evaluation examined CARE's contributions to system-level policy change in the 2018 Farm Bill resulting from its advocacy efforts. In addition, this system-level analysis documented any ripple effects and additional (possibly unintended) outcomes that took place as a result of the policy change.

Secondly, an impact-level analysis involved the estimation of how many people's lives are better in Malawi and Bangladesh, two countries with Food for Peace non-emergency programs, or RFSAs.

## Utilization-focused approach

The evaluation provided actionable recommendations informed by the findings. These recommendations aimed to:

- Equip CARE with recommendations to improve the effectiveness and efficiency of future advocacy strategies and tactics.
- Explore potential improvements in CARE's methods for estimating the broader, systemic impact of its advocacy efforts.
- Strengthen CARE's use of data to guide decision-making and inform future advocacy efforts.

To ensure a utilization-focused evaluation, the evaluators propose a participatory workshop at the study's conclusion. The workshop will aim at both presenting and discussing the recommendations to foster ownership and understanding and gathering feedback to ensure their alignment with CARE's needs. This approach seeks to align the evaluation with the principles of Utilization-Focused Evaluation (UFE) aiming at enhancing the likelihood that the evaluation findings are used to improve future practices within

CARE.

## Evaluation Matrix

The evaluation matrix integrated research questions, evaluation criteria, indicators, data sources, and methods of collection and analysis at both the system and impact levels (see Annex II). The evaluation questions are categorized according to the chosen criteria and linked with their respective indicators. Additionally, data sources and analytical methodologies are specified for each question.

The evaluation criteria are constructed using the Organization for Economic Cooperation Development's Development Assistance Committee (OECD-DAC) guidelines, which describe standards for evaluation planning and implementation to assure high-quality and useful evaluation practices.

- The first evaluation criterion refers to **effectiveness**, which assesses in this case whether CARE's advocacy campaign achieved its intended outcomes, and the broader system-level changes CARE aimed to influence. It evaluates the success of advocacy activities, considers contextual factors, and measures how well CARE's efforts met legislative goals. This criterion is essential for determining the impact of CARE's advocacy efforts on policy changes.
- The second evaluation criterion is **efficiency**, which explores how CARE converted resources into results, exploring the choice and implementation of tactics.
- The third evaluation criterion is **impact** and examines the broader, significant effects—both positive and negative, intended, and unintended—of the advocacy efforts, such as sustainable changes from the Farm Bill and CARE's role in these changes. Also, it seeks to estimate how many people benefited and the long-term improvements in their lives.
- The last criterion is **sustainability** and refers to the likelihood of continued benefits post-intervention, exploring long-term effects, structural changes like policy shifts and institutional strengthening, potential challenges to these gains, and the readiness of stakeholders to sustain benefits.

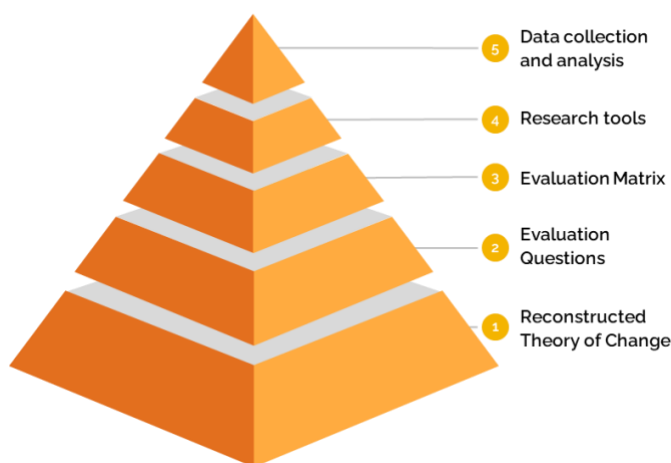
The OECD-DAC criteria that were defined as out of scope for this evaluation, according to the objectives outlined in the Terms of Reference, are relevance and coherence.

## 2.2 Reconstructed Theory of Change

Considering the theory-based Contribution Analysis methodology chosen for this study, the Theory of Change is a fundamental component that structures the

whole evaluation process. The Theory of Change serves as the foundation for the evaluation matrix and research strategy, the selection of the key evaluation criteria and the drafting of relevant evaluation questions.

Figure 2. Contribution Analysis and Theory of Change



Source: Author's own elaboration.

## Reconstruction of the Theory of Change

First, the reconstruction of the narrative of change comprised desk analysis of programmatic documentation and an interpretation exercise to identify causal relationships between programmatic components and expected goals.

Second, a Theory of Change workshop was conducted to collect feedback and validation based on the perspectives, experiences, and thoughts of CARE's Evaluation Core Team<sup>3</sup>.

Third, the reconstructed and validated Theory of Change was further iterated and complemented based on the evaluation findings, arising from further desk research and primary data collection.

## Description of the draft Theory of Change

The reconstructed Theory of Change displayed in the following figure describes the evaluators' interpretation of CARE advocacy and influencing activities within the framework of the 2018 Farm Bill and its subsequent expected effects and impacts on recipient countries. The Theory of Change proposed includes the following elements:

- **System-based perspective:** CARE's approach to advocacy and influencing for the 2018 Farm Bill is embedded within a broader strategy that encompasses multiple change pathways in a complex system. This evaluation focuses specifically on the advocacy pathway for policy change to

achieve system-level impact.

- **Two levels of analysis:** The Theory of Change is structured around two levels of analysis: the system level, which addresses the policy changes related to the 2018 Farm Bill, and the population impact level, which considers the effects of these policy changes on populations in recipient countries.
- **Target stakeholders and impact populations:** At the system-level policy change analysis, CARE's advocacy for the 2018 Farm Bill targeted mainly the U.S. government, NGOs, and private sector actors. At the impact-level analysis, the focus was on rural populations in recipient countries, particularly those most vulnerable.
- **Activities:** The activities aimed at influencing the 2018 Farm Bill comprise mainly: developing unified messaging and legislative asks in collaboration with partner NGOs, mobilizing Congressional champions through direct engagement and advocacy, leveraging public advocacy and media to raise awareness and support, and engaging in corporate partnerships to boost advocacy efforts.
- **Change mechanisms at the system-level policy change:** A set of change mechanisms emerging as a result of CARE's activities in relation to the 2018 Farm Bill were identified, in particular the enhanced agreement on NGO positions, strengthened alliances, increased Congressional awareness and support, and direct influence of key decision makers. The evaluation found that CARE's contribution to the policy change was enabled by CARE's role as a system intermediary, a thought leader, and a steering actor.
- **Outcomes on the system-level policy change:** CARE's advocacy efforts contributed to key changes to Food for Peace in the 2018 Farm Bill, in particular ending monetization and the use of Community Development Funds. A relevant unintended consequence arising from CARE's intervention is the improved NGO alignment and coordination, as observed through the evaluation.
- **Change mechanisms at the population impact-level:** The preliminary analysis identified change mechanisms through which the 2018 Farm Bill influenced recipient countries' populations' food security and lives. Specifically, effects such as more efficient and targeted approaches to aid distribution, more flexible funding, and decreased risks of market distortions, among others, are considered relevant.
- **Outcomes at the population impact-level:** The outcomes at the impact-level comprise improvements in food security and economic empowerment of populations, including the reduction of the proportion

<sup>3</sup> The Evaluation Core Team for this evaluation included Brittany Dernberger, Kellen Lott, and Julia Stafford.

of people experiencing moderate to severe food insecurity, the decrease in malnutrition rates among children, and the increase in access to basic drinking water and sanitation services. Additionally, outcomes include enhancing the involvement of women in household decision-making, both in agricultural production and the utilization of household income. Finally, an increase in the number of programs that effectively address rights related to food, water, and nutrition is expected.

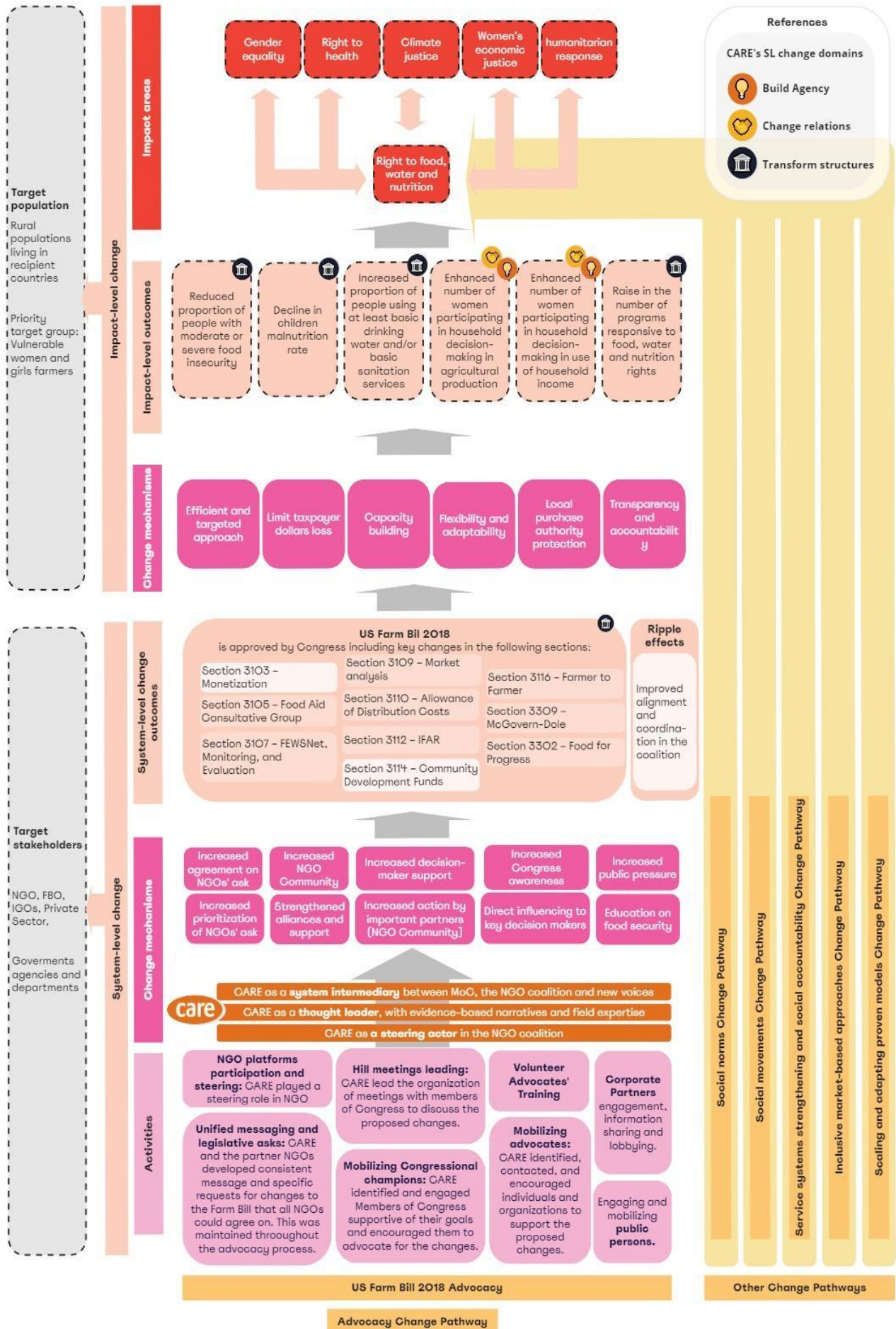
- **Impact area:** The Theory of Change prioritizes the impact area “Right to Food, Water and Nutrition,” acknowledging its complex relation and interaction with CARE’s other impact areas.

#### Note on the concept of Change Mechanisms

The evaluators utilize the category of “change mechanisms” rather than outputs to offer a tailored, systems-sensitive, and advocacy-adequate analysis. Change mechanisms illustrate the processes or reactions that occur in response to advocacy and policy change, serving as the correct “conceptual bridge” between activities and outcomes.

The preference of this terminology over the traditional concept of outputs is inspired by the realist approach to evaluation, which emphasizes the understanding of how specific contexts interact with complex mechanisms to produce outcomes. Mechanisms, in this sense, are not merely activities carried out, but include the effect on target groups and the reaction to these activities.

Figure 3. Reconstructed Theory of Change



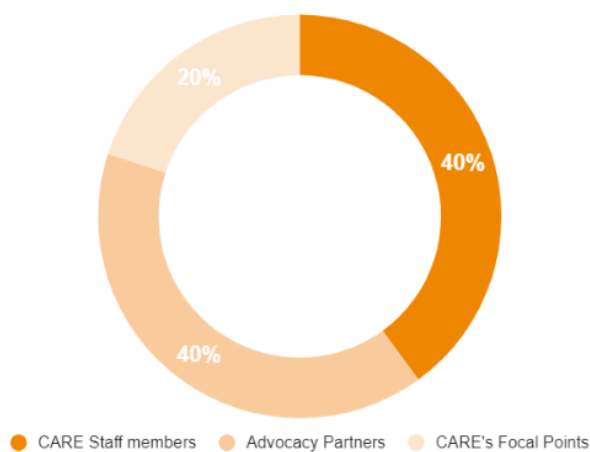


## 2.3 Data collection and analysis

### Mixed methods approach and triangulation.

The evaluation utilized a mixed methods approach, drawing on both qualitative and quantitative data sources to guarantee a comprehensive and robust assessment. The triangulation contributed to enhanced reliability and validity of the evaluation results, leading to more informed and actionable insights. Primary data collection for the evaluation was conducted through 10 interviews, group workshops and a Theory of Change reconstruction working session with CARE’s Evaluation Core Team. Bellwether Interviews targeted current and former CARE staff members and advocacy partners. Key Informant Interviews were conducted with CARE’s Country and Regional Focal Points in Bangladesh and Malawi.

Figure 4: Bellwether Interviews



Source: Author's own elaboration.

Extensive secondary data collection, both quantitative and qualitative, was conducted. It included the analysis of CARE’s programmatic documentation, legal documents, official reports from U.S. agencies on the funding structure of international food aid, international organizations’ food security and funding reports, and large datasets of U.S. funding history and programmatic impact. The mixed-methods approach permitted triangulating findings from both qualitative and quantitative data to strengthen the findings' validity through convergence, compensating with the strengths of one method whenever weaknesses of the other were identified.

The primary and secondary data collection tools and data analysis methods were identified for each level of analysis and categorized according to data type.

Table 1: Data collection and analysis tools and methods

Primary data collection and analysis	
Data collection tools	Data Analysis Methods
1 Targeted interviews	<ul style="list-style-type: none"> <li>Qualitative coding analysis.</li> <li>Thematic analysis.</li> <li>Narrative analysis</li> </ul>
2 Participatory workshop	<ul style="list-style-type: none"> <li>Qualitative coding analysis.</li> <li>Thematic analysis.</li> <li>Narrative analysis</li> </ul>
Secondary data collection analysis	
Data collection tools	Data Analysis Methods
1 Programmatic documentation	<ul style="list-style-type: none"> <li>Thematic analysis.</li> <li>Narrative analysis</li> </ul>
2 Annual and thematic reports	<ul style="list-style-type: none"> <li>Thematic analysis.</li> <li>Narrative analysis</li> </ul>
3 Open databases	<ul style="list-style-type: none"> <li>Descriptive statistics.</li> <li>Trends analysis</li> </ul>
4 News screening	<ul style="list-style-type: none"> <li>Narrative analysis</li> </ul>

Source: Author's own elaboration.

## 2.4 Primary data collection

Primary data collection for the evaluation was conducted through interviews. A total of ten interviews were conducted with various stakeholders to gather insights, based on the evaluation questions.

Figure 5: Type of Interviews

System-level	Impact-level
<p><b>7</b></p> <p><b>Bellwether interviews</b> targeted current and former CARE staff and advocacy partners, providing insights on the internal and strategic dynamics regarding CARE’s advocacy efforts prior to and during the 2018 U.S. Farm Bill. Members of Congress were also invited to interview from CARE and the external evaluators, nonetheless it was not possible to engage them.</p>	<p><b>3</b></p> <p><b>Key Informant Interviews</b> were conducted with Country Offices’ Monitoring, Evaluation, Accountability, and Learning (MEAL) Focal Points in Bangladesh and Malawi, and with CARE’s South Africa Regional Office, with the objective to capture localized and contextualized information on the impact of the 2018 U.S. Farm Bill at the recipient countries’ level.</p>

The interviews were **semi-structured**, allowing for a flexible guided conversation, ensuring that critical information is captured while also allowing new insights to surface. The interview scripts were based on the evaluation matrix, personalizing the evaluation questions to each type of stakeholder and the related context. Interviews aimed at identifying unique information—such as “how” and “why” questions—that is challenging to understand through quantitative and qualitative secondary data analysis. They also sought to gather information on relevant contextual factors, ripple effects and/or unintended consequences, and programmatic information.

**Non-Probabilistic snowball sampling** was employed to select and identify the interviewees. Through this method, the evaluators started with a group of known informants, provided by CARE, and expanded the sample based on emerging information and participant referrals. This method was chosen for the following reasons:

- CARE’s advocacy efforts and networks involve stakeholders who may not be accessible through conventional sampling methods. In fact, networks and close contacts play a critical role at the policy level in advocacy efforts.
- At the level of recipient countries, accessing key informants with institutional memory and field expertise can be challenging.
- If the evaluation requires interviewing further informants, contacting referred stakeholders from previous interviewees is an efficient and effective tool to deepening the understanding and further exploring the evaluation questions.

To leverage CARE’s existing networks and gain legitimacy towards the identified informants, the initial contact was made by the CARE Evaluation Core Team, who introduced the scope of the evaluation and the evaluators. The evaluators then directly contacted the invited interviewees to schedule the interview session and provide consent and confidentiality information.

## Data Treatment Protocols

The development of the interviews and the subsequent analysis of data emerging from them were conducted following the protocols and practices described below:

- **Voluntary participation and rights of interviewees:** Participation in this evaluation through the interview is entirely voluntary and interviewees received Informed Consent information which requires explicit consent. Interviewees were assured of complete anonymity and confidentiality throughout the process. They had the opportunity to ask questions about the project at any time and were free to refuse to answer any questions or withdraw from the assessment without any consequences.
- **Data registration:** During the interviews, no recordings were made. Interviewers took notes using

unique identifiers that do not directly reference the identity of the interviewees, thus preserving their anonymity.

- **Data storage:** All collected data was exclusively hosted by the evaluation consultants. Raw data, including interview notes, was and will not be shared externally and was stored in anonymized format. Access to this data is strictly controlled and limited only to the evaluators.
- **Data analysis:** Information was handled with adherence to principles of anonymity and confidentiality. Data was analyzed and described in anonymized and aggregated format in the final report, ensuring that no individual or institution can be identified. Explicit written permission was sought from the relevant parties when the report needed to reference a specific institution.

## 2.5 Secondary data collection

The main data sources were mapped and linked to each level of analysis. A combination of seven programmatic documents were explored at the system policy-change level, utilizing content and thematic analysis methods. On the impact-level, ten secondary data sources, including programmatic documentation and open databases, were analyzed using content analysis and descriptive statistics methods. Additionally, the evaluation included stakeholder mapping to identify all individuals, groups, and organizations with a stake in the 2018 Farm Bill, and to understand their relationships and influence with CARE. Further refinement was achieved through interviews and their subsequent analysis.

Table 2: Main secondary data sources and methods, system-level policy change

Document Type	Title	Year	Source	Data Analysis Methods
Programmatic documentation	Food Aid Reform coalition petition	2018	CARE	Content analysis, thematic analysis
Programmatic documentation	Farm Bill Conference Report	2018	U.S. Congress	Content analysis, thematic analysis
Programmatic documentation	Advocacy and Influencing Impact Reporting Tool	2018	CARE	Content analysis, thematic analysis
Programmatic documentation	CARE 2030 Global Indicators for measuring change	2018	CARE	Content analysis, thematic analysis
Programmatic documentation	FY 2018 Reach Information	2018	CARE	Content analysis, thematic analysis
Programmatic documentation	FY2019 Impact/outcomes/lasting change information, projects, and initiatives	2019	CARE	Content analysis, thematic analysis
Programmatic documentation	FY17 Reach information, projects, and initiatives	2017	CARE	Content analysis, thematic analysis

Source: Author's own elaboration.

Table 3: Main secondary data sources and methods, population impact-level

Document Type	Title	Year	Source	Data Analysis Methods
Programmatic documentation	International Food Assistance Report (IFAR)	2013 - 2023	USAID	Content analysis, descriptive statistics
Programmatic documentation	Food for Peace Funding Overview	2019	USAID	Content analysis
Programmatic documentation	Food Assistance Fact Sheet Malawi	2016 - 2020	USAID	Content analysis, descriptive statistics
Programmatic documentation	Food Assistance Fact Sheet Bangladesh	2015. 2020	USAID	Content analysis, descriptive statistics
Programmatic documentation	USAID Food Assistance Overview	2023	USAID	Content analysis
Programmatic documentation	Office Food for Peace Annual Report	2019	USAID	Content analysis
Open databases	Dollars to Results Bangladesh	2019 - 2022	Foreign Assistance USAID	Descriptive statistics
Open databases	Dollars to Results Malawi	2020- 2022	Foreign Assistance USAID	Descriptive statistics
Programmatic documentation	CARE International Bangladesh Program Overview	2018	CARE	Content analysis
Programmatic documentation	CARE International in Malawi Program Overview	2018	CARE	Content analysis

Source: Author's own elaboration.

## Data treatment protocols & analysis

The impact-level analysis examined the variations in Food for Peace funding levels over time and assessed the reach of FFP programs to estimate and approximate the number of lives impacted in recipient countries. **FFP programs** were selected because the amendments of the 2018 Farm Bill included in this evaluation were specific to Food for Peace. The primary data source for this analysis was the **International Food Assistance Report (IFAR)**, published annually by USAID. The data collected included records from 2013 to 2023, with a few reporting gaps in key indicators for 2020, 2021, and 2023.

As mentioned in subsection 1.2, the impact-level analysis had a **geographical scope** focused on specific recipient countries, namely Bangladesh and Malawi. These two countries represent a sample of the total population impact, accounting for 2 out of 12 recipient countries of FFP non-emergency programs during the time period of the evaluation.

**The estimations were conducted by considering all awardees under FFP programs**, including, but not limited to, those where CARE was the principal awardee. This comprehensive approach allowed for a more thorough estimation of the total impact of food assistance.

The quantitative approach did not aim to anchor the reasoning within a formal causal framework. Instead, the assessment prioritized a statistical analysis focused on describing and analyzing data patterns through descriptive statistics. In other words, **no causal relationships were inferred from the variables under study**.

Although this evaluation did not adhere to causal estimations, it was possible to conduct a **before-and-after analysis**. This type of analysis can reveal trends and patterns over time, providing insights into how the variables have changed and evaluating the effect of a policy change. The process involves collecting and comparing data from two specific periods—pre-intervention (before) and post-intervention (after). The period before the amendments consisted of data collected between 2013 and 2018, while the period after the amendments' implementation spanned from 2019 to 2023. To facilitate the comparison, an average of both funding levels and beneficiary reach rates was calculated.

The outcome variables used in this analysis are **beneficiaries** and **funding levels**. USAID defines direct beneficiaries as individuals who come into direct contact with the interventions (goods or services) provided by the program in each technical area. This includes individuals who receive training, benefit from program-supported technical assistance or service provision or receive a ration or another type of good. Indirect beneficiaries are those who benefit indirectly from the

goods and services provided to the direct beneficiaries. Funding levels are associated with meeting the specific administrative, management, personnel, storage, and distribution costs of programs. This includes implementing income-generating activities, community development, health, nutrition, cooperative development, agriculture, and other development activities. Additionally, funding encompasses cash resources made available to FFP partners for enhancing programs, including the use of local and regional procurement and other market-based food assistance interventions.

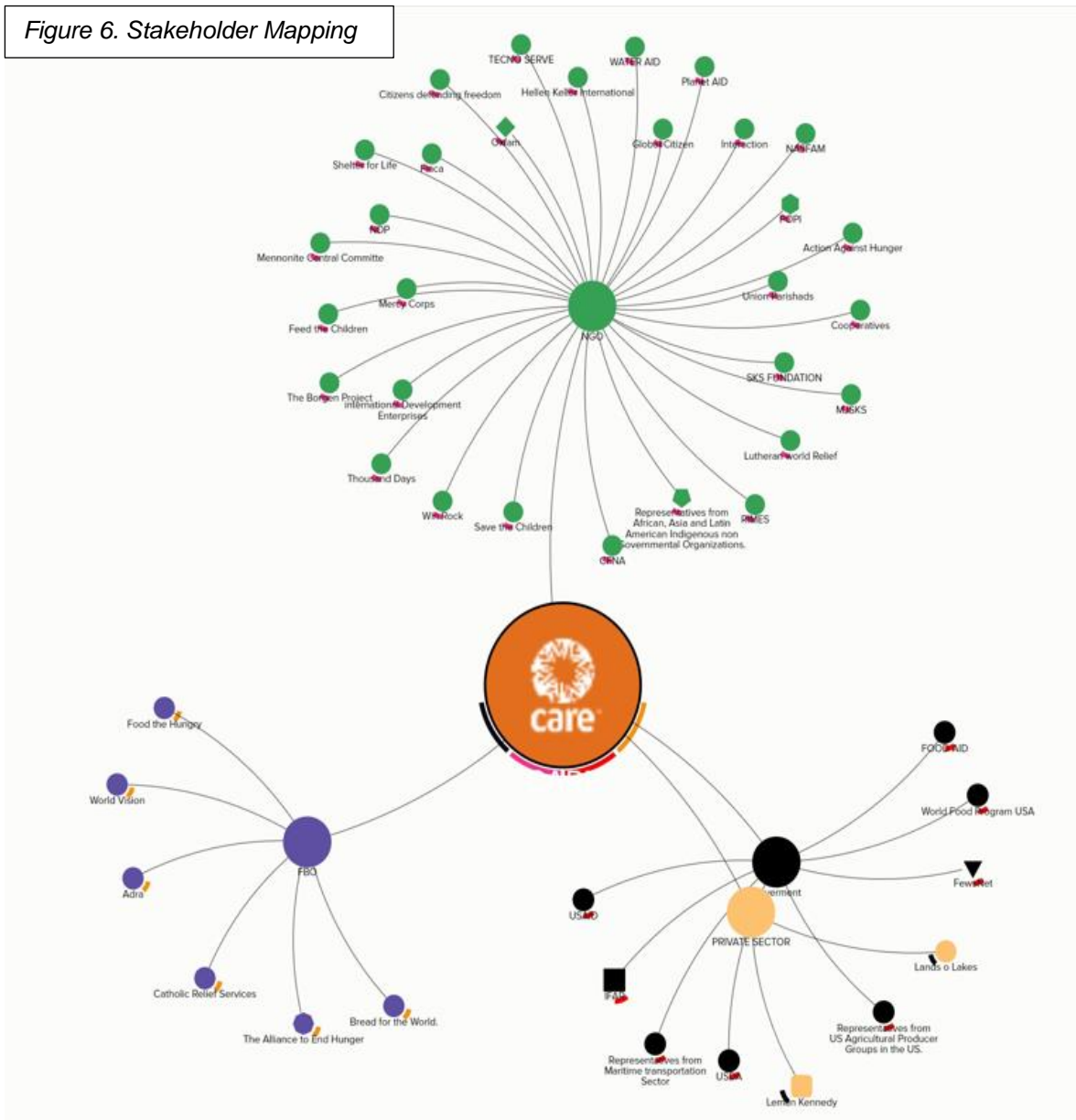
## Stakeholder mapping

A high-level stakeholder map was developed as part of the system-level analysis, identifying the key actors CARE interacted with in its advocacy and influencing efforts. The stakeholder mapping exercise was informed by both desk research and interviews and resulted in a list of the main stakeholders in the 2018 Farm Bill advocacy system. They were analyzed based on the following categories:

- Organization type, differentiating among government, NGO, international organization, and private sector actors;
- Influencing power in the 2018 Farm Bill drafting, indicating preliminary hypotheses on each actor's level of influence in the drafting of the bill, classified as high, medium, or low;
- CARE's type of relationship, described as coordination, partnership, or influencing; and
- Alignment with CARE's interests, being complementary to or contrasting with those of CARE, according to preliminary hypotheses.

The following figure represents some of the various stakeholders analyzed.

Figure 6. Stakeholder Mapping



## Limitations, challenges, and mitigation measures

Given the complex nature of the evaluation, a set of challenges and limitations has been identified. The evaluation implemented a set of methodological tools available to mitigate the incidence of the limitations, as described in the following table.

Table 4. Limitations, challenges, and mitigation

	Limitation	Mitigation Measures
Time delays in policy impact	The effects of policy changes in the 2018 Farm Bill on the recipient countries' food systems is a long-term dynamic and cannot be assessed entirely in minor time spans. According to reviewed literature and interviewees, the specific effects of the policy amendments in the recipient countries might be able to be analyzed in the long term (e.g., 10 years). These kinds of system-wide dynamics go beyond focused case studies covering a minor period of years.	The data analysis focused on identifying emerging trends and patterns in funding levels and the number of beneficiaries across all years with available data from recipient countries. To effectively monitor the impact of policies, follow-up studies or periodic data revisions may be recommended. Additionally, incorporating more recipient countries beyond Bangladesh and Malawi could provide a more comprehensive understanding of the impact.
Insufficient data availability and/or quality	The publicly available data was insufficient due to the limited number of years included, lack of adequate gender disaggregation, and absence of individual-level records, which impacted the depth and reliability of the analysis.	Triangulation was employed, compensating for the insufficient quantitative secondary data with primary data collected through interviews. In addition, multiple reputable sources were integrated to compensate for gaps or deficiencies in individual datasets. Combining data from various sources can enhance completeness and reliability.
Challenges with interviewee engagement and potential biases	Engaging the identified interviewees, primarily Members of Congress, proved challenging. Additionally, responses from Country Offices were often biased towards what could be perceived as desirable answers.	Proactive engagement of interviewees was implemented through follow-up emails and flexible agendas. User-friendly informed consent notices were used to avoid administrative burden on the interviewees, and interviews were kept short (maximum 45 minutes). Anonymity and confidentiality were ensured to minimize potential bias.
Other factors or unknown variables influencing outcomes and impact	Isolating CARE's specific contributions to policy changes is challenging due to numerous external influences and the collaborative nature of advocacy efforts. Similarly, identifying the singular impact of the Farm Bill on the analyzed recipient countries can underestimate the effects of external factors and unknown variables. The multidimensional nature of food insecurity further complicates isolating the effect of the 2018 Farm Bill amendments on people's living conditions.	The triangulation approach aimed at integrating multiple data sources (interviews, documents, available evaluations, quantitative datasets). The data collection and analysis tools were designed to capture nuanced information that could link actions directly to changes, despite the presence of multiple contributors.

# EVALUATION FINDINGS

This section provides a detailed description of the evaluation findings, organized by the **two levels of analysis**:


- The system-level, which focuses on the policy changes within the 2018 Farm Bill, and
- The impact-level, which examines the effects of these changes on people in recipient countries.

The findings are presented in response to the **Evaluation Questions** that were outlined in the Evaluation Matrix, and in relation to the relevant **OECD-DAC evaluation criteria**, which include effectiveness, efficiency, impact, and sustainability. By linking the findings to these criteria, the evaluation provides a clear framework for assessing the success and value of CARE's advocacy efforts.

## 3.1 Triangulation and findings

The use of triangulation, which involves comparing and contrasting data from different sources, was instrumental in enhancing the reliability and validity of the evaluation results. By cross-validating findings from interviews, desk research, and data analysis, the evaluation was able to generate more informed and actionable insights. The triangulation process also helped to identify any inconsistencies or discrepancies in the data, allowing for a more accurate interpretation of the evaluation findings.

All findings are supported by the triangulation of different sources of evidence, which include a combination of interviews with former CARE staff, CARE Regional and Country Offices staff and CARE partner NGOs, qualitative desk research, and data analysis.

A selection of findings is marked with the following icon: , which indicates a higher level of robustness, as they are supported by triangulated data from a significant number of diverse sources.



## 3.2 System level policy change findings

### What was the systems-level policy change CARE achieved through the 2018 Farm Bill?

EVALUATION QUESTION 1: To what extent did CARE's advocacy activities contribute to achieving specific legislative asks for the Farm Bill, and which of these activities emerged as particularly effective in catalyzing systems-level changes? Additionally, what were the key factors contributing to their success?

OECD-DAC criterion: Effectiveness

#### FINDING 1.

Strategic goals and tactics: CARE set clear internal goals and aligned tactics toward intended policy changes but lacked detailed documentation of their systems change strategy. Specifically, while a formal Theory of Change or intervention logic wasn't documented, interviews with CARE staff confirmed clear advocacy goals were defined on a deliberate prioritization of specific provisions (namely monetization and use of CDF) resulting from assessing CARE's influence, other competing interests and relative distribution of influence, and the broader advocacy landscape. This highlights a strategic approach focused on achievable, incremental change. Furthermore, the absence of documented retrospectives or evaluations and staff turnover limits gathering evidence on team's perspectives on expectations and lessons learned.



*°We made a calculation that we thought that we could be more effective by really focusing on maximizing the amount of funding for global food assistance. It was just, it was one that we probably weren't going to win, and it could really take away from those areas where we thought we had a much better shot. The tricky piece has always been around, you know, the monetization issue and how much flexibility are built into funding°*

- Interview with former CARE Staff

#### FINDING 2.

Concise communication on legislative asks: CARE effectively communicated its legislative asks clearly and concisely to stakeholders. For example: CARE helped focus attention on a few key policy changes and facilitated the agenda-setting process with InterAction's NGO coalition. The effectiveness of CARE's communication was significantly supported by a solid understanding of the individuals and groups they were targeting, both within the NGO coalition and Congress, which allowed CARE to tailor the communication content, style, and channels. Furthermore, CARE's provision of field evidence presented compelling narratives that were key enablers of effective communication.



#### FINDING 4.

Effective lobbying: Direct, constant, and incisive lobbying proved particularly effective. CARE's focused and targeted approach to lobbying was particularly instrumental in building Congressional support, and targeting staff members to address technical issues, ensuring that their advocacy received the necessary attention and consideration.



*"I think the government relations team, and I can say this because I wasn't directly involved in it, did a very good job on Capitol Hill in particular making this issue salient and really continuing to push local procurement. I think there was a really thoughtful political eye that was brought to the work and to the coalition that was convened, and I think CARE was really critical in that."*

- Interview with former CARE Staff

#### FINDING 5.

Sustained coalition efforts: Sustained coalition efforts were crucial, with strong support from faith-based organizations providing robust support for CARE's legislative goals, enhancing the sustainability of the Farm Bill's changes.



#### FINDING 6.

Individual advocacy efforts: In addition to coalition efforts, individual advocacy actions were also significant, and no major challenges arose from these independent efforts, demonstrating the effectiveness of a multi-level advocacy approach.





EVALUATION QUESTION 2: To what extent did CARE effectively leverage existing networks and partnerships to amplify their advocacy message? What mechanisms or processes did CARE employ to identify, select, and engage with partner NGOs involved in advocacy efforts?

OECD-DAC criterion: Effectiveness

**FINDING  
7.**

Collective advocacy platforms: The InterAction network, as well as other NGO coalitions, was essential in achieving the pursued policy changes. These networks were instrumental in aligning and amplifying CARE's advocacy efforts through coordinated coalition action, demonstrating the power of collective advocacy.

**FINDING  
8.**

Partnerships and alignment: Partnerships emerged based on shared goals, with many bilateral partnerships being organic and informal. This approach allowed flexibility but may have lacked strategic coherence, leading to potentially missed opportunities for more structured and impactful collaboration.



*"The partnership with other NGOs was organic and situational. Not formal."  
- Interview with former CARE Staff*

**FINDING  
9.**

Corporate partners: CARE's engagement with corporate partners was inconsistent, with limited support due to corporate partners' focus on specific Farm Bill interests unrelated to CARE's asks. This inconsistency reduced the overall impact and utilization of corporate partnerships in CARE's advocacy efforts



**FINDING  
10.**

New voices: CARE played a critical role in bringing new voices, particularly faith-based organizations (FBOs), grassroots organizations, and experts, among others, into the advocacy discussions, broadening the coalition and enhancing the legitimacy of their advocacy.



*"CARE's role in engaging with the FBOs was really helping to lead the full coalition, including ensuring that organizations like FBOs stayed active and talked to the member offices where they could really have had the biggest impact."  
- Interview with former CARE Staff*

**FINDING  
11.**

Partners identification and selection: CARE's approach to identifying and selecting partners appeared to be somewhat inconsistent and lacked a clear strategic framework. While some partners were chosen for their specific relevance to advocacy goals, the overall process was not sufficiently structured.



EVALUATION QUESTION 3: Which roles and responsibilities did CARE undertake in relation to partner organizations involved in advocacy efforts related to systems-level change? Were there any challenges or limitations encountered in CARE's efforts to engage and support partner organizations, and if so, how were they addressed or mitigated?  
 OECD-DAC criterion: Effectiveness

**FINDING 12.**

Steering role: CARE played a steering role in the pre-existing NGO coalition, providing direction without necessarily building a new coalition. CARE played this role together with a few other large organizations and was crucial for coordinated advocacy efforts.



*“CARE played a leadership role in coordinating the whole community.”*  
 - Interview with former CARE Staff

*“CARE served as a co-chair of the InterAction coalition for a while, which allowed them to play a central role in guiding the broader community on how to respond to food security policies emerging from the administration and Congress.”*  
 - Interview with NGO Staff

**FINDING 13.**

Field expertise: CARE's field expertise and experience in food aid programming and implementation brought significant value to the coalition, serving as a source of leadership and legitimacy, and enhancing the coalition's overall effectiveness through improved evidence and concise information.



*“They were bringing a direct experience of U.S.-funded programs to bear in the conversations. It was important to have CARE certainly there. It has a pretty big programmatic on the ground presence.”*  
 - Interview with NGO Staff

**FINDING 14.**

Intermediary with Congressional stakeholders and champions: CARE facilitated effective communication between Congress and coalition members. This role was essential in ensuring that the coalition's advocacy messages were heard and considered by policymakers. CARE effectively identified and liaised with Congressional champions, who supported and advocated for CARE's legislative asks in the Congressional Farm Bill process. CARE's key added value, in this role, was the provision of expert strategic lobbying information and strong relationships with Members of Congress and Congressional staff.



*“We were able to preserve and actually expand the number of Members who cared about the global piece of legislation and were willing to support it.”*  
 - Interview with former CARE Staff

EVALUATION QUESTION 4: How effectively did coordination and communication between CARE and its partner organizations enhance the outcomes of their collaborative advocacy efforts, and what aspects of these efforts were most positively affected?  
 OECD-DAC criterion: Effectiveness

**FINDING 15.**

Coalition platforms: The InterAction network and other coalition platforms like the Food Aid Reform coalition effectively facilitated coordination and alignment among coalition members, amplifying CARE's advocacy efforts through collective action and ensuring consistent messaging.



**FINDING 16.**

Coordination mechanisms: The coalition was well-organized, with smooth internal operations that enhanced collaborative outcomes, demonstrating the effectiveness of coordinated advocacy efforts.



**FINDING 17.**

Pre-existing NGO community: The pre-existing NGO coalition was a crucial enabling factor, with strong personal relationships and deep partner knowledge facilitating coordinated advocacy efforts.

EVALUATION QUESTION 5: How did political, social, or economic conditions influence the choice and effectiveness of CARE's advocacy tactics, and how were these tactics adapted in response to changing circumstances and emerging challenges during the advocacy process?  
 OECD-DAC criterion: Effectiveness

**FINDING 18.**

Political landscape: The political landscape was characterized by multiple competing issues vying for policymakers' focus. Furthermore, some degree of opposition from key political figures and antagonism between two crucial committees—the House Foreign Affairs Committee (supportive of the Farm Bill changes) and the House Agriculture Committee (opposed to the changes)—coupled with misinformation from interest groups, posed challenges. CARE adapted by focusing on those areas where little to no opposition was encountered, deemed also as most relevant according to their field knowledge (namely monetization, CDF, and gender-related aspects). CARE also engaged in continuous dialogue to mitigate Congressional resistance.



*“The Agriculture Committee in the House was a pretty strong opponent of reform and the Republicans of the Foreign Affairs Committee was actually a fairly strong advocate for reform.”*

*“In the Senate, it tended to line up less along Democratic and Republican lines, it was more kind of farm state representatives and kind of non-farm state representatives.”*

*“There were Members with the House Agriculture Committee and the Senate Agriculture Committee that were big champions that we worked with.”*

- Interviews with former CARE Staff and NGO Staff

EVALUATION QUESTION 6: What were the primary obstacles or challenges encountered by CARE and its partners in advocating for systems-level change in relation to the 2018 Farm Bill? How were these obstacles identified and prioritized throughout the advocacy process, and what strategies were employed to address them?

OECD-DAC criterion: Effectiveness

**FINDING 19.**

Competition for attention: One of the primary obstacles encountered by the NGO coalition was the competition for attention among numerous issues. Competition for legislative attention led CARE to unify messaging within the NGO community, presenting a consolidated front to legislators and addressing fragmented communication issues identified through feedback from Members of Congress.



*“These were generally issues that we didn’t have [strong opponents]. It was much more than we were in competition with everything else that was fighting for attention. I would say it was less about getting members to flip their position and more about getting them to care and focus on this.”*

- Interview with former CARE Staff

**FINDING 20.**

Coalition landscape and previous advocacy: The Obama Administration's support for food aid reform, particularly during the 2014 Farm Bill process, and the NGO coalition's previous advocacy work on the 2016 Global Food Security Act strengthened the coalition advocating for reforms in the 2018 Farm Bill but also the stakeholders opposing the NGO's proposals. This created enabling factors that supported the coalition's advocacy and new, increased obstacles, both of which affected the overall advocacy environment.



*“A few years earlier, during the Obama administration, their support of food aid reform actually strengthened the coalition.”*

- Interview with former NGO Staff

EVALUATION QUESTION 7: How did the allocation of resources, including financial, human, and organizational, impact the choice and implementation of advocacy tactics and the ability to respond to changing circumstances?  
OECD-DAC criterion: Efficiency

**FINDING 21.** Resource allocation: CARE organically and deliberately prioritized resources for activities deemed most effective, such as direct lobbying of Congress and coalition participation, optimizing their impact. Overall, CARE strategically dedicated significant resources to Farm Bill advocacy.



*“There was a personnel and budget decision to have someone who’s an expert in those issues and who would focus on them full-time. This meant we weren’t going to do some other things.”*

- Interview with former CARE Staff

**FINDING 22.** Availability of resources: The availability of significant resources enabled CARE’s active role in 2018 Farm Bill advocacy, ensuring sustained and focused efforts. CARE’s financial capacity arises as a differential enabling factor for their role in the advocacy efforts.



*“And it’s really only a very, very large, relatively well-resourced organization like CARE that has the ability to actually effectively advocate on something like this that takes you away from your comfort zone and only comes up every four years.”*

- Interview with former CARE Staff

EVALUATION QUESTION 8: To what extent did CARE’s advocacy strategies and tactics contribute to driving systems-level change in the context of the 2018 Farm Bill? What mechanisms or pathways facilitated the translation of advocacy wins into systems-level changes?

OECD-DAC criterion: Impact

**FINDING 23.** Pragmatic strategy: CARE’s pragmatic advocacy strategy for was effective in achieving long-term, incremental policy changes that aligned with their goals.



*“CARE has been pragmatic but principled in its approach in the Farm Bill, recognizing that incremental change is not enough and at the same time celebrating the small changes that they made.”*

- Interview with NGO Staff

**FINDING 24.** Contribution: CARE’s advocacy contributed to significant policy changes in the 2018 Farm Bill for which they advocated, reflecting a systems-level impact.



**FINDING 25.** Gender perspective: CARE’s contribution ensured gender considerations in the Farm Bill discussions, navigating political sensitivities, and leveraging relationships to integrate women and girls’ needs into conversations about food assistance provisions.



*“A lot of the other big groups would rather never bring up gender because they know that it’s tricky. It could upset Republicans, the groups that are really super focused on gender are not ones that can go in and talk to Republicans to a large extent, and they do not have relationships with Agriculture members. That is a critical piece that CARE brings to the table, making sure that we can’t talk about effective food assistance if we’re not talking about gender.”*

- Interview with former CARE Staff

EVALUATION QUESTION 9: Were there any unintended consequences resulting from CARE’s advocacy wins that influenced systems-level changes, either positively or negatively? Have there been any ripple effects on other food aid policies or programs due to the changes in the Farm Bill?

OECD-DAC criterion: Impact

**FINDING 26.**

Improved alignment and coordination in the coalition: Improved alignment and clarity of goals among coalition organizations emerges as a positive ripple effect from the 2018 Farm Bill advocacy, facilitating more effective dialogue and collaboration, reducing contention, and promoting a cooperative advocacy environment.



*“We’re much more aligned, we’re much clearer on what we want to see changed, and much better able to have open dialogue of what’s wrong, what’s not working, what do we want to see fixed, that sort of thing.”*

- Interview with NGO Staff

**Reflections on potential challenges of the 2018 Farm Bill for future advocacy**

CARE and the NGO coalition’s successful changes in the 2018 Farm Bill present potential long-term challenges that could somehow undermine CARE’s advocacy achievements. Because the 2018 Farm Bill resulted in increased flexibility for Food for Peace implementers, commodity groups representing US-based agricultural interests have invested in proposals that would significantly increase in-kind food aid requirements for Food for Peace. These proposals could create a scenario in which implementing organizations are compelled to revert to monetization to secure adequate funding for Resilience Food Security Activities (RFSAs). This could erode the progress made in the 2018 Farm Bill which further centered flexibility and needs-based approaches in Food for Peace programs.

While these reflections are theoretical conjectures and are not currently supported by robust evidence, the outcome of the current Farm Bill negotiations will determine the extent to which this challenge materializes. For example, the pressure to monetize food aid could result in fewer people being served by Food for Peace programs.

EVALUATION QUESTION 10: Are there any indications that the changes brought about by the Farm Bill are sustainable in the long term? What are the potential challenges to maintaining the positive outcomes of the Farm Bill provisions in the future?

OECD-DAC criterion: Sustainability

**FINDING 27.**

Strong coalition and NGO alignment: Improved alignment and coordination among coalition organizations enhanced the sustainability of their advocacy, supporting long-term Farm Bill outcomes. The robust support system and the sustained, longstanding efforts highlight that these organizations are prepared and determined to keep pushing for further improvements and maintaining the progress made.



*“We’re much more aligned, we’re much clearer on what we want to see changed, and much better able to have open dialogue of what’s wrong, what’s not working, what do we want to see fixed.”*

- Interview with former CARE Staff and NGO Staff.

**FINDING 28.**

Political changes: Changes in political leadership and administration priorities can threaten the sustainability of the Farm Bill’s provisions, as new administrations may shift priorities away from established agendas or propose new legislative amendments to the Farm Bill that reverse the progress made in 2018.



**FINDING 29.**

Congressional turnover: Frequent turnover in Congress poses a recurring challenge for the sustainability of the changes achieved, as new members may lack understanding or support for the international aspects of the Farm Bill. Additionally, the retirement of key Congressional champions risks opponents rolling back progress, necessitating continuous advocacy to maintain gains.



### 3.3 Impact level change on target populations

What impact-level changes did CARE achieve through the 2018 Farm Bill in the analyzed recipient countries?

3.7 million people have improved lives in Bangladesh and Malawi

It is challenging to estimate the number of people in Bangladesh and Malawi who have improved lives due to legislation passed in Washington, DC. We estimate the impact of this policy change by following the Theory of Change outlined in section 2.2 above: CARE operated at different levels—from the federal level in the U.S. via the 2018 Farm Bill to the national level in Bangladesh and Malawi to local communities—to improve food security. Our assessment therefore measures the combined impact of CARE’s efforts at all levels and is based on CARE’s substantial contribution, not attribution. Systems are influenced by multiple actors and forces. We do not claim that CARE’s influence alone led to improved food security for people in Bangladesh and Malawi. Rather, our impact measurement approach seeks to reflect the complex reality of how systems change happens simultaneously at multiple levels.

The interviews highlight how CARE’s field expertise brought significant value to the coalition, serving as a source of leadership and legitimacy, and enhancing the coalition’s overall effectiveness through improved evidence and concise information. As one respondent noted:

*“CARE served as a co-chair of the InterAction coalition for a while, which allowed them to play a central role in guiding the broader community on how to respond to food security policies emerging from the administration and Congress.”*  
 - Interview with NGO Staff

The independent assessment of CARE’s advocacy clearly indicates that CARE contributed to passing specific provisions of the 2018 Farm Bill that enhanced the effectiveness, efficiency, and focus on systems change in Food for Peace. Thus, we quantified the impact of these changes to Food for Peace in Bangladesh and Malawi using USAID International Food Assistance Reports (IFAR) data.

Table 5. Total Estimated Impact in Bangladesh and Malawi

Country	Fiscal Year	RFSA Participants	Country	Fiscal Year	RFSA Participants
Bangladesh	2019	790,146	Malawi	2019	754,485
Bangladesh	2020	624,120	Malawi	2020	No records
Bangladesh	2021	511,968	Malawi	2021	3,479
Bangladesh	2022	260,462	Malawi	2022	No records
Bangladesh	2023	248,673	Malawi	2023	540,485
<b>Total</b>		<b>2,435,369</b>	<b>Total</b>		<b>1,298,449</b>

Total Impact: 2,435,369 people in Bangladesh + 1,298,449 people in Malawi = 3,733,818 people.

Data Source: USAID IFAR FY 2019 - 2023. Calculations are based on the number of Food for Peace Title II non-emergency beneficiaries within each country.

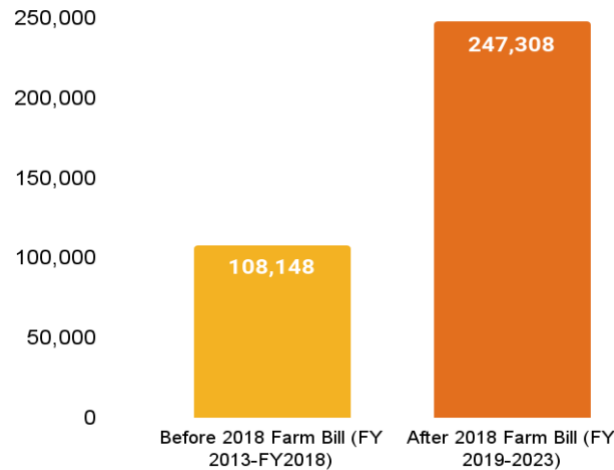
EVALUATION QUESTION 11: What effects can be observed in FFP programs in Bangladesh as a result of the elimination of the minimum monetization requirement in in-kind U.S. food aid on an average annual basis?  
 OECD-DAC criterion: Impact

**FINDING 30.**

Beneficiary patterns in Bangladesh FFP programs: During the period from FY 2013 to 2018, FFP programs in Bangladesh reached an average of 108K beneficiaries annually. In the subsequent period from FY 2019 to 2023, organizations such as CARE, World Vision, and Helen Keller International were able to support more than double that number, averaging 247K individuals annually in Bangladesh. This pattern suggests that, among other factors, the removal of the minimum monetization requirement for U.S. commodities may have enabled USAID to extend food assistance to a significantly larger number of beneficiaries.



Figure 7: Average annual beneficiary trends in FFP programs in Bangladesh



Source: Author's own elaboration based on USAID IFAR FY 2013 - 2023

**FINDING  
31.**

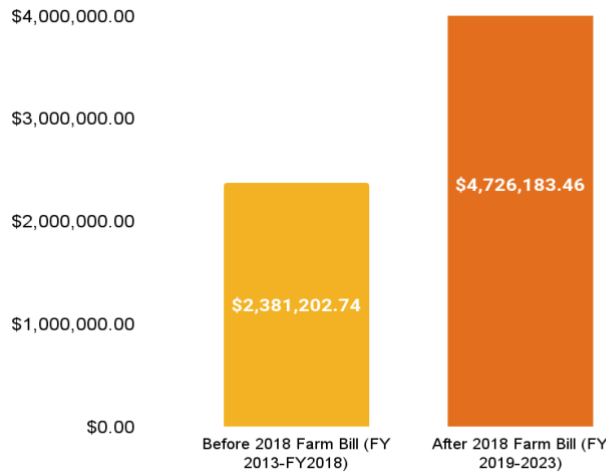
Funding availability increased by 97% during FY 2019-2023 in Bangladesh: During the period from FY 2013 to 2018, the average annual contribution to FFP programs in Bangladesh was \$2.38M. In the period from FY 2019 to 2023, this average annual contribution surged to \$4.7M, reflecting a significant 97% increase in financial support. This pattern suggests that the removal of the minimum monetization requirement for U.S. commodities may have led to a substantial increase in funding for FFP programs in Bangladesh.



### Methodological Note

- Bangladesh was selected as a case study for the end of the monetization mandate, as it is a country where this practice was implemented in the period leading up to the 2018 Farm Bill. Malawi was chosen as a case study for the newly consistent use of CDF in RFSAs, given that it has been a recipient of this funding.
- The estimations were conducted by considering all awardees under FFP programs, including, but not limited to, those where CARE was the principal awardee.
- An original dataset was created by merging several data sources (FY 2013 – 2023) for both recipient countries, revealing a significant gap starting in 2019. This suggests that the changes in the 2018 Farm Bill may have led to an increase in beneficiaries and funding allocation. However, it is important to note that this relationship is not causal.
- This analysis acknowledges that, in addition to the Farm Bill changes, other variables and factors may also influence the outcomes.

Figure 8: Average annual funding trends in FFP programs in Bangladesh



Source: Author's own elaboration based on USAID IFAR FY 2013 - 2023

EVALUATION QUESTION 12: What effects can be observed in FFP-funded programs in Malawi as result of increased consistency of use of CDF in non-emergency programs on an average annual basis?

OECD-DAC criterion: Impact

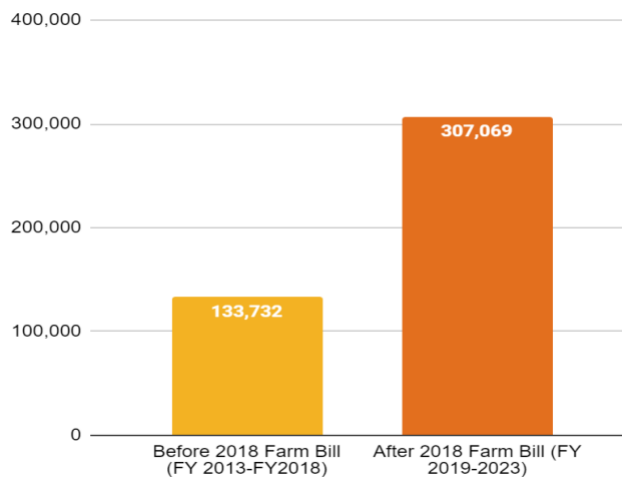
**FINDING 32.**

**Beneficiary patterns in Malawi FFP programs:**

Patterns in Malawi's FFP programs show that an average of 307K people were reached annually during FY 2019 to 2023. In contrast, during the previous period from FY 2013 to 2018, the average number of beneficiaries was 133K. This represents more than a doubling of the reach of these programs, which may be associated with, but not limited to, the effectiveness of the more consistent use of CDF in expanding support to a larger population.



Figure 9: Average annual beneficiary trends in FFP programs in Malawi



Source: Author's own elaboration based on USAID IFAR FY 2013 - 2023

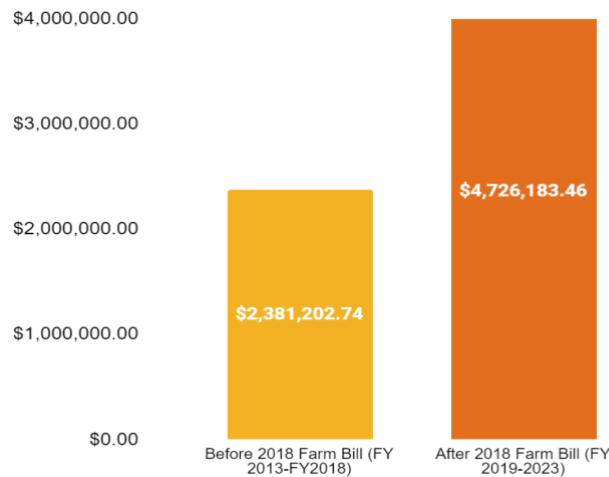


**FINDING 33.**

Funding patterns in Malawi FFP programs:  
From FY 2013 to 2018, the average annual CDF contribution to these programs was \$2.38 million. In the subsequent period from FY 2019 to 2023, CDF resources in Malawi surged to \$14.7 million. This significant increase suggests that consistent use of CDF to fund FFP non-emergency programs enabled greater support and development within the region, leading to more resources being allocated to FFP programs. However, other factors may also be influencing this pattern.



Figure 10: Average annual funding trends in FFP programs in Malawi



Source: Author's own elaboration based on USAID IFAR FY 2013 - 2023

EVALUATION QUESTION 13: To what extent does the evidence support assessments of the relative significance of the 2018 Farm Bill in relation to other factors that could potentially influence people's quality of living in Bangladesh and Malawi?

OECD-DAC criterion: Effectiveness

**FINDING 34.**

Multiple factors influencing quality of life in recipient countries:  
Between FY 2019 and 2023, both Bangladesh and Malawi have faced a multitude of challenges that have significantly impacted the quality of living for people. These include economic shocks, severe climatic conditions, natural disasters, humanitarian crises, and the COVID-19 pandemic, all of which have exacerbated food insecurity levels and affected people's quality of living. In Bangladesh, high inflation and an ongoing refugee crisis further complicate the situation. Malawi, frequently hit by natural disasters such as floods and cyclones, has also been adversely affected by the Ukraine war, posing significant challenges to food security and living conditions in the region. Consequently, isolating the impact of the Farm Bill amendments on living conditions in both countries is challenging.



*"Over the past three years, we have experienced almost annual declarations of a state of national disaster. These declarations unlock donor and humanitarian support to address the challenges of food insecurity."*

*-Interview with Country Office*

**FINDING 35.**

There are multiple factors influencing funding allocation in recipient countries:  
Multiple factors influence the availability of funding in recipient countries. Key among these are the effectiveness of training and reporting mechanisms, which play a crucial role in funding allocation across FFP programs.



EVALUATION QUESTION 14: What type of positive or negative trends can be identified in the number of revised policies, legislation, public programs, and/or budgets addressing food, water, and nutrition rights in Bangladesh and Malawi?

OECD-DAC criterion: Sustainability.

FINDING  
36.

There is a knowledge gap regarding USAID funding mechanisms and CARE internal decision-making processes, leading to misunderstandings among country offices about the 2018 Farm Bill amendments. This gap results in a widespread misperception of budget shortages in programming due to the implementation of the Farm Bill amendments. In the long term, this affects the ability of country offices to take advantage of funding opportunities and advocate effectively at the local level.



*“When our program is performing exceptionally well and some of our interventions require additional support for further development and sustainability, we face challenges due to the CDF. USAID is not permitting us to extend the cost, which creates a problem in securing the necessary funds to continue these activities. This, in my view, is one of the significant drawbacks.”*

*-Interview with Country Office*

# CONCLUSIONS & RECOMMENDATIONS

The present section synthesizes the key findings from the evaluation, offering two main conclusions corresponding to the evaluation's levels of analysis, the system level, and the impact level.

Each level presents a conclusion that encapsulates the key evaluation findings, followed by a set of actionable recommendations aimed at enhancing CARE's future advocacy and impact measurement efforts. The recommendations are targeted towards specific teams within CARE, ensuring clarity and accountability in their implementation.

## Conclusion 1: CARE's contribution to systems level policy change in the 2018 Farm Bill

What was the systems-level change CARE achieved through the 2018 Farm Bill?

**CARE's advocacy contributed to driving systems-level change in the context of the 2018 Farm Bill, achieving specific legislative changes, particularly through effective lobbying and sustained coalition efforts.**

In particular, the translation of specific advocacy wins into systems-level changes was facilitated by their ability to:

- Diversify the voices and perspectives included in the discussion,
- Leverage field expertise from recipient countries,
- Provide expert lobbying information, and
- Present robust evidence to different advocacy targets

The specific legislative changes to which there is evidence of CARE's contribution are:

- Ending the mandate of monetization,

Greater flexibility on the use of the Community Development Funds (CDF). **Related findings: F1, F2, F3, F4, F5, F6, F10, F13, F14, F15, F23, F24, F25.**

### 1.1. CARE's role

CARE's role as a connector and translator among different types of stakeholders (e.g., Members of Congress and Congressional staff, NGO coalitions, faith-based organizations) was central to the success of advocacy efforts related to system-level change. In this role, CARE:

- Gave direction to the NGO coalition asks and external communications, capitalizing on extensive thematic knowledge and field evidence.
- Acted as a connector between Congressional stakeholders and coalition members, empowering new voices. Based on their lobbying expertise and knowledge of Congressional dynamics, CARE supported connections and tailored their communication, increasing the efficacy of the coalition's messaging.
- Served as a thought leader, providing strong evidence-based narratives and field expertise in Farm Bill conversations.

**Related findings: F9, F11, F12, F13, F14.**

### 1.2. Leveraging partners, networks, and resources

CARE effectively leveraged existing NGO coalitions and networks to amplify their advocacy message by engaging with a wide array of stakeholders and empowering new voices in the conversation, including faith-based organizations, grassroots groups, and experts. The InterAction platform played a crucial role in aligning and amplifying CARE's efforts through coordinated coalition action. Organic and informal partnerships provided flexibility but sometimes lacked strategic coherence.

<p>1.3. Navigating the political landscape</p>	<p>Additionally, effective coordination and communication between CARE and its partners led to collaborative outcomes. Improved alignment due to previous joint advocacy and coordination mechanisms promoted a cooperative advocacy environment. CARE's provision of expert lobbying information and strong data positively affected advocacy outcomes. Finally, CARE dedicated significant resources, including financial, human, and organizational to Farm Bill advocacy efforts, which enabled CARE to play an active role. CARE strategically prioritized resources for activities deemed most effective, such as direct lobbying and coalition participation.</p> <p><b>Related findings:</b> F5, F7, F8, F10, F11, F14, F15, F16, F21, 22, F26.</p> <hr/> <p>Among the obstacles faced in CARE's advocacy efforts, competition for Congress's attention is most important, followed by some opposition from key figures and antagonism between committees. These obstacles were identified through conversations with Members of Congress. CARE addressed these challenges by:</p> <ul style="list-style-type: none"> <li>• Focusing on a set of critical advocacy areas that received the most Congressional support,</li> <li>• Developing targeted tactics focused on identifying and leveraging Congressional champions,</li> <li>• Engaging in continuous dialogue with all stakeholders,</li> <li>• Unifying messaging within the NGO community to mitigate resistance and address fragmented communication, leveraging existing NGO platforms.</li> </ul> <p><b>Related findings:</b> F17, F18, F19, F20.</p>
<p>1.4. Sustaining changes in the future</p>	<p>There are indications of positive ripple effects from CARE's advocacy wins, including improved alignment and coordination among coalition organizations, which enhance advocacy sustainability and support long-term Farm Bill outcomes. However, the sustainability of the 2018 Farm Bill's changes is challenged by political shifts, congressional turnover, and the rotation of key internal and external actors. Continuous advocacy and strong coalition support are essential to maintaining and expanding positive outcomes.</p> <p>Additionally, while the 2018 Farm Bill introduced significant progressive reforms, such as the elimination of the monetization requirement, long-term challenges could undermine CARE's advocacy achievements. In the 2024 Farm Bill reauthorization cycle, external stakeholders have proposed increased levels of in-kind food aid requirements in Food for Peace that could prompt USAID to revert to monetization to secure adequate funding for RFSAs. This could erode the progress made in shifting away from a commodity-centric food aid model towards a more flexible and needs-based approach.</p> <p><b>Related findings:</b> F26, F27, F28, F29.</p>

## Recommendations: How can CARE improve its evidence-based advocacy on food security and nutrition?

<p>Target: CARE USG Govt Advocacy team and M&amp;E team</p>	<p><b>RECOMMENDATION 1</b></p> <p>Develop a Theory of Change for CARE's U.S. Government (USG) food and nutrition security advocacy: Outline CARE's long-term vision for systemic change of CARE's USG food and nutrition security advocacy, identifying key expected outcomes, change mechanisms, activities, needed inputs, and assumptions. The Theory of Change will serve as a guide for prioritizing advocacy efforts, learning while implementing the activities, and measuring impact over time, ensuring that CARE avoids fragmentation and triggers synergies among the diverse array of advocacy activities.</p>
<p>Target: CARE USG Govt Advocacy team</p>	<p><b>RECOMMENDATION 2</b></p> <p>Cultivate sustained and solid Congressional engagement: Effective Congressional engagement is a key enabler of CARE's policy achievements. To continue strengthening Congressional engagement, CARE should prioritize relationship building, dedicating time and resources to nurture relationships with key Members of Congress and their staff, particularly those on committees relevant to food security and international aid. Specifically, this includes regular communication, briefings on CARE's work and impact, and invitations to participate in field visits or events. As CARE determines which key member offices to build relationships with, they should also identify Congressional champions and empower them through information and support.</p>
<p>Target: CARE USG Govt Advocacy team</p>	<p><b>RECOMMENDATION 3</b></p> <p>Continue fostering CARE's role as a key intermediary: Maintain CARE's role as a key mediator between Congress and the NGO coalitions. Continue bringing together a wide range of stakeholders and empowering diverse voices to broaden support and increase the legitimacy of CARE's advocacy agenda.</p>

<p>Target: CARE USG Govt Advocacy team</p>	<p><b>RECOMMENDATION 4</b> Sustain organizational lobbying expertise: Dedicate resources to continue building a skilled and experienced lobbying team within CARE—which in 2018 supported both CARE’s direct Congressional engagement and CARE’s steering role within the NGO platform. Building organizational lobbying capabilities is fundamental to ensure expertise and knowledge remains within the organization despite staff turnover.</p>
<p>Target: CARE USG Govt Advocacy team</p>	<p><b>RECOMMENDATION 5</b> Promote transition from organic partnerships to strategic partnerships: Establish formal and/or more structured agreements with priority partners to clearly define roles, responsibilities, and expectations. This will foster further alignment by a) identifying complementary expertise, resources, and networks; and b) defining tactics with expected outputs and outcomes, so that achievements can be monitored and impact measured.</p>
<p>Target: CARE M&amp;E team</p>	<p><b>RECOMMENDATION 6</b> Document advocacy activities and monitor its outcomes "by design:" Utilize the existing Impact Reporting Tools to systematically and comprehensively document key advocacy activities, such as meetings, events, and publications. Additionally, track relevant policy changes and outcomes to assess the impact of advocacy efforts. Ensure a "monitoring by design" approach, defining in the program design phase a set of key indicators and baseline information to monitor contributions and impact across implementation.</p>

## Conclusion 2: The 2018 Farm Bill’s impact level on recipient countries’ populations

### Methodological Note

- Bangladesh was selected as a case study for the end of the monetization mandate, as it is a country where this practice was implemented in the period leading up to the 2018 Farm Bill. Malawi was chosen as a case study for the newly consistent use of CDF in RFSAs, given that it has been a recipient of this funding.
- The estimations were conducted by considering all awardees under FFP programs, including, but not limited to, those where CARE was the principal awardee.
- An original dataset was created by merging several data sources (FY 2013 – 2023) for both recipient countries. This suggests that the changes in the 2018 Farm Bill may have led to an increase in beneficiaries and funding allocation. However, it is important to note that this relationship is not causal.
- This analysis acknowledges that, in addition to the Farm Bill changes, other variables and factors may also influence the outcomes.

## How are people's lives better as a result of CARE's achievements?

**CARE successfully advocated for the elimination of the monetization mandate and greater certainty in the use of Community Development Fund (CDF) in the 2018 Farm Bill, which led to increased funding availability for programs under Food for Peace (FFP). Consequently, USAID was able to extend food assistance to a greater number of beneficiaries.**

To estimate the effects on people's quality of living, the analysis focused on FFP programs in Bangladesh and Malawi, representing two out of 12 recipient countries. These countries were selected as a sample to illustrate the broader impact of the legislative amendments in the 2018 Farm Bill.

The quantitative analysis considered two outcome variables: beneficiary reach and funding levels. Secondary data sources, such as the USAID International Food Assistance Reports from fiscal years (FY) 2013 to 2023, were utilized to estimate these effects.

**Related findings: F30, F31, F32, F33, F34, F35, F36.**

As a result of CARE's contributions, we estimate that 3.7 million people—2.43 million in Bangladesh and 1.29 million people in Malawi—have improved lives.

The independent assessment of CARE's advocacy clearly indicates that CARE contributed to passing specific provisions of the 2018 Farm Bill that enhanced the effectiveness, efficiency, and focus on systems change in Food for Peace. Thus, we quantified the impact of these changes to Food for Peace in Bangladesh and Malawi using USAID International Food Assistance Reports (IFAR) data.

Country	Fiscal Year	RFSA Participants	Country	Fiscal Year	RFSA Participants
Bangladesh	2019	790,146	Malawi	2019	754,485
Bangladesh	2020	624,120	Malawi	2020	No records
Bangladesh	2021	511,968	Malawi	2021	3,479
Bangladesh	2022	260,462	Malawi	2022	No records
Bangladesh	2023	248,673	Malawi	2023	540,485
<i>Total</i>		<i>2,435,369</i>	<i>Total</i>		<i>1,298,449</i>

Total Impact: 2,435,369 people in Bangladesh + 1,298,449 people in Malawi = 3,733,818 people.

*Data Source: USAID IFAR FY 2019 - 2023. Calculations are based on the number of Food for Peace Title II non-emergency beneficiaries within each country.*

### 2.1 Monetization elimination

Beneficiaries and funding allocation patterns in Bangladesh FFP programs: Starting in FY 2019, both beneficiaries and funding allocation patterns have shown significant increases. From FY 2019 to 2023, a total of 2.43 million people participated in RFSA, with funding levels reaching a total of \$51.89 million. This growth can be associated with, but is not limited to, changes in the 2018 Farm Bill that ended the monetization mandate in Food for Peace.  
**Related findings: F30, F31**

### 2.2. CDF funds consistency

Beneficiaries and funding allocation patterns in Malawi FFP programs: In Malawi, 1.29 million people participated in RFSA, and \$72 million was allocated in funding between FY 2019 and 2023. This significant growth can be associated with, but is not limited to, the 2018 Farm Bill change that increased certainty around use of CDF.  
**Related findings: F32, F33**

2.3.  
Knowledge gap

A knowledge gap regarding USAID funding mechanisms has emerged as a significant challenge for both CARE Country Offices and CARE global teams. This has led to a generalized misperception of budget shortages in programming, attributed to the implementation of the 2018 Farm Bill amendments.

Related findings: F34, F35, F36

## Recommendations: How can CARE better estimate the potential systems-level impact of advocacy efforts?

<p>Target: CARE global technical teams, especially Food and Water Systems Team, and Country Office teams</p>	<p><b>RECOMMENDATION 1</b> Establish regular fora on legislative updates: Implement regular structured platforms (fora or assemblies, workshops, webinars, etc.) for ongoing dialogue between the USG Advocacy and Country Office teams. These spaces should facilitate the sharing of legislative updates, ongoing Farm Bill negotiations, and advocacy strategies by the USG Advocacy team, while also providing a space for Country Office teams to offer insights on programmatic implications and potential impact-level consequences of policy changes. In these spaces, internal experts like the Institutional Fundraising Strategy (IFS) team can offer ad hoc training sessions or learning workshops to country office staff to familiarize them with USAID's funding processes and criteria. This will ensure better alignment between Regional and Country Offices for future advocacy objectives, Farm Bill discussions, and local advocacy efforts in recipient countries.</p>
<p>Target: CARE global technical teams, especially IFS</p>	<p><b>RECOMMENDATION 2</b> Increase engagement with country offices and information sharing on USAID funding mechanisms and programming: Foster collaboration and information sharing with Country Offices to achieve a unified approach to addressing food insecurity through FFP programs and avoid misunderstandings, making sure programming leverages on the opportunities arising from the flexible funding structures and facilitates financial sustainability.</p>
<p>Target: CARE USG Advocacy team, with support of CARE global technical teams, and Country Office teams</p>	<p><b>RECOMMENDATION 3</b> Foster a continuous cycle of evidence-based advocacy: Maintain and promote CARE's position as a thought leader, which has proven to be one of their key differentiators, by consistently providing evidence-based insights and analysis on food security issues. On this evidence basis, the U.S. Advocacy team can prioritize advocacy strategies and tactics that are directly informed by policy impacts on recipient countries. For this, it is recommended to establish systematic feedback loops or consultation mechanisms to receive contributions from Country Office teams.</p>
<p>Target: CARE M&amp;E team; Country Office teams</p>	<p><b>RECOMMENDATION 4</b> Strengthen data collection strategies: Establish standardized data collection protocols and data management strategies to consistently measure food security indicators for FFP programs.</p>
<p>Target: CARE M&amp;E team</p>	<p><b>RECOMMENDATION 5</b> Conduct focused assessments on impact-level dynamics: Use the standardized data collected to perform detailed focused assessments and estimate the direct and indirect effects of the changes in the 2018 Farm Bill on food security in a larger number of recipient countries considering greater robustness and bias control. The collected data and insights will be helpful to advocate for necessary policy adjustments at the local and national levels, ensuring that programming remains effective and adequately funded.</p>

# ANNEX

## Annex I: List of abbreviations

Acronym	Meaning
CARE	Cooperative for Assistance and Relief Everywhere
CDF	Community Development Fund
FAR	Food Aid Reform coalition
FBO	Faith-Based Organization
FFP	Food for Peace
FNS	Food and Nutrition Security
FY	Fiscal Year
IFAR	International Food Assistance Report
M&E	Monitoring and Evaluation
McGovern-Dole	McGovern-Dole Food for Education Program
NGO	Non-Governmental Organization
USAID	United States Agency for International Development
USG	United States Government



## Annex II. Evaluation Matrix

Levels	OECD-DAC Evaluation criteria	ID	Evaluation questions	Indicators	Data sources	Methods of collection and analysis
System Level	Effectiveness	EQ1.	To what extent did CARE's advocacy activities contribute to achieving specific legislative asks for the Farm Bill, and which of these activities emerged as particularly effective in catalyzing systems-level changes? Additionally, what were the key factors contributing to their success?	Number of legislative asks met effectiveness of specific activities	Primary data: Interviews Secondary data: Programmatic documentation, News screening	Content analysis, thematic analysis, qualitative coding
System Level	Effectiveness	EQ2.	To what extent did CARE effectively leverage existing networks and partnerships to amplify their advocacy message? What mechanisms or processes did CARE employ to identify, select, and engage with partner organizations involved in advocacy efforts?	Number of partnerships leveraged effectiveness of engagement efforts	Primary data: Interviews Secondary data: Programmatic documentation, News screening	Content analysis, thematic analysis, qualitative coding
System Level	Effectiveness	EQ3.	Which roles and responsibilities did CARE undertake in relation to partner organizations involved in advocacy efforts related to systems-level change? Were there any challenges or limitations encountered in CARE's efforts to engage and support partner organizations, and if so, how were they addressed or mitigated?	Roles identified in CARE's action	Primary data: Interviews Secondary data: Programmatic documentation, News screening	Content analysis, thematic analysis, qualitative coding, narrative analysis
System Level	Effectiveness	EQ4.	How effectively did coordination and communication between CARE and its partner organizations enhance the outcomes of their collaborative advocacy efforts, and what aspects of these efforts were most positively affected?	Perceptions on communication and coordination effectiveness	Primary data: Interviews Secondary data: Programmatic documentation, News screening	Content analysis, thematic analysis, qualitative coding, narrative analysis
System Level	Effectiveness	EQ5.	How did political, social, or economic conditions influence the choice and effectiveness of CARE's advocacy tactics, and how were these tactics adapted in response to changing circumstances and emerging challenges during the advocacy process?	Changes in advocacy tactics over time and scenarios, types of adaptations made	Primary data: Interviews Secondary data: News screening, Open databases	Content analysis, thematic analysis, qualitative coding
System Level	Effectiveness	EQ6.	What were the primary obstacles or challenges encountered by CARE and its partners in advocating for systems-level change in relation to the 2018 Farm Bill? How were these obstacles identified and prioritized throughout the advocacy process, and what strategies were employed to address them?	Modalities of identification of obstacles, strategies employed	Primary data: Interviews Secondary data: News screening	Content analysis, thematic analysis, qualitative coding, narrative analysis

Levels	OECD-DAC Evaluation criteria	ID	Evaluation questions	Indicators	Data sources	Methods of collection and analysis
System Level	Efficiency	EQ7.	How did the allocation of resources, including financial, human, and organizational, impact the choice and implementation of advocacy tactics and the ability to respond to changing circumstances?	CARE Staff and former Staff's perception of resource intensity and utilization	Primary data: Interviews Secondary data: Programmatic documentation	Content analysis, thematic analysis, qualitative coding
System Level	Impact	EQ8.	To what extent did CARE's advocacy strategies and tactics contribute to driving systems-level change in the context of the 2018 Farm Bill? What mechanisms or pathways facilitated the translation of advocacy wins into systems-level changes?	Evidence of contribution links	Primary data: Interviews, Participative workshop Secondary data: Programmatic documentation	Content analysis, thematic analysis, qualitative coding, narrative analysis
System Level	Impact	EQ9.	Were there any unintended consequences resulting from CARE's advocacy wins that influenced systems-level changes, either positively or negatively? Have there been any ripple effects on other food aid policies or programs due to the changes in the Farm Bill?	Types and number of unintended consequences and/or ripple effects identified	Primary data: Interviews, Participative workshop Secondary data: Programmatic documentation	Content analysis, thematic analysis, qualitative coding, narrative analysis
System Level	Sustainability	EQ10.	Are there any indications that the changes brought about by the Farm Bill are sustainable in the long term? What are the potential challenges to maintaining the positive outcomes of the Farm Bill provisions in the future?	Perceptions on sustainability and/or long-term impact of outcomes achieved	Primary data: Interviews, Participative workshop Secondary data: Programmatic documentation	Content analysis, thematic analysis, qualitative coding, narrative analysis
Impact Level	Impact	EQ11.	What effects can be observed in FFP programs in Bangladesh as a result of the elimination of the minimum monetization requirement in in-kind U.S. food aid on an average annual basis?	Number of beneficiaries of FFP programs; Funding level of FFP programs	Primary data: Key informants' interviews Secondary data: Open databases, Annual and thematic reports, News screening	Descriptive statistics, trends analysis, qualitative coding analysis, thematic analysis, narrative analysis
Impact Level	Impact	EQ12.	What effects can be observed in FFP-funded programs in Malawi as result of the flexibilization of the Community Development Funds (CDF) on an average annual basis?	Number of beneficiaries of FFP programs; Funding level of FFP programs	Primary data: Key informants' interviews Secondary data: Open databases, Annual and thematic reports, News screening	Descriptive statistics, trends analysis, qualitative coding analysis, thematic analysis, narrative analysis
Impact Level	Effectiveness	EQ13.	To what extent does the evidence support assessments of the relative significance of the 2018 Farm Bill in relation to other factors that could potentially influence people's quality of living in Bangladesh and Malawi?	Number of people participating in food security programs	Primary data: Key informants' interviews Secondary data: Open databases, Annual and thematic reports, News screening	Descriptive statistics, trends analysis, qualitative coding analysis, thematic analysis, narrative analysis

Levels	OECD-DAC Evaluation criteria	ID	Evaluation questions	Indicators	Data sources	Methods of collection and analysis
Impact Level	Effectiveness	EQ1 4.	What type of positive or negative trends can be identified in the number of revised policies, legislation, public programs, and/or budgets addressing food, water, and nutrition rights in Bangladesh and Malawi?	Proportion of people with moderate or severe food insecurity	Primary data: Key informants' interviews Secondary data: Open databases, Annual and thematic reports, News screening	Descriptive statistics, trends analysis, qualitative coding analysis, thematic analysis, narrative analysis

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