

**REPUBLIC OF SOUTH SUDAN**

# **The National Taskforce on COVID-19**

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Report on the Genesis of the Six Dollars Charge Imposed on COVID-19  
Private Laboratories From September 6th 2021 to December 26th 2021

**Investigation Committee**  
12/17/2022

**The National Taskforce on COVID19**  
**Report on the Genesis of the Six Dollars Charge Imposed on COVID-19 Private Laboratories**

**From September 6<sup>th</sup> 2021 to December 26<sup>th</sup> 2021**

**January 17<sup>th</sup> 2022**

**Juba – South Sudan**

**Introduction:**

On December 17<sup>th</sup> 2021, the NTF issued its 100<sup>th</sup> Communiqué in which part of it stated the following; *“The Taskforce directs the laboratories to suspend the payment of the six dollars charge; therefore the reconstituted committee is tasked to investigate the genesis of that payment.*

***The committee is comprised of the following;***

1. Col. Dr. Ajak Makor – Chairman
2. Dr. Moua Moti – Secretary
3. Dr. Fredrick Khamis Tawad – Member
4. Hon. Dr. Victoria Stephen Majur – Member
5. Maj- Gen. Police Majok Kuol – Member
6. Dr. Ader Macar Aciek - Member

*The Committee is further directed to sit with the laboratories management to agree on the issue of the percentage.”*

**Plan of Actions:**

The committee made the following points as its plan of action;

1. Distribution of the 100<sup>th</sup> communiqué to all the COVID-19 operational laboratories.
2. Asking the laboratories management to prepare reports on;
  - a. The genesis of the six dollars payment
  - b. How much have been paid
  - c. Who received the payment
  - d. Which account was the cash deposited
  - e. Avail payment receipts
  - f. Record any technical challenges facing the issuance of the unified certificate
3. Report on the payment of the 20% share.

The committee distributed the 100<sup>th</sup> communiqué to all the operational laboratories on the same date of December 22<sup>nd</sup> 202.

The following table is a summary of the findings of each laboratory on the unified certificate the payment of the six dollars charge;

S/No.	Laboratory Name	Starting Date of Six Dollars Payment	Technical Challenges	Total Amount Paid
1.	Med-Blu Laboratory	11/10/2021	<ul style="list-style-type: none"> <li>- Time consumer, taking more than 15 minutes to serve one client</li> <li>- System is insecure; porous and is accessible by anyone and data manipulation risk is very high</li> <li>- Results are not available via e-mail or SMS, they are hand-picked.</li> <li>- Delay in authorization to produce results.</li> <li>- The E-Service operates with preload system where you cannot enter without paying the six dollars in advance.</li> </ul>	<ul style="list-style-type: none"> <li>- <b>87,000 USD</b></li> <li>- From 11/10/2021 to 21/12/2021</li> <li>- No payment of the 20% shares.</li> </ul>
2.	Bio-Lab Molecular Biological Laboratory	09/09/2021	<ul style="list-style-type: none"> <li>- No customer care service available for the unified system when it breakdown.</li> <li>- System is insecure and can be accessed by anyone.</li> <li>- Discrepancy in operating the unified system, Bio-lab has 5 steps while some other labs have lesser steps.</li> <li>- The E-Service operates with preload system where you cannot enter without paying the six dollars in advance.</li> </ul>	<ul style="list-style-type: none"> <li>- <b>35,172 USD</b></li> <li>- Paid from 09/09/2021 to 21/12/2021</li> <li>- No payment of the 20% shares.</li> <li>- Money collectors: <ul style="list-style-type: none"> <li>• Larry Agepo</li> <li>• Margaret Andrew Makur</li> <li>• Suzan Adol Chigai</li> <li>• Sarah Gribani</li> <li>• Athiang Mayen</li> </ul> </li> </ul>
3.	Check-up Clinic	10/09/2021	<ul style="list-style-type: none"> <li>- System is insecure and is accessible by anyone</li> <li>- Time consuming because of a prolonged questionnaire</li> <li>- Slow and unstable network which breakdown frequently</li> </ul>	<ul style="list-style-type: none"> <li>- <b>5,210,080 SSP</b></li> <li>- From 10/09/2021 to 24/12/2021</li> <li>- No payment of the 20% shares</li> </ul>

			<ul style="list-style-type: none"> <li>- Data cannot be retrieved or reproduced</li> <li>- Multiple data entrance for one client in case of mistakes</li> <li>- Gender cannot be differentiated</li> </ul>	
4.	Queens Medical Center	Not indicated	<ul style="list-style-type: none"> <li>- Time consuming to process one client, 5 steps leading to unnecessary queues and client frustration</li> <li>- System cannot refund payment in case cancellation or double entrance.</li> <li>- Cannot detect whether a client has tested before or not which allows manipulation of results (positive here and negative there on request).</li> <li>- Doesn't show financial report or total number of tests carried out per day</li> <li>- Slow network and frequent system breakdown</li> </ul>	<ul style="list-style-type: none"> <li>- <b>30,758 USD</b></li> <li>- <b>16,642,000 SSP</b></li> <li>- No payment of the 20% shares, instead the operational agreement speaks the reverse</li> </ul>
5.	PIC Diagnostic Center	06/09/2021	<ul style="list-style-type: none"> <li>- Time consuming because of a prolonged 29 questionnaire with 5 steps.</li> <li>- Payment top up is not clear</li> <li>- Frequent system breakdown</li> <li>- The E-Service operates with preload system where you cannot enter without paying the six dollars in advance.</li> </ul>	<ul style="list-style-type: none"> <li>- <b>5,600 USD</b></li> <li>- From 06/09/2021 to 24/12/2021</li> <li>- No payment of the 20% shares</li> </ul>
6.	Nojum Diagnostics	Date is not indicated	<ul style="list-style-type: none"> <li>- System is insecure and can be easily hacked and it doesn't require a high IT technical expertise to login into the system, search, edit and affect all the information in the whole COVID19 Data of all the operational laboratories</li> <li>- It discloses patient's private health information to the public</li> <li>- Tracking and searching capacities were facilitated through a filter button, this allowed cross-lab disclosure of client's data which is</li> </ul>	<ul style="list-style-type: none"> <li>- Did not disclose any payment details on the six dollars charge although they said that they did pay</li> <li>- They never pay the 20% shares</li> </ul>

			compromising to data confidentiality and was removed making it again very difficult to search clients or making daily or weekly protocol.	
7.	Life – Link Clinic	Since October 2021	<ul style="list-style-type: none"> <li>- This is their only available system since they started operating</li> <li>- The E-Service operates with preload system where you cannot enter without paying the six dollars in advance.</li> </ul>	<ul style="list-style-type: none"> <li>- Did not disclose any payment details on the six dollars charge</li> <li>- <b>Dr. Obiaha said that they have been paying the 20% share to a certain Akuei from the office of the VP for SC</b></li> </ul>
8.	Crawford Laboratory	Date not disclosed	<ul style="list-style-type: none"> <li>- No any technical challenge reported, instead the management praised the system</li> </ul>	<ul style="list-style-type: none"> <li>- Did not disclose any payment details on the six dollars charge or the 20% shares</li> </ul>
9.	Catherina Laboratory	Was not operational by the time of the initiation of the investigation	-	-
10.	<p>Total Payment:</p> <ol style="list-style-type: none"> <li>1. One hundred fifty eight thousand five hundred and thirty dollars and</li> <li>2. Twenty one million eight hundred fifty two thousand South Sudanese Pounds</li> </ol>			<ol style="list-style-type: none"> <li>1. 158,530 USD &amp;</li> <li>2. 21,852,000 SSP</li> </ol>

**I. The Genesis of the Six Dollars Payment per each client imposed on laboratories;**

- a. COVID-19 was first diagnosed in South Sudan on April 5<sup>th</sup> 2020
- b. The National Public Health Lab was the sole COVID-19 testing Center until December 2020 when the pressure and high demand for testing overwhelmed the National Public Health Laboratory.
- c. On January 5<sup>th</sup> 2021 the first private laboratory was granted license to conduct COVID-19 testing after meeting the 33 point checklist.
- d. Other 7 private laboratories were subsequently granted permission to conduct COVID-19 testing.

- e. Many cases of forged certificates were detected at JIA and other POEs.
  - f. Many clients were found with positive COVID-19 test results after exiting the country with negative COVID-19 test results.
- II. In view of the above points, the NTF deliberated on means of combating forged COVID-19 test certificates and a unified e-system (like the DHIS2) was suggested to control the issuance of test certificates and curb forging and plagiarisms of certificates.
  - III. In January 2021; Crawford Capital Limited made a presentation offering to operate COVID-19 Testing Laboratory as well as expressing their interest (EoI) to avail their system for the unified electronic certificate.
  - IV. On August 30<sup>th</sup> 2021; the office of the VP for Service Cluster and the Chairman of the NTF on COVID-19 issued an ultimatum letter number **RSS/VP-SC/J/0182-2021** to the Undersecretary of the Ministry of Health who is the Secretary of the NTF on COVID-19 about the **Deadline for the Unified Electronic Certificate of COVID-19** which was indicated to be effected by September 6<sup>th</sup> 2021.
  - V. All the laboratories were instructed to conform to the order and they were warned that failure to **use the unified Electronic Certificate** will render their certificates invalid. Law enforcement agencies were instructed to enforce this directive accordingly but the letter was silent about any payment and there was no mention of the six dollars.
  - VI. Laboratory managers informed this investigating committee that some people presenting themselves as NRA officials started coming to the labs at evening hours requesting cash payment for operating the unified electronic system, then later on they presented themselves as officials of the Capital Pay Company, a company that collect money on behalf of Crawford Capital Limited, the operator of the e-governance system.

### What is the E – Governance System?

The E. Governance System is defined as *“the use of information and telecommunication technology (ICT) by the government to provide and facilitate government services, exchange of information, communication, transactions and integration of various **standalone** systems and services”*. The E. Governance system has the following types;

- a. *Government to Government (G2G) System; Exchange of information within the government institutions.*
- b. *Government to Citizens (G2C) System; a platform for interaction of the citizens with government institutions.*
- c. *Government to Employees (G2E) System; the interaction between government institutions and its employees in an efficient and speedy manner.*
- d. *Government to Business (G2B) System where the businesses are able to interact with the government seamlessly with respect to the services of the government offered to businesses.*

**The objectives of the E. Governance system are to;**

- a. *Support and simplify governance for the government, citizens and businesses*
- b. *To make government administration more transparent and more accountable while addressing the society needs.*
- c. *To reduce corruption in the government.*
- d. *To ensure speedy administration of services and information.*
- e. *To reduce difficulties for business, provide immediate information and enable digital communication by E- Business.*

Unfortunately; none of the above objective was realized through the implementation of the Unified Electronic Certificate.

#### **Chronology of the Contract between the Ministry of Information Telecommunication and Postal Services with Crawford Capital Limited:**

1. **On 28/06/2019** Dr. Lado Wani Kenyi; the Director - General of the National Communication Authority (NCA) wrote a report with reference of **RSS/NCA/J/DG/3.a.2** to Hon. Michael Makuei Lueth – the minister of Information, Telecommunication and Postal Services summarizing to him the presentation of the Proposal of Crawford Capital Limited to partner with the South Sudan Government on the implantation of the E – Government System.
2. The report proposed a committee of **(9) members** to workout modalities with Crawford Capital Limited to ensure that everything is in line with the “**government digital plan**”.
3. The report suggested “8 points” as the term of reference (TOR) of such partnership.
4. Crawford Capital Limited Preposition as per the NCA report;
  - a. Crawford Capital Limited proposed to partner with the government by implementing, operating and maintaining the E – Government System in the republic of South Sudan.
  - b. Crawford Capital Limited proposed the MIT&PS to be the face of the project representing the government and holds **35% of the shares** on behalf of the government while Crawford Capital Limited retains the remaining **65% shares** in the project.
  - c. Crawford Capital Limited stated that it has secured funding with the World Bank and the African Development Bank for similar projects and they are quite familiar with the procedures, hence they assured the NCA team that getting funding for this project will not be a problem.
5. **On 11/07/2019**, the minister of MIT &PS wrote a letter with reference **RSS/TGoNU/MICT&PS/MO/J/8.13.17** to the Director General of the Internal Security Bureau about the implementation of the E – Governance System in the Republic of South Sudan requesting his office to study the procedures and advice accordingly.
6. **On 05/09/2019**, the DG of the ISB wrote back to the minister of the MIT&PS about Crawford Capital Limited Expression of Interest (EoI) for the implementation of the E –

- Governance System in the Republic of South Sudan in which he indicated that the ISB has no objection to the project.
7. However; **the ISB Technical Team** made the following observations;
    - a. *Crawford Capital Limited should work in partnership with the ISB ICT department since the company is aiming to create a huge database and integration of services that can be accessed on line.*
    - b. *The government should appoint an E – Government Advisory Committee to generate regulatory policies and supervises the implementation of the E – Government System.*
  8. **On 24/10/2019** , Hon. Garang Majak Bol, the undersecretary of the ministry of Finance wrote to the undersecretary of the MIT&PS a letter of no objection for the partnership between the MIT&PS and Crawford Capital Limited in the implementation of the E-Government System provided that the recommendations from the DG of the IBS are considered.
  9. **On the same date of 24/10/2019**, **Hon. Justin Aleer De Mayen**; the Undersecretary of the MIT&PS wrote to the Undersecretary of the ministry of Justice and Constitutional Development a letter with reference **RSS/MICT&PS/USO/J/24/10/2** requesting for drafting and authentication of a contract between the MIT& PS with Crawford Capital Limited on the Implementation, Operating and Maintaining the E – Government Services.
  10. **On 16/11/2019**. A certificate of drafting a contract between the Government of South Sudan represented by the MIT&PS and Crawford Capital Limited (CCL) was issued by the Ministry of Justice and Constitutional Development.
  11. **On 29/11/2019**; the Partnership Contract between the MIT& PS and CCL was signed by and authenticated.
  12. **On the same date of 29/11/2019**, **Hon. Justin Aleer De Mayen** the Undersecretary of the MIT&PS wrote to Mr. Garang Malek, the CEO of Crawford Capital Limited informing him about the confirmation of the partnership.

#### **Observations on the contract between the MIT& PS and CCL:**

1. This Partnership agreement predates the discovery of COVID-19 Pandemic, it was signed and authenticated on November 29<sup>th</sup> 2019 which is 5 months (April 5<sup>th</sup> 2020) before the appearance of COVID19 in South Sudan and one month before the discovery of COVID-19 in the whole world (December 31<sup>st</sup> 2019).
2. There is no any addendum made in the contract to include specific phrases on COVID-19 Pandemic to explain the role of the National Taskforce on COVID-19 and the National Ministry of Health.
3. The role of the Ministry of Finance through the NRA has not been specified in the contract despite the fact that the Ministry of Finance (MoF) is the sole legal custodian of public funds as per the laws of South Sudan; instead the 35% government shares were given to the MIT&PS with no specified accounts for depositing.



### **Challenges which faced the Investigation Committee:**

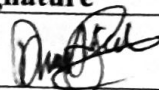
1. The communiqué number 100 was issued on December 17<sup>th</sup> 2021 but was not released until December 22<sup>nd</sup> 2021 due to some obstruction by the office of the Executive Director in the office of the Vice President for Service Cluster.
2. Mr. Ayaga Garang, the Executive Director in the office of the Vice President for Service Cluster issued a contradictory letter to the PCR labs on December 23<sup>rd</sup> 2021 which forced the chairman of the investigation committee to make some necessary public clarifications on Eye Radio and Facebook.
3. Some laboratory managers declined to submit their financial report on the payment of the six dollars for reasons unclear to the investigating committee.
4. All the laboratory managers did not submit the full number of tested clients since they started operating for the committee to contrast their figures with the total payment.
5. The Executive Director in the office of the Vice President for Service Cluster was discovered to be a signatory in the COVID-19 account while he is neither a member of the NTF nor is he an accounting officer in the Ministry of Health which made the tracing of some financial transactions related to the payment of the six dollars and the 20 % shares very difficult.
6. The ED acted solely to issue operational permission to some lab to operate COVID-19 testing without following the required procedures such as the case of Life link laboratory which was granted permission to operate in Nimule Land Port for testing of travellers.
7. The laboratory managers received an SMS from officials of the Capital Pay threatening them to comply with the payment of the six dollars including the arrears or else their labs risk being shut down as per their ultimatum. In view of this point, there is a high expectation for the Capital Pay Company creeping in again and demanding the labs to clear their arrears and continue paying the foresaid six dollars if this issue is not addressed once and for good by the NTF.

### **Recommendations on the Investigation Outcomes:**

1. The National Taskforce on COVID-19 should permanently nullify the six dollars payment to Capital Pay Company with an immediate effect.
2. Each laboratory that has been paying the six dollars per each client to Capital Pay "***must be refunded***" because there is no any legal bonding agreement that forces these laboratories to incur that loss while the six dollars is divided between CCL with **3.5 dollars profit** and the MIT& PS with **2.5 dollars profit**.
3. Since many PCR Testing Laboratories are facing numerous technical challenges while operating the Unified E – System on COVID-19; each PCR laboratory is recommended to use its own system provided that data are shared with the NPHL on or before 03 pm on daily basis as per the recommendation of MAP inspection team.

4. The Investigation Committee has to be allowed by the NTF Plenary to summon all the PCR laboratories that didn't comply with the work of this investigation.
5. The National Public Health Laboratory and the JIA Security administration as well as Nimule Port and all the other exit points are requested to bring all the lists of travelers from September 6<sup>th</sup> to December 26<sup>th</sup> 2021 to the NTF to ascertain the exact number of all the travelers.
6. All the secretariat works as well as any financial transactions done by the NTF should cease being run from the office of the Vice President for Service Cluster and must be brought back to the office of the Undersecretary of the National Ministry of Health for easy accountability and smooth supervision of COVID-19 activities as per the mandate of the Ministry of Health in order to protect the sovereignty of the Vice President Office and avoid its implication in such an awkward circumstances.
7. The ISB, the NRA, the Anti-Corruption Commission, the Audit Committee of the RTNLA and any other relevant government institution should be served with a copy of this investigation report to take any measure that deems necessary to protect the government function in accordance with the laws and regulations of the Republic of South Sudan.

**Signatures of the Investigation Committee on the Six Dollars:**

S/No.	Name	Position	Signature
1.	Col. Dr. Ajak Makor	Chairman	
2.	Dr. Moua Moti	Secretary	
3.	Hon. Dr. Victoria Stephen Majur	Member	
4.	Dr. Fredrick Khamis Tawad	Member	
5.	Maj- Gen. Police Majok Kuol	Member	
6.	Dr. Ader Macar Aciek	Member	