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**To:** Carrie Hessler- Radelet, Director  
Keri Lowry, Regional Director  
Anne Hughes, Acting Chief Compliance Officer

**From:** Kathy A. Buller, Inspector General 

**Date:** January 15, 2016

**Subject:** Final Report on the Audit of the Peace Corps/Kyrgyz Republic (IG-16-01-A)

Transmitted for your information is our Final Report on the Audit of Peace Corps/Kyrgyz Republic.

Management concurred with both recommendations and both recommendations have been closed. In its response, management described actions it is taking or intends to take to address the issues that prompted each of our recommendations. We wish to note that in closing recommendations, we are not certifying that the agency has taken these actions or that we have reviewed their effect. Certifying compliance and verifying effectiveness are management's responsibilities. Our comments, which are in the report as Appendix D, address these matters.

You may address questions regarding follow-up or documentation to Assistant Inspector General for Audit Judy Leonhardt at 202.692.2914, Lead Auditor Rebecca Underhill at 202.692.2941 or to Senior Auditor Renita Davis at 202.692.2940.

Please accept our thanks for your cooperation and assistance in our review.

cc: Laura Chambers, Chief of Staff  
Jeremy Parker, Acting Country Director/ Director of Management and Operations, Peace Corps/ Kyrgyz Republic  
Joseph Hepp, Chief Financial Officer  
Carlos Torres, Deputy Director  
Tonia Wellons, Associate Director, Office of Strategic Partnership  
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IG



PEACE CORPS

# Office of Inspector General

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Scenes from the Osh Bazaar in Bishkek, Kyrgyz Republic



## Final Audit Report

Peace Corps/Kyrgyz Republic

IG-15-07-A

January, 2016

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## EXECUTIVE SUMMARY

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### BACKGROUND

The Office of Inspector General (OIG) conducted an audit of Peace Corps/Kyrgyz Republic (hereafter referred to as “the post”) July 13–24, 2015. We previously performed an audit in November 2006 and issued our report in March 2007 (IG-07-05-A). More than 900 Peace Corps Volunteers have served in Kyrgyz Republic since the program’s inception in 1993.

#### Staff:

U.S. direct hires: 3

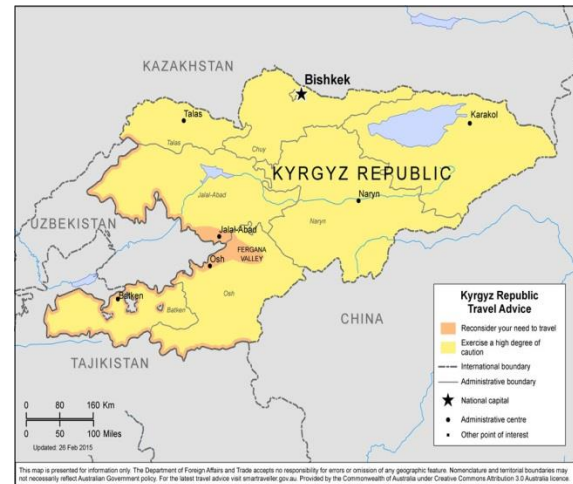
Foreign service nationals: 1

Full-time personal services contractors: 30

#### Spending (approx.):

Fiscal Year (FY) 2015 post spending: \$2 Million

Average regional overhead: \$490,000



Map of Kyrgyz Republic

### WHAT WE FOUND

The post’s financial and administrative operations were effective and complied with agency policies and applicable federal laws and regulations. Although the post’s financial and administrative operations are high functioning, there were a few areas in need of improvement. Specifically:

- The post did not ensure transactions were entered into the accounting system before the cashier disbursed payments.
- The post allowed the medical assistant to operate as an unofficial sub-cashier.

### RECOMMENDATIONS IN BRIEF

Our report contains two recommendations directed to the post: that the post comply with agency policies when disbursing imprest fund payments, and that the post obtain approval from the Office of Global Accounts Payable to designate the medical assistant as a sub-cashier.

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## BACKGROUND

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OIG conducted the audit of the post July 13–24, 2015. We previously performed an audit in 2006 and issued our report IG-07-05-A in 2007.

More than 900 Peace Corps Volunteers have served in Kyrgyz Republic since the program's inception in 1993. At the time of our audit, 124 Volunteers were working in three project sectors: teaching English as a foreign language, health education, and community economic development. The post had three U.S. direct hires, one foreign service national, and 30 full-time personal services contractors. The post's FY 2015 spending was approximately \$2 million. The Europe, Mediterranean and Asia region at headquarters incurs an additional average cost of approximately \$490,000 per overseas post.<sup>1</sup>

Our overall objective in auditing overseas posts is to determine whether the financial and administrative operations are functioning effectively and in compliance with Peace Corps policies and federal regulations during the period under audit. Appendix A provides a full description of our audit objective, scope, and methodology.

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## AUDIT RESULTS

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### *IMPREST FUND*

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***The post did not ensure transactions were entered into the post's accounting system before disbursing payments.***

Overseas Financial Management Handbook (OFMH) chapter 13.11 states:

It is essential that cashiers operate in "real time," i.e., that the transaction has been entered in FOR Post prior to the cashier taking any action. Not operating "real time" presents several internal control problems, including the risk of not balancing during cash counts/verifications, deficiency (because payment would be made before verification of funds availability), and misrepresentation of the status of funds.

Contrary to Peace Corps policy, the cashier paid expenses before transactions were entered into the post's accounting system (FOR Post) and approved by the designated approving officer. We reviewed eight imprest reconciliation reports and determined that four of the reports (September 2014 and March, April, and May 2015) overstated the amount of cash on hand.

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<sup>1</sup> The agency does not determine a total cost per post beyond directly attributable post expenses, as certain costs are centrally budgeted and managed by headquarters offices including the salaries and benefits of U.S. direct hires. The Peace Corps Office of Budget and Analysis provided the total cost of \$8.8 million incurred by the Europe, Mediterranean and Asia Region in direct support of its 18 overseas posts in FY 2015, which is an average of \$490,000 per post.

The cashier included pre-payments for staff travel, Volunteer expenses, and bank fees as part of the cash on hand balance. According to the cashier, pre-payments were issued because the financial assistant was delayed in making the financial entries. In addition, the cashier was unaware of the amount for bank fees prior to arriving at the bank. When payments are made before transactions are entered into the accounting system, it overstates the cash amount on hand and increases the risk of not balancing during cash verifications.

**We recommend:**

- 1. That the director of management and operations ensure that the cashier comply with the Overseas Financial Management Handbook 13.11 and wait until transactions have been entered into FOR Post and approved before disbursing cash payments.**

*The medical assistant operated as an unofficial sub-cashier by receiving cash advances for the same amount every three days.*

Peace Corps staff and Volunteers are authorized to receive cash advances to make purchases when it is considered economical and efficient to do so. These payments are required to be liquidated within three working days by submitting receipts and unused cash (OFMH 13.18.2).

During our review of the imprest fund, we noted that the medical assistant regularly received interim advances for the same amount. The medical assistant maintains a log book that documents disbursements for medical supplies and keeps the receipts. Every three days, the interim advance is liquidated and a new advance is created. When employees receive regularly scheduled advances they are acting as a sub-cashier rather than an occasional money holder.

The Peace Corps Manual Section 760.3.8 and OFMH 13 exhibit C states that sub-cashiers are designated by the country director to receive cash advances, and that sub-cashiers are responsible for learning and implementing the procedures for operating an imprest fund.

Due to the fact that the medical assistant consistently receives interim advances for medical supplies, it would be beneficial for the post to officially designate the medical assistant as the sub-cashier to receive proper training and understand the rules and regulations involved with holding government funds.

**We recommend:**

- 2. That the country director acquire approval from the Office of Global Accounts Payable for the medical assistant to operate as a sub-cashier and ensure the sub-cashier receives the necessary training.**

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## OTHER AREAS OF CONCERN

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*The post did not comply with federal regulations when modifying a conference contract.*

*Federal Acquisition Regulations* (FAR) 43.202 states, “Change orders shall be issued by the contracting officer except when authority is delegated to an administrative contracting officer.” Furthermore, the contract conference service template part of Overseas Contracting Handbook states in Clause VIII—Contract Management,

(a) “Contracting Officer—All contract administration will be effected by the Contracting Officer. Communications pertaining to contractual administrative matters will be addressed to the Contracting Officer. No changes in or deviation from the scope of work shall be effected without the written modification to the contract executed by the Contracting Officer authorizing such changes.”

In February 2015, the director of management and operations (DMO) signed a conference service contract for approximately \$7,122 U.S. dollar equivalent (USDE) with a clause stating that the contracting officer or representative reserves the right to increase and decrease the number of units of agreed services (rooms, breakfast, lunch, dinner and breaks) at the rates established per the contract by up to five units.

However, contrary to federal regulations and the terms of the contract, in February 2015, the post increased the number of rooms and meals in the conference contract without notifying the contracting officers. The increase to the contract was approximately \$578 USDE over the approved value. According to the post, both the DMO and deputy DMO were out of the country attending a conference. As a result, the payment of approximately \$5,563 USDE<sup>2</sup> was initially approved at the post level by the director of programming and training (DPT), who was temporarily acting as the DMO.

Since the DPT did not have contracting authority to increase the contract value, the contract was not properly modified to reflect the adjustment in room and meal totals. However, headquarters processed the payment because the modifications were within the limits specified in the contract clause. Although the increases to the rooms and meals were within the contract limits, the contracting officers should have been notified of the changes in a timely manner to allow the proper modification to the contract documents.

We did not issue a recommendation to the post regarding contract modifications because this appeared to be an isolated incident, and the post followed correct procedures by notifying the contracting officers for prior contract changes.

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<sup>2</sup> A deposit of approximately \$2,137 USDE had previously been paid when the contract was signed in early February 2015.

***The post should consider obtaining blanket purchase agreements for frequently used vendors.***

The FAR 13.303-1(a) defines blanket purchase agreement (BPA) as “a simplified method of filling anticipated repetitive needs for supplies or services by establishing ‘charge accounts’ with qualified sources of supply.” Peace Corps Contracting Handbook also provides guidance for overseas BPA instruction letters, checklists, templates, order forms, and other useful resources for legal services and samples of BPAs.

We reviewed the disbursements for the posts and noted that five vendors were frequently used for supplies, hotels, and travel. The post had acquired a BPA for only one of these five vendors, a hotel. By obtaining a BPA for frequently used vendors the post could operate more efficiently by reducing costs, paperwork, and the time required to write numerous purchase orders.

We did not issue a recommendation for the post to obtain BPAs because the use of these documents is optional; however, we believe doing so would improve the post’s efficiency when purchasing frequently used supplies and services.

***Multiple short-term replacement staff failed to adequately mitigate the impact of leadership turnover.***

Excessive turnover at post impacted post leadership and resulted in a period of time in 2013 when there were no permanent U.S. direct hire staff at post. Regional management used a series of temporary appointments and experts to fill the three regular U.S. direct hire positions (Country Director, Director of Programming and Training, and Director of Management and Operations). The use of temporary staff was insufficient to mitigate the leadership void at post and in some cases exacerbated stress and hardships on the post. Staff at post expressed frustration with an ever-changing senior leadership and the inability to have consistent management of programs and operations. One example of such change was the filing system for all financial paperwork and support. To meet the needs of a temporary DMO, the entire filing system was reorganized, which caused issues in pulling information in a timely manner for the audit review. OIG has previously raised concerns over excessive personnel turnover and how the agency uses staff to address overseas staffing needs<sup>3</sup>. The OIG further notes the importance of consistency and strong leadership at post; especially when there are long periods of vacancies in permanent senior leadership positions.

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<sup>3</sup> See generally [Final Audit Report: Peace Corps Overseas Staffing \(IG-14-01-A\)](#) and [Final Evaluation Report: Impacts of the Five-Year Rule on Operations of the Peace Corps \(IG-12-05-E\)](#)

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## POSITIVE OBSERVATIONS

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### *Medical Inventory*

When conducting the medical inventory, we noted a best practice in place for tracking medical supplies. Next to each unique medication in the controlled substance logbook, the medical staff had placed a number corresponding to a unique identifier listed on the medical inventory report. This allowed auditors and post staff to quickly verify the details and dosage for each medication they reviewed. The medical staff stated that the practice promotes efficiency during the random medical inventory counts.

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## **QUESTIONED COSTS AND FUNDS TO BE PUT TO BETTER USE**

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We did not identify funds put to better use or questioned costs during the course of the audit.

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## **LIST OF RECOMMENDATIONS**

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**We recommend:**

- 1. That the director of management and operations ensure that the cashier comply with the Overseas Financial Management Handbook 13.11 and wait until transactions have been entered into FOR Post and approved before disbursing cash payments.**
- 2. That the country director acquire approval from the Office of Global Accounts Payable for the medical assistant to operate as a sub-cashier and ensure the sub-cashier receives the necessary training.**

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## APPENDIX A: OBJECTIVE, SCOPE, AND METHODOLOGY

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Our objective in auditing overseas posts is to determine whether the financial and administrative operations are functioning effectively and comply with Peace Corps policies and federal regulations. Our audit conclusions are based on information from four sources: (1) document and data analysis, (2) interviews, and (3) direct observation. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit covered fiscal years 2011, 2012, 2013, 2014, and 2015 through July 24, 2015. While at the post, we interviewed key staff including the country director, the director of management and operations, staff responsible for administrative support, and the lead Peace Corps medical officer.

We communicated issues and areas of improvement to senior staff at post and Peace Corps management at headquarters and included significant issues noted during our audit in this report. We primarily reviewed the following processes and associated controls:

- BOCs
- Contracts and Leases
- Cash and Non-cash Payments
- Imprest Fund
- Credit Card Transactions
- Information Technology General Controls
- Medical Supplies
- Personal Property and Vehicles
- Personal Services Contracts
- Volunteer Payments
- Grants

Although we could not independently verify the reliability of all this information, we compared it with other available supporting documents to determine data consistency and reasonableness. We relied on the results of the annual Federal Information Security Management Act review, which did not identify deficiencies with data reliability that would impact our audit. Based on these efforts, we believe the information we obtained is sufficiently reliable for this report.

Our audit criteria were derived from the following sources: Financial Accounting Standards Advisory Board's Statement on Federal Accounting Standards, the Peace Corps Manual, the Overseas Financial Management Handbook, Peace Corps Overseas Contracting Handbook, Peace Corps Personal Property Management Handbook, and other Peace Corps policies and initiatives. Throughout the audit, auditors were aware of the possibility or existence of fraud, waste, or misuse

significant to the audit objectives and conducted procedures designed to obtain reasonable assurance of detecting any such fraud as deemed appropriate.

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## APPENDIX B: LIST OF ACRONYMS

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BPA	Blanket Purchase Agreement
DMO	Director of Management and Operations
DPT	Director of Programming and Training
FAR	Federal Acquisition Regulations
FY	Fiscal Year
OFHM	Overseas Financial Management Handbook
OIG	Office of Inspector General
USDE	U.S. Dollar Equivalent

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## APPENDIX C: AGENCY RESPONSE TO THE PRELIMINARY REPORT


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Since 1961.

### MEMORANDUM

**To:** Kathy Buller, Inspector General

**Through:** Anne Hughes, Acting Chief Compliance Officer 

**From:** Keri Lowry, Regional Director, EMA   
Jeremy Parker, Acting Country Director, Peace Corps/Kyrgyz Republic

**Date:** January 5, 2016

**CC:** Carrie Hessler-Radelet, Director  
Laura Chambers, Chief of Staff  
Ken Yamashita, Acting Associate Director for Global Operations  
Joaquin Ferrao, Deputy Inspector General  
Judy Leonhardt, Assistant Inspector General for Audits  
Kristin Besch, Chief of Operations, EMA  
Nancy Gehron, Chief Administrative Officer, EMA  
Darcy Neill, Expert Consultant, Peace Corps/Kyrgyz Republic  
Wendy Shapiro, Director of Programming and Training, Kyrgyz Republic

**Subject:** Agency Response to the Preliminary Report of Peace Corps/Kyrgyz Republic,  
November, 2015

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Enclosed please find the agency's response to the recommendations made by the Inspector General for Peace Corps/Kyrgyz Republic, as outlined in the Preliminary Report of the IG Audit sent to the agency on Wednesday, December 9, 2015.

The Region and the Post have addressed and provided supporting documentation for both of the recommendations provided by the OIG in its Preliminary Audit Report: Peace Corps/Kyrgyz Republic.

### **Recommendation 1**

**That the director of management and operations ensure that the cashier comply with the Overseas Financial Management Handbook 13.11 and wait until transactions have been entered into FOR Post and approved before disbursing cash payments.**

#### **Concur:**

**Response:** The following internal controls have been set to ensure that the cash on hand balance is accurate:

- The Cashier is working closely with the Financial & Administrative Assistant to make sure that payments, such as cash deposits into PCV accounts, are not made until obligations and prepared disbursements are entered into FOR Post. This process is being particularly scrutinized by the Director of Management and Operations.
- Bank fees and replenishment cashing fee are being processed through documented interim advance forms sheets.
- Cash counts display no disbursements included as cash.

#### **Documents Submitted:**

- Cash counts from September through December 2015
- Examples of cash deposits made to Volunteers

**Status and Timeline for Completion:** Completed, September 2015

### **Recommendation 2**

**That the country director acquire approval from the Office of Global Accounts Payable for the medical assistant to operate as a sub-cashier and ensure the sub-cashier receives the necessary training.**

#### **Concur:**

**Response:** Post subsequently took the corrective action of training the Medical Assistant to serve as a sub-cashier, acquired approval from the Office of Global Accounts Payable to have the Medical Assistant operate as a sub-cashier, and altered the Medical Assistant's Statement of Work to reflect her new responsibilities as sub-cashier. Currently the Medical Assistant is functioning as a sub-cashier.

#### **Documents Submitted:**

- Office of Global Accounts Payable sub-cashier approval for Medical Assistant
- Contract modification for Medical Assistant including sub-cashier duties in Statement of Work

**Status and Timeline for Completion:** Completed, December 2015

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## **APPENDIX D: OIG COMMENTS**

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Management concurred with all two recommendations. We closed both recommendations based on evidence of corrective actions that address the recommendations.

In its response, management described actions it is taking, or intends to take, to address the issues that prompted each of our recommendations. Certifying compliance and verifying effectiveness are management's responsibilities. However, when we feel it is warranted, we may conduct a follow-up review to confirm that action has been taken and to evaluate the impact

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## APPENDIX E: CRITERIA USED TO SUPPORT ISSUES IN THE REPORT

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### Federal Requirements

#### FEDERAL ACQUISITION REGULATION

The *Federal Acquisition Regulation 13.303- 1 (a)*, “Blanket Purchase Agreement” states, “A blanket purchase agreement (BPA) is a simplified method of filling anticipated repetitive needs for supplies or services by establishing “charge accounts” with qualified sources of supply...”

The *Federal Acquisition Regulation 43.202*, “Authority to issue change orders” states, “Change orders shall be issued by the contracting officer except when authority is delegated to an administrative contracting officer.”

### Peace Corps Requirements

#### THE PEACE CORPS MANUAL

The Peace Corps Manual 760, 3.3.8, “Definitions: Sub-Cashier” states

*Sub-Cashier* means a Direct Hire employee or Volunteer who has been designated in writing by the Country Director or his/her designee to receive an imprest fund from a Class B cashier; is under the supervision of the same Country Director as the cashier from whom the advance is received; is accountable to such cashier for the funds received; and is stationed within a reasonable distance to the advancing cashier. Payment limitations and safekeeping requirements, which apply to cashiers, also apply to sub-cashiers.

#### OVERSEAS FINANCIAL MANAGEMENT HANDBOOK

Section 13.18.2, “Interim Advances” states

Peace Corps Trainees, Volunteers, or staff may receive an interim advance to make a cash purchase when it is more economical or expeditious than making the payment by U. S. Government check or EFT. PSCs who receive Interim Advances are acting as Occasional Money Holders, see OFMH 13.18.3.

This interim cash advance must be supported by a copy of the authorized purchase document and liquidated (accounted for) within three (3) working days. The recipient of the funds is personally accountable for the funds until they are accounted for (with receipts or funds are returned).

The cashier should liquidate the advances within three (3) working days after issuance by obtaining copies of original receipts or other confirmation of use from the individual(s) to whom the funds were advanced. Unused cash must be returned to the cashier, with the receipts documenting the purchase. The cashier will then mark the interim receipt "Void" and return it to the person who received the advance. The receipts and the authorized purchase document are processed as a regular cashier disbursement.

## Section 13 Exhibit C, “A Guide to Sub-Cashiers” states

Subcashiers make disbursements in support of Peace Corps activities. Subcashiers are responsible for learning and implementing the procedures for operating an imprest fund as outlined in this guide and other provided material. These procedures were established to ensure adequate control over federal funds and to reduce the government's vulnerability to fraud, waste and mismanagement.

A Principal Class B Cashier is one who receives an advance from a disbursing officer for an imprest fund and is authorized to advance an imprest fund to his or her own alternate and to a Subcashier. The Principal Cashier is accountable in his or her own name to the U.S. Disbursing Officer (USDO) for the entire amount of the advance received.

A Subcashier is an individual who has been designated in writing by the Country Director or DMO and approved by the Director, Global Accounts Payable to receive an imprest fund from the Principal Cashier and is accountable to the Principal Cashier for the funds received. Payment limitations and safekeeping requirements, which apply to the Principal Cashier, also apply to Subcashiers.

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## APPENDIX F: AUDIT COMPLETION AND OIG CONTACT

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### AUDIT COMPLETION

This audit was conducted under the direction of Assistant Inspector General for Audits Judy Leonhardt by Lead Auditor Rebecca Underhill and Senior Auditor Renita Davis.

A handwritten signature in blue ink that reads "Judy Leonhardt". The signature is written in a cursive style with a large, stylized "J" and "L".

### OIG CONTACT

If you wish to comment on the quality or usefulness of this report to help us strengthen our product, please contact Assistant Inspector General for Audits Judy Leonhardt at [jleonhardt@peacecorps.gov](mailto:jleonhardt@peacecorps.gov) or 202.692.2914.

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