



Peace Corps Office of Inspector General

FINAL AUDIT REPORT

Peace Corps/China

IG-07-07-A

H. David Kotz, Inspector General

March 2007

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INTRODUCTION

The Office of Inspector General conducted an audit of Peace Corps/China March 7 - 25, 2006. Lead Auditor Robert Clark reviewed aspects of the post's financial and administrative operations. The audit was suspended due to the transfer of the lead auditor to another agency. The audit report was written by another auditor and is based on the lead auditor's work papers.

PRINCIPAL FINDINGS

The post's greatest weakness appeared to be in the inconsistency of the contract documents. Leases had erroneous information and the files for leases, staff contracts, and credit cards lacked essential information. Peace Corps/China also had not received authorization to hire a contractor as a cashier or alternate cashier, even though the post had clearly documented the need to use a contractor for this function.

BACKGROUND

The Chinese government first expressed interest in hosting a Peace Corps program in 1988, as it opened its economy to international markets and made overtures to Western governments. The Peace Corps/China office was opened in 1993 and the first group of 18 Volunteers arrived later that year. At the request of the host government, Volunteers are referred to as "US-China Friendship Volunteers" rather than Peace Corps Volunteers.

In 1998, the Peace Corps signed a formal country agreement and the program expanded into two additional provinces. In addition to its English education and resource development project, the post launched an environmental education project in mid-2000. The post's activities were suspended due to the Severe Acute Respiratory Syndrome (SARS) outbreak in April 2003 and Volunteers returned in the summer of 2004.

The Chinese government did not allow the Peace Corps to hire foreign service national staff through the U.S. embassy. Instead, the Chinese government required the Peace Corps to collectively contract all locally hired staff through a local organization.

SCOPE AND METHODOLOGY

Our objective in auditing overseas posts is to determine whether the financial and administrative operations comply with Peace Corps policies and federal regulations. Our audit conclusions are based on information from three sources: document and data analysis, interviews, and direct observation. The audit is conducted in accordance with the government auditing standards prescribed by the Comptroller General of the United States.

Our audit procedures included a preplanning program to review cash management of PC/China with headquarters personnel responsible for the post's cash management.

While at the post, we interviewed the country director, administrative officer, and some staff responsible for administration. At the end of our in-country review, we briefed the country director and the administrative officer on our findings.

Our audit criteria are derived from the following sources: the Peace Corps Manual (PCM), the Overseas Financial Management Handbook (OFMH), current Peace Corps initiatives and policies, General Accountability Office (GAO) standards, and other federal regulations.

FINDINGS AND RECOMMENDATIONS

Accounting for Obligations and Liquidations

The post's Status of Obligation report reflected four uncleared travel advances.

As of March 9, 2006, there were four travel vouchers on the Status of Obligation report for 2002. All four had been posted as conversion items. Three of the amounts appeared as obligations not deobligated, and the fourth appeared as a negative liquidation.

These balances may have been due to conversion posting problems, to travelers not submitting their travel vouchers, or they may represent actual travel advances in excess of vouchers for which a collection had not been made.

GAO Internal Control Standards (GAO-01-1008G), General Application controls activities that are identified as necessary and states that timely action is to be taken on exceptions, implementation problems, or information that requires follow up.

The post did not always have documents to support obligations.

The post was not able to locate three obligating documents for travel when we reviewed the Status of Obligation Summary for 2006. These three obligations totaled \$10,500.00.

The Peace Corps Manual (PCM) 753.4.2.1 requires documentary evidence for all obligations. Without supporting documentation, there is no evidence that these travel obligations were legal and valid. It is not known whether the traveler did not complete the documentation or whether the documentation was misfiled.

There were 2003 and 2005 outstanding obligation balances.

Four obligations for fiscal year 2003 that totaled \$1,681.21 and one obligation of \$2,661.19 for fiscal year 2005 were not cleared. The post needs assistance from headquarters to clear these outstanding obligations.

PCM section 753.8.3 states:

Obligated balances should realistically represent amounts expected to be paid, regardless of the fiscal year funds involved. Therefore, while the review of outstanding current year obligations must be emphasized to assure the most efficient use of funds currently available, prior year obligations should also be adjusted as appropriate. Normally, obligations outstanding at the end of a fiscal year should be settled within a relatively short period after September 30 and final adjustments made.

It is unclear why these obligations were still outstanding. Outstanding obligations might represent unpaid vouchers that the post needs to be aware of.

Not all staff submitted travel vouchers within five working days.

A random sampling of travel vouchers for fiscal year 2006 showed that three out of seven vouchers were submitted after five working days. One staff member took 20 days to submit his voucher.

PCM section 812.18.10 states: "A travel voucher for each trip performed at Peace Corps expense must be completed and submitted within 5 working days after completion of travel."

The administrative staff did not have a system in place to ensure that travel vouchers were submitted in a timely manner. By travelers filing their vouchers late, the post was not able to promptly collect from travelers any balance due from travel advances or promptly reimburse travelers for expenses in excess of travel advances.

We recommend:

- 1. That Office of Accounts Receivable and Cash Management work with the post to clear the four outstanding travel advances reflected on the 2002 Status of Obligations.**
- 2. That the post process collections for outstanding travel advances not cleared by a travel voucher.**
- 3. That the post maintain documentary evidence for all obligations.**
- 4. That the post work with headquarters to clear the FY 2003 and FY 2005 outstanding unliquidated obligations.**
- 5. That the post implement a system to assure that staff comply with the regulation to submit travel vouchers within five working days after completing travel.**

Volunteer and Trainee Allowances

The post did not have a memorandum of agreement (MOA) with the bank handling Volunteer allowance distributions.

The post did not have a signed agreement with the bank that handled Volunteer allowance distributions. Such an agreement includes how overpayments and closure of Volunteer accounts are to be handled by the bank. The post did have a process for the distribution of the Volunteer allowances through the bank, and we were advised that the region was aware of the process that the post used. However, the post had no documentation showing that this was approved by the Office of Accounts Receivable and Cash Management and the region.

PCM section 221.6.1.1 requires country directors to establish MOAs with the bank(s) handling the distribution of Volunteer allowances. Without an agreement, the post might encounter complications in the closure of bank accounts for Volunteers that terminate their service early.

We recommend:

- 6. That the post obtain a Memorandum of Agreement with the bank handling Volunteer allowance distributions that includes the information in PCM section 221.6.1, Attachment F.**

Billings and Collections

Individual bills of collection were not completed for some collections.

The post processed one receipt for combined funds collected from staff for personal telephone usage. The post should process individual bills of collection for staff that owe for personal phone calls and provide them a receipt when the debt is paid. By combining the debts owed into one bill of collection, the post needed to wait until collections were made from all staff that owed for personal telephone calls to process the collection.

We also found that the billing officer did not record the dates that collections were made in the Bill of Collection Log.

The Overseas Financial Management Handbook (OFMH) section 5 requires that a copy of a bill of collection with the amount due be given to the debtor for collection. OFMH section 5 also includes what information is required in the Bill of Collection log.

Bills of collection for personal use of vehicles were not issued monthly.

The post billed for authorized personal use of Peace Corps vehicles, but did not bill monthly. Personal use of Peace Corps vehicles was authorized, because China did not permit cars to be imported. This use had been approved by the regional director and Chief of Mission.

The post did not comply with PCM section 777.8 that requires prompt billing for debts and recommends that billings be completed by the end of each month. In addition to complying with the Peace Corps policy, monthly billing helps avoid having a staff member run up a large bill of collection that might be more difficult for the staff member to pay and for the post to collect.

We recommend:

- 7. That the billing officer issue individual bills of collection to each debtor.**
- 8. That the post maintain a date paid column in the Bill of Collection Log.**
- 9. That the post complete monthly billings for authorized personal use of Peace Corps vehicles.**

Imprest Fund

The post's cashier is not a direct hire.

Because the Chinese government did not allow the Peace Corps to hire staff through the U.S. embassy, the post did not have a direct hire permanent employee serving as the cashier. Peace Corps/China had one contract with a local organization for all local staff. The cashier that was hired under this contract had passed the cashier examination and the post had authorized the contractor to serve as a cashier for Peace Corps. It is not known if the post had requested the region to obtain authorization from the U.S. Disbursing Officer (USDO) to have a contractor serve as PC/China's cashier.

Additionally, the contract did not include the responsibilities for the imprest fund for the contractor who managed the imprest fund. It is possible that the cashier would not be held accountable for any losses to the imprest fund without this inclusion in the contract.

PCM section 760.3.1.3 requires cashiers to be direct hire employees.

The post did not have an alternate cashier.

During the period of the audit, a staff member had been given temporary designation as alternate cashier until he could pass the cashier examination. However, this staff member failed the cashier examination twice and his appointment as alternate cashier was rescinded.

As of August 9, 2006, the post did not have an alternate cashier or a sub-cashier. In the event of the cashier leaving or being out of the office for an extended period, the post did not have a staff member who could perform cashier duties.

PCM section 760.3.1.3.3 describes the duties of an alternate cashier as being able to perform the cashier duties during the cashier's absence. Additionally OFMH section 9.2 requires that alternate cashiers pass the cashier examination within 180 days of designation.

We recommend:

- 10. That the Chief Financial Officer (CFO) obtain authorization from the USDO to allow a non-direct hire staff member to be the PC/China cashier.**
- 11. That the post rewrite the contract to include responsibility for the imprest fund for host country staff appointed as cashier or alternate cashier.**
- 12. That the country director request approval for the appointment of an alternate cashier.**

Vehicle Management

Vehicle logs were not dated when reviewed.

The post had a vehicle log that was maintained and signed as being monitored; however, the date of the signature was not always included. Without a date, there was no proof that the logs were monitored weekly.

PCM section 527.6.1 requires that the country director ensure that vehicle records and files be maintained: the vehicle log should be reviewed, initialed, and dated on a weekly basis by the staff member responsible for initiating repairs and billing for authorized personal use.

We recommend:

13. That the country director ensure that the person responsible for initiating vehicle repairs and billing for personal vehicle use review and initial the vehicle logs on a weekly basis.

Contracts

Lease contracts contained erroneous information.

We found four lease contracts that misstated the total cost of the lease. We also found a lease signed after the lease period had begun. There were also conflicting dates included in another lease.

The post needs to adhere to PCM section 733 guidelines on completing lease agreements. In addition, the post needs to be consistent with contract terms.

Contractors' files did not include essential information.

Some PC/China contractor files did not contain sole source justifications and security clearances. PC/China contracted with an organization for its staffing needs. These contractors are comparable to personal services contractors. Each contractor must have a file, and the file needs to include essential information as required by PCM section 743.

PCM section 743.8 requires that a security clearance be conducted for all contractors. Documentation of the clearance should be in each contractor's individual file. Without the documentation, there was no proof that clearance has been obtained.

Written approval for the post's Peace Corps Medical Officer (PCMO) was not documented.

PC/China hired a local personal services contractor for one of the two PCMO positions. However, the PCMO's file did not include written approval from the Office of Medical Services.

PCM 743.11.2 requires that: "Country Directors shall review the medical qualifications of all prospective medical services contractors . . . and obtain written concurrence from the Director of Medical Services prior to awarding the contract." Without documentation in the file, it is unclear whether the post had requested or received authorization to hire the PCMO.

We recommend:

- 14. That the post work with the Office of Acquisitions and Contract Management to bring their leases agreements into compliance.**
- 15. That the post obtain the required documentation for the contractor files.**
- 16. That the post obtain written approval from the Office of Medical Services for their PCMO.**

Credit Card Management

Purchases made with the purchase card were not pre-approved by the approving official.

Purchase card purchases had not been pre-approved by the approving official (the country director). The bank log also did not contain a column for the signature of the approving official.

OFMH section 34.4 requires that the approving official pre-approve purchases before they are made.

We recommend:

- 17. That the administrative officer obtain approval before making purchases with the post's purchase card.**
- 18. That the post maintain a purchase card log that includes the signature of the approving official.**

Personnel

Written appraisals of staff were not conducted on an annual basis.

Performance appraisals were not always being completed for staff. PCM section 743.19 requires that appraisals be conducted for all contractors at the end of each contract year. It further states: “Only complete and objective written performance evaluations may be utilized in the acquisition process to access . . . past performance and in considering the contractor for future awards.” These appraisals should be maintained in each contractor’s individual file.

We recommend:

19. That the post conduct annual appraisals for all staff and maintain a written copy in their file.

POST STAFFING

The post had 20 full-time staff positions: three American direct-hires, one PSC and 16 contractors and three part-time interns.

Staff Listing as of March 1, 2006

Position	Status
Country Director	USDH
Administrative Officer	USDH
PTO	USDH
Program Manager	Contractor
Program Manager	Contractor
Program Manager	Contractor
Program Assistant	Contractor
Training Assistant	Contractor
Executive Assistant	Contractor
Training Coordinator	Contractor
Staff Support coordinator	Contractor
PCMO	PSC
PCMO	Contractor
Medical Assistant	Contractor
Financial Assistant	Contractor
Cashier	Contractor
General Service Manager	Contractor
GSA Driver	Contractor
Driver	Contractor
Contract Driver	Contractor
Interns (part-time)	Interns

LIST OF RECOMMENDATIONS

1. That Office of Accounts Receivable and Cash Management work with the post to clear the four outstanding travel advances reflected on the 2002 Status of Obligations.
2. That the post process collections for outstanding travel advances not cleared by a travel voucher.
3. That the post maintain documentary evidence for all obligations.
4. That the post work with headquarters to clear the FY 2003 and FY 2005 outstanding unliquidated obligations.
5. That the post implement a system to assure that staff comply with the regulation to submit travel vouchers within five working days after completing travel.
6. That the post obtain a Memorandum of Agreement with the bank handling Volunteer allowance distributions that includes the information in PCM section 221.6.1, Attachment F.
7. That the billing officer issue individual bills of collection to each debtor.
8. That the post maintain a date paid column in the Bill of Collection Log.
9. That the post complete monthly billings for authorized personal use of Peace Corps vehicles.
10. That the Chief Financial Officer (CFO) obtain authorization from the USDO to allow a non-direct hire staff member to be the PC/China cashier.
11. That the post rewrite the contract to include responsibility for the imprest fund for host country staff appointed as cashier or alternate cashier.
12. That the country director request approval for the appointment of an alternate cashier.
13. That the country director ensure that the person responsible for initiating vehicle repairs and billing for personal vehicle use review and initial the vehicle logs on a weekly basis.
14. That the post work with the Office of Acquisitions and Contract Management to bring their leases agreements into compliance.
15. That the post obtain the required documentation for the contractor files.
16. That the post obtain written approval from the Office of Medical Services for their PCMO.

17. That the administrative officer obtain approval before making purchases with the post's purchase card.
18. That the post maintain a purchase card log that includes the signature of the approving official.
19. That the post conduct annual appraisals for all staff and maintain a written copy in their file.

APPENDIX A

REGION'S RESPONSE TO THE PRELIMINARY REPORT AND THE OFFICE OF THE CHIEF FINANCIAL OFFICER'S RESPONSE TO RECOMMENDATION NOS. 1 AND 10

MEMORANDUM

To: H. David Kotz, Inspector General

From: Jay Katzen, EMA Regional Director

Date: March 16, 2007

Subject: **Regional Response to the Preliminary Report on the Audit of Peace Corps/China (December 2006)**

It is with pleasure that the region and post respond to the Preliminary Report on the Administrative Evaluation of Peace Corps/China. Post concurs with all recommendations but one, many of which already have been implemented. Attached are our responses to each recommendation.

Three findings or recommendations remain Open. In two cases Peace Corps efforts to close the findings cannot proceed without, and thus depend upon, action by State Department officials (USDO and RSO). The third Open item is not yet timely for closure, as it relates to a contract which does not expire until March 2008.

REGIONAL RESPONSE
to the
PRELIMINARY REPORT
on the
Audit of
Peace Corps/China
dated

December 2006

PEACE CORPS
Office of Inspector General

March 22, 2007

Responses to OIG Recommendations

- 1. That Office of Accounts Receivable and Cash Management work with the post to clear the four outstanding travel advances reflected on the 2002 Status of Obligations.**

CONCUR: The outstanding travel advances from 2002 were items related to the financial system conversion and have been cleared. Item was verified as matched to headquarters records on February 20, 2007.

- 2. That the post process collections for outstanding travel advances not cleared by a travel voucher.**

CONCUR: The one outstanding travel advance has been closed (No. 366020011250041).

- 3. That the post maintain documentary evidence for all obligations.**

CONCUR: Policy implemented April 2006.

- 4. That the post work with headquarters to clear the FY 2003 and FY 2005 outstanding unliquidated obligations.**

CONCUR: All outstanding unliquidated obligations except one have been cleared. FY03 items were done by HQ and FY05 items were done jointly by HQ and post during 2006. The one remaining open obligation is \$3,100 in connection with the PCMO contract, which is still active until March 2008. According to PC Contracts Office, the contractor is not obliged to submit final claims under this contract and obligation until after the contract has ended. Estimated completion date: April 30, 2008.

- 5. That the post implement a system to assure that staff comply with the regulation to submit travel vouchers within five working days after completing travel.**

CONCUR: System implemented December 2006. New post policy outlines Cashier, AO, and FA responsibilities for monitoring and follow-up on outstanding travel vouchers.

- 6. That the post obtain a Memorandum of Agreement with the bank which handles Volunteer allowance distributions, and that the MOA includes the information in PCM section 221.6.1, Attachment F.**

DO NOT CONCUR: Bank of China (primary post bank) and other financial institutions are unable to sign a Memorandum of Agreement due to national, regional and local banking protocols and regulations. Post will attempt to obtain an MOA with the bank of China if this national banking policy changes. Post has sought and received approval for an exception from the Chief Financial Officer through the Director of Global Accounts Payable.

7. That the billing officer issue individual bills of collection to each debtor.

CONCUR: Billing system implemented December 14, 2006. Bills of Collection with multiple payees on a single BOC are no longer issued.

8. That the post maintain a “date paid” column in the Bill of Collection Log.

CONCUR: Bill Collection Logs revised as of October 17, 2006. Bill of Collection Log now includes a “date paid” column.

9. That the post complete monthly billings for authorized personal use of Peace Corps vehicles.

CONCUR: Monthly billings implemented December 2006. Billings for personal use of vehicles are completed monthly.

10. That the Chief Financial Officer (CFO) obtain authorization from the USDO to allow a non-direct hire staff member to be the PC/China cashier.

CONCUR: Director of Financial Policy and Compliance has contacted USDO in Bangkok to determine status and obtain written copies of original verbal approval. Director of Global Accounts Payable scheduled to meet with USDO while in Bangkok in early February 2007 and will pursue. EMA Region Director and PC Chief Financial Officer discussed matter on March 16, 2007; ultimate resolution may depend upon change on Chinese Government’s policy regarding employment of Chinese nationals by entities such as Peace Corps.

11. That the post rewrite the contract to include responsibility for the imprest fund for host country staff appointed as cashier or alternate cashier.

CONCUR: A signed modification to Contract # 366-07-2001 was completed in January 2007, including the Cashier’s responsibility for the imprest fund.

12. That the country director request approval for the appointment of an alternate cashier.

CONCUR: Country Director requested approval; cable request from HQ to FSC Bangkok sent January 23, 2007.

13. That the country director ensure that the person responsible for initiating vehicle repairs and billing for personal vehicle use review and initial the vehicle logs on a weekly basis.

CONCUR: Policy/practice implemented April 2006. All logs are now signed on a weekly basis by GSA/GSM.

14. That the post work with the Office of Acquisitions and Contract Management to bring their leases agreements into compliance.

CONCUR: New lease agreements implemented in 2006. Modifications to the lease agreement for the first four floors the fifth floor and lobby were added, and the separate agreement for the fifth floor and lobby (366-03-1106) was allowed to expire. The lease for the former AO Residence (366-04-2203) was allowed to expire. The lease for a storage unit (366-04-2002) was allowed to expire. Option periods were corrected in the lease agreement for the CD Residence (366-03-1102).

15. That the post obtain the required documentation for the contractor files.

CONCUR: To the extent possible post obtained documentation that was missing or destroyed in connection with the post's suspension due to SARS epidemic in 2003/2004. Post is working with Consulate RSO to obtain necessary clearances for HCN staff. Completion date will depend on Embassy RSO LOE/workload and staffing. Five new contractor documentation certifications were completed as of January 31, 2007. Estimated completion date: May 31, 2007

16. That the post obtain written approval from the Office of Medical Services for their PCMO.

CONCUR: Approval document dated July 2005 was located at post.

17. That the administrative officer obtain approval before making purchases with the post's purchase card.

CONCUR: Change in practices implemented April 2006. Country Director approves all purchase card transactions prior to purchase.

18. That the post maintain a purchase card log that includes the signature of the approving official.

CONCUR: Change to Purchase Card Log implemented April 2006. Purchase card log modified to include signature of the approving official.

19. That the post conduct annual appraisals for all staff and maintain a written copy in their file.

CONCUR: Annual appraisals for all staff were completed by January 2007. Copies are included in each staff file.



Peace Corps

TO: David Kotz, Inspector General
FROM: George Schutter, Chief Financial Officer
DATE: 30 January 2007
SUBJECT: Response to December 2006 Preliminary Report on the Audit of Peace Corps/China

Below is the Office of the Chief Financial Officer's response to your Preliminary Report on the Audit of Peace Corps/China.

Recommendation #1:

That Office of Accounts Receivable and Cash Management work with the post to clear the four (4) outstanding travel advances reflected on the 2002 Status of Obligations.

Response to Preliminary Report Recommendation #1:

Concur. The four (4) outstanding travel advances have been cleared.

Recommendation #10:

That the Chief Financial Officer (CFO) obtain authorization from the United States Disbursing Officer (USDO) to allow a non-direct hire staff member to be the PC/China cashier.

Response to Preliminary Report Recommendation #10

Concur. In March 2006, the OCFO requested authorization from the Department of State to have a non-direct hire staff member serve as the PC/China cashier. The Deputy USDO at Global Financial Services in Bangkok (GFS/Bangkok) has forwarded an inquiry to their Washington office (which is responsible for the final decision) to make a decision on the request. GFS/Bangkok will contact us when they have more information. We expect to have a response within the next 30 days.

If you have questions or need additional information, please contact Stephanie Mitchell at (202) 692-1715.

cc: Jay Katzen, Regional Director, EMA
David Liner, Chief of Staff/Operations
A. Courtney Santonicola, Deputy Chief of Staff/Operations
Jon Darrah, Country Director
Carey Fountain, Chief Acquisition Officer
Karen Tekleberhan, Deputy Chief Financial Officer
Stephanie Mitchell, Director of Financial Policy and Compliance

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APPENDIX B

OIG COMMENTS

The region concurred with 18 recommendations and did not concur with one recommendation; we accepted their non-concurrence. We closed recommendations numbers 1 - 3, 5 - 9, and 11 - 19. Recommendation numbers 4 and 10 remain open pending confirmation from the chief compliance officer that the following has been received:

- For recommendation no. 4, documentation showing that the FY 2005 outstanding unliquidated obligation is cleared.
- For recommendation no. 10, documentation showing that the USDO authorizes a non-direct hire staff member to be the PC/China cashier.

In their response, the region and the chief financial officer describe actions they are taking or intend 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 they have taken these actions nor that we have reviewed their effect. 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 audit the impact.

REPORT FRAUD, WASTE, ABUSE, AND MISMANAGEMENT

Fraud, waste, abuse, and mismanagement in government affect everyone from Peace Corps Volunteers to Agency employees to the general public. We actively solicit allegations of inefficient and wasteful practices, fraud, and abuse related to Peace Corps operations domestically or abroad. You can report allegations to us in several ways, and you may remain anonymous.

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