



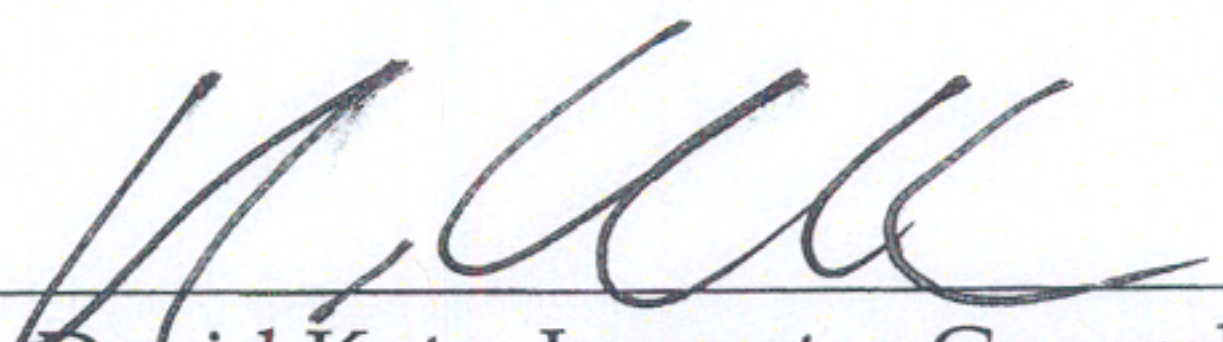
**Peace Corps  
Office of Inspector General**

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**FINAL EVALUATION REPORT**

**Peace Corps/Eastern Caribbean**

**IG-07-12-E**

  
H. David Kotz, Inspector General

**July 2007**

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## Acronyms

APCD.....	Associate Peace Corps Director
BCC.....	Behavior Change Communication
CD.....	Country Director
CDU.....	Country Desk Unit
EAC.....	Emergency Action Committee
EAP.....	Emergency Action Plan
FY.....	Fiscal Year
IST.....	In-Service Training
MS.....	Manual Section
PC.....	Peace Corps
PCM.....	Peace Corps Manual
PCMO.....	Peace Corps Medical Officer
PCSSO.....	Peace Corps Safety and Security Officer
PEPFAR.....	President's Emergency Plan for AIDS Relief
PST.....	Pre-Service Training
PTO.....	Programming and Training Officer
RSO.....	Regional Security Officer
SPA.....	Small Project Assistance
SSC.....	Safety and Security Coordinator
USAID.....	United States Agency for International Development
VAD.....	Volunteer Assignment Description
VIDA.....	Volunteer Information Database Application
V/T.....	Volunteer or Trainee

# EXECUTIVE SUMMARY

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## WHY WE DID THIS EVALUATION

*The Office of Inspector General conducts regular reviews of Peace Corps operations.*

*We selected PC/Eastern Caribbean based on a risk analysis that highlighted two major issues. First, the last program evaluation of PC/Eastern Caribbean took place in 2000, over six years ago. Second, the post supports a relatively large number of Volunteers while facing unique management and administrative challenges due to the geography of the Caribbean.*

According to Title 22, Chapter 34 of the United States Code (the “Peace Corps Act”), Peace Corps Volunteers are to “help the peoples of [requesting] countries and areas in meeting their needs for trained manpower.” To fulfill this goal, Volunteers require support from in-country Peace Corps staff to meet their personal and work-related needs. During our review of PC/Eastern Caribbean, we noted several opportunities to improve post management and Volunteer support in areas as diverse as safety and security and Small Project Assistance (SPA) grant funding. Specifically, we found:

- Due to shortcomings in the post’s Emergency Action Plan (EAP), PC/Eastern Caribbean might be unable to evacuate Volunteers in the event of a major hurricane.
- One safe house had water on hand to supply Volunteers for less than a day, while another safe house had less than a two-day supply.
- The post’s annual safety and security Compliance Report contained inaccuracies in at least ten major areas.
- PC/Eastern Caribbean did not fully implement 40% of a Peace Corps Safety and Security Officer’s (PCSSO’s) recommendations made in March 2006.
- Some Associate Peace Corps Directors (APCDs) did not conduct adequate and effective site visits, which risked Volunteer safety and security and threatened the successful implementation of the post’s new project plan.
- Eleven percent of the Volunteers in our sample did not receive prescription medications and re-fills on time.
- The post’s Peace Corps Medical Officers (PCMOs) maintained expired medical supplies, made such supplies available to Volunteers, and did not ensure that pharmaceuticals were consistently stored in climate-controlled environments.
- The post’s SPA Committee exercised weak fiscal oversight, resulting in a lost opportunity to fund at

least six additional grants. Funds totaling \$8,547 were still outstanding or unaccounted for beyond the required grant completion dates.

- The post did not enforce the procedures it imposed upon community organizations regarding the use of the President's Emergency Plan for AIDS Relief (PEPFAR) monies.
- PC/Eastern Caribbean awarded a contract in spite of the contractor's potential conflict of interest. Without resolution of this issue, the post will be forced to rely on information of questionable objectivity to determine: 1) whether to continue Peace Corps operations in Antigua and Barbuda, and 2) how to implement its integrated community development project there.
- Forty-one percent of the Volunteers in our sample expressed that their Volunteer Assignment Descriptions (VADs), which help prospective Volunteers decide whether to accept a Peace Corps assignment, were vague and did not provide enough information.

Our report contains 31 recommendations, which, if implemented, should improve internal controls and correct the weaknesses noted in our findings.

# INTRODUCTION

## BACKGROUND

The Peace Corps entered the Eastern Caribbean in 1961, when St. Lucia became one of three pilot Peace Corps posts worldwide. Since that time, Peace Corps has expanded its presence throughout the region. Today, PC/Eastern Caribbean's Volunteers can be found on ten islands in six nations: Antigua and Barbuda, Dominica, Grenada, St. Kitts and Nevis, St. Lucia, and St. Vincent and the Grenadines. Over 4,300 Volunteers have served in the Eastern Caribbean, and in July 2006, the post welcomed its seventy-sixth group of Volunteers (EC 76). At the time of our visit in November 2006, 123 Volunteers from four groups were living and working throughout the Eastern Caribbean. See Figure 1.

**Figure 1. Distribution of PC/Eastern Caribbean Volunteers**

<i>Country of Assignment</i>	<i>Number and Percent of Volunteers</i>
Antigua and Barbuda	10 (8%)
Dominica	25 (20%)
Grenada	22 (18%)
St. Kitts and Nevis	19 (15%)
St. Lucia	21 (17%)
St. Vincent and the Grenadines	26 (21%)
<b>TOTAL</b>	<b>123 (99%)<sup>1</sup></b>
<i>Volunteer Group and Close of Service Date</i>	<i>Number and Percent of Volunteers</i>
EC 72 (3/2007) <sup>2</sup>	1 (1%)
EC 73 (9/2006)	0 (0%)
EC 74 (3/2007)	20 (16%)
EC 75 (9/2007)	36 (29%)
EC 76 (9/2008)	66 (54%)
<b>TOTAL</b>	<b>123 (100%)</b>

The geography of the Eastern Caribbean presents the post with unique challenges. To manage and support Volunteers scattered throughout the region, PC/Eastern Caribbean operates a main office in Castries, St. Lucia, where the country director, programming and training officer (PTO), safety and security coordinator (SSC), administrative officer, and administrative staff are located. APCDs, the Volunteers' main Peace Corps contacts, work in satellite offices in the

<sup>1</sup> Due to rounding, percentages do not add to 100%.

<sup>2</sup> One Volunteer extended service for a third year, resulting in a March 2007 Close of Service date.

capitals of Dominica, Grenada, St. Kitts and Nevis, St. Lucia, and St. Vincent and the Grenadines. Although the APCD position for Antigua and Barbuda was vacant at the time of our visit, the post maintained an office with two administrative staff there. The APCD from Dominica supports the Volunteers in Antigua and Barbuda.

PCMOs are based in the main office in St. Lucia and the satellite office in St. Kitts. A third PCMO, based in Dominica, retired shortly after our visit, and the post recently advertised to fill the position in St. Vincent and the Grenadines instead. The PCMOs travel regularly throughout the islands and meet individually with the Volunteers to help ensure their health and safety.

In September 2006, PC/Eastern Caribbean initiated a new integrated community development project plan. This plan guides the work of EC 76 and will provide the framework for all incoming Volunteers in the foreseeable future. Through this project plan, the Volunteers seek to empower communities by supporting local projects and training. For instance, the Volunteers may:

- Assist village councils, community-based organizations, and non-governmental organizations to address community needs.
- Teach in schools and establish after-school programs.
- Support programs for at-risk children and those with physical or learning disabilities.
- Implement strategies focused on HIV/AIDS prevention.

In short, the project plan requires Volunteers to integrate into their communities, work with governmental officials and their community partners to assess the communities' needs, and develop a strategy to meet the identified needs.

## **OBJECTIVE**

The objective of our evaluation was to determine whether PC/Eastern Caribbean has provided adequate support and oversight to ensure its Volunteers meet the development needs of the people of the Eastern Caribbean. This objective is encapsulated by the first goal of Peace Corps' mission. Appendix A provides a full description of our evaluation objective, scope, and methodology.

## PROGRAM EVALUATION RESULTS

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Due to the on-going implementation of PC/Eastern Caribbean's new integrated community development project plan, we were unable to fully evaluate the project plan or training related to it. However, we identified internal control weaknesses in related areas that could negatively impact Volunteers' safety and health and threaten the successful implementation of the project plan. These issues are detailed in the findings below. Because the current country director began work in the Eastern Caribbean in July 2006, we recognize that she has not had ample time to assess the post's internal controls. Notably, she took immediate steps following our fieldwork to correct many of the weaknesses outlined in this report, resulting in benefits to Volunteers and the post alike.

### **PC/EASTERN CARIBBEAN DID NOT ADEQUATELY TEST ITS EMERGENCY ACTION PLAN OR ENSURE ITS FUNCTIONALITY.**

PC/Eastern Caribbean had not tested its EAP in accordance with the Peace Corps Manual or implemented best practices to help ensure the EAP functions on a practical level. For instance:

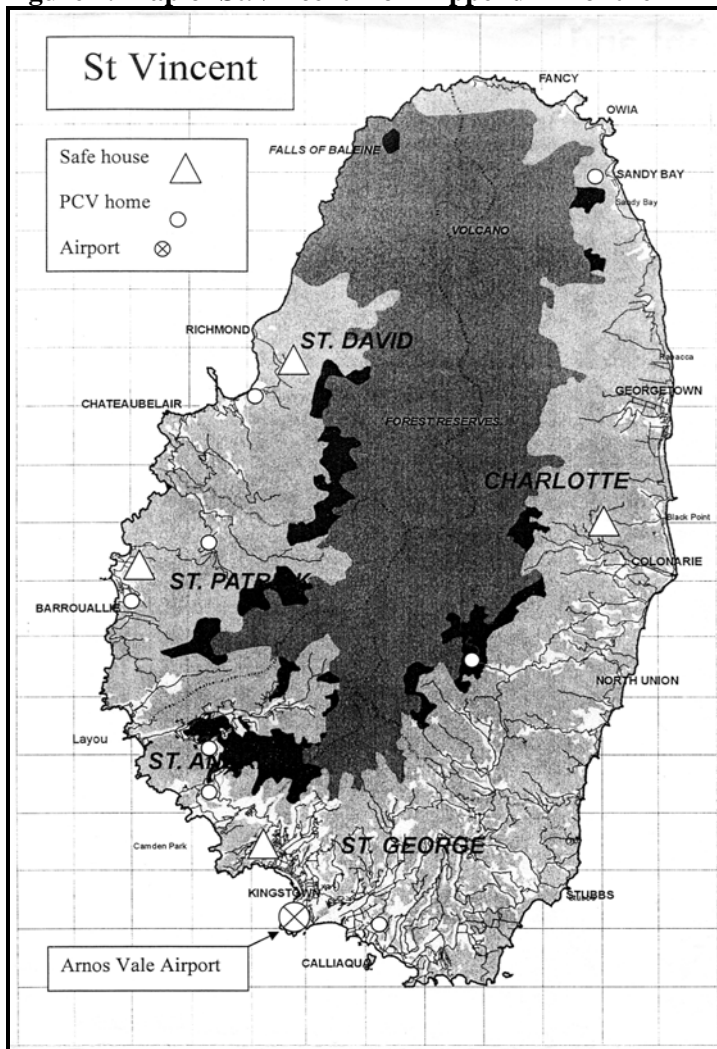
- As of December 2006, over 20 months had elapsed since PC/Eastern Caribbean's last consolidation test on March 30, 2005. Subsequent to that date, we found no evidence that the post confirmed the course of action to be taken by Volunteers, Trainees, and staff at each potential stage of an emergency. According to Peace Corps Manual section 270.7.2: "Under the direction of the CD [Country Director], the EAP must be reviewed and tested annually to identify areas that may need revision. Such testing should include, at a minimum, the adequacy and reliability of the in-country communication network and the process for confirming the course of action to be taken by V/Ts [Volunteers and Trainees] and staff at each potential stage of an emergency." As a result, PC/Eastern Caribbean has no assurance that all Volunteers know what to do and where to go in the event they are told to consolidate in safe houses or evacuate due to widespread social unrest or an approaching hurricane.
- EAP communication tests have relied exclusively on telephones (usually cell phones), which are most Volunteers' primary means of communication. According to best practices outlined in Section I. E of the Volunteer Safety Council's the *Standard Operating Procedures for the Emergency Action Plan Template*, "it is strongly recommended that communication tests (which test primary, secondary, and tertiary means of communication) occur bi-annually, quarterly, or even



monthly . . . .” Without identifying or testing other means of communication, the post reduces its ability to locate all of its Volunteers in the event of an emergency consolidation or evacuation. As Section III. A of the *Standard Operating Procedures* further notes: “Because telephone service is likely to be interrupted during a large-scale emergency, Volunteers should also identify an alternate *non-telephone* means of communication.”

- Appendix F of the post’s EAP, “Maps to Consolidation Points,” shows the general vicinity rather than the exact location of the safe houses where Volunteers consolidate in an emergency. (See Figure 2.) According to best practices provided in *Trouble-Shooting Tips for the New EAP*, “Appendix F requires that you have a map showing how to get to every consolidation point. The map should show major roads and landmarks that will be easy to recognize.” This document also notes that a country-wide map indicating the towns where Volunteers are to consolidate cannot replace street maps to actual consolidation points. Because of the poor quality of the maps, one Volunteer informed us that she did not know the location of her consolidation point. Furthermore, staff from other islands called upon to assist in emergencies – such as the staff that helped locate and evacuate Volunteers after Hurricane Ivan struck Grenada in 2004 – could encounter similar difficulties using only the country map.
- The post may not be able to carry out the EAP as currently written. For instance, the EAP does not provide enough time to consolidate Volunteers in safe houses and, if needed, evacuate them in the event of a major hurricane. One staff member who researched evacuation flight options informed us that two of the three regional charter flight operators identified in the EAP would stop flying within 48 hours of a predicted hurricane strike. However, according to the EAP, Volunteers would evacuate no sooner than 24 - 36 hours before a predicted hurricane strike, after the charter flights had likely ceased operating.

**Figure 2. Map of St. Vincent from Appendix F of the EAP**



*This map of St. Vincent shows the general vicinity of Volunteer consolidation points, or safe houses, but is not specific enough to guide someone to the exact location of the safe houses. Maps in Appendix F of the EAP of the other islands where Volunteers serve are similar to this one.*

The U.S. Embassy’s Regional Security Officer (RSO) in Barbados highlighted the importance of this issue by suggesting that Peace Corps research charter flights originating in the U.S. as a back-up plan.

- An October 2006 report issued by the PCSSO to the country director raised additional questions about the practicality of the post’s EAP. The PCSSO emphasized that as the post moves into new offices over the long term, it should consider selecting the offices based on

their suitability to serve as consolidation points. According to the report, this practice “would help monitor [Volunteers’] whereabouts and facilitate evacuation, as well as relieve the APCD of some burdens in supporting geographically dispersed safe houses.” He added that the “[p]ost’s overall EAP planning should shift to facilitate the *quick relocation* of [Volunteers] from a hurricane-affected island (prior to a storm or during initial disaster-recovery).”

These issues illustrate that regional and post management need to re-emphasize the importance of developing an EAP that is clear, comprehensive, and practical. Neither the region nor the post could provide us with recommendations the regional director made to improve PC/Eastern Caribbean’s EAP.

Because the post has not completed all required testing of the EAP on an annual basis or ensured its practical functionality, Volunteers may not be able quickly and orderly consolidate and evacuate, should the need arise. The post could also have difficulty contacting Volunteers during or following a weather-related emergency.

## RECOMMENDATIONS

We recommend:

- 1. That the regional director ensure that all posts in the Inter-America and Pacific Region receive timely written feedback on their EAP submissions.**
- 2. That the country director enforce Peace Corps Manual section 270.7.2 by annually testing the process for confirming the course of action to be taken by Volunteers, Trainees, and staff at each potential stage of an emergency.**
- 3. That the country director revise the EAP with input from the PCSSO to bring it into compliance with agency policy and regulations, incorporating best practices, and ensuring its practicality.**
- 4. That the country director submit the revised EAP to the regional director for revision and/or approval and redistribute the finalized EAP to the Volunteers, headquarters regional staff, and the U.S. Embassy.**

**SOME VOLUNTEER  
SAFE HOUSES WERE  
STOCKED WITH  
INSUFFICIENT WATER  
AND SPOILED FOOD  
SUPPLIES.**

History indicates that the Eastern Caribbean is prone to major hurricanes, as most recently evidenced by Hurricane Ivan, which devastated Grenada in September 2004. The post's EAP recognizes the significance of severe weather in this region by noting that at least 11 major hurricanes have hit the islands of the Eastern Caribbean since 1980. Appendix G of the EAP includes a list of provisions to be maintained at each safe house in preparation for such an emergency, including various food items and four liters of water per person per day to last a period of five days. In spite of the post's recognition of the threat posed by hurricanes, two of the six safe houses we visited during hurricane season were unprepared. For example:

- One safe house on Dominica had 52.5 liters of water in stock. Normally, this safe house would host only four Volunteers, but due to the recent influx of EC 76 Volunteers, it served as a temporary safe house for an additional five Volunteers at the time of our visit. Based on the requirements outlined in the EAP, that amount of water would last nine Volunteers less than two days and equated to a shortage of 127.5 liters of water. Even based on the needs of four Volunteers, the water stock was insufficient and equated to a shortage of 27.5 liters or less than a three-day supply.
- A safe house on Antigua had only 7.5 liters of water on hand for five Volunteers. That amount of water would last the Volunteers less than one day and equated to a shortage of 92.5 liters.

In addition, during a visit to PC/Eastern Caribbean in February 2006, the PCSSO noted that "some foodstuffs among the safe houses' provisions were expired . . . ." In a follow-up visit in October 2006, he found moldy supplies and rusted cans of food in a safe house in Nevis. All of the food had to be discarded. See Figure 3.

According to Appendix G of the post's EAP, the APCDs are responsible to "ensure the required amounts of food and water are maintained in a suitable condition in preparation for any emergency situation." However, the post had no policies and procedures to ensure compliance with this requirement, and APCDs were not held accountable for this responsibility in their most recent performance reviews.

**Figure 3. : Spoiled Safe House Provisions**



*This picture shows rusted cans containing emergency provisions that were stored at one Volunteer safe house in Nevis. The PCSO found the spoiled provisions during a visit in October 2006.*

As a result, Volunteers might not have enough food or water in the event of an emergency calling for consolidation. According to the APCD for Grenada, PC/Eastern Caribbean faced this problem in the aftermath of Hurricane Ivan, when many Volunteers were holed up for five days without adequate food and water and no means of communicating with Peace Corps staff.

## **RECOMMENDATIONS**

**We recommend:**

- 5. That the country director ensure that all safe houses are stocked with food and water to last the Volunteers for at least five days.**
- 6. That the country director establish written policies and procedures to ensure that APCDs regularly inspect the emergency supplies at each safe house and keep them fully stocked year-round.**

**THE POST DID NOT IMPLEMENT ALL OF THE PCSSO’S SAFETY AND SECURITY RECOMMENDATIONS.**

Nine PCSSOs, working under the auspices of the Peace Corps Office of Safety and Security, provide support to posts on all areas of safety and security. The PCSSO responsible for PC/Eastern Caribbean traveled to the post twice during 2006 at the request of the former and current country directors. Each time, he issued a report containing recommendations to improve Volunteer safety and security. However, the PCSSO determined that four of the ten recommendations from his March 1, 2006 report have not been completely implemented. See Figure 4.

**Figure 4. Unimplemented PCSSO Recommendations**

<i>March 2006 PCSSO Recommendations</i>	<i>October 2006 PCSSO Observations</i>
Install the latest version of VIDA [Volunteer Information Database Application], and begin using the Offsite and Leave feature and the Volunteer Whereabouts reports.	In process.
Refine safe house selection process, including using the safe house survey tool.	Safe house survey apparently distributed, but no procedures or records were evident.
Make safe house provisions uniform across different islands, and create a system and timetable for inspecting provisions.	Supplies were checked prior to hurricane season, but problems existed with supplies for at least one safe house.
Conduct a training for safe house hosts, or devise a guidebook regarding safe house management and best practices.	In process.

Peace Corps Manual section 270.2.2 states: “The CD is responsible for establishing and maintaining the V/T safety support system at post.” Ensuring the implementation of recommendations that improve Volunteer safety and security is a major aspect of maintaining this system.

Further, there needs to be a greater management emphasis placed on the issues highlighted in the PCSSO’s report.

These recommendations are critical to the safety and security of all Volunteers in the Eastern Caribbean. Implementing the PCSSO’s recommendation regarding VIDA would help the post keep track of Volunteers’ whereabouts. Failure to maintain similar information in Bolivia garnered national attention a few years ago: after a Volunteer went missing in February 2001, the Government Accountability Office determined that PC/Bolivia “had failed to properly supervise

[the] missing Volunteer and lost track of him.” Furthermore, the importance of the safe house recommendations is highlighted by the fact that PC/Eastern Caribbean was unable to reach and assist Volunteers on Grenada for up to five days following Hurricane Ivan.

## RECOMMENDATIONS

We recommend:

7. **That the country director develop a timeline for the implementation of all recommendations from the PCSSO’s March 2006 report and proceed with the implementation.**
8. \*
9. **That the country director develop a timetable for, and proceed with, training the SSC on safety and security matters delegated to him.**

## PC/EASTERN CARIBBEAN SUBMITTED AN INACCURATE MS 270 COMPLIANCE REPORT.

On June 30, 2006, the post’s former country director submitted an inaccurate annual report on PC/Eastern Caribbean’s compliance with PCM section 270 to the region. While we did not review each item in the MS 270 Compliance Report for accuracy, we did examine those areas that most directly impacted Volunteers’ physical safety. We found ten areas of non-compliance and inaccurate reporting, which are detailed at length in Appendix C. For example:

- The post reported that safety and security responsibilities were included in staff position descriptions, but we found that none of the APCDs’ position descriptions mentioned Volunteer safety and security.
- The post reported that the country director was a member of the U.S. Embassy’s Emergency Action Committee (EAC). While the previous country director may have participated in the EAC at the time the post filed the Compliance Report, the current country director was not involved. We find this issue

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\* This recommendation has been removed as it can be addressed more thoroughly in an upcoming Agency-wide evaluation.

particularly troubling, since the islands of the Eastern Caribbean anticipate hosting hundreds of thousands of spectators during the World Cup Cricket Tournament in March and April 2007. The EAC could provide the country director a venue for asking questions about and obtaining information on this event, which has safety and security ramifications for the Volunteers. We credit the country director for recognizing the importance of this issue after we brought it to her attention. According to the country director, she contacted the U.S. Embassy in November 2006 to determine how she could participate in the EAC remotely, given that the Embassy is in Barbados.

- The post reported that site assessment procedures were established and applied. However, the APCDs did not apply these procedures consistently. For instance, the APCDs for Grenada, St. Kitts and Nevis, and St. Lucia certified at the bottom of “Site Development Criteria and Assessment Summary” forms that sites met all the criteria. However, those APCDs noted earlier on the same forms that all the criteria were not met. We found no evidence that the APCD on St. Vincent completed this form at all.
- The post reported that the Country Desk Unit (CDU) at Peace Corps Headquarters had provided feedback on its EAP and that it utilized an EAP checklist to ensure compliance with regulations. However, the SSC and CDU were unable to provide us with copies of the feedback or the EAP checklist.
- The post reported that it had tested the EAP annually under varying conditions. However, as mentioned previously in this report, the last test occurred approximately 20 months prior to our visit. We also found no evidence that the EAP was tested under varying conditions.

This incorrect reporting occurred because, according to the SSC, he reported safety and security information provided by the APCDs and other staff without verifying its accuracy. In addition, the post has no written policies and procedures to ensure the accuracy of the Compliance Report.

The purpose of PCM section 270 is to “describe the basic



components of the Volunteer and Trainee . . . safety support system that each overseas post is required to maintain.” Due to the inaccuracies we noted in the MS 270 Compliance Report, we cannot have sufficient assurances that the post has fully developed such a system to meet the Volunteers’ safety needs.

## **RECOMMENDATIONS**

**We recommend:**

- 10. That the post review all portions of the MS 270 Compliance Report for accuracy in addition to the items detailed in this report.**
- 11. That the country director submit a revised MS 270 Compliance Report to the region that accurately depicts areas of non-compliance and update the report once the post achieves full compliance.**
- 12. That the country director establish written policies and procedures to ensure the accuracy of future MS 270 Compliance Reports.**

## **APCDs DID NOT CONSISTENTLY CONDUCT AND DOCUMENT SITE VISITS.**

We noted that three of the five APCDs have not conducted and/or documented site visits with Volunteers in accordance with their duties and responsibilities. For example:

- During a 23-month period (January 2005 – November 2006), the APCD on Dominica documented a total of nine visits to Volunteers’ homes or work sites. Our interviews with the APCD and these Volunteers confirmed the infrequent visits. At the time of our visit, there were 25 Volunteers living on Dominica.
- The APCD for St. Vincent and the Grenadines had no records of site visits for the five Volunteers we interviewed who had served there for at least one year. Two of the five Volunteers reported that the APCD had never visited them at their homes or workplaces, while the other three Volunteers stated that he “stops by” occasionally. The APCD admitted in an interview that he does not conduct enough site visits and that he often “just shows up” or “drops in” on Volunteers.

- The APCD for St. Kitts and Nevis informed us that she frequently “drops in” to see how Volunteers are doing, but stated “I don’t have a site visit schedule per se.” She was unable to provide us with any documentation of site visits.

The duties and responsibilities of PC/Eastern Caribbean’s APCDs require them to:

- “Visit Volunteer sites and homes at least semi-annually to understand first hand the assignment requirements.”
- “File site visit reports.”

The Center for Field Assistance and Applied Research’s “Programming and Training Booklet 5: How to Implement a Project” elaborates on the scope of site visits: “Visits by other staff do not take the place of site visits from APCDs. Because many Volunteers perceive their APCD to be their Peace Corps ‘boss,’ it is critical that APCDs make the *agreed-upon scheduled* visits to Volunteer sites and *sit down with each Volunteer alone* to discuss what and how they are doing.” (Emphasis added.)

The lack of consistent and documented site visits by the three APCDs can be attributed to a number of reasons. First, none of the APCDs’ most recent annual performance evaluations (covering the period December 2004 - December 2005) noted the lack of site visit documentation. Second, the country director may not have in the beginning of her tenure placed sufficient emphasis on her responsibilities under PCM section 270.5.2, which holds her responsible to “ensure that post staff make regular visits to each V/T’s site.” Third, comments from two APCDs seemed to show that they do not place sufficient importance on site visits. One APCD stated that he does not always need to hold formal meetings with Volunteers and their community partners, because the island is “a small community,” and he knows most of the community players.

The site visit is one of the APCDs’ most important tools to assess Volunteers’ safety and job performance. Documented site visits meeting the quality and quantity standards set forth in Peace Corps guidance could have helped the APCDs identify and mitigate risks in the following examples:

- The APCD in Dominica informed us that he initially inspected and disapproved a Volunteer’s proposed

house due to its isolation and the large amount of brush growing around it. However, after the Volunteer told the APCD that he had cleared much of the brush away, the APCD approved the house without inspecting it again. The former country director and SSC visited the home in January 2006, and noted in the trip report, “This Volunteer house is very isolated. The property is a wooden building with the metal window not secured by burglar bars. It is located away from [the] housing community positioned in [an] area surrounded by bush . . . . The property because of its location is a very easy target for theft and robbery.” That same month, an intruder allegedly broke into the Volunteer’s home and stole a digital camera and a bag of rice. Our interview with the APCD and our review of his files disclosed that he knew about the break-in but did not visit the Volunteer’s home even after that incident. At the time of our visit in November 2006, the Volunteer was living in the same location.

- One Volunteer’s home in St. Kitts was broken into in November 2006, about nine months after he moved in. According to the Volunteer, the intruder(s) stole his television, laptop, iPod, and cell phone. We visited the Volunteer’s house with the APCD and noticed that it was almost completely surrounded by a six foot high fence that was overgrown with shrubs and trees. (See Figure 5.) The Volunteer’s home abutted another house that the Volunteer referred to as “drug house,” a concern that the APCD had been previously unaware of. He further noted that he lived “in a somewhat dangerous neighborhood.” We obtained a copy of the Volunteer Home Assessment, signed by the PCMO, which showed that the house did not meet several requirements for the following reasons: 1) the external doors did not all have deadbolts; 2) the external windows did not have bars; 3) overgrown shrubs were around the building; and 4) the home was only 400 yards from a rum shop. According to the APCD, she visited the Volunteer twice at his home and once at work before the break-in, although we found no documentation describing the visits.

**Figure 5. Volunteer's House on St. Kitts**



*This Volunteer's house was broken into just days before our arrival on St. Kitts. An intruder allegedly broke the window pictured here to gain access to the house. This photo also shows a tall stone fence and overgrown shrubs surrounding the house, which allowed the intruder to enter undetected.*

Furthermore, according to the country director, site visits are “at least as important or more important” to the success of the integrated community development project plan compared to other Peace Corps projects. She noted that PC/Eastern Caribbean’s project plan provides Volunteers with the flexibility to decide how they can help the community, based on community input. However, site visits are critical, according to the country director, to help Volunteers focus and “narrow down the world of opportunities.”

Finally, not documenting site visits results in a disservice to future Volunteers, particularly in the event of Peace Corps personnel changes. Prior site visit reports could provide new country directors, PTOs, and APCDs a wealth of knowledge on the history of sites, including problems that consistently arose in the past and solutions that could benefit future Volunteers. PCM section 892.6.2 stresses the importance of documentation: “Peace Corps records shall be complete to the extent necessary to facilitate action by an incumbent and her/his successor . . . .”

We applaud the country director for taking action to address

the issue of site visits. She told us that shortly after our visit, she met with the APCDs and informed them that Volunteers have the right to at least three site visits during their tenure. She noted that the site visits should last about a day and that Volunteers should plan part of the visit to ensure their concerns are addressed.

Since our visit, the country director has requested a spreadsheet program for the inventory of medical supplies. We are pleased that the post has already begun to take action in this area.

## RECOMMENDATIONS

We recommend:

**13. That the country director establish written policies and procedures that detail activities to monitor the quality and quantity of site visits conducted by the APCDs.**

**14. That the country director hold APCDs accountable for conducting and documenting site visits in their annual performance evaluations.**

## VOLUNTEERS DID NOT ALWAYS RECEIVE PRESCRIPTION REFILLS ON TIME.

Four of the 37 Volunteers in our sample (11%) informed us that they did not receive prescriptions and refills on their medication from Peace Corps in a timely manner, and an additional Volunteer outside our sample stated that she did not receive a prescription refill on time. For example:

- One Volunteer stated that she arranged for two of her daily medications to be express mailed from the U.S. on three different occasions. This Volunteer also informed us that she had to break tablets of multiple medications in half because the PCMO did not obtain the appropriate doses of her medications on time. E-mail correspondence provided by the Volunteer showed that she regularly informed the PCMO of her medication needs and requested refills several weeks before running out of medication.
- According to another Volunteer, “Upon entering the Peace Corps, we were assured that Peace Corps would provide all medication we were consistently on so long as we filled out the appropriate paperwork and brought

along a 3-month supply. I was on [a birth control medication]. A week before the 3 month mark rolled around, . . . I went in to [the PCMO's] office for refills for my birth control. I naively assumed that [the PCMO] would . . . know that we all needed our medications at that time. [The PCMO], however, had kept no record of these dates and did not have my birth control on hand." The Volunteer informed us that the PCMO placed her on a different brand and type of birth control, which may have placed her "at risk for pregnancy and complications for a full 3 months after changing pills."

- During an interview, one Volunteer informed us that she had a one-week supply of her prescription medication on hand. The Volunteer stated that she had informed her PCMO about one month earlier of the need to refill her prescription. Subsequently, the Volunteer informed us that she ultimately arranged to have her medication shipped from home and was reimbursed by Peace Corps.
- The minutes of Volunteer Advisory Committee meetings held in January 2005, November 2005, and March 2006 all reflected Volunteers' concerns about delays in obtaining prescription medications. According to the minutes from the March 13, 2006 meeting, "Prescription medications for both new Volunteers who bring a three-month supply and for refills for currently serving Volunteers are often late and sometimes unavailable. Some Volunteers have had to take action on their own to get medications, since those ordered by Peace Corps were late or didn't arrive."

Peace Corps' responsibility with regard to this issue is clearly outlined in the agency's policies and procedures and even mentioned in pre-departure materials provided to potential Volunteers. PCM section 262.5.0 states that Volunteers and Trainees "will be provided with all necessary and appropriate medical care during the course of their Peace Corps service." Peace Corps Technical Guideline 110, "Volunteer Health Program," section 5.1 charges PCMOs with the responsibility to maintain "supplies of medications and medical equipment to manage anticipated routine and emergency health needs." Further, the PC/Eastern Caribbean Welcome Book informs individuals invited to serve in the Eastern Caribbean: "The Peace Corps will provide you with all the necessary inoculations, medication, and information to stay healthy . . ."

The post's inability to consistently provide Volunteers with medications in a timely manner can jeopardize the Volunteers' health. This issue arose because none of the PCMOs had maintained an inventory of medical supplies or a tickler system to alert them to order medications on an on-going basis. According to PCM section 734.2.1.6:

The PCMO/PCMC is responsible for establishing the accuracy of inventories, maintaining appropriate controls, and ensuring the proper usage of all medical supplies and equipment. A general inventory of supplies must be taken at least every month by the Country Director or designee. . . . The system is used to:

- Compare the actual inventory on hand.
- Determine when a new order must be placed by comparing the usage rate to the balance.
- Determine the appropriate order size.

Furthermore, PCMOs did not all have adequate administrative support or computer skills to maintain a working inventory system and procure medications in a timely manner. Since our visit, the country director informed us that she assigned an administrative assistant to provide part-time support to the PCMO in St. Lucia. We urge the country director to ensure that the PCMO in St. Kitts and Nevis and the PCMO who will be hired in St. Vincent and the Grenadines also receive adequate administrative support to fulfill their responsibilities.

## **RECOMMENDATIONS**

**We recommend:**

- 15. That the country director establish a medical inventory system that meets the requirements of PCM section 734, and train the PCMOs and their administrative support staff on its use.**
- 16. That the country director supervise the monthly medical inventory.**
- 17. That the country director ensure that all PCMOs receive adequate administrative support to procure Volunteers' medications in a timely manner.**

**PCMOs MADE  
EXPIRED AND  
IMPROPERLY STORED  
MEDICAL SUPPLIES  
ACCESSIBLE TO  
VOLUNTEERS.**

The post's three PCMOs maintained expired medical supplies, made such supplies available to Volunteers, and did not ensure that pharmaceuticals were consistently stored in climate-controlled environments.<sup>3</sup> For example:

- In St. Vincent, we found a rape kit in the PCMO's office that expired in February 2005.
- In Antigua, 117 condoms with expiration dates of June 2003 and December 2005 were stored in a refrigerator accessible to Volunteers.
- In the Volunteer lounge in Dominica, we found ten containers of over-the-counter medicines, such as ibuprofen, antacids, and motion sickness pills, with expiration dates as old as August 2004. Many of the original labels on these containers were covered with tape, with the name of another type of medication written on the tape. (See Figure 6.) According to one Volunteer on Dominica, her fellow Volunteers joke about whether the labels truly reflect the contents of the bottles.
- Medical supplies in the Antigua office and St. Vincent Volunteer lounge, two locations with no permanent PCMO presence at the time of our visit, were not consistently kept in climate-controlled environments. In both instances, the PCMOs stored medication in rooms with working air conditioners that were turned off the days we visited.

According to Peace Corps Technical Guideline 110, section 5.1, PCMOs should maintain "supplies of medications and medical equipment to manage anticipated routine and emergency health needs." Such supplies should be maintained with due consideration given to the products' expiration dates.

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<sup>3</sup> See Appendix C for a complete list of expired medical supplies.



**Figure 6. Expired Medications**



*This picture shows some of the expired medications in the Volunteer lounge in Dominica. The original labels of the three bottles on the left had been taped over, and the medications' names and expiration dates were handwritten on the tape. All of the medicine in the five bottles in the foreground had expired, and we found no expiration date on the clear bag of ibuprofen behind the bottles on the right.*

Furthermore, Technical Guideline 200, "Overseas Health Units," section 7 states: "Peace Corps health units should have adequate storage areas for medical equipment and supplies . . . . Pharmaceuticals should be stored in climate controlled conditions."

The problems noted in this finding occurred for three main reasons. First, the country director did not ensure that staff destroyed expired medical supplies in accordance with PCM section 511.8.8. According to this regulation, "Excess medical supplies (medicines, dressing materials, laboratory reagents, test kits, birth control products, vaccines and the like) with dated expired shelf life must be appropriately destroyed in the presence of the PCMO and the Property Account Holder's designated representative." Second, particularly in offices with no on-site PCMO, Volunteers were in charge of notifying the PCMOs when medical supplies were low or had expired; however, Volunteers do not have authority to hold PCMOs accountable for re-stocking medication. Third, because Antigua and Barbuda and St. Vincent and the Grenadines have no permanent PCMO presence, no one in those offices had

clear responsibility for maintaining medical supplies in a climate-controlled environment.

The impact of relying on expired medical supplies could be severe. For example, utilizing expired rape kits to collect evidence could adversely affect rape prosecutions. In addition, according to the National Institutes of Health, expired condoms are more likely to break, thereby increasing the risk of pregnancy and transmission of sexually transmitted diseases.

Furthermore, we spoke with representatives from Pfizer, GlaxoSmithKline, and Ortho-McNeil Pharmaceutical, all of which manufacture products identical or similar to the pharmaceuticals discussed in this report. They informed us that their medications could become chemically unstable if stored beyond the expiration date or in conditions outside the parameters described on the packaging. None of the representatives would vouch for the effectiveness of their companies' medications, if expired or improperly stored; in fact, they did not recommend using such pharmaceuticals.

This issue is particularly troubling because the Office of Inspector General's Audit of PC/Eastern Caribbean, issued in November 2000, recommended that the post destroy excess and expired medical supplies, and we found the same deficiency six years later. Since we concluded our field work, the country director reassigned staff members with the responsibility for maintaining Volunteer medications and stated that she will review medical supplies when she visits each island. However, written policies and procedures that mandate when and how regular reviews of medical supplies will take place would provide additional internal control and should alert future country directors to the seriousness of this issue.

## RECOMMENDATIONS

We recommend:

- 18. That the country director develop policies and procedures to ensure that responsible staff members check expiration dates, inform the appropriate official when supplies become low, and monitor the conditions in which medications are stored.**

**19. That the country director develop written policies and procedures requiring that the country director (or a designee) perform regular reviews of the pharmaceuticals' expiration dates and storage conditions.**

**THE POST'S SPA COMMITTEE DID NOT FULFILL ITS FISCAL OVERSIGHT RESPONSIBILITIES.**

In 1983, the United States Agency for International Development (USAID) and Peace Corps established the SPA program. The purpose of this program is to encourage sustainable self-help efforts in communities where Volunteers live and work. In fiscal year (FY) 2006, USAID obligated \$2,376,000 for Peace Corps' SPA program through an Inter-Agency Agreement. Of that amount, USAID committed \$54,000 to be used for small-scale SPA grants in the Eastern Caribbean by signing an Implementing Instrument with PC/Eastern Caribbean. These documents, in addition to a SPA Program Handbook and the PC/Eastern Caribbean SPA Guidelines govern the use of SPA funds. These criteria require a SPA Committee, which consists of the PTO and the SPA Coordinator, to review, approve, and oversee SPA grants.

Our review disclosed that the SPA Committee approved grant proposals above the grant ceiling and did not ensure that unused grant funds were returned to Peace Corps.

For example, four of the 15 grants (27%) approved by the SPA Committee in FY 2006 were above the \$3,000 per grant limit set by the post's SPA Program Guidelines. PC/Eastern Caribbean therefore approved \$18,169 more than the guidelines permitted and could have instead funded up to six additional SPA grants at \$3,000 apiece. See Figure 7.

**Figure 7. SPA Grants Provided to Volunteers and Community Organizations in FY 2006**

<i>Country</i>	<i>Project Title</i>	<i>Grant Amount (Not to Exceed \$3,000)</i>	<i>Amount Over the Post's \$3,000 Limit</i>	<i>Total by Country (Not to Exceed \$9,000)</i>	<i>Amount Over the Country's \$9,000 Limit</i>
<b>Antigua and Barbuda</b>	The Power of Protection: A Grassroots Effort to Empower Women	\$ 3,872 <sup>4</sup>	\$ 872	\$ 3,872	\$ 0
<b>Dominica</b>	ASTERS: <u>A Seed That EmpoweRS</u>	3,000	0	8,004	0
	Health Education Seminar for People with Disabilities	2,288	0		
	Youth Get Real: Facing the Realities & Challenges of HIV/AIDS	2,716	0		
<b>Grenada</b>	Secondary School Form One Introductory HIV/AIDS Workshop	1,243	0	12,814	3,814
	Exploring the Impact of Stigmatization of People Living with HIV/AIDS	511	0		
	St. George's Youth Conference: Let the Youth Speak	1,942	0		
	Empowering Youth	1,945	0		
	HIV/AIDS Sessions, Victoria	1,295	0		
	BCC Training Manual Testing Project	5,878	2,878		
<b>St. Kitts and Nevis</b>	Behavior Change Communication/Project Strong	2,993	0	11,871	2,871
	Preparing Our Adolescence, Preserving Our Future	3,000	0		
	BCC Manual Testing	5,878	2,878		
<b>St. Lucia</b>	BCC Manual Production and Testing	14,541 <sup>5</sup>	11,541	14,541	5,541
<b>St. Vincent and the Grenadines</b>	Deliverance Health Campaign	3,000	0	3,000	0.00
<b>TOTALS</b>		<b>\$54,102</b>	<b>\$18,169</b>	<b>\$54,102</b>	<b>\$12,226</b>

<sup>4</sup> PC/Eastern Caribbean cancelled the check for the full amount of this grant within one week after the post approved and funded it.

<sup>5</sup> On September 27 and October 6, 2006, the post recovered \$4,867 of this grant from the Volunteer after being notified by PC/Washington that this grant exceeded agency-wide limits on SPA grants. At the time of our visit in November 2006, the post had provided a net \$9,948 for the purposes of the St. Lucia grant.

- The Implementing Instrument allowed Peace Corps to allocate up to \$9,000 in SPA funds per Eastern Caribbean island nation. However, the post exceeded the limit in Grenada, St. Kitts and Nevis, and St. Lucia by a total of \$12,226. According to the PTO, the SPA Committee waived this requirement without obtaining an amendment to the post's Implementing Instrument from USAID. These monies could have funded additional grants. See Figure 7.
- The SPA Committee did not ensure that \$5,547 in unused SPA money was returned. The completion reports for two Grenada SPA grants, "Empowering Youth" (dated July 2006) and "BCC [Behavior Change Communication] Training Manual Testing Project" (dated September 2006) showed unused funds remained after the completion of these projects. However, the agency's accounting records indicated that PC/Eastern Caribbean still had not recovered the unused \$5,547. According to the SPA Handbook: "In the event there are unused funds at the end of the project, these should be collected from the Volunteer and the post-level procedures for collections initiated. If the collections procedures are followed in a timely manner, it may be possible for post to reissue the re-claimed authority in the same fiscal year, for additional SPA Projects."
- The SPA Committee approved one project that was not scheduled for completion by August 30, 2006, as required by the post's SPA Program Guidelines. The project, "Preparing Our Adolescents, Preserving Our Future" had no specific end date; instead the SPA Project Abstract stated: "The project will be ongoing." As of December 2006, the Volunteer had not submitted a completion report to PC/Eastern Caribbean, resulting in \$3,000 still outstanding. PC/Eastern Caribbean's lack of oversight of these funds makes them susceptible to fraud, waste, and abuse.

These problems occurred because the SPA Committee members did not consistently enforce the rules and regulations detailed in the SPA criteria.

## RECOMMENDATIONS

We recommend:

- 20. That the country director enforce all criteria governing the approval of SPA grants and use of SPA grant funds.**
- 21. That the country director recover the \$5,547 in unused funds from the appropriate Volunteers for the SPA grants “Empowering Youth” and “BCC Training Manual Testing Project.”**
- 22. That the country director obtain the completion report for the SPA grant project “Preparing Our Adolescents, Preserving Our Future” and recover all unused SPA funds from the appropriate Volunteer.**

## THE SPA COMMITTEE APPROVED GRANTS FOR PURPOSES CONTRARY TO SPA REQUIREMENTS.

All of PC/Eastern Caribbean’s SPA grants employed the BCC methodology, which seeks to engage community members in a dialogue concerning HIV/AIDS in an effort to promote and maintain positive behavioral change. For example, using BCC methodology, one Volunteer worked with a community to produce t-shirts, paint a mural, and write skits incorporating a community-tailored HIV/AIDS message. To assist in the implementation of the BCC methodology, a group of Volunteers developed a BCC Manual at the request of national government representatives, post staff, and fellow Volunteers.

Our review disclosed that the SPA Committee awarded three grants to test the BCC Manual; however, these grants were contrary to the SPA Program’s guiding principles for two reasons. First, the idea to test the BCC Manual was not conceived by a local community, but was specifically requested by the PTO. Second, PC/Eastern Caribbean synchronized these projects with pre-service training (PST) so that Trainees could participate, and grant funds were used to support training them on the BCC methodology. The grants were provided to volunteers and community groups in St. Lucia (\$14,541), St. Kitts and Nevis (\$5,878), and Grenada (\$5,878). Because the post subsequently recovered \$4,867 from the St. Lucia grant, it ultimately provided a net \$21,704 for purposes contrary to SPA requirements. This amount represents 40% of all SPA grant funds committed to PC/Eastern Caribbean in FY 2006.

- **St. Lucia.** In response to the question “What community identified priority does this SPA Project address?” from the SPA project abstract, the Volunteer proposing this project wrote: “The goal of this project is to support the *national* [emphasis added] strategic goal of reducing HIV transmission and mitigating the impact of HIV and AIDS . . . .” We found no evidence that this grant was community-initiated. In addition, the SPA Completion Report noted that one of the objectives of the project was “BCC training of the [Trainees].” It also noted that “14 [Trainees] were partially trained in BCC” and that SPA funds paid for refreshments for Trainees.
- **St. Kitts and Nevis.** The Volunteer who proposed this grant informed us that her APCD asked her to write a SPA grant proposal to test the BCC Manual. The Volunteer added that the proposal “wasn’t traditional,” because she didn’t know how she would spend the grant funds or what the actual project would entail until after she secured the funding. Only then did the Volunteer meet with the community to develop the project. With regard to training, the SPA Completion Report stated, “BCC training was held for [the community organization’s] members and Peace Corps Volunteers.” It also noted that “some of the activities were adapted based on the [Volunteer] and student ideas,” and “the new Peace Corps Volunteers in St. Kitts/Nevis are now familiar with the BCC methodology.”
- **Grenada.** According to the completion report for the Grenada grant, “In April 2006, Grenada’s APCD . . . asked [two Volunteers] to plan a Small Projects Assistance (SPA) grant-funded project that would test the BCC Field Test Manual . . . . During the meeting, the team decided to ask [a specific non-governmental organization in Grenada] to act as the counterpart organization for the SPA grant.” The completion report continues by noting: “The project was to be designed to include the participation of community partners . . . and EC 76 Peace Corps Trainees . . . . The APCD led, as a part of PST and in preparation for the sessions with community partners, a training session covering the 12 steps of the BCC methodology for the Trainees.” Significantly, one of the Volunteers who filed this report informed us that only two community members and 14 Trainees attended one the sessions funded by this grant.

This lopsided participation brings into question the extent to which this grant helped the local community.

The Implementing Instrument states that SPA Program activities in the Eastern Caribbean will “be conceived and implemented by a local community organization or group, facilitated by a Volunteer.” Additionally, the SPA Handbook states: “Community groups should be the primary organizers as well as the principal beneficiaries of projects supported with SPA grant funds. These resources may not to [sic] be used to fund projects . . . which support Peace Corps operations or operational needs.” Expending SPA monies to train Peace Corps Trainees supports normal agency operations. Such activities should be funded by Peace Corps’ own appropriation rather than by grant monies provided by USAID.

These problems occurred because post’s SPA Committee and Volunteers received no formal training on SPA Program requirements. As a result, the sustainability of the resulting projects and benefit to the people of the Eastern Caribbean is highly questionable. This fact is recognized by the Peace Corps and USAID in Annex A of the Inter-Agency Agreement: “Capacity building for community development is the cornerstone of the sustainable development philosophy shared by USAID and the Peace Corps, and embodied in this [SPA] Program. Both agencies agree that sustainability depends on the participation of local people in all aspects of the development effort. Participation helps ensure that development initiatives are based on the aspirations and experience of the people involved and, by approaching poverty issues ‘from the ground up,’ local people themselves will provide the ideas, momentum and staying power necessary for the sustainable development efforts.” Using SPA grant monies to train Trainees also deprives local communities from the full benefit of these grants and raises similar sustainability issues.

## RECOMMENDATIONS

We recommend:

- 23. That the country director repay \$21,704 to the SPA fund with Peace Corps’ appropriated funds. This represents the net amount of grant monies used for inappropriate purposes.**



**PEPFAR FUNDS  
WERE NOT USED IN  
ACCORDANCE WITH  
AGREED-UPON  
CRITERIA.**

**24. That the country director develop written policies and procedures requiring:**

- **SPA Committee members to complete formal classroom training on SPA criteria before approving any additional SPA grants, and**
- **Volunteers to complete similar formal training before applying for SPA grants.**

The President’s Emergency Plan for AIDS Relief establishes the U.S. government’s overall strategy for combating HIV/AIDS in countries around the world. The Department of State’s Office of the Global AIDS Coordinator, which leads the implementation of PEPFAR, allocated \$336,200 to Peace Corps from funds appropriated in FY 2006. PC/Eastern Caribbean reported that it spent \$61,500 for PEPFAR purposes. However, the post did not ensure that \$10,414 of that amount (17%) was used by community groups in compliance with agreed-upon criteria. The \$10,414 was provided to community groups in Antigua and Barbuda, Dominica, and St. Vincent and the Grenadines to test PC/Eastern Caribbean’s BCC Manual. See Figure 8.

**Figure 8. PEPFAR Funds Provided to Community Organizations in FY 2006**

<i>Country</i>	<i>Project Title</i>	<i>Amount</i>
<b>Antigua</b>	BCC Manual Test and Project	\$ 3,385
<b>Dominica</b>	BCC Workshop Project Implementation	3,385
<b>St. Vincent and the Grenadines</b>	BCC Manual Testing Project	3,644
<b>TOTAL</b>		<b>\$10,414</b>

In awarding these funds, the former country director and the former acting country director used SPA Project Agreements for the PEPFAR-funded activities with the community groups. This action placed SPA requirements on the use of the PEPFAR monies, as evidenced by the signed agreements:

“This SPA Project Agreement is executed pursuant to the current Inter-Agency Agreement between the U.S. Agency for International Development (USAID) and the Peace Corps . . . governing Small Project Assistance Funds, as amended on August 27, 1999,

and the Implementing Instrument signed by USAID and [Peace Corps] on August 29, 2005.”

However, these PEPFAR-funded projects did not fully comply with the SPA Inter-Agency Agreement, Implementing Instrument, or Handbook as follows:

- The local organizations did not conceive of the BCC Manual testing projects. Instead, the PTO informed us that she asked the APCDs to identify Volunteers to write SPA proposals for this purpose. As a result, the sustainability of these projects is largely suspect, given that the need for the projects was determined by PC/Eastern Caribbean rather than the local people. (Please see the previous finding for a more detailed discussion of project sustainability.)
- The post could not provide completion reports for any of the three projects, which is required by the SPA Handbook. Therefore, PC/Eastern Caribbean could not verify whether the \$10,414 in PEPFAR funds was spent appropriately and/or if the community groups still possess unspent PEPFAR money.

According to the PTO, who signed two of the agreements in her capacity as acting country director, SPA Agreement forms were used because no PEPFAR Agreement forms existed. She stated that she did not intend to require the community organizations to follow SPA guidelines. In addition, we noted that the post had no policies and procedures in place with regard to awarding and monitoring PEPFAR monies.

## RECOMMENDATIONS

We recommend:

- 25. That the country director enforce all PEPFAR agreements by ensuring recipients submit completion reports.**
- 26. That the country director collect all outstanding PEPFAR monies from Volunteers or community in accordance with their agreements.**

**ANTIGUA CONTRACT  
PRESENTS A  
POTENTIAL  
CONFLICT OF  
INTEREST.**

**27. That the country director establish written policies and procedures describing how the post will award and monitor PEPFAR monies to other entities.**

The post entered into a contract on November 28, 2006 that presents a potential conflict of interest (contract number PC-538-001171). Under this 90-day, \$6,667 contract, the contractor is to serve as a Peace Corps Program Specialist in Antigua and Barbuda and perform the following work:

- Act as the principal advisor to the PTO, providing services for program assessment and development in Antigua and Barbuda.
- Research, plan, design, develop, and implement program and training activities within the community development project in Antigua.
- Explore and define areas for possible program involvement with national government offices, non-governmental agencies, community-based organizations, and Volunteers.
- Define roles for Volunteers and responsibilities and authorities for host agencies and the Peace Corps.
- Identify homestay and permanent housing for Volunteers.
- Conduct site surveys and site development.

The nature of these tasks forms the basis for implementing any Peace Corps project plan. Therefore, the contractor's work should provide Peace Corps with information on the feasibility of implementing its new integrated community development project in Antigua and Barbuda. In fact, the PTO, to whom the contractor directly reports, informed us that she expects the contractor to recommend whether Peace Corps should maintain its presence in Antigua and Barbuda, since some of the Volunteers have reported struggling with their projects there.

However, we noted that the contractor also served as the Antigua and Barbuda PST Island Director from July 18 - September 25, 2005. She received \$1,778 under that contract for designing, implementing, and evaluating training for the influx of new Volunteers there. This individual signed another contract to serve as the Antigua and Barbuda PST Island Director from July 17 - September 23, 2006 and received

\$2,222 under that contract.<sup>6</sup> She therefore stands to gain financially as long as Peace Corps continues its operations in Antigua and Barbuda, due to the probability of receiving future contracts to train new Volunteers.

According to Federal Acquisition Regulations, section 9.505: “Each individual contracting situation should be examined on the basis of its particular facts and the nature of the proposed contract. The exercise of common sense, good judgment, and sound discretion is required in both the decision on whether a significant potential conflict exists and, if it does, the development of an appropriate means for resolving it.” This section of the FAR also notes the following as an underlying principle of contracting: “Preventing the existence of conflicting roles that might bias a contractor’s judgment.”

The country director and PTO informed us that this issue arose because they did not perceive a conflict of interest. However, without resolution of the conflict of interest, the post will be forced to rely on information of questionable objectivity to determine: 1) whether to continue Peace Corps operations in Antigua and Barbuda, and 2) how to implement its integrated community development project there. As a result, future Volunteers could face the same difficulties outlined by current Volunteers in Antigua and Barbuda in an August 2006 meeting as follows:

- Finding fulfilling and sustainable jobs.
- Aimless volunteering and feelings of providing cheap labor.
- Lack of community partners.
- Lack of direction and vision.
- Host country nationals not knowing Peace Corps despite its long presence in the country.
- Perceived impracticality of community development work.

In addition to these programmatic effects, PC/Eastern Caribbean paid the contractor half of the contract amount, \$3,333, just eight days after signing the contract. The post will likely be unable to recover these funds. This payment was in fact contrary to PCM section 743.15.0, which states that

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<sup>6</sup> According to the PTO, most of the work under the July - September 2006 contract was performed on St. Lucia due to the resignation of the APCD in Antigua and Barbuda and the subsequent decision not to send any EC 76 Volunteers there.

personal service contractors “are not paid for services until they have performed the services required by their contracts.”

## RECOMMENDATIONS

We recommend:

- 28. That the country director terminate contract number PC-538-001171 in accordance with the contract’s termination clause.**
- 29. That the country director ensure that the post vet all contractors for potential conflicts of interest before entering into contracts.**

## MANY VOLUNTEERS DID NOT FIND THE VOLUNTEER ASSIGNMENT DESCRIPTION HELPFUL.

The purpose of the VAD is to provide prospective Volunteers with enough information to help them decide whether the proposed two-year Peace Corps assignment is the right fit for their personality, interests, and skills. However, the VAD for PC/Eastern Caribbean uses jargon to describe Volunteers’ work that may be difficult for someone to understand with little or no prior background in community development.<sup>7</sup> For instance, the VAD states that Volunteers may:

- Provide training on participatory assessment tools, project design and management, and strategic planning.
- Improve the organizational structure, management systems, and the delivery of social and health services.
- Improve the leadership and organizational skills of directors, managers, staff and volunteers in community organizations.
- Assist staff in learning to identify and access resources (financial, human and informational) to meet the needs of their organizations.
- Train and assist communities in applying Behavior Change Information and BCC methodologies in the prevention of HIV/AIDS and other diseases.

To provide greater insight into the work of Volunteers, the VAD includes comments from three Volunteers who have served in the Eastern Caribbean. However, like the VAD’s explanation of Volunteers’ typical duties, these comments

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<sup>7</sup> A copy of the section entitled “Your Primary Duties” from the current VAD is included in its entirety in Appendix E of this report.

provide scarce information for someone deciding whether to accept a community development assignment. For example:

- “Community Development Worker.....hmmmm.... there are so many areas that you could go into under the auspices of community development . . . . The nature of being a community development worker itself is vague and varied, so you must be open to exploring new areas and be flexible in your thinking.”
- “You begin working, getting involved in community projects and making friends with your neighbors and the other Volunteers. The Eastern Caribbean begins to make sense.”
- “Basically I work with already existing organizations to help strengthen their ability to fulfill their own objectives.”

According to the “Guidance for Drafting Volunteer Assignment Descriptions” issued by the Office of Communications: “In order to write clearly, it’s important that you refrain from jargon or lingo, such as programmatic and technical terms, internal agency vocabulary, acronyms, clichés, redundancies, and long sentences.” With regard to Volunteer comments, the VAD guidance notes that they “will be geared to the particulars of the job assignment and [the Volunteers’] experiences working in that country.”

We found that these issues arose because the post did not sufficiently enforce the VAD guidelines. As a result, 15 of the 37 (41%) Volunteers we interviewed indicated that the VAD was not useful.<sup>8</sup> Furthermore, 34 of 57 (60%) PC/Eastern Caribbean Volunteers responding to the Office of Planning, Policy, and Analysis’ 2006 Volunteer Survey noted that Peace Corps materials about their primary assignments were minimally or not at all useful.

While we recognize that community development is a difficult field to explain in layman’s terms in a brief document, Peace Corps has an interest in providing prospective Volunteers with information that is as accurate and realistic as possible.

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<sup>8</sup> These figures included Volunteers from EC 74, 75, and 76. For the sake of brevity, the most recent VAD, which pertains only to EC 76 Volunteers, is described in detail here. We reviewed the VADs for EC 74 and 75 Volunteers and observed that they included similar language. Of note, the most recent VAD is less specific than prior year VADs, which is not a desired trend, given the Volunteers’ criticism.

Otherwise, a vague VAD can needlessly contribute to unrealistic expectations among Volunteers and ultimately frustrate Peace Corps' ability to implement its mission. A workshop facilitator for Volunteers serving in Antigua and Barbuda recognized the effects that unrealistic expectations had upon Volunteers there. According to her report: "Many of the Volunteers expressed disappointment over what they saw as a definite disconnect between what they expected as PCV's [sic] and how they actually functioned . . . . Individuals could not understand how they were put in placements so contrary to the skills and interests stated to Peace Corps, and felt ultimately that the organization simply did not care about them. This led to some feelings of resentment, especially since all of them gave up something(s) important to them to give of their time and talent."

## RECOMMENDATIONS

We recommend:

- 30. That the country director follow the Guidance for Drafting Volunteer Assignment Descriptions (VADs) issued by the Office of Communications, in connection with future VADs.**
- 31. That the country director establish written policies and procedures to annually revise the VAD with input from staff and Volunteers.**

## CONCLUSION

Our recommendations in this report reveal a common theme: PC/Eastern Caribbean needs to establish a number of written policies and procedures to enhance the post's effectiveness and guide staff in performing their work in accordance with federal and agency regulations.

Office of Management and Budget Circular A-123, as incorporated in PCM section 784.2.0, states that "Internal Control – organization, policies, and procedures – are tools to help program and financial managers achieve results and safeguard the integrity of their programs." Furthermore, the "Standards for Internal Control in the Federal Government," issued by the Comptroller General of the United States, discusses the importance of documenting policies and procedures: "Internal controls and all transactions and other significant events need to be clearly documented, and the documentation should be readily available for examination."

The documentation should appear in management directives, administrative policies, or operating manuals.”

A robust internal control system mandates that written policies and procedures, at a minimum, address the following questions:

- **Who** is the responsible staff member?
- **What** is the staff member responsible to do?
- **When** should the staff member perform key aspects of the internal control activity?
- **How** should the staff member carry out these responsibilities?

PC/Eastern Caribbean has experienced much transition as of late, having welcomed its third country director in less than a year in July 2006. Well-written policies and procedures, however, can ease the transition from one country director to the next and provide a solid framework for staff members called upon to manage the post in an acting capacity. In the end, strengthening internal controls in this manner can only benefit the post’s staff and Volunteers.



# LIST OF RECOMMENDATIONS

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## WE RECOMMEND:

1. That the regional director ensure that all posts in the Inter-America and Pacific Region receive timely written feedback on their EAP submissions.
2. That the country director enforce Peace Corps Manual section 270.7.2 by annually testing the process for confirming the course of action to be taken by Volunteers, Trainees, and staff at each potential stage of an emergency.
3. That the country director revise the EAP with input from the PCSSO to bring it into compliance with agency policy and regulations, incorporating best practices, and ensuring its practicality.
4. That the country director submit the revised EAP to the regional director for revision and/or approval and redistribute the finalized EAP to the Volunteers, headquarters regional staff, and the U.S. Embassy.
5. That the country director ensure that all safe houses are stocked with food and water to last the Volunteers for at least five days.
6. That the country director establish written policies and procedures to ensure that APCDs regularly inspect the emergency supplies at each safe house and keep them fully stocked year-round.
7. That the country director develop a timeline for the implementation of all recommendations from the PCSSO's March 2006 report and proceed with the implementation.
8. \*
9. That the country director develop a timetable for, and proceed with, training the SSC on safety and security matters delegated to him.
10. That the post review all portions of the MS 270 Compliance Report for accuracy in addition to the items detailed in this report.
11. That the country director immediately submit a revised MS 270 Compliance Report to the region that accurately depicts areas of non-compliance and update the report once the post achieves full compliance.

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\* This recommendation has been removed as it can be addressed more thoroughly in an upcoming Agency-wide evaluation.

12. That the country director establish written policies and procedures to ensure the accuracy of future MS 270 Compliance Reports.
13. That the country director establish written policies and procedures that detail activities to monitor the quality and quantity of site visits conducted by the APCDs.
14. That the country director hold APCDs accountable for conducting and documenting site visits in their annual performance evaluations.
15. That the country director establish a medical inventory system that meets the requirements of PCM section 734, and train the PCMOs and their administrative support staff on its use.
16. That the country director supervise the monthly medical inventory.
17. That the country director ensure that all PCMOs receive adequate administrative support to procure Volunteers' medications in a timely manner.
18. That the country director develop policies and procedures to ensure that responsible staff members check expiration dates, inform the appropriate official when supplies become low, and monitor the conditions in which medications are stored.
19. That the country director develop written policies and procedures requiring that the country director (or a designee) perform regular reviews of the pharmaceuticals' expiration dates and storage conditions.
20. That the country director enforce all criteria governing the approval of SPA grants and use of SPA grant funds.
21. That the country director recover the \$5,547 in unused funds from the appropriate Volunteers for the SPA grants "Empowering Youth" and "BCC Training Manual Testing Project."
22. That the country director obtain the completion report for the SPA grant project "Preparing Our Adolescents, Preserving Our Future" and recover all unused SPA funds from the appropriate Volunteer.
23. That the country director repay \$21,704 to the SPA fund with Peace Corps appropriated funds. This represents the net amount of grant monies used for inappropriate purposes.
24. That the country director develop written policies and procedures requiring:
  - SPA Committee members to complete formal classroom training on SPA criteria before approving any additional SPA grants, and

- Volunteers to complete similar formal training before applying for SPA grants.
25. That the country director enforce all PEPFAR agreements by ensuring recipients submit completion reports.
  26. That the country director collect all outstanding PEPFAR monies from Volunteers or community groups in accordance with their agreements.
  27. That the country director establish written policies and procedures describing how the post will award and monitor PEPFAR monies to other entities.
  28. That the country director terminate contract number PC-538-001171 in accordance with the contract's termination clause.
  29. That the country director ensure that the post vet all contractors for potential conflicts of interest before entering into contracts.
  30. That the country director follow the Guidance for Drafting Volunteer Assignment Descriptions (VADs) issued by the Office of Communications, in connection with future VADs.
  31. That the country director establish written policies and procedures to annually revise the VAD with input from staff and Volunteers.

## POST STAFFING

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The PC/Eastern Caribbean post consists of six island nation offices each with an APCD and a few support staff to support the work of the Volunteers. The main office in St. Lucia houses the country director and support staff including the training manager, safety and security specialist, and financial management staff to support and oversee all six island offices. Three PCMOs located on St. Lucia, St. Vincent's, and St. Kitts and a temporary PCMO on Dominica provide medical services to the Volunteers.

At the time of our visit, the post had 32 staff. In addition, one staff position was vacant. The post's staff included two U.S. direct hire employees, nine foreign service nationals, and 21 personal services contractors. We interviewed fourteen staff.

## APPENDIX A

# OBJECTIVE, SCOPE, AND METHODOLOGY

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The objective of our evaluation was to determine whether PC/Eastern Caribbean has provided adequate support and oversight to assist its Volunteers in meeting the development needs of the people of Eastern Caribbean. This objective is encapsulated by the first goal of Peace Corps' mission. Specifically, we considered whether:

- PST and in-service training (IST) provided Volunteers with the technical and language skills necessary to carry out their primary assignments.
- PC/Eastern Caribbean had promoted a safe living and working environment for Volunteers.
- Volunteer work sites and assignments were prepared to meet the needs of the Volunteers and the people of the Eastern Caribbean.
- PC/Eastern Caribbean had effectively overseen external funding in accordance with agency policy.

We did not complete our work regarding the first objective because the post was implementing a new project plan at the time we conducted fieldwork in the Eastern Caribbean. Therefore, we were unable to determine if training provided Volunteers with the tools they needed to work under the new project plan.

Because interviews with Volunteers comprised a major part of our evaluation methodology, our scope encompassed the time period during which Volunteers in our sample have served in Eastern Caribbean, from January 2005 to the conclusion of our fieldwork at post in November 2006. We limited our review of SPA grants to FY 2006, because most of the Volunteers who had SPA grants in FY 2005 had already completed their service, and we were unable to interview them.

To accomplish our objective, we:

- Reviewed relevant criteria, including the Peace Corps Act (Title 22, Section 34 of the United States Code), Federal Acquisition Regulations, various Peace Corps Manual Sections, Agency-wide guidance on the EAP and evacuation preparation, the SPA Project Handbook, and post-specific policies and procedures.
- Reviewed documentation related to post operations, including its Integrated Planning and Budget System submission, the EAP, the project plan, project status reports, VADs, PC/Eastern Caribbean staff position descriptions, results of the 2004 and 2006 Annual Survey of the Peace Corps Volunteer, SPA grant proposals, site and housing development reports, and site visit reports.

## APPENDIX A

- Inspected pharmaceuticals provided to Volunteers at their sites, made accessible to Volunteers in cabinets in Peace Corps offices, and kept in the PCMOs' offices to determine if they had expired or were improperly stored.
- Inspected Volunteer safe houses and reviewed safe house provisions maintained in preparation for Volunteer consolidation.
- Inspected Volunteers' homes for safety and security.
- Reviewed and observed SPA grant projects.
- Selected a judgmental sample of Volunteers based on their length of service, island of service, project focus, gender, age, and ethnicity and interviewed 43 of the 123 Volunteers (35%). These interviews occurred at the Volunteers' home or work sites on all ten islands where Volunteers serve.
- Interviewed 27 of the Volunteers' community partners.
- Interviewed eight ministry officials with community development responsibilities from all six countries that comprise the PC/Eastern Caribbean post.
- Interviewed a number of headquarters Peace Corps staff from the Inter-America and Pacific Region, Safety and Security Office, Office of Medical Services, and PC/Eastern Caribbean post with responsibility for all aspects of Volunteer support.
- Interviewed relevant State Department officials, including the U.S. Ambassador to Barbados and the Eastern Caribbean, Deputy Chief of Mission, RSO, and Eastern Caribbean Desk Officer.

We relied on computer-processed data from PC/Eastern Caribbean's accounting system for information on SPA grant and PEPFAR funds provided to Volunteers and community organizations. However, we did not evaluate general controls over the accounting system because that work was outside the scope of our evaluation.

We performed our evaluation from October 2006 - January 2007, including work at PC/Eastern Caribbean from November 6 - 22, 2006. As a part of our review, we evaluated the system of internal controls to the extent that we considered necessary to accomplish our objective. We identified internal control weaknesses in the areas of Volunteer safety and security, medical support, site visits, approval and oversight of SPA grants, oversight of PEPFAR agreements, contracting, and communicating job responsibilities to potential Volunteers. The internal control weaknesses identified are discussed in the Results of Evaluation section of this report. If implemented, our recommendations should strengthen internal controls.

## APPENDIX B

### PRIOR REPORTS

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Since 2000, the Office of Inspector General has issued two reports related to PC/Eastern Caribbean.

**Office of Inspector General Report, “Evaluation of Peace Corps/Eastern Caribbean,” report number IG-00-1-2, issued August 2000.** This report contained 16 recommendations related to project design, implementation, and management; Volunteer projects; personal safety; health care; and training programs. In particular, the report noted that Volunteers’ role in their assignments was not made clear during training, some Volunteers questioned the sustainability of their projects, and the medical supply contractor was unreliable. The report recommended in part that the post: 1) consistently apply its Volunteer site selection criteria; 2) ensure APCDs visit and approve all housing before occupation by Volunteers; and 3) include activities to better clarify the Volunteers’ roles in their assignments. The region concurred with all the recommendations.

**Office of Inspector General Report, “Audit of Peace Corps/Eastern Caribbean,” report number IG-00-1-1, issued November 2000.** This report contained 27 recommendations related to budgeting, the imprest fund, Volunteer allowance procedures, host country resident personal services contractors, physical security, vehicle management, information security, medical inventory, and Volunteer safety and security. In particular, the report noted that the post had exceeded its budget authority for fiscal year 1999 due to an ineffective reconciliation process, the post did not destroy excess medical supplies, and the country director was not a member of the U.S. mission’s Emergency Action Committee. The report recommended in part that 1) the administrative officer perform required reconciliations, 2) the post destroy excess medical supplies, and 3) the country director join the Emergency Action Committee. The region concurred with all the recommendations except for one, and the OIG accepted the region’s response to the one outstanding recommendation.

## APPENDIX C

### EXPIRED PHARMACEUTICALS

During our visits to the Peace Corps offices in the Eastern Caribbean, we noted a number of pharmaceuticals that had no expiration date clearly marked on the packaging or that had already expired. The PCMOs stocked most of the over-the-counter pharmaceuticals noted in this appendix in Volunteer-accessible medicine cabinets or refrigerators. Some items, such as birth control pills and vaccines, were kept in the PCMOs' offices but had nonetheless expired. The medical supplies listed below expired as early as June 2003, more than three years before we commenced fieldwork for this evaluation.

<i>EXPIRED PHARMACEUTICALS</i>				
<i>Location</i>	<i>Date Reviewed</i>	<i>Item</i>	<i>Primary Use/Explanation</i>	<i>Expiration Date</i>
<b>Dominica</b>	<b>November 11, 2006</b>	Aspirin	Reduction of pain, fever, and inflammation	February 2006
		Ibuprofen in Bottles	Reduction of pain, fever, and inflammation	November 2005, June 2006
		Ibuprofen in a Bag	Reduction of pain, fever, and inflammation	None noted
		Diphenhydramine	Treatment of motion sickness	October 2005, September 2006
		Antacids	Treatment of upset stomach	April 2005
		Calcium Tablets	Dietary supplement	August 2006
		Acetaminophen	Reduction of pain and fever	February 2005
		Calohist Topical Antihistamine	Treatment of skin irritation	July 2006
		Lice Treatment	Treatment of lice	August 2004
		Garlic Supplements	Dietary supplement	August 2005
<b>St. Vincent and the Grenadines</b>	<b>November 11, 2006</b>	Rape Kit	Collection of forensic evidence for possible prosecution	February 2005
		Annusol HC	Treatment of hemorrhoids	December 2004
		Bismuth Tablets	Treatment of upset stomach	February 2005
		Paracetamol	Reduction of pain and fever	February 2005



## APPENDIX C

		Hepatitis B Vaccine	Prevention of Hepatitis B	April 2006
<i>EXPIRED PHARMACEUTICALS</i>				
<i>Location</i>	<i>Date Reviewed</i>	<i>Item</i>	<i>Primary Use/ Explanation</i>	<i>Expiration Date</i>
<b>St. Kitts and Nevis</b>	<b>November 13, 2006</b>	Birth Control Pills	Contraception	None noted
		Polio Vaccine	Prevention of polio	November 2006
		Tylenol PM	Reduction of pain and fever	October 2006
<b>Antigua and Barbuda</b>	<b>November 17, 2006</b>	Sunscreen	Protection against sunburn	January 2004
		Multivitamins	Dietary supplement	February 2006
		Epsom Salts	Treatment of constipation	August 2006
		Dimenhydrinate	Treatment of nausea and vomiting	None noted
		Condoms (115 count)	Contraception	December 2005
Condoms (2 count)	Contraception	June 2003		
<b>Grenada</b>	<b>November 20, 2006</b>	Acetaminophen	Reduction of pain and fever	October 2006
		Skin Care Cream	Skin care	October 2006

## APPENDIX D

# INACCURACIES IN PC/EASTERN CARIBBEAN'S MS 270 COMPLIANCE REPORT

The table below represents the results of our review of PC/Eastern Caribbean's MS 270 Compliance Report, which the former Country Director submitted to the region on June 30, 2006. The first five columns below are copied from the Compliance Report, while the final column indicates the results of our review for each item. The post incorrectly reported compliance with the following ten activities designed to enhance Volunteer safety and security.

<b>ANALYSIS OF MS 270 COMPLIANCE REPORT</b>					
<i>Activities</i>	<i>Means of Verification</i>	<i>Point of Contact</i>	<i>Where is document kept?</i>	<i>Points to consider. Briefly describe the post's efforts here.</i>	<i>Results of Office of Inspector General Review</i>
<b>2.2a CD has made clear staff responsibilities with respect to MS 270</b>	<input checked="" type="checkbox"/> Safety and security included in staff position descriptions and performance appraisals	CD, AO [Administrative Officer] and SSC	Personnel files	<ul style="list-style-type: none"> <li>o Post does ongoing informal training for staff in safety and security</li> <li>o Post does new employee orientations</li> </ul>	Staff position descriptions do not include safety and security responsibilities.
<b>2.2c CD has established a strong working relationship with the Embassy and RSO for S&amp;S [safety and security] related issues.</b>	<input checked="" type="checkbox"/> Regular attendee at Country Team meetings  <input checked="" type="checkbox"/> Member of EAC  <input checked="" type="checkbox"/> Interface with RSO	CD, SSC	[No information provided]	<ul style="list-style-type: none"> <li>o Embassy is in Barbados where Peace Corps has no presence, but CD is in regular contact with Embassy personnel</li> <li>o RSO follows up and supports the post on crimes reported by CIRF [Crime Incident Reporting Form]</li> </ul>	While the prior CD may have participated in EAC meetings, the current CD does not. When brought this issue to the current CD's attention, she informed us that she immediately took steps to participate in the EAC.
<b>2.4a V/T has demonstrated an understanding of host country cultural norms and ability to adapt daily conduct accordingly</b>	<input checked="" type="checkbox"/> Site visit report/IST report  <input checked="" type="checkbox"/> Counterpart/supervisor feedback (if applicable)	APCDs  APCDs	APCD files  APCD files	<ul style="list-style-type: none"> <li>o Extensive time is devoted to this topic during PST/IST</li> <li>o Site visit reports describe issues related to Volunteers' understandings of cultural norms</li> <li>o Site visits evaluate Volunteers' integration into their communities</li> </ul>	The files of the APCD in Dominica contained only sporadic documentation of site visits, while the files for the APCDs in St. Kitts and Nevis and St. Vincent and the Grenadines contained none.

## APPENDIX D

<b>ANALYSIS OF MS 270 COMPLIANCE REPORT</b>					
<i>Activities</i>	<i>Means of Verification</i>	<i>Point of Contact</i>	<i>Where is document kept?</i>	<i>Points to consider. Briefly describe the post's efforts here.</i>	<i>Results of Office of Inspector General Review</i>
<b>3.0c Procedures are established and applied for updating Volunteers regarding security issues in a timely manner</b>	<input checked="" type="checkbox"/> Procedural guidance <input checked="" type="checkbox"/> Updates to Volunteers (i.e. newsletter articles, CD memos, VAC [Volunteer Advisory Committee] communications)	CD, SSC and APCDs	APCD files	<ul style="list-style-type: none"> <li>○ All situations are reported to Volunteers in periodic summaries</li> <li>○ Method of dissemination determined by urgency of the situations and upcoming events such as ISTs, MSCs [Mid-Service Conference] and newsletter schedules</li> </ul>	We were unable to locate any written procedural guidance to update Volunteers regarding security issues. Documenting procedures constitutes a basic internal control.
<b>5.0a Site selection criteria are established and applied</b>	<input checked="" type="checkbox"/> Written criteria <input checked="" type="checkbox"/> Site assessment checklist <input checked="" type="checkbox"/> Housing checklist	CD, PTO, SSC, APCDs, PCMOs	Program files	<ul style="list-style-type: none"> <li>○ Reviewed and revised annually prior to PST</li> </ul>	Four APCDs approved housing that did not fulfill the requirements of the housing checklist and one APCD did not use the housing checklist at all. The post had no written criteria detailing whether Volunteer housing must meet each of those requirements or if exceptions were allowed.
<b>5.0b Site selection procedures are established and applied</b>	<input checked="" type="checkbox"/> Site assessment procedures <input checked="" type="checkbox"/> Site assessment reports <input checked="" type="checkbox"/> Site selection decision	APCDs, SSC, PCMOs	APCD files	<ul style="list-style-type: none"> <li>○ APCDs on the individual islands take the lead in site selection</li> </ul>	The post implemented new site development and selection procedures for EC 76. However, these procedures were not applied consistently. For instance, four APCDs placed Volunteers at sites that did not meet all the criteria on the new "Site Development Criteria and Assessment Summary" forms. In addition, some APCDs did not complete these forms for all EC 76 Volunteers.

## APPENDIX D

<b>ANALYSIS OF MS 270 COMPLIANCE REPORT</b>					
<b>Activities</b>	<b>Means of Verification</b>	<b>Point of Contact</b>	<b>Where is document kept?</b>	<b>Points to consider. Briefly describe the post's efforts here.</b>	<b>Results of Office of Inspector General Review</b>
<b>5.0c Community and counterpart orientation procedures are established and applied</b>	<input checked="" type="checkbox"/> Community/ counterpart orientation materials <input checked="" type="checkbox"/> Report of meetings with communities and counterpart agencies	PTO, RTM [Regional Training Manager], SSC APCDs, PCMOs, CD, training teams	Training files, APCD files	<ul style="list-style-type: none"> <li>○ Post uses a community partner handbook to inform and orient community partners</li> </ul>	We found no evidence of written community and counterpart orientation <i>procedures</i> . Volunteer files did not always contain reports of meetings with communities and counterpart agencies.
<b>5.0d Volunteer site visit standards are established and applied</b>	<input checked="" type="checkbox"/> Procedural guide/checklist <input checked="" type="checkbox"/> Site visits schedule/format <input checked="" type="checkbox"/> Site visit report	PTO, SSC, APCDs, PCMOs, CD	Program files, APCD files	<ul style="list-style-type: none"> <li>○ [No information provided]</li> </ul>	The post recently developed and implemented a new site visit form, but it is not yet widely used. In addition, the post has no written standards detailing basic elements of site visits, such as frequency of visits, when site visit forms must be filed, etc.
<b>7.0a EAP is developed and revised to incorporate CDU comments and lessons from EAP tests.</b>	<input checked="" type="checkbox"/> EAP checklist <input checked="" type="checkbox"/> CDU feedback <input checked="" type="checkbox"/> Revised EAP	CD, SSC CDU	SSC files	<ul style="list-style-type: none"> <li>○ Post follows EAP template for each annual revision</li> <li>○ Revised EAP being developed now and will be sent out for comments</li> </ul>	The post and CDU were unable to provide us with copies of an EAP checklist or CDU feedback.
<b>7.0c EAP is tested annually under varying conditions</b>	<input checked="" type="checkbox"/> Test results and analysis are sent to the Region following each test, using either the VIDA EAP Test Record or the EAP Appendix K <input checked="" type="checkbox"/> Follow-up revisions	CD, SSC	SSC files	<ul style="list-style-type: none"> <li>○ Lesson learned discussed with APCDs, other staff and V/Ts after tests through follow up meetings</li> <li>○ Communications tests done periodically, with frequent tests near the start of hurricane season</li> <li>○ Tests are not announced and proceed until all PCV/Ts are reached.</li> </ul>	An EAP consolidation test was last held on March 30, 2005, 20 months prior to our fieldwork. All EAP communications tests in the last two years were conducted by telephone (primarily cell phone). The documentation suggests that EAP tests have occurred under similar conditions.

## APPENDIX E

# EXCERPT FROM PC/EASTERN CARIBBEAN'S VOLUNTEER ASSIGNMENT DESCRIPTION

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This excerpt from the VAD for PC/Eastern Caribbean's community development workers includes the full description of Volunteers' primary duties. Peace Corps sent this description to prospective EC 76 Volunteers. Forty-one percent of the Volunteers we interviewed stated that the VAD did not clearly describe their job assignment.

### YOUR PRIMARY DUTIES

The Peace Corps/Eastern Caribbean program seeks to support communities and families in their efforts to improve their quality of life by strengthening their capacities to respond to challenges and opportunities. Your first responsibility will be to integrate into the community where you are assigned. Once you have a good understanding of your community and the wider country context, you will have the opportunity to contribute in a variety of ways.

- A. To strengthen the abilities of community groups and organizations to identify, evaluate, and develop solutions to demonstrated community priorities. You may:
  - Provide training on participatory assessment tools, project design and management, and strategic planning
  - Improve the organizational structure, management systems and the delivery of social and health services
  - Improve the leadership and organizational skills of directors, managers, staff and volunteers in community organizations
  - Assist staff in learning to identify and assess resources (financial, human and informational) to meet the needs of their organizations
  
- B. To improve the technical skills of a variety of service providers in entrepreneurship, information communication technology (ICT), remedial education and basic literacy.
  
- C. To assist communities in addressing health issues such as HIV/AIDS, including planning and implementing preventive interventions. You may:
  - Provide training on HIV/AIDS prevention and care
  - Train and assist communities in applying Behavior Change Information (BCI) and Behavior Change Communication (BCC) methodologies in the prevention of HIV/AIDS and other diseases
  - Train and assist communities in applying life skill and virtues methodologies

While in many cases you will be called upon to use your skills in a specific area, please note that all Volunteers are expected to get involved in HIV/AIDS related activities.

## APPENDIX E

It is important to recognize that your community development assignment may require you to be a self-starter who does not need to be told what to do. Skills transfer is your goal, so you must be able to work well with other people on a daily basis. You may not have a clearly defined local counterpart to work with on a day-to-day basis at the beginning of your service, and you may need to independently identify community partners and those in need of training. Not everyone is comfortable with such ambiguity and lack of structure. Please think carefully about your own skills, needs, and commitment to service before you accept this challenging assignment!

## **APPENDIX F**

# **OIG CONTACTS AND STAFF ACKNOWLEDGEMENTS**

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### **OIG CONTACTS**

If you wish to comment on the quality or usefulness of this report to help us improve our products, please e-mail Alice Bunker, Assistant Inspector General for Evaluations and Inspections, at [abunker@peacecorps.gov](mailto:abunker@peacecorps.gov), or call (202) 692-2913.

### **STAFF ACKNOWLEDGEMENTS**

Alice Bunker, Assistant Inspector General for Evaluations and Inspections, and Crist Chensvold, Senior Evaluator, managed all aspects of this assignment, and Lori Carruthers contributed to the writing of this report.

**APPENDIX G**

**REGION'S RESPONSE TO  
THE PRELIMINARY REPORT**

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**45<sup>th</sup>**  
**Peace  
Corps**  
*Anniversary*

*1961-2006: a legacy of service at home and abroad*

MEMORANDUM

**To:** David Kotz, Inspector General

**From:** Allene Zanger, Regional Director, Inter-America and Pacific *AZ*

**Date:** May 1, 2007

**Subject:** Preliminary Program Evaluation Report on the Eastern Caribbean

Enclosed please find the Regional response to the recommendations made by the Inspector General for Peace Corps Eastern Caribbean, as outlined in the Preliminary Program Evaluation Report Peace Corps/Eastern Caribbean.

The Region concurs with 29 of 31 of the IG's recommendations.

**RESPONSES TO A PRELIMINARY REPORT**  
**ON THE**  
**INSPECTOR GENERAL'S PROGRAM**  
**EVALUATION OF THE**  
**EASTERN CARIBBEAN**

**May 1, 2007**

**1. That the regional director ensure that all posts in the Inter-America and Pacific Region receive timely written feedback on their EAP submissions.**

**Concur:** The regional director will ensure that all posts in the Inter-America and Pacific Region receive timely written feedback on their EAP submissions through the Safety and Security Desk Officer.

**Date of completion:** August 31, 2007

**2. That the country director enforce Peace Corps Manual section 270.7.2 by annually testing the process for confirming the course of action to be taken by Volunteers, Trainees, and staff at each potential stage of an emergency.**

**Concur:** Testing of the Communication and Consolidation phases in all six Eastern Caribbean islands has been completed. Testing will continue on an annual basis according to the enclosed interim guidance from the IAP Region.

**Date of Completion:** May 1, 2007

**3. That the country director revise the EAP with input from the PCSSO to bring it into compliance with agency policy and regulations, incorporating best practices, and ensuring its practicality.**

**Concur:** Post will review and revise the EAP with the PCSSO during the May 8 – 19, 2007 PCSSO visit to bring it into compliance with agency policy and regulations, incorporating best practices, and ensuring its practicality.

**Date of Completion:** June 30, 2007

**4. That the country director submit the revised EAP to the regional director for revision and/or approval and redistribute the finalized EAP to the Volunteers, headquarters regional staff, and the U.S. Embassy.**

**Concur:** Post will submit the revised EAP to the Regional Director for revision and/or approval and redistribute the finalized EAP to the Volunteers, headquarters regional staff, and the U.S. Embassy.

**Date of Completion:** August 1, 2007

**5. That the country director ensure that all safe houses are stocked with food and water to last the Volunteers for at least five days.**

**Concur:** Post will verify that all safe houses are stocked with food and water to last the Volunteers for at least five days.

**Date of Completion:** June 1, 2007

**6. That the country director establish written policies and procedures to ensure that APCDs regularly inspect the emergency supplies at each safe house and keep them fully stocked year-round.**

**Concur:** The country director has established written policies and procedures to ensure that the emergency supplies at each safe house are fully stocked year-round.

**Date of Completion:** March 15, 2007

**7. That the country director develop a timeline for the implementation of all recommendations from the PCSSO's March 2006 report and proceed with the implementation.**

**Do Not Concur:** Post will take action on eight of the ten items on PCSSO report that require action on the part of the Post and believes this appropriately addresses the recommendations.

**Date of Completion:** August 30, 2007

**8. That the country director establish written policies and procedures to ensure that the post expeditiously implements all PCSSO recommendations or provide the regional director and PCSSO with a written rationale for non-concurrence.**

**Concur:** The country director will adopt the Region's interim guidelines for responding to pertinent PCSSO recommendations in a timely manner.

**Date of Completion:** August 30, 2007

**9. That the country director develop a timetable for, and proceed with, training the SSC on safety and security matters delegated to him.**

**Concur:** The PCSSO and country director will develop an outline of training activities to occur during the next PCSSO visit scheduled for May 9 - 18, 2007. In addition, the SSC will attend the SSC Conference in Panama April 23 - 27, 2007 and the country director will provide regular supervision for the SSC.

**Date of completion:** June 1, 2007

**10. That the post review all portions of the MS 270 Compliance Report for accuracy in addition to the items detailed in this report.**

**Concur:** The post will review all portions of the MS 270 compliance report for accuracy.

**Date of Completion:** June 30, 2007

**11. That the country director immediately submit a revised MS 270 Compliance Report to the region that accurately depicts areas of non-compliance and update the report once the post achieves full compliance.**

**Concur:** Post will update the MS 270 report and submit it to the Regional Director.

**Date of Completion:** June 30, 2007

**12. That the country director establish written policies and procedures to ensure the accuracy of future MS 270 Compliance Reports.**

**Concur:** The country director will establish written policies and procedures to ensure the accuracy of future MS 270 compliance reports.

**Date of Completion:** June 30, 2007

**13. That the country director establish written policies and procedures that detail activities to monitor the quality and quantity of site visits conducted by the APCDs.**

**Concur:** The country director has developed and reviewed site visit forms and procedures to track and document all site visits.

**Date of Completion:** May 1, 2007

**14. That the country director hold APCDs accountable for conducting and documenting site visits in their annual performance evaluations.**

**Concur:** APCDs will submit calendars of their scheduled site visits quarterly. New site visit forms will be used to document the visit. Adherence to these schedules and use of forms will be reviewed during performance reviews.

**Date of Completion:** July 30, 2007

**15. That the country director establish a medical inventory system that meets the requirements of PCM section 234, and train the PCMOs and their administrative support staff on its use.**

**Concur:** The country director will establish a medical inventory system that meets the requirements of PCM section 234 and train the PCMOs and their administrative support staff on its use.

**Date of Completion:** July 1, 2007

**16. That the country director supervise the monthly medical inventory.**

**Concur:** The country director will provide oversight of the supervision of the monthly medical inventory through the work of the Administrative Assistants on each island. Country director will personally review the inventory supplies once a year.

**Date of Completion:** Ongoing as of June 1, 2007

**17. That the country director ensure that all PCMOs receive adequate administrative support to procure Volunteers' medications in a timely manner.**

**Concur:** Position description of Administrative Assistants has been updated to reflect support role for the PCMOs.

**Date of Completion:** July 1, 2007

**18. That the country director develop policies and procedures to ensure that responsible staff members check expiration dates, inform the appropriate official when supplies become low, and monitor the conditions in which medications are stored.**

**Concur:** The country director will ensure staff compliance with medical technical guidelines that refer to expiration dates, monitoring, and storage conditions of medications.

**Date of Completion:** June 1, 2007

**19. That the country director develop written policies and procedures requiring that the country director (or a designee) perform regular reviews of the pharmaceuticals' expiration dates and storage conditions.**

**Concur:** The country director will ensure staff compliance with medical technical guidelines that refer to the monitoring of expiration dates and storage conditions of pharmaceuticals.

**Date of Completion:** June 1, 2007

**20. That the country director enforce all criteria governing the approval of SPA grants and use of SPA grant funds.**

**Concur:** The country director will enforce all criteria governing the approval of SPA grants and use of SPA grant funds.

**Date of Completion:** August 1, 2007

**21. That the country director recover the \$5,547 in unused funds from the appropriate Volunteers for the SPA grants “Empowering Youth” and “BCC Training Manual Testing Project.”**

**Concur:** Funds have already been recovered effective November, 2006 and have been used to implement other SPA projects.

**Date of Completion:** November 24, 2006

**22. That the country director obtain the completion report for the SPA grant project “Preparing Our Adolescents, Preserving Our Future” and recover all unused SPA funds from the appropriate Volunteer.**

**Concur:** Completion report will be completed and any unused funds will be dispositioned.

**Date of Completion:** July 1, 2007

**23. That the country director repay \$21,704 to the SPA fund with Peace Corps appropriated funds. This represents the net amount of grant monies used for inappropriate purposes.**

**Do Not Concur:** The usage of these funds has been coordinated with USAID and they concur with the projects for which the funds were used.

**24. That the country director develop written policies and procedures requiring:**

- **SPA Committee members to complete formal classroom training on SPA criteria before approving any additional SPA grants, and**
- **Volunteers to complete similar formal training before applying for SPA grants.**

**Concur:** Post will establish and conduct a training module for SPA committee members and PCVs.

**Date of Completion:** Ongoing, as of September 30, 2007

**25. That the country director enforce all PEPFAR agreements by ensuring recipients submit completion reports.**

**Concur:** The country director will ensure that recipients have submitted completion reports.

**Date of Completion:** July 1, 2007

**26. That the country director collect all outstanding PEPFAR monies from Volunteers or community groups in accordance with their agreements.**

**Concur:** The post will collect all outstanding PEPFAR monies from Volunteers or community groups in accordance with their agreements.

**Date of Completion:** July 1, 2007

**27. That the country director establish written policies and procedures describing how the post will award and monitor PEPFAR monies to other entities.**

**Concur:** CD will adopt the guidance that is provided by the Office of AIDS Relief.

**Date of Completion:** July 1, 2007

**28. That the country director terminate contract number PC-538-001171 in accordance with the contract's termination clause.**

**Concur:** Contract PC-538-001171 has been terminated.

**Date of Completion:** November 22, 2006

**29. That the country director ensure that the post vet all contractors for potential conflicts of interest before entering into contracts.**

**Concur:** Post will create a checklist to vet all contractors for potential conflicts of interest before entering into contracts.

**Date of Completion:** July 1, 2007

**30. That the country director follow the Guidance for Drafting Volunteer Assignment Descriptions (VADs) issued by the Office of Communications, in connection with future VADs.**

**Concur:** Post will follow the "Peace Corps Style Guidelines for Writers and Editors," which is the only existing guidance issued by the Office of Communications that addresses Volunteer Assignment Descriptions.

**Date of Completion:** 60 days prior to the next incoming group

**31. That the country director establish written policies and procedures to annually revise the VAD with input from staff and Volunteers.**

**Concur:** Policies and procedures will be established to reflect the duties and timelines of the staff and Volunteers responsible for revising the VADs.

**Date of Completion:** July 1, 2007



## APPENDIX H

# OIG COMMENTS

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As stated in the conclusion of this report, our recommendations reveal a common theme: PC/Eastern Caribbean needs to establish a number of written policies and procedures to enhance the post's effectiveness and guide staff in performing their work in accordance with federal and Agency regulations.

The report notes that written policies and procedures, at a minimum, should address the following questions:

- **Who** is the responsible staff member?
- **What** is the staff member responsible to do?
- **When** should the staff member perform key aspects of the internal control activity?
- **How** should the staff member carry out these responsibilities?

To close those recommendations that call for the promulgation of policies and procedures, we ask that the post please pay particular attention to each of these questions.

The region concurred with 29 of our 31 recommendations. We closed recommendation nos. 14 and 23.\* Furthermore, we removed recommendation no. 8 from the draft report as it can be addressed more thoroughly in an upcoming Agency-wide evaluation. Therefore, 28 recommendations remain open pending confirmation from the chief compliance officer that the following have been received:

- For recommendation no. 1, information on actions planned or taken to ensure that all posts in the Inter-America and Pacific Region receive timely written feedback on their EAP submissions.
- For recommendation no. 2, documentation showing that the country director has enforced MS 270.7.2 by testing the process for confirming the course of action to be taken by Volunteers, Trainees, and staff at each potential stage of an emergency. Please note that the potential stages of an emergency, per PC/Eastern Caribbean's EAP, include Alert, Standfast, Consolidation, Evacuation, and All Clear.
- For recommendation no. 3, a copy of the revised EAP.
- For recommendation no. 4, documentation showing that the revised EAP has been submitted to the regional director for revision and/or approval and that it has been distributed to the Volunteers, region, and U.S. Embassy.

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\* Although not paid with Peace Corps appropriated funds, the \$21,704 in questioned costs mentioned in recommendation 23 was satisfactorily repaid to the SPA fund.

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- For recommendation no. 5, information on actions planned or taken ensure that all safe houses are stocked with food and water to last the Volunteers at least five days.
- For recommendation no. 6, a copy of the policies and procedures that ensure APCDs regularly inspect the emergency supplies at each safe house and keep them fully stocked year-round.
- For recommendation no. 7, a copy of the timeline for the implementation of the four outstanding PCSSO recommendations noted presented in Figure 4 of this report and/or a written explanation of why the post did not take actions with respect to the open recommendations of the PCSSO.
- For recommendation no. 9, a copy of the outline of training activities and actions the country director plans to take to provide regular supervision of the SSC.
- For recommendation no. 10, information on the actions planned or taken to review all portions of the MS 270 Compliance Report for accuracy.
- For recommendation no. 11, a copy of the revised MS 270 Compliance Report sent to the region that accurately depicts any areas of non-compliance.
- For recommendation no. 12, a copy of the policies and procedures that ensure the accuracy of future MS 270 compliance reports once they have been promulgated.
- For recommendation no. 13, a copy of the policies and procedures established to monitor the quality and quantity of site visits conducted by the APCDs. The policies and procedures should detail how the site visit form should be used (i.e., whether the entire form needs to be completed, how many site visits are required, who is responsible for completing the forms, etc.)
- For recommendation no. 15, information on the actions planned or taken to ensure a medical inventory is established that meets the requirements of PCM section 234 and to ensure staff are trained on its use.
- For recommendation no. 16, specific information on how the country director will supervise the monthly medical inventory.
- For recommendation no. 17, a copy of the updated position descriptions of the Administrative Assistants.

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- For recommendation no. 18, a copy of the policies and procedures that ensures responsible staff members check expiration dates, inform the appropriate official when supplies become low, and monitor the conditions in which medications are stored once said policies and procedures have been promulgated.
- For recommendation no. 19, a copy of the policies and procedures once they have been promulgated.
- For recommendation no. 20, information on the actions planned or taken to enforce all criteria governing the approval of SPA grants and the use of SPA grant funds.
- For recommendation no. 21, evidence from Peace Corps' official accounting records showing that the country director has recovered the \$5,547 in unused funds.
- For recommendation no. 22, a copy of the completion report for the SPA grant project "Preparing Our Adolescents, Preserving Our Future" and, if applicable, evidence from Peace Corps' official accounting records showing that the country director has recovered all unused SPA funds from this project.
- For recommendation no. 24, a copy of the policies and procedures that require training on SPA criteria for SPA committee members and PCVs once said policies and procedures have been promulgated.
- For recommendation no. 25, information on actions planned or taken to enforce all PEPFAR agreements by ensuring recipients submit completion reports.
- For recommendation no. 26, evidence from Peace Corps' official accounting records showing that the country director has collected all outstanding PEPFAR monies from Volunteers or community groups in accordance with their agreements.
- For recommendation no. 27, a copy of the policies and procedures provided by the Office of AIDS Relief describing how the post will award and monitor PEPFAR monies to other entities.
- For recommendation no. 28, documentation showing that the country director has terminated contract number PC-538-001171 in accordance with the contract's termination clause.

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- For recommendation no. 29, a copy of the checklist the post will use to vet all contractors for potential conflicts of interest before entering into contracts.
- For recommendation no. 30, information on the actions planned to ensure the post follows the document entitled “Guidance for Drafting Volunteer Assignment Descriptions” prepared by the Office of Communications.
- For recommendation no. 31, a copy of the written policies and procedures to annually revise the VAD with input from staff and Volunteers once they have been promulgated.

In their response, the region describes 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***

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