



Peace Corps  
Office of  
**INSPECTOR  
GENERAL**

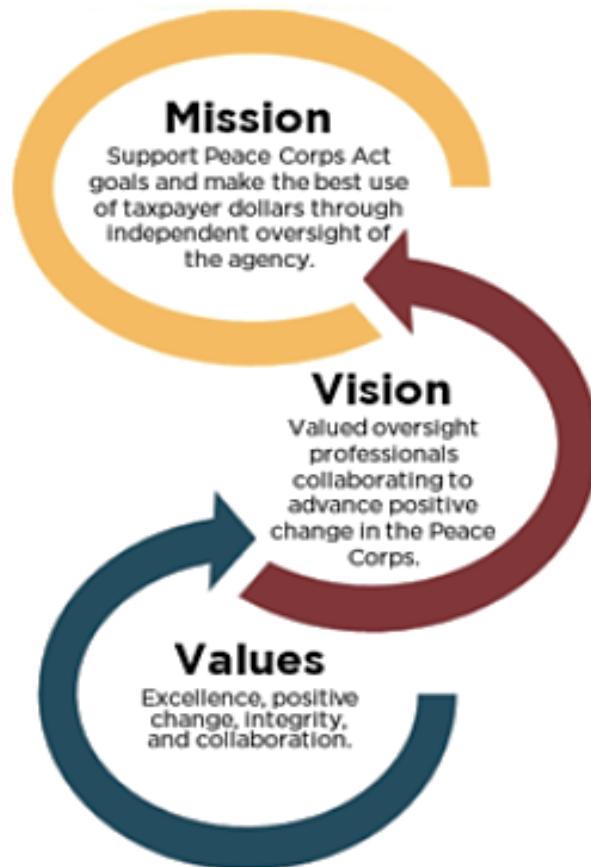
**SEMIANNUAL REPORT TO CONGRESS**

April 1, 2022 to September 30, 2022



# Office of Inspector General

TOGETHER WE MAKE A BETTER PEACE CORPS



Established in 1989, OIG receives its legal authority from the Inspector General Act of 1978, as amended. The law requires that OIG fully and currently inform the Peace Corps Director and the Congress about problems and deficiencies identified by OIG relating to the administration of agency programs and operations.

## Goals

1

Provide independent oversight

2

Effectively communicate with stakeholders

3

Strengthen OIG

**Semiannual Report to Congress**  
April 1, 2022, to September 30, 2022

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# Highlights from this Report

## Message from the Acting Inspector General

I am pleased to present the Peace Corps Office of Inspector General's (OIG's) Semiannual Report to Congress. This report describes the work of OIG from April 1, 2022, to September 30, 2022, and reflects our responsibility to keep Congress fully and currently informed about the challenges facing the Peace Corps and the actions OIG recommended to address them.

As of the end of the reporting period, more than 750 Peace Corps Volunteers have returned to service in 36 countries following the global evacuation of Volunteers in March of 2020. OIG continues to perform work supporting agency efforts to redeploy Volunteers to the field as the Peace Corps progresses towards the safe return to service.

Specifically, the Evaluation Unit issued two reviews on post compliance with agency policies and guidance related to Peace Corps Volunteer health and safety and the re-entry process. We recommended Peace Corps/Ecuador improve staff familiarity with emergency response roles and responsibilities. We recommended Peace Corps/Zambia properly document serious crime incidents in Volunteer site history files and complete the Medical Action Plan.

Additionally, the Audit Unit issued a report on the agency's compliance with the Payment Integrity Information Act for fiscal year 2021. The Audit Unit continued its work on its reviews of Peace Corps Management of Payroll and Benefits for U.S. Direct Hires, Peace Corps U.S. President's Emergency Plan for AIDS Relief Expenditures, and Peace Corps Volunteer Payments and Collections at End of Service.

The Investigation Unit conducted investigations of fraud, waste, abuse, and mismanagement in Peace Corps programs and operations, including alleged sexual assault mismanagement. In the area of mismanagement, investigators worked with evaluators to support cross-unit projects, including a matter related to Volunteer medical care.

During the reporting period and throughout the fiscal year, the agency prioritized the importance of compliance. This resulted in the total closure of 107 recommendations encompassing 33 reports. Closure of many of these recommendations represent important progress in areas reported as management challenges including compliance, internal controls, and Volunteer support programs.

PEACE CORPS OFFICE OF INSPECTOR GENERAL

Finally, I am pleased to share that the Council of Inspectors General on Integrity and Efficiency announced that it will honor our office with an Award for Excellence in recognition of the exemplary review of the facts and circumstances surrounding the death of a Peace Corps/Ghana Volunteer, which identified deficiencies that contributed to delays in the care of a critically injured Volunteer.



Joaquin Ferrao  
Acting Inspector General

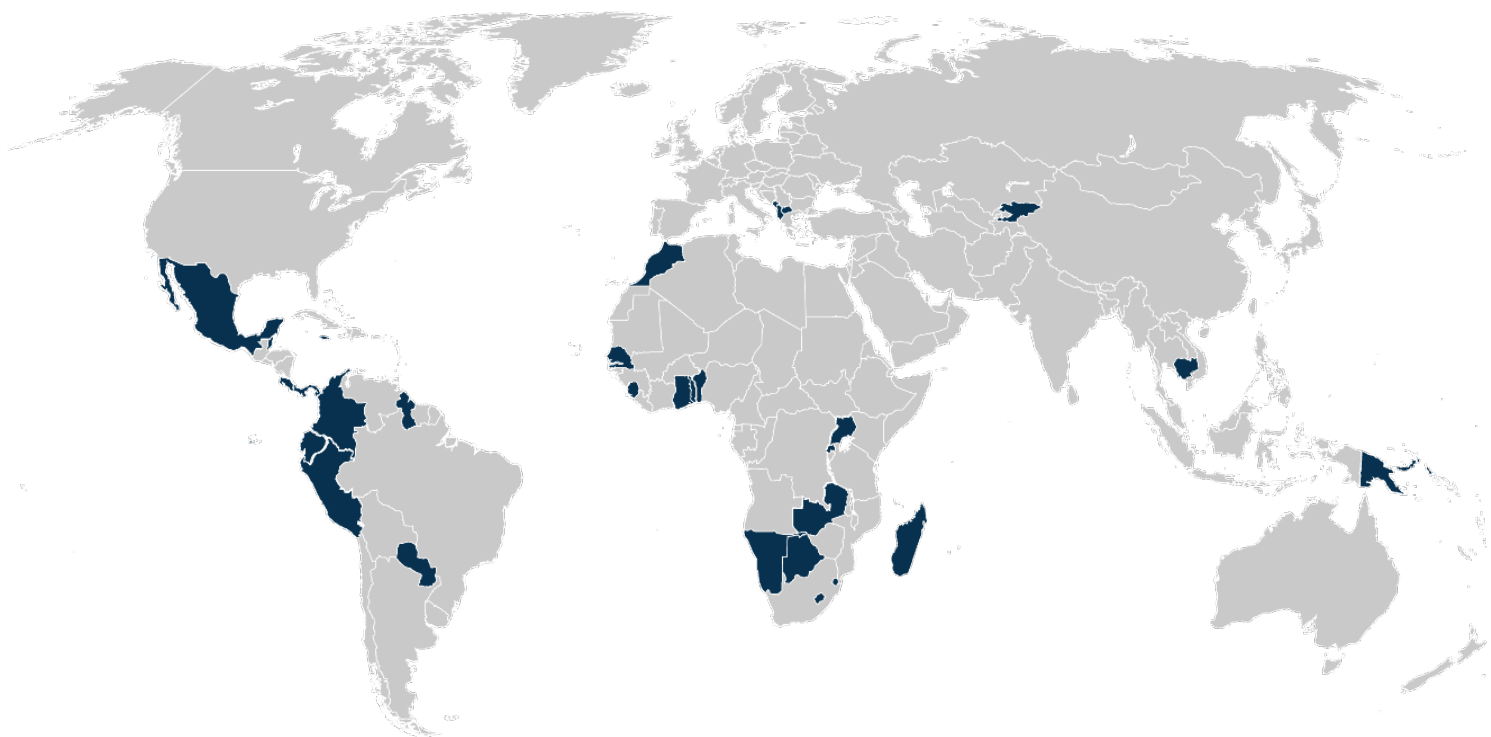
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# Management and Administration Unit

## Posts with Volunteers & Trainees, as of September 30, 2022



Albania & Montenegro  
Belize  
Benin  
Botswana  
Cambodia  
Colombia  
Costa Rica  
Dominican Republic  
Eastern Caribbean  
Ecuador  
Eswatini

The Gambia  
Ghana  
Guyana  
Jamaica  
Kosovo  
Kyrgyz Republic  
Lesotho  
Madagascar  
Mexico  
Morocco

Namibia  
North Macedonia  
Panama  
Paraguay  
Peru  
Rwanda  
Senegal  
Sierra Leone  
Togo  
Uganda  
Zambia



## Agency Context

As of September 30, 2022, there are 750 Peace Corps Volunteers and Trainees serving at 32 posts worldwide. These Volunteers and Trainees returned to service following the agency's unprecedented global evacuation in March 2020. Among those, there are 28 reinstated Volunteers that were evacuated in 2020.

Costa Rica and Colombia are among the countries that received Volunteers this reporting period. Those in Costa Rica are supporting the country's bilingual initiatives and helping address setbacks the educational system faced due to the pandemic, unemployment challenges, and the impacts that youth experienced due to the closure of schools, playgrounds and sports fields. The Volunteers deployed in Colombia are helping facilitate online learning platforms, digital literacy, and youth extracurricular and community education activities.

During this reporting period, Peace Corps Response (PCR) sent its 4000<sup>th</sup> Volunteer in the history of the program to serve in Colombia. PCR sends experienced professionals to undertake short-term, high-impact service assignments in communities around the world. PCR issued 70 invitations for assignments in 21 countries and 43 PCR Volunteers entered duty in 16 countries.

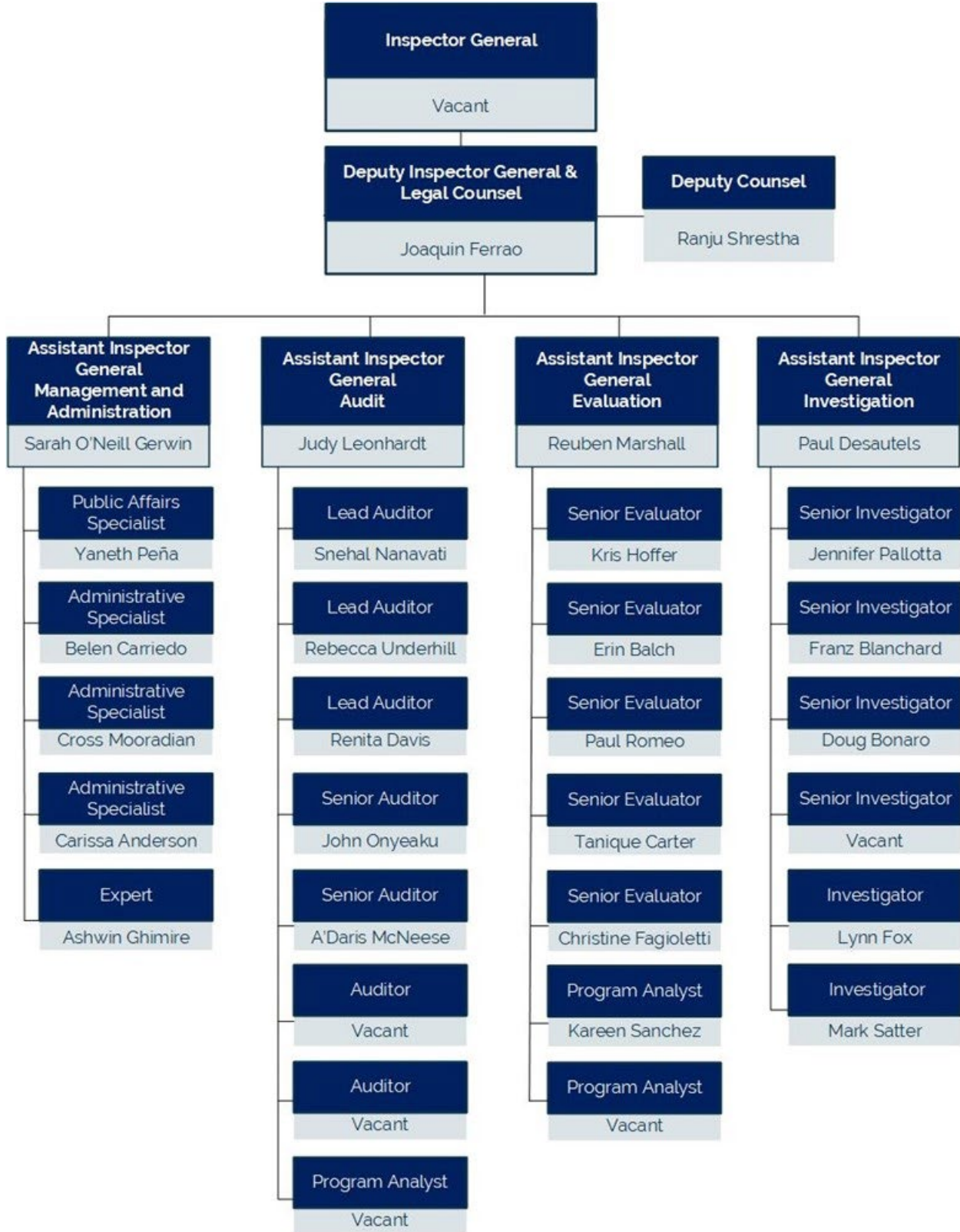
The agency also continued to engage in the Peace Corps Virtual Service Pilot model where Virtual Service Pilot Participants (VSPPs) donate time and voluntary services to the agency to participate virtually and contribute to the requests of interested Host Country Partners for support. For example, in Thailand, VSPPs collaborated in Teaching Empowerment for Student Success programs, where local teacher participants are trained in teaching English phonics to Thai students. In Guyana, VSPPs supported the Epidemiology Unit of the Ministry of Health. During this reporting period, 285 VSPPs engaged in 39 countries.

These programs and operations are supported by 2,479 locally engaged personnel in host countries and 867 U.S direct hire staff, of whom 190 worked abroad, 677 worked at headquarters, regional recruiting offices, and other domestic locations, during this reporting period.

## Staffing

**Mark Satter** joined OIG in August of 2022 as an investigator. He previously spent 10 years with the U.S. Environmental Protection Agency OIG conducting fraud, employee integrity, and general crimes investigations. Mark served in the Army for 10 years and deployed to Operation Iraqi Freedom from 2003 to 2004. Mark holds a master's degree in criminal justice from St. Joseph's University.

## OIG Organizational Chart



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# Management and Performance Challenges

## Inspector General's Statement

In accordance with the Reports Consolidation Act of 2000, the Office of Inspector General (OIG) is submitting what it has determined to be the most significant management and performance challenges facing the Peace Corps. The challenges discussed in the attachment to this memo are to be included in the Agency Financial Report for Fiscal Year (FY) 2022.

The Inspector General's (IG) management challenges are observations of the IG based on the work performed by OIG, as well as information uncovered during the performance of our oversight responsibilities.

We are pleased to report that, during this fiscal year, the agency prioritized the importance of compliance, closing out 107 recommendations with a total cost savings of approximately \$5.46 million related to 33 OIG reports. This resulted in the closure of 21 out of 27 OIG reports with open recommendations. Closure of many of these recommendations represent progress in areas reported as management challenges including compliance, internal controls, and Volunteer support programs.

Additionally, in 2020, the Peace Corps identified and prioritized the need to improve diversity and inclusion within the agency to better achieve the mission of promoting understanding of Americans on the part of the peoples served. Due to these commitments and the resources mobilized to achieve this objective, the OIG included Diversity and Inclusion of Staff and Volunteers in the 2020 and 2021 publications of the statement of management challenges. While the OIG has not undertaken reviews of this area, we have previously noted the agency's efforts to prioritize and expand activities in this area. The agency is incorporating ICDEIA (intercultural competence, diversity, equity, inclusion, and accessibility) goals into the Peace Corps strategic plan and building plans for accountability and sustainable program implementation, including establishing a new office to coordinate and support these efforts. Given these developments, we are no longer addressing this topic separately as part of the agency's biggest challenges.

## Extraordinary Developments Impacting the Peace Corps

After the unprecedented evacuation of all Peace Corps Volunteers more than two years ago due to the COVID-19 pandemic, overseas operations have resumed, and Volunteers began to return to posts in March 2022. The agency's re-entry process has been guided by the Country Re-Entry Guide (CREG). The CREG provides guidance for returning Volunteers to service, with an emphasis on mitigating the risks of the COVID-19 pandemic. In FY 2022, the OIG completed two re-entry health and safety compliance

reviews of posts to ensure CREG requirements and relevant health and safety measures have been met. In FY 2023 the OIG plans to conduct additional re-entry health and safety reviews as well as initiate full country program evaluations and post audits.

While the return of Volunteers to service abroad is an important milestone, the Peace Corps Volunteer program will continue to be strongly impacted by global, regional, and country specific complications stemming from the COVID-19 pandemic or, as the case may be, post pandemic environment.

### **Significant management challenges facing the Peace Corps:**

- Volunteer Health and Safety
- Human Capital Management
- Information Technology Security Management
- Planning and Implementation

The aforementioned management challenges illustrate the most significant areas OIG believes need improvement for the Peace Corps to effectively manage its resources and minimize the potential for fraud, waste, and abuse occurring in its operations.

Addressing the issues related to these challenge areas will enable the agency to increase operational efficiencies and improve mission effectiveness.



## Challenge: Volunteer Health and Safety

### Why This Is a Challenge

#### *Volunteer Medical Care*

Since Peace Corps' inception in 1961, Volunteer health care has been a top priority for the agency. Given the difference in global health conditions and medical infrastructure among the more than 60 countries where Volunteers serve, effectively addressing this priority is a challenge and requires sustained attention. The Peace Corps Act requires that Volunteers receive health care during their service, which includes "all appropriate examinations, preventive, curative, and restorative health and medical care." The Office of Health Services (OHS) operates a comprehensive, international health system designed to maintain and improve the health of Volunteers. OHS is responsible for providing clinical and preventive health services, clinical supervision and support, technical advice, training and education, and administrative support services to Volunteers through a multidisciplinary staff of trained professionals. More than 60 Peace Corps overseas health units are staffed by two or more Peace Corps Medical Officers (PCMO), who serve as the primary medical clinician for Volunteers. Generally, PCMOs are responsible for assessing, diagnosing, providing clinical care, and documenting Volunteers' physical and mental health conditions.

In a June 2022 review of a medical case from 2018, OIG found several systemic issues, including that the patient safety event reporting process was not effectively implemented. The finding echoed our 2021 report on the death of a Volunteer in Ghana, which found that the agency's root cause analysis of the incident did not detect critical vulnerabilities and did not comply with industry standards. That finding then prompted us to reopen a previously closed recommendation from a 2016 follow-up evaluation of issues identified in a 2010 review of Volunteer health care in Morocco, relating to the patient safety reporting process.

The 2022 review of a medical case from 2018 also found that the PCMO did not always follow the clinical escalation technical guideline that requires PCMOs to consult with the regional medical officer for any condition likely to require emergency surgery or hospitalization. Our oversight activities have found other problems related to the medical technical guidelines which are documented in prior reports. Although those recommendations have been closed, to help address some of these recurring issues, OIG launched an evaluation of the medical technical guidelines in May 2022.

During the spring and summer of 2022, OIG conducted post re-entry health and safety reviews of Peace Corps/Zambia and Peace Corps/Colombia. Both reviews found issues related to medical action plans, which is a longstanding matter highlighted in our 2020 review of recurring issues at Peace Corps posts. In August 2021, OIG issued a report on the death of a Volunteer in Ghana, and our review included a finding that Peace Corps/Ghana's medical action plan did not fully comply with agency guidelines.

### *Volunteer Site Development*

In 2021, the Peace Corps began recording Volunteer crime data in a new system. The new system links to the Volunteer Information Database Application (VIDA), which staff use to track and manage Volunteer information. In 2022, OIG learned that the migration of crime data to the new system encountered technical issues that impacted the reliability of historical crime incident location data and the ability of VIDA to flag security incidents by site. The agency has issued and revised guidance repeatedly in response to these issues to support posts. Challenges in managing or using site history data could impact staff's ability to identify safety risks during site development. OIG is currently gathering additional information to assess the nature and extent of any challenges.

The agency requires that posts maintain site history files; including programming, safety and security information about past and current sites that could affect a future decision to use a site. OIG findings related to site history files have been a recurring issue. During the spring and summer of 2022, OIG conducted re-entry health and safety reviews of Peace Corps/Zambia and Peace Corps/Colombia. At both posts, OIG found instances of non-compliance with the agency's requirements for maintaining site history files. In 2016, OIG issued a management advisory report to highlight systemic deficiencies relating to site history files, which included a recommendation to improve the site history data management system. The OIG's 2020 review of recurring issues at Peace Corps posts found that between FY 2016 and FY 2019, 12 post evaluations contained findings related to site history files, including missing documentation and missing crime information. In 2021, we conducted a follow-up review of an evaluation of Peace Corps/Moldova and found that crime incidents were not documented in the site history files as required; the same finding we reported in our 2013 country program evaluation of Peace Corps/Moldova.

The agency requires that posts use site selection criteria to ensure Volunteer sites, housing, and work assignments are appropriate. The OIG's 2020 review of recurring issues at Peace Corps posts found that all OIG post evaluation reports issued between FY 2016 to FY 2019 included findings related to site selection criteria. In our follow-up evaluation of Peace Corps/Moldova, we found that staff did not properly document their housing inspections. OIG is concerned that COVID-19 considerations have increased the difficulty of Volunteer site development. Steps to mitigate the risks of COVID-19 transmission will likely impact decisions regarding appropriate Volunteer housing, communities, and worksites. During FY 2023, OIG plans to conduct post re-entry health and safety reviews that include traveling to posts to assess compliance with Volunteer site and housing requirements.

### *Volunteer Drug Use*

In the past, OIG was concerned that country directors struggled to resolve allegations of drug use through administrative action due to a high burden of proof and a lack of tools necessary to address the allegations in a fair and consistent manner. However, Volunteers have been absent from service abroad for more than two years; and OIG will

continue to monitor this issue now that Volunteers are returning to service. Four out of six recommendations issued in a 2018 OIG management advisory report on Volunteer drug use remain open.<sup>1</sup>

## Progress in Addressing the Challenge

### *Volunteer Medical Care*

The agency developed the Country Re-Entry Guide (CREG) in June 2020, which includes tools and deliverables for returning Volunteers to service and reducing the risk of COVID-19 transmission upon return. See the *Planning and Implementation* challenge for more information on the CREG.

There has been significant progress by the agency in taking action on OIG recommendations impacting Volunteer health care. In September 2021, the agency updated manual section 261 to provide at least two qualified medical officers and appropriate numbers of support staff, at all posts with an active Volunteer population. Moreover, OIG closed twelve recommendations related to improving Volunteer health care. The closed recommendations included three post-specific recommendations as well as recommendations to improve health unit staffing issues, improve training recordkeeping, and improve mental health care standards. The agency closed the final recommendations from a 2014 evaluation of the effectiveness and implementation of Volunteer sexual assault risk reduction and a 2017 evaluation of the agency's sexual assault risk reduction and response program.

### *Volunteer Site Development*

OIG closed 10 recommendations at three Peace Corps posts related to Volunteer housing and site development, such as improving site selection procedures and oversight, including two recommendations from the follow-up review of an evaluation of Peace Corps/Moldova. In addition, OIG closed the final recommendation of a 2019 report that addressed the impact of homestay requirements on Volunteer safety. OIG also closed all three of the recommendations made in a 2016 management advisory report that addressed the systems, guidance, and oversight of site history files.

As we noted above, in 2021 the Peace Corps began recording Volunteer crime data in a new system that links to VIDA. Although we have some concerns about the accessibility of historical crime data in VIDA, we are encouraged that crime data reported in the new system should be accessible in VIDA to appropriate staff when reviewing sites for Volunteer placements. During recent remarks to all Country Directors, CEO Spahn emphasized the importance of compliance and quality assurance, specifically calling out the need for post to properly manage and use their site history files. Related with those remarks, we are also pleased to learn that the agency has begun developing a system to integrate quality assurance functions at posts and HQ to better manage and track key processes and procedures, including site management and site history file

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<sup>1</sup> [Management Advisory Report: Volunteer Drug Use \(2018\)](#)



documentation. The effort aims to place a quality assurance position at each post and will be implemented by temporary regional quality assurance experts who were recently onboarded, as well as supporting roles in the Office of Global Operations (OGO) and Office of the Chief Compliance Officer (OCCO). As the phases of the project are rolled out, we look forward to seeing benefits in key areas, including site management and site history file documentation.

### **What Needs to Be Done**

Ensuring the health of Volunteers as they return to the field will require extensive coordination between work units at posts and between posts and headquarters. In addition to CREG requirements, the agency is requiring posts to complete a COVID-19 response plan as part of their emergency action plan. Posts should continue to implement these critical components to ensure the health of Volunteers during the pandemic.

#### *Volunteer Medical Care*

To improve the Volunteer health care program, the agency should implement the open recommendations from the 2016 Follow-Up Evaluation of Issues Identified in the 2010 Peace Corps/Morocco Assessment of Medical Care. The three remaining recommendations address patient safety event reviews, and our June 2022 review of a medical case from 2018 also included a recommendation in this area to improve the identification and reporting of patient safety events.

The CREG requires each post to conduct a comprehensive review of their medical action plan. Nonetheless, both post re-entry health and safety reviews that OIG conducted over the spring and summer found issues related to medical action plans, and the agency should improve its oversight to ensure each post has complete and updated medical action plans.

#### *Volunteer Site Development*

Posts must ensure that site selection criteria are clear, that Volunteers' sites, housing, and work assignments meet their criteria, and that appropriate staff inspect and approve housing and properly document the results. The agency should continue to provide training and technical assistance to overseas field staff to ensure their site management activities are supported by complete and accurate site history files. The agency should also provide sufficient oversight to ensure the effective implementation of agency site development and site placement procedures, including interim measures.

To mitigate the risks associated with operating during the COVID-19 pandemic, the agency has established a broad set of considerations for field staff concerning the selection of Volunteer sites. Posts will need to implement a site development process that accounts for these considerations while also avoiding the longstanding issues with site development that OIG has identified during oversight activities.

**Key OIG Resources:**

[Final Report on the Post Re-Entry Health and Safety Review of Peace Corps/Ecuador \(2022\)](#)

[Management Advisory Report: Peace Corps Medical Case Review \(2022\)](#)

[Follow up Evaluation of Peace Corps/Moldova \(2021\)](#)

[Review of the Facts and Circumstances Surrounding the Death of a Peace Corps/Ghana Volunteer \(2021\)](#)

[Recurring Issues Report: Common Challenges Facing Peace Corps Posts, FYs 2016-2019 \(2020\)](#)

[Management Advisory Report: Peace Corps/Ghana Gas Tank Cooking Safety \(2020\)](#)

[Evaluation of Peace Corps/Eastern Caribbean \(2020\)](#)

[Evaluation of Peace Corps/Tanzania \(2020\)](#)

[Evaluation of Peace Corps/Panama \(2020\)](#)

[Management Advisory Report: Review of the Circumstances Surrounding the Death of a Volunteer in Peace Corps/Comoros \(2019\)](#)

[Evaluation of Peace Corps/Kyrgyz Republic \(2019\)](#)

[Evaluation of Peace Corps/Paraguay \(2019\)](#)

[Evaluation of Peace Corps/Comoros \(2019\)](#)

[Evaluation of Peace Corps/Thailand \(2019\)](#)

[Evaluation of Peace Corps/Mozambique \(2019\)](#)

[Review of New Country Entry Guidance for Conflict-Affected Countries \(2019\)](#)

[Follow-Up Review of Peace Corps/Namibia \(2019\)](#)

[Follow-Up Review of Peace Corps/Nepal \(2019\)](#)

[Evaluation on Homestay Impact \(2019\)](#)

[Evaluation of Peace Corps/Senegal \(2018\)](#)

[Management Advisory Report: Volunteer Drug Use \(2018\)](#)

[Evaluation of Peace Corps/Albania \(2018\)](#)

[Case Study of Effective Site Development Practices \(2018\)](#)

[Follow-Up Review of Peace Corps/Uganda \(2018\)](#)

[Follow-up Review of Peace Corps/Peru \(2018\)](#)

[Management Advisory Report: Managing the Suspension of Peace Corps/Kenya \(2018\)](#)

[Evaluation of Peace Corps/South Africa \(2017\)](#)

[Evaluation of Peace Corps/Costa Rica \(2017\)](#)

[Management Implication Report: Challenges Associated with Staff Turnover \(2017\)](#)

[Evaluation of Peace Corps/Kosovo \(2017\)](#)

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[Management Advisory Report: Site History Files \(2016\)](#)

[Evaluation of the Peace Corps' Sexual Assault Risk Reduction and Response Program \(2016\)](#)

[Follow-Up Evaluation of Issues Identified in the 2010 Peace Corps/Morocco Assessment of Medical Care \(2016\)](#)

[Evaluation of Peace Corps/Rwanda \(2016\)](#)

[Evaluation of Peace Corps Sexual Assault Risk-Reduction and Response Training \(2013\)](#)

## Challenge: Human Capital Management

### Why This Is a Challenge

OIG oversight activities have frequently identified concerns with staff hiring and retention and knowledge management, which are pillars of human capital management.

Nearly all Peace Corps U.S. direct-hire (USDH) staff are subject to a 5-year term limit called the “5-year rule” (FYR). Congress enacted the FYR in 1965 to create a constant flow of new employees, including returned Peace Corps Volunteers; avoid the inflexibility associated with the civil service system; and prevent employees from working their entire career at the Peace Corps. However, an OIG evaluation of the FYR in 2012 found that it resulted in high turnover – the rate was quadruple the government-wide average – compromised the agency’s ability to attract and retain qualified personnel for core management functions and contributed to brief staff tenures. These factors impaired the agency’s institutional memory and knowledge management practices.

### *Hiring and Retaining Qualified Staff*

In 2013, OIG reported on these challenges in our audit of Peace Corps overseas staffing. We found that the agency struggled to maintain a robust pool of qualified applicants and ensure positions were filled in a timely manner. It had difficulty managing the hiring and administrative timelines for open positions, maintaining consistency in the interview and hiring process, planning for transfers, and dealing with unexpected vacancies. These challenges were aggravated by the agency’s accelerated rate of overseas staff turnover. Headquarters personnel recruitment is similarly difficult because many of the positions require specialized knowledge and the ability to perform governmental budgeting, payment, and contracting.

In our 2016 audit of Peace Corps’ healthcare benefits administration contract, we identified that inexperienced staff and insufficient planning contributed to instances of the agency’s non-compliance with the Federal Acquisition Regulations and other complex rules associated with soliciting, awarding, and administering contracts or procurements. This is particularly concerning due to the large sums of money processed in contracting and acquisitions.

In July 2017, OIG issued “Management Implication Report – Challenges Associated with Staff Turnover” to the acting Director. This report outlined the negative effects of staff turnover on the agency’s ability to maintain high quality Volunteer support and improve core business functions, illustrating that high staff turnover is a persistent challenge for the agency that spans multiple levels and areas of operation. Almost all supervisory/management positions at the Peace Corps, both at headquarters and overseas, are subject to the FYR. Since these positions directly impact the agency’s operations, recruiting and hiring skilled personnel to fill these vacancies is critical.

The OIG’s 2020 review of recurring issues at Peace Corps posts found that, from FY 2016 to FY 2019, staff turnover and staffing gaps impaired emergency medical

preparedness, led to ineffective Volunteer technical training, and resulted in heavy staff workloads that in some cases left required tasks incomplete. A 2019 Office of Personnel Management (OPM) assessment of the agency's organizational design and performance found that the FYR contributed to increased turnover and extended vacancies that resulted in a lack of continuity and curtailed the agency's productivity. The agency reports that its staff vacancy rate is 15.8 percent as of August 2022 compared to 12.9% in August 2020.

OIG has not reviewed how the FYR may exacerbate staffing challenges in the post COVID staffing environment. However, it is clear is the agency is currently facing staffing challenges. For example, staffing limitations resulted in delays in the implementation of the agency's strategic plan according to the FY22 Q3 All-Agency Strategic Plan Update (July 26, 2022). Peace Corps' ability to progress on seven of twenty-two performance goals was delayed because of staff limitations in six different areas of operations: Peace Corps Response (PCR), Volunteer Recruitment and Selection (VRS), Office of Health Services (OHS), Office of Global Operations (OGO), Africa Region (AF), and Office of Chief Financial Officer (OCFO).

The agency reported vacancy rates for VRS, OHS, and OGO as 28 percent, 18 percent, and 13 percent respectively. According to strategic plan progress updates from agency leadership, staffing gaps impacted Peace Corps Response and VRS efforts to expand Peace Corps Response, recruit Volunteers and increase the diversity of the Volunteer corps. The agency required personnel with specific areas of expertise to enable OHS to develop a comprehensive duty of care framework, and to establish post-level processes for communicating results with community-level stakeholders in the Africa region. Insufficient staff capacity delayed the incorporation of risk management and strategic priorities into agency governance processes in the OCFO. OGO noted that delays in onboarding Regional Quality Assurance Experts delayed the development and roll out of the Quality Assurance process and the hiring of Post Quality Assurance Specialists. Significantly, Office of Human Resources (OHR), the office responsible for advertising openings and onboarding staff, contends with a 22 percent vacancy rate.

### *Knowledge Management*

Knowledge management, defined as capturing, distributing, and effectively using knowledge, becomes critical in environments with high turnover. OIG's 2012 evaluation of the FYR unearthed a trove of internal and external reviews and studies from as early as 1974 that documented the agency's dearth of institutional memory caused by the FYR. The 2019 OPM assessment also identified work process inefficiencies caused by inadequate documentation of past problem-solving and initiatives as well as siloed work practices.

## Progress in Addressing the Challenge

Staff training continued to improve in FY22. The agency closed the last four remaining recommendations from the Final Report on the Program Evaluation of the Peace Corps' Training of Overseas Staff (2014). This entailed a comprehensive assessment of the applicability and relevance of federally mandated trainings to overseas staff, and the production of an agency-wide mandatory training catalogue.

### *Hiring and Retaining Qualified Staff*

The 2018 Sam Farr and Nick Castle Peace Corps Reform Act authorized the agency to extend the appointments of positions designated by the Director as “critical management” or “management support” positions that require specialized technical or professional skills, as well as knowledge of agency operations. The authority provides for additional five-year terms beyond the term limits provided in the Peace Corps Act. As of August of 2022, the agency designated 79 positions as exempt from the 5-year rule, including 44 positions exempted since 2019.<sup>2</sup> About sixty-three percent of exempted positions are now in the Office of Health Services, the Office of Safety and Security, the Office of Victim Advocacy or regional offices where staff are responsible for safety and security of Volunteers. The agency also designated nine positions as exempt for core support functions such as contracting, financial management, information technology management, and human resources management.<sup>3</sup>

### *Knowledge Management*

The agency implemented the PATH global onboarding program for new hires in FY22. One of the goals of this program is to ensure all staff regardless of position or location receive organized, motivational, and impactful onboarding during their first year working for Peace Corps. The agency also provided training for all supervisors and their delegates to support, tailor and execute the PATH onboarding program.

## What Needs to be Done

### *Hiring and Retaining Qualified Staff*

The agency has not addressed two recommendations (recommendations 2 and 3) from our 2012 evaluation of the FYR, which identified the need for a process to manage turnover and retain qualified personnel. OIG reviewed the current number of exempt positions and found that the nine core support function positions mentioned above represent only 7.8 percent of all exemptions. Exempting additional positions in these critical areas may contribute to increased tenure and lower vacancy rates. Also, two recommendations (recommendations 10 and 11) in our 2013 Audit Report: Peace Corps Overseas Staffing remain open. These recommendations address the need for training for post rating officials on their role in conducting performance reviews and providing

<sup>2</sup> The number of exempted positions excludes 34 OIG and 3 Office of Victim Advocacy positions not subject to the five-year rule by operation of law (see The Kate Puzey Volunteer Protection Act of 2011).

<sup>3</sup> Per OHR data, Peace Corps headquarters has 960 staff total.

adequate feedback, and also improved guidance on senior staff performance appraisals and performance elements.

The agency should improve employee satisfaction to reduce vacancies, as well as attract and retain qualified staff. Results of the 2021 Federal Employee Viewpoint Survey (FEVS) show that the Peace Corps fell from 6<sup>th</sup> to 9<sup>th</sup> place out of 29 small agencies in rank as one of the best places to work. The overall employee engagement and satisfaction score dropped from 85 percent in FY20 to 77 percent in FY21, which remains higher than the government-wide score of 64.5 percent. The survey showed that the largest negative shifts concerned employee satisfaction with recognition for performance. (-9.6% shift for question 12, -10% for question 41, and -11% for question 20).

### *Knowledge Management*

Peace Corps leadership should develop and enact an agency-wide strategy to formalize knowledge management practices related to recording institutional memory, developing standard operating procedures for key processes, and ensuring information accessibility. Also, the agency should consider, where appropriate, implementing the recommendations from the 2019 OPM assessment of the agency's organizational design and performance.

### **Key OIG Resources:**

[Recurring Issues Report: Common Challenges Facing Peace Corps Posts \(2020\)](#)

[Fiscal Year 2018-2022 Strategic Plan \(2018\)](#)

[Management Implication Report: Challenges Associated with Staff Turnover \(2017\)](#)

[Final Report on the Program Evaluation of the Peace Corps' Training of Overseas Staff \(2014\)](#)

[Evaluation of Impacts of the Five-Year Rule on Operations of the Peace Corps \(2012\)](#)

[Final Audit Report: Peace Corps Overseas Staffing \(2013\)](#)



## Challenge: Information Technology Security Management

### Why This Is a Challenge

As the role of technology continues to grow due to hybrid and virtual work environments, the protection of agency data and the security of information systems becomes even more critical. System outages and the loss of data can have catastrophic impacts to the agency, such as impacting Volunteers safety, staff productivity, and the Peace Corps' reputation. Information security is not an IT (information technology) problem or concern, but something that impacts all aspects of the agency's business operations. The Peace Corps has not yet adequately incorporated information security risks as an undercurrent in all its business operations and decisions.

The Peace Corps continues to lack an effective information security program. Foundational IT elements are missing, such as a complete understanding of their IT environment. Specifically, they lack of an up-to-date, accurate, and complete inventory of information systems, including hardware and software assets. Understanding where the agency's system boundaries lie is critical for knowing how to protect the information residing within the Peace Corps network. For example, if the agency does not know what assets they own, they cannot update and maintain these assets to ensure they are protected from critical security vulnerabilities. Providing these updates is a critical element to ensuring that the sensitive data maintained by the Peace Corps— notably employee personnel records, Volunteer health records, and Volunteer sexual assault incident information—is fully protected.

The agency has repeatedly failed to follow the correct steps to conduct a full and comprehensive system security review on the backbone of its IT infrastructure, the General Support System (GSS). All information systems should undergo an assessment of their information security controls to ensure effectiveness. This process includes identifying information security risks to the system, designing controls to mitigate these risks, and adequately protect the information within the system. However, for the last 4 years, the agency has taken numerous missteps and circumvented their own policies for ensuring all proper controls of the GSS are adequately developed and implemented.

As the GSS is the backbone of the Peace Corps' IT infrastructure, it provides connectivity, security, storage, and data access for its employees and contractors. Many systems within the Peace Corps infrastructure rely on the GSS for inherited controls. Negligence in the GSS's security posture review can leave other critical systems, including the financial system, vulnerable to known and potentially unknown, common and critical information security risks. This has also resulted in an inefficient use of resources as OCIO (Office of Chief Information Officer) has spent efforts in a reactive manner to address issues as they surface, instead of proactively preventing and addressing the weaknesses.



Another key foundational issue is the absence of a fully-implemented, comprehensive, agency-wide enterprise risk management (ERM) program that is effective at monitoring, identifying, and assessing security weaknesses and resolving related problems at the entity, business process, and information system levels. See the *Planning and Implementation* challenge. While the agency continues to work on their ERM program, it is unclear how cybersecurity risks have been incorporated into both the office level and the enterprise level program. Without a robust risk management process, the Peace Corps is exposed to risk of attacks, environmental disruptions, and business failures.

### Progress in Addressing the Challenge

The Federal Information Security Modernization Act of 2014 (FISMA) is designed to ensure agencies develop, document, and implement an agency-wide program to provide comprehensive security for the information and systems that support their operations and assets. As part of OIG's annual review of the agency's compliance with FISMA, a score is assessed to provide a consistent and comparable metric across government agencies. The five-level scale ranges from Level 1, Ad-hoc to Level 5, Optimized. A Level 4, Managed and Measurable, is considered to be an effective level of security. For FY 2022, OMB changed the guidance for IGs on how Federal agencies should be reviewed. A set of "core IG metrics" were established to identify the most important data points. These 20 metrics were chosen because they would provide sufficient data to determine the effectiveness of an agency's information security program with a high level of confidence.

In FY 2022, the agency maintained their status at Level 2, Defined, as measured against the set of core OIG metrics. Since OIG began reporting IT security as a management challenge in 2009, the agency's cybersecurity posture was at Level 1 Ad-hoc, indicating a reactive program without formalized policies and procedures. Moving to Level 2 indicates policies, procedures, and strategy are formalized and documented. In FY 2022, the agency made progress in formalizing several core policies and procedures, such as an Information Security Continuous Monitoring and Supply Chain Risk Management strategies. However, OIG was not able to assess the implementation of these policies and procedures to determine their effectiveness or if operations adhere to them.

### What Needs to Be Done

For the Peace Corps to advance their program to Level 3, Consistently Implemented, the agency will need to demonstrate that their developed policies, procedures, and strategy have been consistently applied and followed throughout their daily operations. This requires all staff members to adopt and maintain an information security-focused mindset when engaging in their day-to-day activities.

In order to ensure that the agency's information, operations, and assets are protected, it is critical that the Peace Corps achieve full compliance with FISMA and other Federal laws and regulations that apply to managing its IT security infrastructure. OIG's reviews of the Peace Corps' Information Security Program have contained several actionable steps that the agency should take to improve its security program.

OIG continues to encourage the agency to dedicate substantial resources for implementing and maturing their information security program. Specifically, we assert that focusing on the following two recommendations will elevate their information security program:

- Establishing a comprehensive Enterprise Risk Management (ERM) program, and;
- Developing a strategy and structure that integrates information security into business operations.

Adopting these actions will foster a sustainable culture that incorporates information security across its business operations. Once this is accomplished, the Peace Corps will be able to better identify its information security and organization-wide risks in order to assess and respond to those risks in a timely manner. This, in turn, will reduce the agency's exposure to targeted attacks and environmental disruptions. This will also ensure that resources are utilized in a proactive manner to prevent and address the weaknesses before they are exploited, leading to an effective information security program.

#### Key OIG Resources:

[Review of the Peace Corps' Information Security Program \(2022\)](#)

[Summary of Internal Control Issues Over the Peace Corps Financial Reporting \(FY 2021\)](#)

## Challenge: Planning and Implementation

### Why This Is a Challenge

OIG's 2019 management challenges reported concerns about the agency's struggle to plan for the long-term impacts of risk and resource needs of the organization. Specifically, OIG highlighted areas of concern where the agency did not apply sufficient time and resources to ensure access to quality data for decision making, and establish oversight to comprehensively consider risks to plan and implement initiatives and programs.

Informed decision making involves consideration of data quality, data accessibility, and consultation with those with applicable knowledge. In 2021, the Peace Corps began recording Volunteer crime data in a new information system, however, historical data was not initially transferred to the new system. The agency subsequently reversed its decision and migrated all the historical data and issued new guidance to support post's site development efforts while crime incident data was being migrated to the new system. When the agency transferred data to the new system it issued revised guidance, and subsequently revised that guidance due to a number of technical issues that impacted the ability of VIDA to flag security incidents by site. OIG is reviewing these actions to determine whether they had an impact on posts' ability to conduct site development.

In addition, our management advisory report on Volunteer drug use found that an important obstacle to prioritizing and addressing Volunteer drug use was the agency's inadequate approach to maintaining the information it needs to understand the scope of the problem and ensuring data quality of the information it collected.<sup>4</sup>

Establishing sufficient oversight and coordination should be a key consideration when planning and implementing programs. Our management implication report on Peace Corps/Ukraine's President's Emergency Plan for AIDS Relief (PEPFAR) Food Voucher Program communicated concerns that there was insufficient management awareness and oversight at headquarters for Peace Corps staff implementing PEPFAR-funded activities without Volunteers. Proper oversight helps to identify and address risks and ensure that programmatic activities are consistent with the Peace Corps Act and further the agency's mission and goals.

The Financial Statement Audit has identified issues with property management almost every year since 2014, leading to increased financial and operational risk. The FY22 audit found that the three offices involved in property management (OCIO, OCFO, and Management/Administrative Services) do not effectively coordinate property recording systems or processes, which has led to circumventing internal controls and inaccurate

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<sup>4</sup> [Management Advisory Report: Volunteer Drug Use \(2018\)](#)

accounting of assets. Our recurring issues report also highlighted how programmatic issues could be addressed by strengthening oversight over internal control systems and assigning responsibility or delegating authority appropriately.

In addition, when investing resources, the agency focuses on functions that directly impact Volunteer support, but management should also consider prioritizing functions that enable the Peace Corps to provide that support. Our audit of the agency's payroll and benefits processes (forthcoming) found that OHR and OCFO did not establish effective oversight procedures to reconcile payroll transactions and remediate deficiencies related to ensuring the accuracy of payroll adjustments. ERM and information technology security are critical programs for efficient business processes, effective programming, and the safeguarding of data. Agency management is responsible for implementing practices that effectively identify, assess, respond to, and report on risks.

Our audit of the payroll and benefits processes also identified that OHR lacked a risk assessment, including a process to detect erroneous data received from a National Finance Center hosted database. A risk assessment would enable management to establish effective policies, procedures, and monitoring systems that would identify inaccuracies related to employee salary and benefits. Our audit recommended that OCFO establish adequate monitoring structures over USDH payroll transactions to mitigate the effect of these risks. The agency committed to developing an ERM program in 2018 but staffing challenges have impeded progress in this area. Information technology security meanwhile suffers from inadequate action and inconsistent implementation of agency policy. See the *Information Security Management* challenge.

The COVID-19 pandemic continues to pose unique challenges for the Peace Corps that affect every aspect of operation as the agency has begun redeploying Volunteers to posts with varying pandemic responses, supporting infrastructure, and data reliability. As of October 2022, 51 posts have issued invitations for Volunteers to serve, and 41 posts have received Volunteers/Trainees. While the agency continues to advance its goals and respond to evolving contexts, effective implementation and monitoring will be key to success.

### Progress in Addressing the Challenge

As stated above, the Peace Corps deployed over 900 Volunteers to 41 posts as of October 2022. The OIG began conducting re-entry health and safety reviews in 2021, which are remote assessments of posts' compliance with criteria established in the Country Re-Entry Guide (CREG). These reviews were designed with a narrow scope to provide timely assessments of some of the most critical factors of re-entry and Volunteer support. By September 2022, our three reviews largely found that the agency is effectively implementing its re-entry plans—including compliance with the internal and

external review process and implementation of Volunteer training. Adherence to the detailed criteria of the CREG represents significant coordination between post and HQ staff. Areas that we noted deserved additional attention included ensuring completion of relevant staff training and the management of site history files. Subsequent reviews will include traveling to posts for closer assessment of areas such as site development.

The agency developed and implemented guidance for drafting and submitting decision memoranda to the Director to help ensure timeliness and uniformity in documenting recommendations to and decisions by the Director. To enhance its business support functions, the agency added quality assurance, legal, and risk management responsibilities to the function of the compliance office.

Lastly, the agency advanced efforts to implement an ERM framework including creating and staffing a Chief Risk Officer position, completing all office-level risk registers, and incorporating the Chief Compliance Officer/ERM in the decision memo clearance process. The Chief Compliance Officer's role in this process is to identify whether risk-based discussions are needed and to ensure there are no major compliance issues.

### What Needs to Be Done

The Peace Corps must take critical steps to ensure appropriate planning and implementation of their programs and operations. Implementation of agency policies and procedures should be timely, fully integrated with the program or function, include consult with relevant offices and experts, and establish sufficient oversight. The agency should prioritize ensuring access to quality data for decision making.

Additionally, the Peace Corps should continue to prioritize development of an ERM program to comprehensively assess decisions at the agency level and improve the ability to successfully plan and implement new programs while properly considering possible setbacks and how to address them. Specifically, management must develop a comprehensive HR risk assessment to ensure that policies and procedures are effectively designed and implemented to prevent and detect payroll transaction errors and establish waiver policies and payroll reconciliation procedures. The OCFO should be involved in payment reconciliation processes to improve the monitoring system.

The Peace Corps must establish sufficient oversight and coordination structures for core business functions within the agency, especially those requiring resources from multiple offices. Without additional oversight, functioning of property management and payroll reconciliation will continue to increase operational risks. The agency should continue to implement effective monitoring processes to ensure that the CREG supports post operations and Volunteer health and safety as intended. Agile implementation will play a critical role as the pandemic-related contexts continue to develop at posts.

**Key OIG Resources:**

[Management Advisory Report: Volunteer Drug Use \(2018\)](#)

[Recurring Issues Report: Common Challenges Facing Peace Corps Posts - FYs 2016-2019 \(2020\)](#)

[Management Implication Report: Peace Corps/Ukraine's PEPFAR Food Voucher Program \(2021\)](#)

[Final Report on the Post Re-Entry Health and Safety Review of Peace Corps/Ecuador \(2022\)](#)

[Final Report on the Post Re-Entry Health and Safety Review of Peace Corps/Zambia \(2022\)](#)

The Peace Corps' Management of Payroll and Benefits for U.S. Direct Hires (2022) (Forthcoming)

Final Report on the Post Re-Entry Health and Safety Review of Peace Corps/Colombia (2022) (Forthcoming)

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# Advice, Assistance, and Other Reportable Matters

## Support to the Agency

### Review of Agency Regulations, Policies, and Procedures

OIG continues to provide advice and assistance to the Peace Corps Senior Policy Committee and other offices by commenting on drafts of new or updated policies, procedures, and other documents governing agency organization or practice. During this reporting period, OIG reviewed 18 policies and procedures. Topics include: Volunteer conduct; staff responsibilities and conduct; Non-United States citizen staff discrimination; small grants program; Volunteer allowances; completion of service data advancement and extension of service; early termination of service; staff absence and leave; organization, mission, and functions of the Office of the Chief Financial Officer; the agency acquisition system; Volunteer/Trainee readjustment allowance; Volunteer education loans; confidentiality of Volunteer information; evaluation policy; information technology management; and conditions of service for U.S. overseas staff.

### Participation in Peace Corps Staff Training

On Sept 28, 2022, OIG offered two virtual briefings to 76 country directors; directors of management and operation; and other overseas staff members. OIG leadership discussed the audit and evaluation selection process, how to prepare for a post audit or evaluation, and how to work with the Investigation Unit.

### OIG Support for Background Checks

During the reporting period, OIG continued to implement the standard operating procedure established with key Peace Corps offices. Those offices would integrate and automate requests for OIG records check as part of the background check process on any individual who worked or volunteered for the Peace Corps and is seeking to return as an employee or Volunteer. This procedure is meant to supplement the agency's onboarding process to produce accurate and complete background checks for the purposes of employment and volunteer service. This program has helped the agency comply with the employee and Volunteer background check requirements in the Sam Farr and Nick Castle Peace Corps Reform Act of 2018. Additionally, upon the request of the agency, the OIG expanded support to the Peace Corps Virtual Service Pilot model. During this reporting period, OIG conducted 453 records checks, of which 106 were for staff and 347 were for Volunteers or participants.



## **OIG Support for Peace Corps Safety and Security Officers**

During this reporting period, the Investigations Unit met with the Peace Corps Safety and Security Officers (PCSSO) during an agency worldwide PCSSO Conference. The discussion was held to introduce all current staff from both offices and to identify areas for focused communication and collaboration. Specifically, we discussed the Peace Corps' response to deaths of Volunteers, coordinating efforts, and reporting as established in Manual Section 265 *Death of a Volunteer*. Due to the wide range of possibilities that could present in such incidents, the Peace Corps and OIG committed to developing a practical training that could address likely real-world scenarios and exercise expected collaboration between the two offices.

## Management Implication Reports

### Peace Corps Response to Reports of Sexual Assault: Compliance with the Kate Puzey Peace Corps Volunteer Protection Act

A news media outlet published an article asserting that the Peace Corps failed to support Volunteers when they reported sexual assaults during their service. Chief Executive Officer Carol Spahn requested OIG review each case for possible criminal and management-level implications and compliance with Kate Puzey Act requirements regarding the provision of support services for victims of sexual assaults. During this reporting period, OIG issued one Management Implication Report (MIR) related to this matter.

#### IG-22-06-SR

OIG issued this MIR in August 2022. In this matter, a returned Peace Corps Volunteer (RPCV) reported a sexual assault while serving in the Inter-America and the Pacific Region from 2016 to 2018. The news article asserted that the RPCV was not offered, and did not receive, sexual assault response services as required by the Kate Puzey Peace Corps Volunteer Protection Act of 2011 and agency policy and procedures.

We found that the agency documented providing the RPCV with some but not all the services the RPCV requested. The agency provided medical care and safety planning as requested but did not provide a timely explanation of legal options. The RPCV had to request this information from the Office of Victim Advocacy two months after reporting the sexual assault since the RPCV did not get the information needed from post staff. We also found that while the Peace Corps Medical Officer (PCMO) provided the RPCV with immediate critical medical services following the sexual assault, the PCMO did not adhere to Peace Corps Manual Section 243 *Responding to Sexual Assault Procedures*, which required the PCMO to review the services and options available with the Volunteer once the Volunteer's immediate needs were met.

The RPCV also reported to OIG that staff did not meet with the RPCV to discuss the sexual assault before leaving the country. While OIG could not determine the extent of an in-person discussion of the sexual assault during the close of service exam, the PCMO's appointment notes included feedback from the RPCV on how the RPCV was coping with the effects of the sexual assault. The RPCV was also provided a counseling session the following day. The news article further reported the RPCV's concerns about inaccuracies in the crime incident reports. Our review found that the agency was responsive to the RPCV's complaints and twice made changes to the crime incident report. Lastly, OIG confirmed that information disclosed in a presentation to a group of Volunteers during a regional meeting included material that was sensitive and protected Volunteer information, under Peace Corps policy, and should not have been disclosed to other Volunteers without written consent from the RPCV.

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# Audit Unit

## Overview

The Audit Unit conducts independent audits and reviews of agency programs and operations that support the Peace Corps mission. The objectives of OIG audits are to independently examine the financial and administrative operations of the Peace Corps; to promote economy and efficiency; and to ensure compliance with Federal law, regulations, and Peace Corps policy. Audits are wide ranging, covering agency activities carried out at overseas posts, as well as agency-wide operations that affect multiple offices. Auditors report their conclusions and recommendations based on data and document analyses, interviews, and direct observation. OIG also monitors the agency's progress in correcting systemic weaknesses identified in audit reports.

Audits and other reviews<sup>5</sup> are conducted under the direction and guidance of the Assistant Inspector General for Audits. Audits are performed in accordance with the U.S. Generally Accepted Government Auditing Standards (GAGAS) issued by the Comptroller General of the United States.

## Ongoing Work

OIG engaged the independent certified public accounting firm Williams, Adley & Company-DC, LLC to perform an audit of the agency's fiscal year (FY) 2022 financial statements. In accordance with applicable law, OIG reviews the audit work to assure that the work performed by non-Federal auditors complies with the standards established by the Comptroller General. The auditors' report will be included in the agency's FY 2022 financial report to be issued by November 15, 2022.

Along with the final reports detailed in the following sections, the Audit Unit continued its work on its reviews of Peace Corps Management of Payroll and Benefits for U.S. Direct Hires, Peace Corps PEPFAR Expenditures, and Peace Corps Volunteer Payments and Collections at End of Service.

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<sup>5</sup> Other reviews include Management Implication Reports (MIRs) and Management Advisory Reports (MARs), which are conducted in accordance with OIG Directive 2020-03 – Revision to Reporting Procedures for MIRs and MARs.

## Agency-Wide Audits

### Review of the Peace Corps' Compliance with the Payment Integrity Information Act for FY 2021

*IG-22-05-SR*

In May 2022, OIG issued a report on the audit of the Peace Corps' compliance with the Payment Integrity Information Act of 2019 (PIIA) (Public Law 116-177) for FY 2021. The PIIA requires OIG to annually review the agency's compliance with improper payment and payment reporting made in the annual Performance and Accountability Report (PAR) or Agency Financial Report (AFR). OIG performed a review to assess whether the Peace Corps complied with the PIIA reporting requirements and provided adequate disclosure within the annual AFR and accompanying materials. In addition, we evaluated the accuracy and completeness of the agency's reporting.

Our review determined that the Peace Corps did not fully comply with PIIA for FY 2021. The agency did not provide payment integrity information through the Office of Management and Budget's (OMB) FY 2021 Annual Data Call. However, as required, the agency published improper payment information in the AFR for FY 2021; posted the AFR on the agency website; and performed a risk assessment regarding improper payment risk to their program. Furthermore, we concluded that it is unlikely that the Peace Corps met or exceeded the Improper Payments Elimination and Recovery Act of 2010's established threshold (\$10,000,000).

OIG made two recommendations and the agency concurred with both. The recommendations remained open at the end of this reporting period.

## Other Reviews

### Review of the Peace Corps' Information Security Program

*FY 2022*

In September 2022, OIG issued a report on the review of the Peace Corps' information security program for FY 2022. We contracted with Williams, Adley & Company-DC, LLC, an independent certified public accounting firm, to assess the agency's performance against a government-wide maturity model. During FY 2022, the Peace Corps was able to maintain a Level 2, Defined rating. During this review period, the agency made progress in formalizing several core policies and procedures, such as an Information Security Continuous Monitoring and Supply Chain Risk Management strategies.

For the Peace Corps to advance their program to Level 3, Consistently Implemented, the agency will need to demonstrate that their developed policies, procedures, and strategy have been consistently applied and followed throughout their daily operations. This requires all staff members to adopt and maintain an information security-focused mindset when engaging in their day-to-day activities. Creating such a shift requires involvement and dedication from every level of the organization, especially at the executive levels.

We continue to encourage the agency to dedicate substantial resources for implementing and maturing their information security program. Specifically, we assert that focusing on the following two recommendations will elevate their information security program:

- Establishing a comprehensive Enterprise Risk Management (ERM) program, and
- Developing a strategy and structure that integrates information security into the agency's business operations.

Adopting these actions will foster a sustainable culture that incorporates information security across its business operations. Once incorporated, the Peace Corps will be able to better identify its information security and organization-wide risks, and consequently, assess and respond to those risks in a timely manner. This, in turn, will reduce the agency's exposure to targeted attacks and environmental disruptions. This will also ensure that resources are utilized in a proactive manner to prevent and address the weaknesses before they are exploited. The Peace Corps will then be able to achieve an effective information security program.

This report made five recommendations to strengthen the information security program, such as developing a strategy and structure that integrates information security into the agency's business operations. Management concurred with all five of the recommendations, and all remained open at the end of this reporting period. All recommendations issued in this report are part of a normal 12-month audit cycle. As a result, recommendations made during a given fiscal year will remain in an open status during the entire subsequent fiscal year.

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# Evaluation Unit

## Overview

The Evaluation Unit provides the agency with systematic and independent evaluations and reviews of agency programs, operations, or policies at overseas posts and domestic offices. Evaluations address efficiency and effectiveness, identify best practices, and recommend improvements. Evaluators also participate in cross-unit reviews with OIG auditors and investigators. Evaluation Unit reports provide timely, credible information that is useful to managers, policymakers, and others.

Evaluations and other reviews<sup>6</sup> are conducted under the direction and guidance of the Assistant Inspector General for Evaluations. Evaluations are performed in accordance with the CIGIE *Quality Standards for Inspection and Evaluation*.

## Ongoing Work

The Evaluation Unit has continued work on several ongoing projects, including the Evaluation of Human Resources Management for Overseas Contract Staff and reviews of reports of sexual assaults<sup>2</sup> discussed in the Advice, Assistance, and Other Reportable Matters section. The Evaluation Unit launched an evaluation of the agency's Medical Technical Guidelines, which will determine if the Office of Health Services adequately updates the guidelines and assesses challenges to their implementation. After successfully completing the pilot of a new evaluation product, the Post Re-entry Health and Safety Review of Peace Corps/Ecuador, evaluators completed the Post Re-entry Health and Safety Review of Peace Corps/Zambia. Evaluators also completed fieldwork for an additional review that will be published within the next reporting period.

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<sup>6</sup> Other reviews include MIRs/MARs, which are conducted in accordance with OIG Directive 2020-03 – Revision to Reporting Procedures for MIRs and MARs.

## Evaluations of Operations Abroad

### Post Re-Entry Health and Safety Review of Peace Corps/Ecuador

#### *IG-22-01-E*

On November 5, 2021, the Peace Corps notified the United States Congress that Peace Corps/Ecuador intended to resume operations. Peace Corps/Ecuador received its first intake of Volunteers in May 2022. In June 2022, OIG issued the pilot of a new evaluation product, which assessed Peace Corps/Ecuador's compliance with specific agency policies and procedures related to Volunteer or Trainee health and safety and the re-entry process.

We determined that the post complied with all but one of the reviewed policies and procedures. We found that some Peace Corps/Ecuador staff with emergency response roles and responsibilities lacked sufficient familiarity with the Security Incident Reporting Guide and the emergency notification tables.

Management concurred with the only recommendation and provided documentation of actions it took to address our finding. OIG reviewed the documentation, and we closed the recommendation in June 2022.

### Post Re-Entry Health and Safety Review of Peace Corps/Zambia

#### *IG-22-02-E*

On June 10, 2021, the Peace Corps notified the United States Congress that Peace Corps/Zambia intended to resume operations. Peace Corps/Zambia received the first intake of Volunteers in March 2022. In September 2022, OIG issued its review of Peace Corps/Zambia's compliance with specific agency policies and procedures related to Volunteer or Trainee health and safety and the re-entry process.

We found that Peace Corps/Zambia complied with most of the policies and procedures we reviewed. However, we identified two areas of non-compliance and another area that required management attention. We found that: 1) serious crime incidents were not recorded in site history files and the Volunteer Information Database Application (VIDA) as required in Safety and Security Instruction 401 *Site History Files* (SSI 401); 2) some staff had not completed mandatory training as required before Volunteers arrived; and 3) some entries in the medical action plan were blank rather than having "N/A" noted.

Our report made four recommendations. Management concurred with all recommendations, and one remained open at the end of this reporting period.

## Other Reports

### Management Advisory Report: Peace Corps Medical Case Review

*IG-22-03-SR*

In June 2022, OIG issued a special report on the medical care of an RPCV from service in 2018. The RPCV reported concerns to OIG regarding the received medical care, which included an in-country emergency surgical procedure.

We conducted a review and found several systemic issues in Peace Corps' implementation of their policies, which contributed to the RPCV not receiving the medical care needed. The post's medical unit did not follow the agency's standard of care in treating the RPCV and the post's medical officer did not always follow the agency's clinical escalation policy that requires PCMOs to consult with the regional medical officer for any condition likely to require emergency surgery or hospitalization. We found other contributing factors, including ineffective oversight of the post's medical resource assessments and clinical documentation standards.

Our report made five recommendations. If implemented, these recommendations should improve the provision of medical care to Volunteers. Management concurred with all recommendations, and two remained open at the end of this reporting period.

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# Investigation Unit

## Overview

The Investigation Unit is authorized to conduct investigations of alleged criminal and administrative violations of law, regulation, and policy in Peace Corps programs and operations, both domestically and internationally. The Unit investigates allegations involving Peace Corps staff, Volunteers, Trainees, contractors, grantees and other individuals conducting transactions with the Peace Corps. Allegations are made by Peace Corps stakeholders such as Volunteers, staff, contractors, foreign counterparts, other Federal entities, and the general public. OIG receives these allegations through audits, evaluations, Hotline complaints, and other means. OIG investigators have full law enforcement authority, including the authority, upon probable cause, to seek and execute warrants for arrest, search premises, and seize evidence. They are authorized to carry firearms and to make arrests without a warrant while engaged in official duties. In addition, OIG receives substantial investigative support from the Bureau of Diplomatic Security within the Department of State.

The Investigation Unit continues to implement the Sam Farr and Nick Castle Peace Corps Reform Act of 2018 provisions regarding independent reviews of the facts and circumstances surrounding Volunteer deaths. It is the practice of the Investigation Unit to review the details of each incident to assess whether further investigation is required.

## **Investigations of Criminal and Administrative Misconduct**

### **Report of Misappropriation of Government Property in the Africa Region**

OIG received a report that a Peace Corps host country national staff was suspected to have wrongfully acquired Peace Corps information technology equipment to sell internet services to individuals in another country. OIG conducted an investigation and determined that the equipment was not inventoried by the Peace Corps at the time of the allegation and no similar equipment was missing from post inventories. The investigation was closed after the agency advised that the host country national staff member's employment was terminated for an unrelated matter.

### **Report of Security Clearance Mismanagement in the U.S.**

OIG received a report from an employee applicant that claimed a headquarters staff member submitted false statements to support a decision to deny the applicant's national security clearance and did not adequately communicate the appeal process to the applicant.

OIG identified that the applicant was denied a clearance due to failure to disclose a reportable matter in the applicant's background. OIG also found that the staff member sufficiently communicated required information to the applicant.



## Sexual Misconduct Investigations

### Report of Sexual Assault Response Mismanagement in the Africa Region

OIG received a complaint of sexual assault response mismanagement following a Volunteer's sexual assault incident. The complaint alleged that the Peace Corps failed to offer the Volunteer the services of a victim advocate. Further, the Peace Corps reportedly placed the Volunteer in a location with poor living conditions and failed to follow-up on corrective actions to make the environment safer for the Volunteer.

The investigation found that the Peace Corps provided the Volunteer all services required under applicable laws and agency policy for the assault reported. OIG also found that the site conditions, once reported, were addressed by relocating the Volunteer to another site.

### Case Closure of Reported Rape in the Africa Region

OIG investigated the report of rape of a Volunteer by another Volunteer. An RPCV reported the rape as a Restricted Report<sup>7</sup> while serving as a Volunteer, but after the close of service, the RPCV requested that the matter be investigated. The report was subsequently converted to a Standard Report and referred to OIG two years after the incident. The OIG investigation identified a likely suspect, a fellow RPCV who had since left the United States. Working with partner agencies, OIG investigators later located and interviewed the accused who was residing in a third country. During the interview, the accused acknowledged having nonconsensual sex with the RPCV.

The case was presented to the Human Rights and Special Prosecution Section of the Department of Justice but was declined for prosecution.

The results of the investigation were provided to agency management after the end of the reporting period. Subsequently, the agency reported to OIG that it would be considering a notation of an Attachment J<sup>8</sup> to the accused Volunteer's record of service.

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<sup>7</sup> Restricted Reporting provides an alternative way for Volunteers to confidentially report sexual assaults. Volunteers can request certain specific services without dissemination of information about the sexual assault except as necessary for the provision of the services requested, and without automatically triggering an official investigative process.

<sup>8</sup> Pursuant to Peace Corps Manual Section 284, *Early Termination of Service*, the notation of an Attachment J in a Volunteer's record of service means that an allegation of serious misconduct has been made against the Volunteer and that the Volunteer terminated or ended service pending or prior to investigation or inquiry. The Country Director (CD) may also consider an Attachment J if the CD becomes aware of an allegation of serious misconduct after a Volunteer leaves service.

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# Tables

## 1: List of Reports: Audits, Program Evaluations, and Other Reports

Agency-wide Audits		Page
Review of the Peace Corps' Compliance with the Payment Integrity Information Act for FY 2021 (IG-22-05-SR)		33
Review of the Peace Corps' Information Security Program for FY 2022		34
Evaluations of Operations Abroad		Page
Post Re-Entry Health and Safety Review of Peace Corps/Ecuador (IG-22-01-E)		39
Post Re-Entry Health and Safety Review of Peace Corps/Zambia (IG-22-02-E)		39
Other Reports		Page
Peace Corps Response to Reports of Sexual Assault: Compliance with the Kate Puzey Peace Corps Volunteer Protection Act (IG-22-06-SR)		30
Management Advisory Report: Peace Corps Medical Case Review (IG-22-03-SR)		40

## 2: Reports with Questioned Costs, Unsupported Costs, and Funds to Be Put to Better Use

Report	Questioned Costs <sup>1</sup>	Unsupported Costs <sup>2</sup>	Funds to Be Put to Better Use <sup>3</sup>
-	-	-	-
Subtotal	-	-	-
<b>Total</b>			<b>\$-</b>

<sup>1</sup> Questioned Costs are those due to an alleged violation of government or Peace Corps regulations. For example: prohibited purchases and expenditure of funds for purposes that do not relate to the Peace Corps mission.

<sup>2</sup> Unsupported Costs are those not supported by adequate documentation.

<sup>3</sup> Funds to Be Put to Better Use are those that could be used more efficiently if management took actions to implement and complete a recommendation.

### 3: Status of Reports Issued by OIG with Questioned and Unsupported Costs

Recommendation Status	Number of Reports	Questioned Costs	Unsupported Costs
No management decision made by the start of the reporting period	1	\$87,832	-
Issued during the reporting period			
Audits	-	-	-
<b>Total</b>	<b>1</b>	<b>\$87,832</b>	<b>-</b>
Management decision made during the reporting period			
(i) Disallowed costs <sup>12</sup>	1	\$87,832	-
(ii) Costs not disallowed <sup>13</sup>	-	-	-
Subtotal	1	\$87,832	-
<b>Total for which no management decision had been made by the end of the reporting period</b>	<b>-</b>	<b>-</b>	<b>-</b>

### 4: Status of Reports Issued by OIG with Funds to Be Put to Better Use

Recommendation Status	Number of Reports	Funds to Be Put to Better Use
No management decision made by the start of the reporting period	1	\$4,199
Issued during the reporting period		
Audits	-	-
<b>Total</b>	<b>1</b>	<b>\$4,199</b>
Management decision made during the reporting period		
(i) Dollar value of recommendations agreed to by management	1	\$4,199
(ii) Dollar value of recommendations not agreed to by management	-	-
Subtotal	1	\$4,199
<b>Total for which no management decision had been made by the end of the reporting period</b>	<b>-</b>	<b>-</b>

<sup>12</sup> “Disallowed costs” are costs that, upon review, management determined that they are not allowable.

<sup>13</sup> “Costs not disallowed” are costs that, upon review, management determined that they are allowable.

## 5: Recommendations on Which Corrective Action Has Not Been Completed

Type of Report	Number of Recommendations Open at the End of the Reporting Period	Number of Recommendations Open for More than 180 Days
Audits and Evaluations	14	13
Special Reports	20	16
Other	18	n/a <sup>14</sup>

### Audits and Evaluations

#### **Evaluation of the 5-Year Rule (IG-12-05-E)**

2 of 5 recommendations open since June 20, 2012

**Recommendation 2:** OIG recommended that the Director identify which functions should be subject to periodic turnover to meet the needs of the agency, and implement a process to manage turnover so that the agency retains qualified personnel on the basis of merit and performance.

**Recommendation 3:** OIG recommended that the Director identify the agency's core business functions and positions that currently suffer from frequent staff turnover and lack of continuity, and determine and implement a process for acquiring and retaining qualified personnel to perform those functions on the basis of merit and performance.

#### **Audit of Peace Corps Overseas Staffing (IG-14-01-A)**

2 of 13 recommendations open since November 21, 2013

**Recommendation 10:** OIG recommended that the Office of Human Resource Management provide biennial training and guidance to all post rating officials on their role in conducting performance appraisals and the level of detail needed to provide adequate feedback.

**Recommendation 11:** OIG recommended that the Office of Global Operations develop guidance and provide oversight of post senior staff performance appraisals to verify that each performance element is consistently addressed in the appraisal.

#### **Follow-Up Evaluation of Issues Identified in the 2010 Peace Corps/Morocco Assessment of Medical Care (IG-16-01-E)**

3 of 23 recommendations open since March 23, 2016

**Recommendation 7:** OIG recommended that the associate director of the Office of Health Services ensure staffing is sufficient to adequately implement a more effective sentinel event reporting system and that staff involved in root cause analyses have not had direct involvement in the case.

**Recommendation 8:** OIG recommended that the associate director of the Office of Health Services perform all root cause analyses in a manner that includes key components (system focus, cause/effect, action plan and measures).

<sup>14</sup> All recommendations issued in conjunction with the Audit of the Peace Corps' Financial Statements and Review of the Peace Corps' Information Security Program are part of a normal 12-month audit cycle. As a result, recommendations made during a given fiscal year will remain in an open status during the entire subsequent fiscal year.

**Recommendation 9:** OIG recommended that the associate director of the Office of Health Services improve staff understanding of best practices for selecting sentinel events for review and for carrying out root cause analyses.

**Audit of the Peace Corps' Compliance with the Digital Accountability and Transparency Act (IG-20-01-A)**

2 of 4 recommendations open since November 7, 2019

**Recommendation 3:** OIG recommended that the chief financial officer develop and implement a data quality plan that aligns with the requirement of OMB memorandum 18-16 and outlines the risk and mitigating controls the agency has in place to demonstrate that the data submitted is of high quality.

**Recommendation 4:** OIG recommended that the chief financial officer require all quality review steps, outlines in the data quality plan, be performed prior to the senior accountable officer certification of the quarterly submissions for the Digital Accountability and Transparency Act of 2014.

**Evaluation of Peace Corps/Tanzania (IG-20-02-E)**

1 of 22 recommendations open since March 31, 2020

**Recommendation 11:** OIG recommended that the Peace Corps safety and security officer conduct a full country risk assessment for the post.

**Audit of Peace Corps/Ethiopia (IG-20-05-A)**

2 of 13 recommendations open since August 19, 2020

**Recommendation 3:** OIG recommended that the Office of the Chief Financial Officer issue guidance to manage withdrawals of funds from Volunteer bank accounts where the post does not have power of attorney over them.

**Audit of Peace Corps' Compliance with the Digital Accountability and Transparency Act (IG-22-01-A)**

2 of 3 recommendations open since November 8, 2021

**Recommendation 1:** OIG recommended that the chief financial officer develop and implement a process to review and document justifications and/or corrections for all DATA Act Broker errors and warnings prior to quarterly certification.

**Recommendation 2:** OIG recommended that the chief financial officer develop and implement a process to validate the accuracy of DATA Act files after changes to the financial system have been implemented.

**Post Re-Entry Health and Safety Review of Peace Corps/Zambia (IG-22-02-E)**

1 of 4 recommendations open since September 30, 2022

**Recommendation 2:** OIG recommended that the safety and security manager ensure that site history files on the post's shared drive include incident numbers as required by SSI 401.

## Special Reports

### **Management Advisory Report: Volunteer Drug Use (IG-18-01-SR)**

4 of 6 recommendations open since August 7, 2018

**Recommendation 1:** OIG recommended that the Director of the Peace Corps provide country directors with additional support to resolve allegations of drug involvement under manual section 204, 3.5.1 and specifically consider the efficacy of reasonable suspicion drug testing as a means of doing so.

**Recommendation 2:** OIG recommended that the Office of General Counsel review the evidentiary standard required to administratively separate a Volunteer suspected of involvement with drugs to determine whether the standard, and its application, is consistent with promoting the integrity of the program and continues to serve the policy interest of the Peace Corps.

**Recommendation 3:** OIG recommended that the Director of the Peace Corps make necessary changes to policies, procedures, and forms related to Volunteer resignations and administrative separations, so that Volunteer files and early termination statistics include accurate information regarding unauthorized drug use.

**Recommendation 4:** OIG recommended that the Director of the Peace Corps take effective steps to ensure ongoing compliance and consistency in implementation of the Volunteer separation recordation processes.

### **Management Advisory Report: Seed Global Health Services (IG-19-01-SR)**

5 of 5 recommendations open since October 25, 2018

**Recommendation 1:** OIG recommended that the Director of the Peace Corps require the chief acquisition officer to implement procedures and practices that ensure proper segregation of duties to avoid potential conflicts and appearances of favoritism in the cooperative agreement award process.

**Recommendation 2:** OIG recommended that the Director of the Peace Corps establish comprehensive agency policy and procedures on cooperative agreements with non-governmental entities. At minimum, such policy should address the need for competition, circumstances where competition is not required, justifications for noncompetitive awards, and appropriate limitations on cooperative agreement extensions.

**Recommendation 3:** OIG recommended that the Director of the Peace Corps require the Chief Acquisition Officer to implement a record management system for cooperative agreements, to include maintaining specific written documentation to justify all future non-competitive agreements in the agreement file that will assist other staff in substantiating decisions made by former staff.

**Recommendation 4:** OIG recommended that the Director of the Peace Corps require the Chief Acquisition Officer to submit to GSA's Catalog of Federal Domestic Assistance complete and accurate information regarding all grants and cooperative agreements with the Peace Corps.

**Recommendation 5:** OIG recommended that the Director of the Peace Corps require the Chief Acquisition Officer to review relevant Peace Corps contracts, grants, and agreements to ascertain that each file contains the proper anti-lobbying certification, in compliance with applicable laws and regulations and report to OIG the failure of any entity to submit required certifications.



**Management Advisory Report: Review of the Facts and Circumstances Surrounding the Death of a Peace Corps/Ghana Volunteer (IG-21-03-SR)**

7 of 12 recommendations open since August 2, 2021

**Recommendation 4:** OIG recommended that the chief of staff work with the associate directors to ensure that drills to prepare for medical and life-threatening emergencies cover both local and international medical evacuations and that all potential responders (medical staff at headquarters and regional hubs, private medevac contractors, other federal agencies, Volunteers, etc.) are included.

**Recommendation 5:** OIG recommended that the associate director for the Office of Health Services collaborate with the associate director for the Office of Global Operations to develop guidance and training for non-clinical staff to address medical emergency preparedness when conducting site visits, including, but not limited to, providing community contacts with the Peace Corps' contact information and visiting local medical facilities, and integrate this guidance into existing site visit guidance.

**Recommendation 7:** OIG recommended that the Office of Health Services develop and implement a process for managing its recommendations that includes a review of evidence and documentation prior to deciding to close recommendations.

**Recommendation 8:** OIG recommended that the Director develop a comprehensive plan to improve institutional memory in the Office of Health Services, including, but not limited to, identifying critical positions and exempting them from term limits.

**Recommendation 10:** OIG recommended that the associate director for the Office of Health Services incorporate a mechanism and procedures into TG 370 to obtain teleconsults so that the Office of Health Services accesses medical experts during field consults.

**Recommendation 11:** OIG recommended that the Director develop agency-wide policy and procedures that define staff roles and responsibilities to respond to life-threatening medical emergencies.

**Recommendation 12:** OIG recommended that the associate director of the Office of Health Services include provisions for a Root Cause Analysis charter in TG 167.

**Management Advisory Report: Peace Corps Medical Case Review (IG-22-03-SR)**

2 of 5 recommendations open since June 29, 2022

**Recommendation 3:** OIG recommended that the Office of Health Services develop and implement a process for managing its recommendations that includes a review of evidence and documentation prior to deciding to close recommendations.

**Recommendation 5:** OIG recommended that the Office of Health Services improve identification and reporting of patient safety events.

**Special Report: Review of the Peace Corps' Compliance with the Payment Integrity Information Act for FY 2021 (IG-22-05-SR)**

2 of 2 recommendations open since May 11, 2022

**Recommendation 1:** OIG recommended that the Chief Financial Officer follow the guidance outlined in OMB Circular M-21-19, Section VI.D, "Agency Responsibility When a Program is Non-Compliant" to report the OIG's finding of non-compliance with FY21 PIIA requirements.

**Recommendation 2:** OIG recommended that the Associate Director of Management implement a process for recording, monitoring, and tracking all improper payments; including the dollar values of any errors identified and corrective actions taken, for all Travel Card payments.

## Other

### Financial Statement Audit Recommendations

<u>Summary of Internal Control Issues Over the Peace Corps' Financial Reporting</u>			
Issue	Year First Identified	Agency Concurrence with Issue	Open Recommendations
Information Technology Security	2013	Concur	5
Inadequate Internal Controls over Property, Plant, and Equipment	2019	Concur	4
Inadequate Controls Surrounding Processing of Personnel Actions	2020	Concur	3
Plan of Action and Milestones Deficiencies	2020	Concur	1
Total Open Recommendations			13

### Federal Information Security Management Act (FISMA) Review Recommendations

#### Review of the Peace Corps' Information Security Program (FY 2022)

5 of 5 recommendations open since September 30, 2022

**Recommendation 1:** OIG recommended that the Director develop a strategy and structure that integrates information security into the agency's business operations. This should include an established responsibility for assessing information security risks in all agency programs and operations and providing this analysis to senior leadership, including the ERM Council, for decision-making.

**Recommendation 2:** OIG recommended that the Director appoint the chief information security officer to serve on the Enterprise Risk Management Council as a voting member.

**Recommendation 3:** OIG recommended that the Director further define and implement the Enterprise Risk Management program to ensure information security risks are communicated and monitored at the system, business process, and entity levels.

**Recommendation 4:** OIG recommended that the Chief Information Officer perform a full security assessment of the General Support System to obtain a complete understanding of system weaknesses.

**Recommendation 5:** OIG recommended that the Peace Corps consistently improve and implement its inventory management process to ensure information system, hardware, and software inventories are accurate, complete, and up-to-date.

## 6: Summary of Hotline and Other Complaints

### *Complaints Received*

Complaints	Total
Complaints Received via Hotline	94
Complaints Received via Other Sources <sup>15</sup>	5
Total Complaints (All Sources)	99

### *Overview of Complaint Activity<sup>16</sup>*

Complaint Activity	Total
Resulted in Investigations	2
Resulted in Preliminary Inquiries	7
Resulted in Audits or Evaluations	0
Referred to Agency Management	48
Referred to Other Agency	1
No Action Needed	29

<sup>15</sup> These complaints are largely a result of outreach by OIG staff and were received by email, phone calls, and conversations.

<sup>16</sup> The following actions summarize the disposition of complaints received by OIG. In some instances, one complaint can result in multiple actions. In other cases, multiple complaints may be received about the same issue, resulting in one referral or result. The results reflect complaint activities that occurred during this reporting period; in some instances, the complaint may have been received during a prior reporting period.

## 7: Summary of Investigative Activities and Outcomes

Investigative Activities	Preliminary Inquiries <sup>17</sup>	Cases
Open at the beginning of the reporting period	8	9
Opened during the reporting period	6	2
Closed during the reporting period	7	3
Total open at the end of the reporting period	7	8

Reports	Total
Investigative reports issued	2

Referrals	Total
Persons referred for criminal prosecution (Department of Justice)	2
Persons referred for criminal prosecution (state and local authorities) <sup>18</sup>	-
Cases referred to the Department of Justice	2
Cases referred to agency management for administrative action	-
Cases referred to agency management for other information/ action	1
Referrals to other agencies	-

Court Actions	Total
Criminal information and indictments	-
Trial(s) pending	-
Ongoing prosecution <sup>19</sup>	-
Convictions	-
Judgments	-
Fines/assessments/fees	-

Administrative Actions	Total
Employee <sup>20</sup> resignations and terminations	-
Other employee actions <sup>21</sup>	-
Suspension/debarment referrals	-

Monetary Results	Total
Annual savings	-
Recoveries/restitution <sup>22</sup>	-
Cost avoidance	-

<sup>17</sup> Preliminary inquiries are initiated for complaints which either (1) are received from a Peace Corps source (e.g., staff, Volunteer, contractor) or (2) relate to a matter within the jurisdiction of OIG. A preliminary inquiry is limited in scope to the verification of information in a complaint or allegation and to confirm that it falls within the jurisdiction of OIG.

<sup>18</sup> Includes foreign courts.

<sup>19</sup> Includes overseas criminal proceedings.

<sup>20</sup> Volunteers/trainees are included as Peace Corps staff for the purpose of reporting investigative activity.

<sup>21</sup> Includes administrative actions that are less than resignation or termination, for example: letters of reprimand, counseling, and retraining.

<sup>22</sup> Includes potential recoveries.

## 8: References to Reporting Requirements of the Inspector General Act, as Amended

Section Reference	Reporting Requirements	Section	Page
§ 4(a)(2)	Review of legislation and regulations	Advice and Assistance	28
§ 5(a)(1)	Significant problems, abuses, and deficiencies	Advice and Assistance, Audits, and Evaluations	28, 32, 38
§ 5(a)(2)	Significant recommendations for corrective actions	Advice and Assistance, Audits, Evaluations, and Table 5	28, 32, 38, 48
§ 5(a)(3)	Prior significant recommendations on which corrective action has not been completed	Table 5	48
§ 5(a)(4)	Matters referred to prosecuting authorities	Investigations and Table 7	42, 54
§ 5(a)(5)	Summary of instances where information was refused	N/A	-
§ 5(a)(6)	List of audit, inspection, and evaluation reports, including the total dollar value of questioned costs, unsupported costs, and funds to be put to better use	Audits, Evaluations, and Tables 1-4	32, 38, 46-47
§ 5(a)(7)	Summary of significant reports	Audits, Evaluations, and Investigations	32, 38, 42
§ 5(a)(8)	Statistical table - questioned and unsupported costs	Tables 2 and 3	46, 47
§ 5(a)(9)	Statistical table - funds to be put to better use	Tables 2 and 4	46, 47
§ 5(a)(10)	Summary of previous reports with open recommendations	Table 5	48
§ 5(a)(11)	Significant revised management decisions	N/A	-
§ 5(a)(12)	Significant management decisions with which the Inspector General disagrees	N/A	-
§ 5(a)(13)	Information under the Federal Financial Management Improvement Act of 1996	N/A	-
§ 5(a)(14)-(16)	The results of the last peer review conducted by another OIG	Appendix A: Reporting of Peer Reviews	58
§ 5(a)(17)-(18)	Statistical table - investigative reports issued; persons referred for criminal prosecution; indictments and criminal information	Table 7	54
§ 5(a)(19)	Investigations involving a senior government employee where allegations of misconduct were substantiated	N/A	-
§ 5(a)(20)	Instances of whistleblower retaliation	N/A	-
§ 5(a)(21)	Interference with Independence	N/A	-
	Detailed descriptions of the particular circumstances of each-		
§ 5(a)(22)	(A) inspection, evaluation, and audit conducted by the Office that is closed and was not disclosed to the public	N/A	-
	(B) investigation conducted by the Office involving a senior Government employee that is closed and was not disclosed to the public	N/A	-

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# Appendices

## Appendix A: Reporting of Peer Reviews

Pursuant to Section 989C of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Public Law No. 111-203),<sup>23</sup> OIG reports the following peer review information:

### Audit Unit

In December 2021, Peace Corps OIG’s Audit Unit announced its peer review of the National Credit Union Administration (NCUA) OIG. Our review of the period of October 1, 2018 through September 30, 2021, was completed in March 2022. NCUA OIG earned an External Peer Review rating of “pass,” the highest rating available. We provided our results to the NCUA OIG in March 2022, along with a Letter of Comment.

No peer review of the Peace Corps OIG’s Audit Unit was conducted within this reporting period. The last peer review conducted by another OIG was in March 2020, when the National Labor Relations Board (NLRB) OIG issued its System Review Report of the Peace Corps OIG Audit Unit for the period ending September 30, 2019. The Audit Unit received a rating of “pass,” the highest rating available. The peer review found that the Audit Unit’s system of quality control was suitably designed and achieved adequate compliance. The NLRB did not provide any recommendations in the System Review Report.

### Evaluation Unit

In April 2022, Peace Corps OIG’s Evaluation Unit began its peer review of the Export-Import Bank of the United States (EXIM) Office of Inspector General (OIG) for the period March 31, 2019 through March 31, 2022. Our review assessed the extent to which EXIM OIG complied with the CIGIE *Quality Standards for Inspection and Evaluation* (Blue Book). Our review was completed in August 2022, and we provided our results to EXIM OIG in September 2022, along with a Letter of Comment.

No peer review of the Peace Corps OIG’s Evaluation Unit was conducted within this reporting period. In the last peer review from July 2020, the Corporation for Public Broadcasting OIG, with assistance from the Securities and Exchange Commission OIG, issued a final report after completing an external peer review of Peace Corps OIG’s Evaluation Unit for the period January 1, 2019 to December 31, 2019. The review

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<sup>23</sup> Section 989C of the Dodd-Frank Wall Street Reform and Consumer Protection Act amended Section 5(a) of the Inspector General Act of 1978 (5 U.S.C. App.).

assessed compliance with seven standards from CIGIE's *Quality Standards for Inspection and Evaluation (Blue Book)* and determined that 1) Evaluation Unit policies and procedures generally met the standards; and 2) two reviewed reports generally met the standards and complied with Evaluation Unit policies and procedures.

## **Investigation Unit**

No peer review of the Peace Corps OIG's Investigation Unit was conducted within this reporting period. The last peer review conducted by another OIG was in April 2019, when the EXIM OIG conducted a peer review of the Peace Corps OIG Investigation Unit for the period ending February 15, 2019. The review focused on the Peace Corps OIG's internal safeguards and management procedures for its investigative operations. The review team found all of the examined areas to be compliant with CIGIE's Quality Standards for Investigations and Quality Assessment Review guidelines, as well as the Attorney General Guidelines for Offices of Inspector General with Statutory Law Enforcement Authority.

## **Appendix B: Contract Audit Reports**

Pursuant to Section 845(a) of the National Defense Authorization Act for Fiscal Year 2008 (Public Law No. 110-181), OIG reports on final contract audit reports with significant audit findings. During this reporting period, OIG did not issue any audit reports meeting the “significant audit findings” criteria established in Public Law No. 110-181.

# Help Promote the Integrity, Efficiency, and Effectiveness of the Peace Corps

Anyone knowing of wasteful practices, abuse, mismanagement, fraud, or unlawful activity involving Peace Corps programs or personnel should contact the Office of Inspector General. Reports or complaints can also be made anonymously.

## Contact OIG

### Reporting Hotline:

U.S./International: 202.692.2915

Toll-Free (U.S. only): 800.233.5874

Email: [OIG@peacecorpsoig.gov](mailto:OIG@peacecorpsoig.gov)

Online Reporting Tool: [peacecorps.gov/oig/contactoig](https://peacecorps.gov/oig/contactoig)

Mail: Peace Corps Office of Inspector General  
Paul D. Coverdell Peace Corps Headquarters  
1275 First Street NE  
Washington, DC 20526

### For General Information:

Main Office: 202.692.2900

Website: [peacecorps.gov/oig](https://peacecorps.gov/oig)

 Twitter: [twitter.com/pcoig](https://twitter.com/pcoig)

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