



Peace Corps Office of

INSPECTOR GENERAL

Annual Plan

FISCAL YEAR 2020

REVISED/UPDATED MAY 2020

Why this Revision is Necessary:

Due to the impact of the COVID-19 pandemic, on March 15, 2020 the Peace Corps Director Jody Olsen ordered the immediate evacuation of all the Peace Corps volunteers and the temporary suspension of all the Peace Corps operations globally. In addition, in late March 2020 the Coronavirus Aid, Relief, and Economic Security or CARES Act (P. L. 116-136) appropriated \$88 million in supplemental funding to be made available to the Peace Corps for COVID-19 related expenditures. The CARES Act also created the Pandemic Response Accountability Committee (PRAC).¹ As a result of the evacuation of Volunteers, the suspension of Peace Corps overseas operations, and the additional funding Peace Corps has received, the Peace Corps Office of Inspector General (OIG) postponed some of its planned program oversight for FY 2020. We have revised our FY 2020 Annual Plan to include new oversight activities OIG intends to initiate.

COVID 19 Pandemic, the CARES Act, and OIG Oversight of the Peace Corps

The Peace Corps responded to the COVID-19 pandemic by suspending all Volunteer activities and evacuating nearly 6,900 Volunteers from approximately 60 countries of service. In a matter of a few weeks, the agency brought all of its Volunteers back to the U.S. Evacuating all its Volunteers at the same time was unprecedented and required the agency to take extraordinary steps, including the chartering of international flights, to complete the task. The fiscal and programmatic impact of the COVID 19 pandemic on Peace Corps operations is substantial. For the first time since its establishment in 1961, the Peace Corps is without a single active Volunteer. The CARES Act provided the agency with supplemental funding to prevent, prepare for, and respond to coronavirus. Importantly, the law allows these monies to be used for reimbursement of accounts for related cost incurred prior to the law. The CARES Act requires that the agency submit to the PRAC a plan on how the agency will use the funds. The Peace Corps OIG is committed to continued independent oversight over all Peace Corps appropriations, including CARES Act funding. The Peace Corps Inspector General has been appointed to the PRAC.

While the CARES Act funding is critical for the sustainability of the Peace Corps, significant challenges remain. Prior to the global evacuation, Volunteers served in over 60 countries. The Peace Corps' plans to resume its overseas programs and operations will need to be informed by how the pandemic has affected each of the Peace Corps countries and an assessment of the impact of COVID-19 on communities where Volunteers may serve. The agency's re-entry plans will need to be informed by an understanding of the wide-ranging response to COVID-19 of governments and peoples, as well as the economic, health, safety, and social infrastructure in each country it plans to re-enter. To address these enormous challenges, Director Olsen has put together multiple working groups to advise her decision making in how to resume global operations. The working groups draw on broad expertise across the agency, including in the field and at headquarters.

During this time, OIG is committed to monitoring and contributing to the agency's planning and implementation of its re-entry process. OIG oversight will include continued focus on the health and safety of the Volunteers as the agency takes the necessary steps to safely redeploy Volunteers, as well as emphasis on proper spending of taxpayer funds. Through findings and

¹ The PRAC is currently composed of 20 federal Offices of Inspector General to "promote transparency and conduct and support oversight of covered funds and the Coronavirus response to (1) prevent and detect fraud, waste, abuse, and mismanagement; and (2) mitigate major risks that cut across program and agency boundaries." Rather than a stand-alone organization, the PRAC is a Committee of the Council of the Inspectors General on Integrity and Efficiency (CIGIE), an independent entity established within the executive branch by the Inspector General Act of 1978, as amended, that includes the 75 statutorily created federal Inspectors General.

recommendations, particularly those focused on overseas operations, OIG will also provide advice and assistance to support the agency’s full resumption of its operations. Using the vast experience of its staff, and a library of work products and recommendations it has issued, OIG will, as appropriate, provide advice on best practices and lessons learned that will support this process. Our goal is to direct OIG oversight activities in ways that help the Peace Corps safeguard its integrity, better its effectiveness, and cement its long-term success.

The Role of OIG:

- Promote integrity, efficiency, effectiveness, and economy
- Prevent and detect waste, fraud, abuse, and mismanagement
- Identify risk and vulnerabilities and offer expert assistance to improve the Peace Corps’ programs and operations

Established in February 1989, OIG receives its legal authority from the Inspector General Act of 1978, as amended (IG Act). The IG Act establishes OIG as an independent entity within the Peace Corps. The law requires that OIG fully and currently inform the Peace Corps Director and the Congress about problems and deficiencies relating to the administration of agency programs and operations. OIG is authorized by law to review all programs and operations of the Peace Corps. OIG’s work typically examines agency operational efficiency, effectiveness, financial stewardship, and compliance with federal law, regulations, and agency policy.



In accomplishing its mission, OIG is committed to:

Excellence: issuing accurate, timely, and reliable work products.

Positive change: making value-added recommendations to address issues and challenges with agency programs and operations.

Integrity: maintaining independence from the agency, meeting professional and ethical standards, and committing to continual improvement.

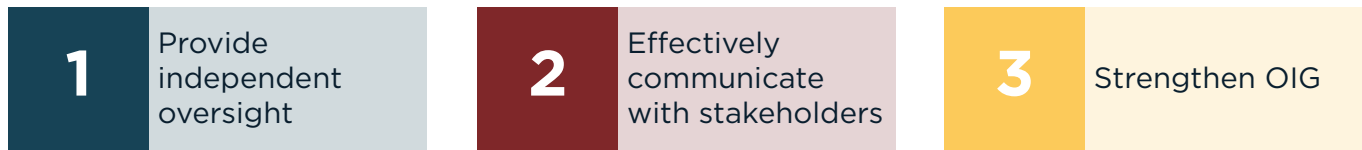
Collaboration: working together and promoting best practices within the office, with the agency, and with external stakeholders.

Staffing and Resources

OIG is comprised of four units: Audit, Evaluation, Investigation, and Management and Administration. Each unit develops its fiscal year (FY) work considering staff availability and FY funding. OIG has a cross-unit outreach committee responsible for informing all stakeholders (agency staff, Volunteers, Congress, and the general public) about the role, work, and resources of OIG, including promotion of the OIG Hotline.

Strategic Goals

As detailed in the OIG Strategic Plan for FYs 2020 to 2022, OIG has three strategic goals:



OIG plans to meet its goals by supporting the Peace Corps through our work to improve program effectiveness, efficiency, compliance, and accountability. OIG will provide briefings, lead trainings, and conduct external engagement while working to deepen our knowledge of the Peace Corps, acquire additional subject matter expertise, improve internal controls, and engage in collaborative activities.

Focus Areas

Throughout the year, OIG will conduct audits, evaluations, investigations, and other reviews addressing the following four priorities.

- Full resumption of overseas post operations, including Volunteer return to service
- Volunteer safety and security and medical care
- Agency-wide processes, programs, and systems
- [Management Challenges](#) identified annually by the IG and published in the Peace Corps' [Agency Financial Report](#) (AFR)²

Advice and Assistance

In addition to our work to help address the focus areas, OIG also plans to conduct the following advice and assistance functions in support of agency goals and objectives:

- Monitor and provide expertise, as appropriate, on the agency's planning/processes for resumption of global operations and implementation of its re-entry plan.
- Provide technical assistance to Peace Corps managers on issues related to financial and administrative policies, procedures, best practices, and effective internal controls.
- Deliver training and best practices presentations on fraud awareness and compliance with agency internal controls.
- Provide Volunteers/trainees and agency staff with informational materials, guidance, trainings, and other presentations on the role, responsibilities, authority, and functions of OIG and how to effectively and confidentially report fraud, waste, abuse, mismanagement, serious administrative misconduct, or criminal wrongdoing involving Peace Corps staff, contractors, or Volunteers/trainees.

² The most recent AFR covering FY 2019 was issued in November 2019. The AFR is issued annually in November covering the previous fiscal year.

Audit Unit

The Audit Unit conducts audits and other reviews of agency programs and financial and administrative operations that support the Peace Corps' mission and its Volunteers serving abroad. The Unit performs audits of the agency's field activities at overseas posts and its administrative support functions at headquarters and domestic recruiting offices. The Unit also contracts with independent public accounting firms to conduct an audit of the agency's financial statements and a review of the agency's compliance with the Federal Information Security Modernization Act of 2014. Audits are performed in accordance with Generally Accepted Government Auditing Standards (GAGAS) issued by the Comptroller General of the United States. These Standards were updated in 2018 to place increased emphasis on internal controls and ensure adequate root cause analysis. OIG also participates in a peer review program that assesses our Audit Unit's compliance with GAGAS. Our Audit Unit underwent a review that was completed in March 2020. The Audit Unit obtained the highest possible rating, "pass".

Post Audits

Applying a risk-based analysis process, we considered the following factors when developing our audit schedule:

- Input from post, regional, and headquarters management and staff
- Congressional requests and referrals from other offices or agencies
- Time elapsed since the last audit
- Number of Volunteers serving
- Size, maturity, and cost of the post
- Trends and anomalies in the agency's financial data and OIG Hotline information

Based on these factors, we intended to initiate audits of at least five posts. However, the COVID-19 emergency evacuation of all Volunteers disrupted our planned activities. We intend to complete the following post audits that were initiated in FY 2019:

- Peace Corps/Ghana
- Peace Corps/Thailand
- Peace Corps/Ethiopia

Agency-Wide Programs and Special Reviews

The Audit Unit regularly initiates, performs, or completes a variety of audits, reviews, and follow-ups of agency-wide programs. These projects are cross-functional and may require assistance from other OIG units. For example, the Unit works closely with the Investigation Unit on forensic analysis of financial data and on Federal Employees' Compensation Act³ issues. In addition, the Unit collaborates with the Evaluation Unit when their expertise is needed on programmatic issues. The Audit Unit will continue to review the agency's internal control program and report on its effectiveness in our audits.

So far in FY 2020, we have issued:

- [Management Advisory Report on Peace Corps President's Emergency Plan for AIDS Relief \(PEPFAR\) Financial Guidance](#)

3 Federal Employees' Compensation Act See 5 U.S.C. §§ 8101 et seq

Most recently, the Audit Unit has focused its activities internally on implementing policy and process changes related to the issuance of new Government Auditing Standards. Additionally, we will be revising our audit program for overseas posts. This revision will incorporate the new standards and institutionalize our audit approach in response to a myriad of policy changes made by the agency. The changes will help OIG strengthen its audit oversight tools and become more efficient.

We plan to initiate an audit of the Peace Corps’ management of human capital in the last quarter of the fiscal year, and are in the process of re-evaluating Peace Corps programs. In addition, we have reached out to the agency to offer our assistance in reviewing disbursement of funds received from the COVID-19 CARES Act.

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| Program Audits and Reviews |
| The Peace Corps’ Management of Human Capital |
| Review of COVID-19 Spending |

Legislatively Mandated Work

We also completed the following legislatively mandated work:

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| <u>Annual Audit of the Peace Corps’ Financial Statements</u> | The Accountability of Tax Dollars Act of 2002 mandates that the agency annually submit its financial statements for audit. An independent public accounting firm performed this audit. OIG’s role was to monitor the independent public accounting firm’s work to ensure that it was of acceptable quality, in compliance with Federal laws and applicable standards, and was completed within the established milestones. |
| <u>Audit of the Peace Corps’ Compliance with the Improper Payments Elimination and Recovery Act of 2010</u> | The Improper Payments Elimination and Recovery Act of 2010 (IPERA) requires IG’s to annually assess the agency’s compliance with IPERA. We assessed the agency’s compliance by completing a full audit. Our report was issued, as required, on May 15, 2020. |
| <u>Annual Review of the Peace Corps’ Information Security Program</u> | OIG is responsible for annually reporting on agency compliance with the Federal Information Security Modernization Act of 2014. To perform this work, OIG contracted with an independent public accounting firm. The auditors reviewed the Peace Corps’ information systems security program and reported related, selected data to the Office of Management and Budget. |
| <u>Audit of the Peace Corps’ Compliance with the Digital Accountability and Transparency Act (DATA Act)</u> | The Digital Accountability and Transparency Act of 2014 requires us to review the agency’s spending data submission to ensure compliance with the Federal reporting requirements. Our report was issued on November 7, 2019. |

Evaluation Unit

The Evaluation Unit conducts independent assessments of the design, implementation, and results of agency operations, programs, and policies. The Unit's goal is to provide timely, credible, and useful information to agency managers, policymakers, and others on program operations and policy issues. The Unit accomplishes this through evaluations of the management and program operations of the Peace Corps at overseas posts and domestic offices. The Unit also participates in cross-functional reviews of agency operations undertaken with OIG auditors or investigators.

OIG evaluations promote integrity, efficiency, and effectiveness; identify best practices; and recommend program improvements and means to comply with Peace Corps policies. The Evaluation Unit conducts reviews and assessments using applicable Federal laws; regulations; and Peace Corps policies, procedures, and performance plans, including the agency's Integrated Planning and Budgeting System (IPBS) and strategic plans. Evaluations are conducted under the direction and guidance of the Assistant Inspector General for Evaluations and in accordance with the Quality Standards for Inspections and Evaluations, published by the Council of the Inspectors General on Integrity and Efficiency (CIGIE). These standards are instrumental in maintaining impartiality, reliability, and credibility; and they set the bar for staff competency, independence, professional judgment, internal quality controls, and stakeholder feedback for process improvements.

Country Program Evaluations

The Evaluation Unit considered the following factors when developing the original FY 2020 evaluation schedule:

- Requests from Congress and agency managers, including country directors
- Conditions of the post or domestic operations brought to our attention by Volunteers, trainees, or staff
- Conditions that indicate a need to evaluate the program to assure the health and safety of Volunteers and staff or to identify and deter fraud, waste, abuse, and mismanagement
- New or changed conditions affecting post operations
- Indications of either high or low performance
- Size, maturity, and cost of the post
- Annual Volunteer Survey results, Volunteer health and safety data, and resignation rates
- Time elapsed since the last country program evaluation

Prior to the agency's decision to evacuate all Volunteers in response to the COVID-19 pandemic, the Evaluation Unit initiated three country program evaluations on OIG's original FY 2020 annual plan: Peace Corps/Eastern Caribbean, Peace Corps/Morocco, and Peace Corps/Mongolia. The Unit was able to complete the evaluation of Peace Corps/Eastern Caribbean and will issue the final evaluation report in June 2020. Due to the evacuation of Volunteers and the suspension of overseas operations, the Unit postponed the evaluations in Morocco and Mongolia and does not plan to initiate any new country program evaluations in FY 2020.

The Evaluation Unit also identifies opportunities to conduct limited-scope follow-up evaluations of particular findings and recommendations made in prior country program evaluation reports. The purpose of these limited scope evaluations is to determine if the actions taken in response to the original evaluation report's recommendations have had the intended effects and been sustained.

Country Program Evaluations Initiated in FY 2019

The following country program evaluations were initiated in FY 2019 and final reports were issued in FY 2020:

- [Peace Corps/Panama](#)
- [Peace Corps/Tanzania](#)

Agency-Wide Programs and Special Reviews

As foreseen in our original FY 2020 annual plan, the Evaluation Unit initiated a review of recurring issues that have been reported in OIG evaluations, audits, and investigations from FY 2016 to FY 2019. This will be the third recurring issues report our office has provided to the agency since 2012. Due to the unique circumstances the Peace Corps faces as a result of the COVID-19 evacuation and suspension of Volunteer activities, OIG will endeavor to use this recurring issues report as a vehicle for providing timely information to Peace Corps managers involved in planning the agency's re-entry process.

As indicated in the original FY 2020 annual plan, the Unit completed a review of another Federal agency's evaluation and inspection work through the CIGIE peer review process.

In February 2020, the Unit initiated a review of the facts and circumstances surrounding the death of a Volunteer in Ghana, and that review remains ongoing.

Depending on the availability of resources the Evaluation Unit may also initiate other evaluations or reviews in FY 2020.

| Program Evaluations and Reviews |
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| Recurring Issues Report (Ongoing) |
| Review of the Facts and Circumstances Surrounding the Death of a Volunteer (Ongoing) |
| Systems and Support for Knowledge Management |
| Management of Overseas Posts' Human Resources Functions |

In addition to the work listed above, our evaluation work is being reviewed in FY 2020 as part of the CIGIE peer review process. The Unit is also assisting with another peer review of the Pension Benefits Guarantee Corporation Office of Inspector General.

Investigation Unit

The Investigation Unit assists the Peace Corps in maintaining integrity in its programs and operations by investigating allegations of fraud, waste, abuse, and misconduct involving grant, contract, and procurement fraud; violations of law and agency policies committed by Peace Corps personnel, contractors, and vendors; and the Federal Employees' Compensation Act⁴ claimants.

Our investigations are conducted in accordance with the IG Act, the Attorney General Guidelines for Offices of Inspectors General with Statutory Law Enforcement Authority, and the Quality Standards for Investigations issued by the President's Council on Integrity and Efficiency and affirmed by CIGIE. Our investigations can result in criminal prosecutions, civil monetary penalties, sanctions, and personnel actions, including verbal counseling, suspensions, debarments, and terminations from Peace Corps service.

⁴ See 5 U.S.C. §§ 8101 et seq.

OIG is authorized by the Attorney General to exercise statutory law enforcement powers pursuant to Section 6(e) of the IG Act and in accordance with the Attorney General Guidelines for Offices of Inspector General with Statutory Law Enforcement Authority. This authority provides OIG with important law enforcement tools including the authority to, upon probable cause, seek and execute warrants for arrest, search premises or seize evidence, make arrests without a warrant while engaged in official duties, and carry firearms.

Investigative Priorities

With the evacuation of all Volunteers in the field the Investigation Unit will be prioritizing completing existing investigations and will continue to pursue a variety of allegations and complaints from multiple sources, including Returned Peace Corps Volunteers who were recently evacuated, staff, and other sources. The following are our priorities:

- Investigate allegations of violations of the PROTECT Act by Peace Corps staff or by Volunteers prior to their evacuation.⁵
- Investigate allegations of sexual assaults by Peace Corps staff or Volunteers.
- Assist the PRAC with COVID-19 fraud investigations, if requested.
- Track complaints or allegations originating with Volunteers about Peace Corps staff relating to misconduct, mismanagement, or policy violations; any breaches of the confidentiality of the Volunteers; and any actions to assure the safety of Volunteers who file such complaints.
- Continue to provide technical assistance to partners and stake-holders on Volunteer deaths.
- Investigate and refer crimes occurring within the Special Maritime and Territorial Jurisdiction of the United States⁶ for U.S. prosecution.
- When appropriate, seek local prosecutions by working with the Diplomatic Security Service and host country police entities.
- Proactively work with the agency, the Audit and Evaluation Units, and external partners to review high-risk programs and contracts for fraud, e.g. FECA.
- Ensure referrals of individuals and entities for suspension and debarment, as appropriate.
- Ensure that allegations of whistleblower reprisal involving staff, Volunteers, and contractors are thoroughly investigated.
- Strengthen our engagement with stakeholders by providing them with briefings about OIG investigative responsibilities and mechanisms for making confidential complaints.

⁵ Prosecutorial remedies and other tools to end the exploitation of children today (Pub. L. 108-21)

⁶ See generally 18 U.S.C. § 7. A number of U.S. criminal laws apply outside of the United States. In many cases these laws are meant to apply to U.S. nationals who become a victim of crime abroad, or who are perpetrators of crimes abroad under certain conditions. Examples include when the crime is committed in a property owned, leased, or used for a government purpose, such as at a Peace Corps post, training office, or similar site. Another circumstance relates to crimes occurring in residences used by the Peace Corps or its personnel, which may include residences where Volunteers or staff permanently reside.