

Final Audit Report

The Peace Corps' Compliance with PEPFAR Funding Allocation Procedures

IG-23-03-A September 2023

EXECUTIVE SUMMARY

BACKGROUND

The U.S. President's Emergency Plan for AIDS Relief (PEPFAR) is a multi-year U.S. Government initiative to address the HIV pandemic. The PEPFAR program is managed and overseen by the U.S. Department of State's Office of the U.S. Global AIDS Coordinator and Health Diplomacy (OGAC). Congress appropriates PEPFAR funds to the State Department, which OGAC allocates to the Peace Corps and other participating Federal agencies.

The Peace Corps Office of Global Health and HIV (OGHH) serves as the primary point of contact for Peace Corps posts, regions, and other headquarter offices regarding PEPFAR operations. The regions and posts are responsible for executing PEPFAR programs in the field, including its programmatic and administrative management. The Peace Corps Office of the Chief Financial Officer (OCFO) is responsible for providing OGHH and the posts with the necessary PEPFAR strategic, technical, and financial guidance. OCFO and OGHH issue the Peace Corps PEPFAR Financial Guidance, which posts use to document how they will request, plan, and execute PEFPAR funding and its programs. Post staff must ensure expenses are correctly applied and distributed between PEPFAR and the Peace Corps' direct appropriations and maintain the appropriate supporting documentation.

OBJECTIVE

The objective of this audit was to determine the basis and justifications for allocating expenses to PEPFAR funds following the global evacuation of Volunteers in March 2020.

WHAT WE FOUND

During this audit, we reviewed PEPFAR expenditures from October 1, 2019, through June 30, 2022, and verified the validity of the total allocation of support expenses to PEPFAR funds. Overall, we determined that PEPFAR allocations were mostly accurate. However, we found instances in which the posts did not follow the prescribed policies and procedures to correctly allocate expenses of approximately \$14,000 to PEPFAR funds. Specifically, most of the sampled posts did not have the appropriate justifications to allocate PEPFAR funds to pay for utilities at U.S. Direct Hire (USDH) residences, which is considered a non-PEPFAR related expense. Using PEPFAR funds to pay for non-PEPFAR related expenses did not comply with the Peace Corps PEPFAR Financial Guidance and may lead to inaccurate external reporting. Providing additional training for post staff on the appropriate allocation of PEPFAR expenses will help prevent such errors from occurring in the future.

Recommendations in Brief

Our report contains two recommendations for the Peace Corps' Office of Chief Financial Officer: 1) reclassify expenses that had been incorrectly charged to PEPFAR and 2) provide additional training to those responsible for reviewing PEPFAR expenses.

PEACE CORPS OFFICE OF INSPECTOR GENERAL

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BACKGROUND

The PEPFAR is a multi-year U.S. Government initiative to address the HIV/AIDS pandemic. Since its inception in 2003, PEPFAR has provided more than \$100 billion toward HIV/AIDS prevention, awareness, and supporting programs. PEPFAR programs are reported to have helped save more than 20 million lives, slowed the rate of AIDS-related deaths, decreased the number of mother-to-child transmissions, and provided treatment and care for millions of people affected by the virus.¹

The State Department's Office of the U.S. Global AIDS Coordinator and Global Health Diplomacy (OGAC) has a fiscal year 2023 budget of \$6.9 billion to support PEPFAR programs. PEPFAR funds are appropriated to the State Department, which are then transferred to various agencies that use these funds to implement PEPFAR programs, including the U.S. Agency for International Development, the Department of Defense, the Department of Commerce, the Department of Labor, the Department of Health and Human Services, and the Peace Corps.

At the Peace Corps, the Office of Global Health and HIV (OGHH) and the Office of the Chief Financial Officer (OCFO) are the key offices responsible for managing PEPFAR programs through the regions and posts. The regions and posts are responsible for executing PEPFAR programs in the field.

OFFICE OF GLOBAL HEALTH, AND HIV/AIDS

OGHH is responsible for managing Peace Corps' partnership with the PEPFAR program and serves as the primary point of contact for Peace Corps posts, regions, and headquarter offices regarding PEPFAR operations. OGHH supports and helps posts coordinate their annual spending plans for PEPFAR funds. An annual spending plan outlines how a post can request, plan, and execute the funding to optimize Peace Corps and PEPFAR strategies for its respective country. Each post develops an Implementation Plan (IP) to communicate its execution of pre-approved funding. OGHH, in conjunction with the region, reviews and approves the IP, which the OCFO and regions then use to provide oversight and financial controls.

OFFICE OF THE CHIEF FINANCIAL OFFICER

OCFO is responsible for funds control, conducting official external reporting, and providing OGHH and the posts with the necessary strategic, technical, and financial guidance on PEPFAR allocations. OCFO also reviews and adjusts the funding allotment levels and responds to data requests from the posts. OCFO issues guidance on how the posts will request, plan, and execute PEFPAR funding and implement its programs. The two main guidance documents are:

• The PEPFAR Financial Guidance, which documents PEPFAR'S programs, policies, procedures, and implementation processes. It outlines how the posts will request, plan, and execute PEPFAR funding to best implement the Peace Corps and PEPFAR strategies for a given country.

¹ GAO Audit Report Number GAO-23-105347, issued December 2022, page 5.

• The PEPFAR Funding Decision Wheel, which is a budget tool that summarizes the allowable and unallowable PEPFAR expenditures.

OCFO also provides technical assistance for IP form updates, preparing monthly PEPFAR budget tools, and circulates other tools, reports, and data summaries.

PEACE CORPS POSTS

The posts are responsible for the direct support of Volunteers and the country-level management of the PEPFAR program. Post staff must ensure expenses are correctly applied and distributed between the PEPFAR and Peace Corps direct appropriations and maintain the appropriate documentation. OCFO provides the PEPFAR Financial Guidance to the posts annually, which outlines how certain support expenses are allowed to be allocated to PEPFAR, including the specific ratio to use when allocating between appropriated and PEPFAR funding. This guidance also outlines the types of expenses that are not allowed to be charged to PEPFAR.

PREVIOUS OIG WORK ON PEPFAR FUNDING

In March 2020, OIG issued a Management Advisory Report on the Peace Corps PEPFAR Financial Guidance. We assessed how overseas posts followed the Peace Corps' guidance when using PEPFAR funding for payments. Our review found that the Peace Corps did not have adequate policy, procedures, or guidance to ensure that PEPFAR funds received by the Peace Corps were appropriately managed. Further, we found that PEPFAR funds were not consistently complying with the guidance.

This review made six recommendations to improve the handling of PEPFAR funds. By September 2022, the agency had taken actions to address all the recommendations and were successfully closed. During our testing for this audit, we verified that Peace Corps implemented the corrective actions related to the allocation of expenses and that the associated issues were not repeated.

GLOBAL PANDEMIC

In March 2020, the Peace Corps evacuated all Volunteers in response to the ongoing coronavirus disease of 2019 (COVID-19) pandemic.

This was an unprecedented challenge for the Peace Corps, as the evacuation was for all countries in which Volunteers were serving. After the global evacuation, OCFO made projections for the return of service timeframes, which continued to change. Initially, it was projected that Volunteers could return to the posts in late 2020. As such, the posts continued to prepare for the anticipated return of Volunteers.

However, the Peace Corps could not begin to return Volunteers to service until fiscal year 2022, and, by the end of fiscal year 2023, they anticipate reentry into almost all the countries that had been evacuated in March 2020.

Since posts did not close during the post-evacuation period, the overseas posts continued to incur routine expenses to maintain post operations (for example: rent, utilities, fuel, and other expenses).

As post staff were retained during the post-evacuation period, the salaries and benefits of the personal service contractors and medical personal service contractors amounted to approximately \$8.8 million or 85 percent of the Peace Corps' PEPFAR Overseas Program Support costs during the post-evacuation period of approximately \$10.3 million².

For the Peace Corps, the expenses allocated to PEPFAR decreased significantly after the March 2020 evacuation of Volunteers. The average monthly total PEPFAR expenditures declined from approximately \$1.3 million before the evacuation to \$0.6 million after the evacuation.

OBJECTIVE

The objective of this audit was to determine the basis and justifications for allocating expenses to PEPFAR funds following the global evacuation of Volunteers in March of 2020.

² The salaries and benefits of the personal service contractors and medical personal service contractors amounted to approximately 63% of the total amount of the PEPFAR Post-Evacuation expenses of approximately \$13.9 million.

RESULTS

During this audit, we reviewed PEPFAR expenditures from October 1, 2019, through June 30, 2022, and verified the validity of the total allocation of support expenses to PEPFAR funds. Overall, we determined that PEPFAR allocations were mostly accurate. However, we found instances in which the posts did not follow the prescribed policies and procedures to correctly allocate approximately \$14,000 in expenses to PEPFAR funds. Specifically, most of the sampled posts did not have an appropriate justification to allocate PEPFAR funds to pay for utilities at U.S. Direct Hire (USDH) residences, which is considered a non-PEPFAR related expense. Using PEPFAR funds to pay for non-PEPFAR related expenses did not comply with the Peace Corps PEPFAR Financial Guidance issued to the posts and may lead to inaccurate external reporting.

USDH UTILITIES

Peace Corps PEPFAR Financial Guidance³ states that:

"PEPFAR must not be used to fund any direct expenses associated with the employment of post leadership positions, including, but not limited to, the Country Director, Director of Programming and Training, or Director of Management and Operations. This includes costs associated with salaries and benefits, relocation costs, property rental or maintenance, utilities, and associated security costs."

During the audit, we reviewed the Peace Corps' control activities relating to PEPFAR transactions. We analyzed disbursements by overseas posts using reports from FORPost, a budget execution and imprest fund management system that is used to record overseas posts' disbursements. Of the 74 transactions sampled,⁴ we found 17 instances where PEPFAR funds were improperly used to pay for utilities at USDH residences. This occurred in six out of the seven countries in our sample, totaling approximately \$14,000 of ineligible transactions.

The Peace Corps PEPFAR Financial Guidance provides that a post's Director of Management and Operations (DMO) is responsible for administering PEPFAR financial activities at their post, including reviewing relevant supporting documentation for transactions.

This guidance is clear that the allocation of USDH utilities is not allowed; however, the DMOs did not ensure that the correct funding source was used to pay for these expenses. Furthermore, GAO's Standards for Internal Control in the Federal Government, Principle 10, subparagraph 10.10 – Design of Control Activities at Various Levels states: "Management may design a variety of transaction control activities for operational processes, which may include verifications, reconciliations, authorizations, approvals, and both physical control activities, and supervisory control activities."

In our interviews, OCFO concluded that additional training for DMOs on the allocation of PEPFAR expenses would have made these allocation errors less likely from occurring.

Additionally, the Peace Corps needs to better execute its current guidance by continually emphasizing the importance of DMOs' review of documentation at the posts. Using PEPFAR

³ Peace Corps PEPFAR Financial Guidance FY2022. This restriction was also provided in the Peace Corps Financial Guidance FY2020 and FY2021.

⁴ See Appendix A: Scope and Methodology for more details on the population and sample selected.

funds to pay for non-PEPFAR related expenses is a violation of the Peace Corps PEPFAR Financial Guidance and may lead to inaccurate external reporting.

We recommend that:

- 1. The Office of the Chief Financial Officer reclassify the U.S. Direct Hire utility expenses of approximately \$14,000 that was charged to PEPFAR to Peace Corps direct appropriations, consistent with the applicable guidance in effect at the time of audit.
- 2. The Office of the Chief Financial Officer and the Office of Global Health and HIV/AIDS coordinate to provide training to the Directors of Management and Operations about PEPFAR allowable and unallowable expenses and to ensure that transactions charged to PEPFAR funds are following the current Office of Chief Financial Officer and Office of Global Health and HIV financial guidance.

QUESTIONED COSTS

During this audit, we identified the following questioned costs.

Questioned Costs						
Recommendation number	Description	Amount				
1	Utility Payments for USDH Residences	\$13,863				

The Inspector General Act of 1978, as amended, defines questioned costs as follows:

"Questioned costs are costs that are questioned because of an alleged violation of a provision of a law, regulation, contract, grant, cooperative agreement, or document governing expenditure of funds; a finding that, at the time of the audit, such costs are not supported by adequate documentation; or a finding that the expenditure of funds for the intended purpose is unnecessary or unreasonable."

LIST OF RECOMMENDATIONS

We recommend that:

- 1. The Office of the Chief Financial Officer reclassify the U.S. Direct Hire utility expenses of approximately \$14,000 that was charged to PEPFAR to Peace Corps direct appropriations, consistent with the applicable guidance in effect at the time of audit.
- 2. The Office of the Chief Financial Officer and the Office of Global Health and HIV/AIDS coordinate to provide training to the Directors of Management and Operations about PEPFAR allowable and unallowable expenses and to ensure that transactions charged to PEPFAR funds are following the current Office of Chief Financial Officer and Office of Global Health and HIV financial guidance.

APPENDIX A: SCOPE AND METHODOLOGY

SCOPE

We conducted this audit between September 2022 and March 2023 while working in a telework environment. The scope of our audit covered the period between October 1, 2019, and June 30, 2022. Our data analysis consisted of PEPFAR expenditures, which were designated as pre-evacuation expenditures between October 2019 to May 2020 (8 months) and post-evacuation expenditures between June 2020 to June 2022 (25 months).

We conducted this performance audit in accordance with the Generally Accepted Government Auditing Standards, 2018 revision. These standards require that we plan and perform audits to obtain sufficient and appropriate evidence that provides a reasonable basis for our findings and conclusions based on our audit objectives.

We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Throughout the audit, we were aware of the possibility or existence of fraud, waste, or misuse that could significantly impact the audit objectives and conducted procedures designed to obtain reasonable assurance of detecting any such fraud as deemed appropriate.

METHODOLOGY

To obtain background information on the agency's internal control process, we reviewed the following:

- PEPFAR Financial Guidance from FYs 2020 to 2022,
- PEPFAR Technical Guidance in Context of COVID-19,
- PEPFAR Funding Decision Wheel for FYs 2020 to 2022, and
- The Overseas Financial Management Handbook.

Additionally, we reviewed internal and external budget memos and relevant PEPFAR related communications and conducted interviews with State Department Office of Global AIDS Coordinator and Peace Corps personnel within OCFO and OGHH. Furthermore, we performed the following:

- Assessed the controls in place to detect, prevent, and correct errors
- Reviewed prior audit reports and investigations that related to PEFAR funds
- Reviewed posts' disbursement vouchers and any associated support and explanations
- Reviewed all supporting documentation provided by Peace Corps and obtained written clarifications from OCFO, when necessary

Our testing methodology consisted of reviewing the Peace Corps FORPost activity for 12 identified countries where the agency allotted funds for PEPFAR related activities. Our analysis indicated that the disbursements for PEPFAR funds in these countries amounted to

approximately \$24.6 million between October 1, 2019, and June 30, 2022. We judgmentally selected 7 of the 12 countries receiving PEPFAR funding: Botswana, Cameroon, Mozambique, South Africa, Tanzania, Uganda, and Zambia. These countries accounted for approximately \$19 million, or 77 percent, of the total PEPFAR disbursements during the period. We analytically reviewed recurring direct expenses (for example, personal service contractors' salaries) for consistency with payments prior to the evacuation.

We selected a judgmental sample of 74 out of 40,969 transactions from our 7 sample countries. The value of these 74 transactions was approximately \$1.1 million. We reviewed these transactions, obtained supporting documentation, and verified the justification for charging these expenses to PEPFAR funds based on the PEPFAR Financial Guidance issued to overseas posts. We verified the validity of the total allocation of support expenses to PEPFAR funds by using the posts' budget tool and Hyperion budgeting software reports.

APPENDIX B: USE OF COMPUTER PROCESSED DATA GUIDE

The Government Accountability Office's Assessing the Reliability of Computer-Processed Data Guide defines "reliability" as data applicable for the audit purpose are sufficiently complete and accurate.

During our audit, we relied on the disbursement reports provided by OCFO. We also independently extracted data from FORPost, a Peace Corps budget execution and imprest fund management tool for the posts. We isolated PEPFAR related expenditures from the FORPost data set but did not test it to ensure that the universe of data provided to us for disbursements was complete.

Our office uses independent auditors to annually audit the agency's financial statements. These auditors have determined that the Peace Corps' financial statements had a material weakness related to the management of property, however, the auditors did not identify any material weaknesses concerning PEPFAR funds or internal controls surrounding the financial statements. Therefore, based on our professional judgement, we determined that the data was sufficiently reliable for the purposes of this report.

APPENDIX C: LIST OF ACRONYMS

COVID-19	Coronavirus Disease 2019
DMO	Director of Management and Operations
IP	Implementation Plan
OCFO	The Office of Financial Officer
OGAC	Office of Global AIDS Coordinator and Health Diplomacy
OGHH	Office of Global Health and HIV/AIDS
OFMH	Overseas Financial Management Handbook
OIG	Office of Inspector General
PEPFAR	President's Emergency Plan for AIDS Relief
USAID	United States Agency for International Development
USDH	United States Direct Hire

APPENDIX D: CRITERIA USED TO SUPPORT ISSUES IN THE REPORT

FEDERAL REQUIREMENTS

THE GOVERNMENT ACCOUNTABILITY OFFICE'S STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT (GAO-14-704G)

Principle 10—Design of Control Activities at Various Levels

10.10

Transaction control activities are actions built directly into operational processes to support the entity in achieving its objectives and addressing related risks. "Transactions" tends to be associated with financial processes (e.g., payables transactions), while "activities" is more generally applied to operational or compliance processes. For the purposes of this standard, "transactions" covers both definitions. Management may design a variety of transaction control activities for operational processes, which may include verifications, reconciliations, authorizations and approvals, physical control activities, and supervisory control activities.

OTHER GUIDANCE

PEPFAR Financial Guidance

This is the primary document that describes the PEPFAR programs and funding. It reinforces priority areas, allowable and unallowable expenses, and updates on new policies and procedures related to PEPFAR. Additionally, this guidance outlines how the posts will request, plan, and execute PEFPAR funding to best implement the Peace Corps and PEPFAR Strategies for a given country.

PEPFAR Funding Decision Wheel

The PEPFAR funding requirements stipulated in the PEPFAR Financial Guidance are summarized in the PEPFAR Funding Decision Wheel, which is used as a quick reference when obligating PEPFAR funding to a post. The PEPFAR Funding Decision Wheel illustrates the funding allocation requirements related to specific expenditure areas. Programmatic and administrative items are clustered into four groups: Volunteers, Trainings, Programming Areas, and Management and Operations.

PEPFAR can only fund purchases that are for HIV-related activities and items, as described in the PEPFAR Financial Guidance and summarized in the PEPFAR Funding Decision Wheel.

State Department's PEPFAR Technical Guidance in Context of COVID-19 Pandemic

Issued by the State Department, PEPFAR Technical Guidance in Context of COVID-19 Pandemic provides guiding principles for the provision of services in PEPFAR-supported countries during COVID- 19 Pandemic. The PEPFAR Technical Guidance during the pandemic focused on the following areas:

- Protect the gains in the HIV response
- Reduce the risk of transmission of COVID-19 among clients served by PEPFAR and PEPFAR-supported staff

In consultation with the host governments, PEPFAR Operating Units have the flexibility to determine how best to continue to serve clients with HIV prevention and treatment services in areas affected by COVID-19.

Overseas Financial Management Handbook

Peace Corps administers PEPFAR funding according to the guidance outlined in the Overseas Financial Management Handbook (OFMH) and the Peace Corps Manual. Section 66 of OFMH requires adequate support for expenditures. The list of prohibited expenses listed in OFMH, Section 46, Questionable and Prohibited Expenses, extends to PEPFAR funds.

APPENDIX E: AGENCY COMMENTS



MEMORANDUM

To:	Joaquin Ferrao, Inspector General				
From:	Allison Blotzer, Acting Chief Financial Officer		SON TZER	Digitally signed by ALLISON BLOTZER Date: 2023.08.29 17:45:05 -04'00'	
		nature			
	Kechi Achebe, Director of Office of Global Heal	th and	l HIV	KECHINYER E ACHEBE Date: 2023.08.30 07:45:12-0400	
	Emily Haimowitz, Chief Compliance and Risk O	fficer	EMILY HAIM	08:57:49 -04'00'	
Date:	September 1, 2023				
CC:	September 1, 2023 Carol Spahn, Director Thomas Peng, Chief of Operations and Administration Lauren Stephens, Chief of Staff Ruchi Jain, General Counsel Scott Beale, Associate Director for Global Operations Michele Godette, Regional Director, Africa Operations Rebecca Sharp, Regional Director, Europe, Mediterranean, and Asia Operations Mike McCabe, Regional Director, Inter- America and Pacific Operations Garrett Prendergast, Senior Budget Analyst, Office of the Chief Financial Officer (OCFO) Terri Gureno, Program Manager, OCFO Gregory Yeich, Compliance Officer				
Subject:	Agency Response to the Preliminary Audit Report Audit of the Peace Corps' Compliance with PEPE Funding Allocation Procedures (22-AUD-04)				

Thank you for the opportunity to respond to this preliminary report from the Office of Inspector General. Enclosed please find the agency's response to the recommendations made by the Inspector General as outlined in the OIG's Preliminary Audit Report: Audit of the Peace Corps' Compliance with PEPFAR Funding Allocation Procedures (22-AUD-04) sent to the agency on July 17, 2023.

Recommendation 1

The Office of the Chief Financial Officer reclassify the U.S. Direct Hire utility expenses of approximately \$14,000 that was charged to PEPFAR to Peace Corps direct appropriations, consistent with the applicable guidance in effect at the time of audit.

Concur

Response: In August 2023, OCFO took corrective action to reallocate approximately \$14,000 charged to PEPFAR for U.S. Direct Hire (USDH) utility expenses to Peace Corps appropriated funds. The reallocation occurred for 17 transactions across six Peace Corps posts.

Documents Submitted:

• Evidence of reallocation from PEPFAR funds to appropriated funds

Status and Timeline for Completion: September 2023

Recommendation 2

The Office of the Chief Financial Officer and the Office of Global Health and HIV/AIDS coordinate to provide training to the Directors of Management and Operations about PEPFAR allowable and unallowable expenses and to ensure that transactions charged to PEPFAR funds are following the current Office of Chief Financial Officer and Office of Global Health and HIV financial guidance.

Concur

Response: In February 2023, the Office of the Chief Financial Officer (OCFO) and Office of Global Health and HIV (OGHH) revised financial guidance for PEPFAR posts. The revised guidance allows posts to spend PEPFAR funds on indirect administrative costs, including expenses at USDH residences, up to a limit for total indirect administrative costs. The limit for each post is based on the level of PEPFAR funding and percentage of indirect administrative costs allowed by Department of State Office of the

U.S. Global AIDS Coordinator.

OCFO and OGHH trained financial staff of PEPFAR posts on updates to financial guidance during the PEPFAR Conference held in Botswana in February 2023 as well as the Africa (AF) Region Director of Management and Operation (DMO) Conference held in Zambia in April 2023.

Documents Submitted:

- Revised PEPFAR financial guidance with accompanying distribution message
- Training material from PEPFAR Conference and AF Region DMO Conference

Status and Timeline for Completion: September 2023

APPENDIX F: OIG RESPONSE

Management concurred with both recommendations. In its response, management described the corrective actions it has completed to address the issues that prompted each of our recommendations. We will close both recommendations based on evidence of corrective actions that address the recommendations.

We wish to note that in closing recommendations, we are not certifying that the agency has taken these actions or that we have reviewed their effect. Certifying compliance and verifying effectiveness are management's responsibilities. However, when we feel it is warranted, we may conduct a follow-up review to confirm that action has been taken and to evaluate the impact.

APPENDIX G: AUDIT COMPLETION AND OIG CONTACT

AUDIT COMPLETION

This audit was conducted under the direction of Assistant Inspector General for Audit Judy Leonhardt, Acting Assistant Inspector General for Audit Renita Davis, and by Lead Auditor Hal Nanavati and Senior Auditor John Onyeaku

Renita Davis

OIG CONTACT

If you wish to comment on the quality or usefulness of this report to help us strengthen our product, please contact Acting Assistant Inspector General for Audit Renita Davis at rdavis@peacecorpsoig.gov or 202.692.2937

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 call or write the Office of Inspector General. Reports or complaints can also be made anonymously.

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Email:

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> Office of Inspector General 1275 First Street NE Washington, DC 20526

For General Information:

Main Office: Website: **U** Twitter:

202.692.2900

twitter.com/PCOIG