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From: Kathy A. Buller, Inspector General

A handwritten signature in blue ink, reading "Kathy A. Buller".

Date: June 14, 2019

Subject: Final Report on the Program Evaluation of Peace Corps/Comoros (IG-19-03-E)

Transmitted for your information is our final report on the Program Evaluation of Peace Corps/Comoros.

Management concurred with all 21 recommendations, all of which remain open. In its response, management described actions it is taking or intends to take to address the issues that prompted each of our recommendations. OIG will review and consider closing recommendations 1-3, 5-7, 11-14, 17, 20, and 21 when the documentation reflected in the agency's response to the preliminary report is received. For recommendations 4, 8, 9, 10, 15, 16, 18, and 19, additional documentation is required.

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.

Our comments, which are in the report as Appendix E, address these matters. Please respond with documentation to close the remaining open recommendations within 90 days of the receipt of this memorandum.

You may address questions regarding follow-up or documentation to Assistant Inspector General for Evaluation Jeremy Black at 202.692.2912.

Please accept our thanks for your cooperation and assistance in our review.

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A Volunteer and university students from her English club.

Final Country Program Evaluation

Peace Corps/Comoros

IG-19-03-E

June 2019



EXECUTIVE SUMMARY

BACKGROUND

The Office of the Inspector General (OIG) conducted an evaluation of Peace Corps/Comoros (hereafter referred to as “the post”) from January 7 to January 23, 2019. More than 180 Peace Corps Volunteers have served the people of Comoros since the program launched in 1988. The program closed in 1995 and reopened in 2015. There is currently one project in Comoros: education. At the time of fieldwork for this evaluation, 30 Volunteers were serving in Comoros.

WHAT WE FOUND

Peace Corps/Comoros faced a complex operating environment due to logistics of having Volunteers on three separate islands, the lack of a U.S. Embassy in country, weak medical infrastructure, a challenging political climate, and the strain of a Volunteer death in 2018.

OIG identified many areas of operation that functioned well. Post and headquarters staff reported they had good communication, and post staff had a positive relationship with embassy personnel in Madagascar and with host country partners in Comoros. We found that the program focused on the Comoros government’s development priorities in poor areas of the country. In addition, Volunteers were contributing to most of their project objectives; health, safety and security, and cross-cultural training were effective; and most Volunteers had supportive, motivated counterparts. The post was conducting required risk assessments, the emergency action plan was updated and tested, and Volunteers were satisfied with the post’s response to security incidents. Volunteers thought healthcare met their needs, and local healthcare providers had been assessed. Volunteers felt integrated, and living and settling-in allowances were sufficient.

We also identified some areas of post operations that required management attention. Though the post was in the process of hiring additional staff, the original staffing model was not sufficient for carrying out and overseeing all programming, training, and site development activities, which had caused a number of issues with training and site management. Specifically, technical training did not prepare Volunteers effectively for their primary assignment, Volunteers were sworn into service with insufficient language ability, and staff were not utilizing the trainee assessment portfolio. Staff also conducted site development activities inconsistently, Volunteer housing did not meet established criteria, the medical unit was not sufficiently involved in site identification and placement, and official programming site visits were either not occurring or not documented as required. Additionally, we identified concerns about the readiness and adequacy of the medical unit, and we found that communication between staff and the Volunteer Advisory Council was ineffective.

RECOMMENDATIONS IN BRIEF

Our report contains 21 recommendations, which, if implemented, should strengthen post operations and correct the deficiencies detailed in the accompanying report.

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HOST COUNTRY BACKGROUND

The Union of the Comoros consists of a group of small islands in southern Africa, located in the northern part of the Mozambique channel between Madagascar and Mozambique. It is a majority Muslim country, and the official languages are Arabic, French, and Shikomori.

Comoros was previously a French colony made up of the islands of Grande Comore, Anjouan, Moheli, and Mayotte. Comoros declared independence from France in 1975, but France did not recognize the independence of Mayotte which remains under French administration. The country is characterized by a tumultuous political history, having experienced over 20 coups or attempted coups since independence. Previously, in accordance with a power-sharing accord, the presidency rotated every 5 years among its three islands, but in August 2018 the Comorian president announced that a July referendum had put an end to the rotating presidency.



Figure 1: Map of Comoros

Comoros's human development index¹ in 2018 was 0.503 which is classified as “low human development”, ranking it 165th of 189 countries measured. The poverty rate was estimated in 2014 as 42.4 percent of the population, and the adult literacy rate was approximately 77.8 percent in 2015.

The education system in Comoros faces challenges such as student protests, teacher strikes, and a lack of resources. Teachers are not paid on a consistent basis, which can cause them to go on strike for extended periods of time.

According to the African Health Observatory, the health system in Comoros was characterized by dilapidated health structures and poorly managed human resources. The Comoros government allocated little money to health spending.

¹ “The Human Development Report” publishes an annual Human Development Index. The Index provides a composite measure of three basic dimensions of human development: health, education and income. Countries are ranked from “very high human development” to “low human development” based on related data.

PEACE CORPS PROGRAM BACKGROUND

OIG conducted fieldwork for this program evaluation of Peace Corps/Comoros from January 7 to January 23, 2019. Prior to this evaluation, we conducted a special review in 1990.² OIG has not performed any audits of the post.

The Peace Corps first established a program in Comoros in 1988, but the program closed in 1995 due to political instability. A new country agreement was signed in September 2014, and the post reopened in early 2015, first with a small contingent of Peace Corps Response Volunteers.³ The first group of two-year Volunteers arrived in June 2015. Since the post opened, 183 Volunteers have served in Comoros. At the time of fieldwork for this evaluation there were 30 Volunteers in country. The post receives a new group of about 22 trainees each year in June. The post's Fiscal Year (FY) 2019 operating budget was \$1,078,078 USD.⁴ A more detailed explanation of the post's project area is below:

- **Education.** Education Volunteers are involved in: teaching English as a foreign Language (TEFL) to students at the secondary school level; designing and implementing teacher training and professional development opportunities; strengthening teacher capacity to speak and teach English; developing teaching materials, lesson plans, and curriculum; and providing IT support.

Peace Corps/Comoros faced a challenging operating environment. First, Volunteers were placed on three different islands, and the only forms of safe transportation between them were ferries with limited service or airplanes. Second, the post was supported by the US embassy in Madagascar because there was no US embassy in Comoros. This posed some administrative challenges, such as the lack of a cost of living adjustment despite high costs in country, an outdated local compensation plan, and the absence of diplomatic pouch service. Third, local medical infrastructure was weak, so the post could not rely on local medical facilities for Volunteer healthcare in some cases. Fourth, turnover in the ministry of education caused school directors to be frequently replaced, so staff often had to visit new directors to explain what the Peace Corps did and the role of Volunteers. Fifth, political instability was an ongoing challenge; frequent protests posed a security risk for Volunteers. For example, the post consolidated all Volunteers to the island of Grande Comore for 2 weeks in October 2018 as a result of violent

² This review was an inspection conducted by OIG's inspections unit. OIG no longer has an inspections unit.

³ Peace Corps Response provides qualified professionals the opportunity to undertake short-term assignments in various programs around the world.

⁴ This amount does not include the salaries, benefits, and related cost of U.S. direct hires assigned to post and other costs the agency has determined should be centrally-budgeted.

protests. Additionally, in January 2018 a Peace Corps Volunteer died while serving in Comoros.⁵ Responding to this death had been a difficult, complex matter for staff.



Figure 2: Students gathered for a memorial marking the 1-year anniversary of a Volunteer's passing.

EVALUATION RESULTS

COMMUNICATION AND COLLABORATION

In our evaluation, we assessed the effectiveness of communication and collaboration using the following researchable question to guide our work:

Do staff effectively communicate and collaborate with each other, Volunteers, and stakeholders?

AREAS OF NO CONCERN

Post and headquarters staff were satisfied with their level of communication. Post staff were generally satisfied with the support and communication they received from headquarters. Most headquarters staff were satisfied with the level of communication they received from the post.

Post staff had a positive relationship with the embassy in Madagascar. As described above, the post was supported by the Embassy in Madagascar, because there was no U.S. Embassy in Comoros. Though the lack of a U.S. Embassy in country presented some challenges, post staff, headquarters staff, and Embassy staff we interviewed reported that the relationship was positive.

Post and host country officials reported they had a positive relationship. Although turnover in the ministry posed some challenges for staff as mentioned above, the post's relationship with the Ministry of National Education, Higher Education, and Scientific Research had recently

⁵ In April 2019, OIG issued a separate report, [Management Advisory Report: Review of the Circumstances Surrounding the Death of a Volunteer in Peace Corps/Comoros \(IG-19-04-SR\)](#). The death occurred just before OIG had planned to conduct this evaluation in January 2018, resulting in the delay of this evaluation until January 2019.

improved. Both post staff and the minister were satisfied with the relationship. The Peace Corps signed a partnership agreement with the ministry in February 2019. One Peace Corps staff member thought it would bring increased visibility to Peace Corps/Comoros, and several staff members thought it would help Peace Corps to improve the support they get from administrators and teachers of schools throughout the country. OIG also met with the Minister of Foreign Affairs and Collaboration who was satisfied with the level of communication and engagement from Peace Corps staff.

We reviewed other areas of communication and collaboration and found that the post had created annual reports to share with stakeholders.

AREAS OF COMMUNICATION AND COLLABORATION THAT REQUIRED MANAGEMENT ATTENTION

The evaluation uncovered one area of communication and collaboration that required management attention, namely that the Volunteer Advisory Council (VAC) was ineffective. The remainder of this section provides more information about this topic. Additionally, we found minor issues with staff collaboration that are part of a finding in the staffing resources section.

Communication with the Volunteer Advisory Council was ineffective.

According to the agency's *Characteristics and Strategies of a High Performing Post*, "there is a Volunteer Advisory Council (VAC) or some other mechanism that gathers, analyzes, and funnels Volunteer concerns and suggestions to staff." The Peace Corps' *Programming, Training, and Evaluation Guidance* states that "VACs serve as a voice—and are also excellent resources—for suggesting solutions to Volunteer issues."

Only 22 percent of Volunteers we interviewed felt that the VAC was a useful mechanism for communication between staff and Volunteers. Staff members reported that VAC meetings had not been sufficiently constructive in the past, though they thought this was improving. Some staff thought the VAC had not been solution-oriented, and instead served as a forum for Volunteers to complain without providing constructive feedback.

The VAC and staff members who attended the meetings lacked a formal system for tracking pending issues from prior meetings to ensure follow up was done. Many Volunteers said that VAC representatives would reach out to Volunteers for input on VAC meeting agenda items, but staff did not always follow through on addressing concerns brought forward during meetings. Staff admitted that there were times they had not followed through on requests, but they also said that when they did follow up on VAC concerns, they did not always communicate the results of the follow-up to Volunteers.

As a result, some Volunteers had the impression that post staff did not care about Volunteer concerns. In addition, the post missed an opportunity to encourage better communication and understanding between staff and Volunteers, as well as to address pervasive Volunteer issues. For example, some Volunteers complained of favoritism among staff, and several Volunteers were frustrated when staff stopped approving their time-away from site requests to stay in the house of Volunteers of a different gender. OIG determined that in both cases, part of the frustration stemmed from a lack of clear communication between staff and Volunteers.

We recommend:

- 1. That the country director develop a plan to improve communication with the Volunteer Advisory Council regarding the status of efforts to address issues raised through the council.**

LEADERSHIP AND MANAGEMENT

In our evaluation, we assessed if Peace Corps leadership effectively managed staffing resources using the following researchable question:

Has leadership effectively managed staffing and staff capacity?

AREAS OF NO CONCERN

Local staff's training needs were assessed regularly. The post had a formalized staff development policy that allowed staff to apply for training funding. With the exception of the program manager who was still new to the job, local staff reported that their training needs had been assessed.

All staff had completed sexual assault risk reduction and response training. OIG found that all staff participated in this training in December 2018.

AREAS OF LEADERSHIP AND MANAGEMENT THAT REQUIRED MANAGEMENT ATTENTION

The evaluation uncovered one area of leadership and management that required attention. The agency's original staffing model for Peace Corps/Comoros was not sufficient for programming and training, and roles and responsibilities for new staff remained unclear. The remainder of this section provides more information about this topic.

The original staffing model for opening Peace Corps/Comoros was not sufficient for programming and training, and roles and responsibilities remained unclear.

Peace Corps' guidance *Characteristics and Strategies of a High Performing Post* states that in high performing posts, "the program has sufficient resources (e.g., staff, vehicles, computers, offices, funds, language skills, training materials) to run efficiently, and these resources are used effectively to support the program." In addition, the guidance explains that "[t]he country director, programming and training officer, and [program managers] have devised and follow a system that defines project management responsibilities and each person's role in key areas, such as representation, site development, reporting, communications with Volunteers, and Volunteer support." Generally in the Peace Corps, the director of programming and training (DPT) and program manager (PM) positions each have roles in ensuring site identification is implemented in accordance with Peace Corps and post policy, and the training manager (TM) is responsible for training design.

The original staffing model the agency relied on when opening Peace Corps/Comoros in 2015 had a small number of programming and training staff, and did not include a DPT. At the time of fieldwork in January 2019, Peace Corps/Comoros did not have a DPT position. Instead, the country director (CD) was expected to fulfill the responsibilities of the country director and DPT positions, and the rest of the staff consisted of programming and training assistants and a language and culture coordinator for Volunteer training. This model reflected the agency's determination that a larger staff would not have had enough work at a small post like Comoros. In addition, the country director who opened the post in 2015 had previous experience as a DPT.

Several headquarters staff we interviewed shared concerns about oversight and workload because the post did not have a DPT. We found several issues with training and site management, all discussed in findings below, that resulted from insufficient oversight and staffing. Specifically, we found that technical training was ineffective, Volunteers were swearing in without sufficient language ability, and the post was not using the trainee assessment portfolio. Further, site identification was done inconsistently, Volunteer housing did not meet established criteria, the medical unit was not sufficiently involved in site identification, and official site visits were either not happening or not documented as required. In addition to these issues, we found that Volunteers were not getting timely responses to requests for staff support as a result of staffing insufficiency. We also assessed that the programming and training unit did not always communicate effectively with other units at the post, which may have been exacerbated by the extent of their workload or lack of oversight. We assessed that these issues could have been addressed and mitigated by a DPT.

The current country director did not have prior experience as a DPT before joining Peace Corps/Comoros and acknowledged difficulties with fulfilling the many duties of the DPT in

addition to her CD responsibilities. “It’s been kind of...hit and miss with the DPT work. But I am very confident about the future.”

The post had hired a PM shortly before fieldwork and was in the process of hiring a TM. Several post staff we spoke with agreed that the programming and training unit was understaffed, but they were optimistic that the addition of a program manager and a training manager would help ease the workload.

Peace Corps/Comoros was in a phase of transition during fieldwork for this evaluation, and some staff at post were confused about the roles of the new PM and TM and how their own jobs would be affected. The addition of a PM and, eventually, a TM will add a layer of management between the country director and the staff who had been responsible for programming, training, site development, and Volunteer support activities since the post’s opening in 2015. A headquarters staff member thought the transition to this new staffing structure could be difficult as staff get used to their new roles. Programming and training staff told us that there were already issues with staff collaboration such as a lack of trust among staff and a feeling that some management decisions had been made without staff’s opinions being taken into account.

The Africa Region intended to help the country director, PM, and TM understand their roles in programming and training through a combination of coaching and shadowing opportunities, and by sending a regional advisor to the post to help clarify roles and responsibilities under their new staffing model.

We recommend:

- 2. That the chief of operations for the Africa Region work with post leadership to develop a plan to implement the post’s transition to a new staffing model and clarify staff roles and responsibilities.**

PROGRAMMING

In our evaluation, we assessed programming using the following researchable questions to guide our work:

Is the program focused on the country’s development priorities, in the poorest areas of the country? Are Volunteers achieving project objectives?

AREAS OF NO CONCERN

The program is focused on the Comoros government’s development priorities. We spoke with host country ministry partners who felt that the Peace Corps program was well-aligned with their development priorities and national education strategy. The government of Comoros had

requested Peace Corps collaboration to implement their newly established national English language strategy. In its new country entry assessment before opening the post, the Peace Corps noted a shortage of English teachers at the middle and high school levels and a weak human capacity in teachers’ ability to speak English, both of which were addressed in the first goal of the TEFL project framework—that Comorian students and teachers use English more effectively.

Programming was addressing the needs of people in poor areas of the country. As discussed above, Comoros’s human development index in 2018 was classified as “low human development,” and ranked on the lower end of countries worldwide. Host government partners we spoke with said that Volunteers were in areas of need, and most Volunteers we interviewed agreed that their work focused on meeting the needs of people in a poor area of the country.

Volunteers were contributing to most of their project objectives. Staff generally agreed that Volunteers were contributing to the primary TEFL project’s goals, though some programming staff members admitted that they were not meeting their project objective related to teacher training. Overall, 94 percent of Volunteers reported that they were contributing to their primary project goals. However, many Volunteers said they did not have enough teaching hours in the classroom each week. This is covered in a finding in the site management section below.

We reviewed other areas of programming and found that Volunteers felt that they were making a difference, and most Volunteers were doing community needs assessments.

TRAINING

In our evaluation, we assessed training using the following researchable question to guide our work:

Do trainings prepare Volunteers for service?

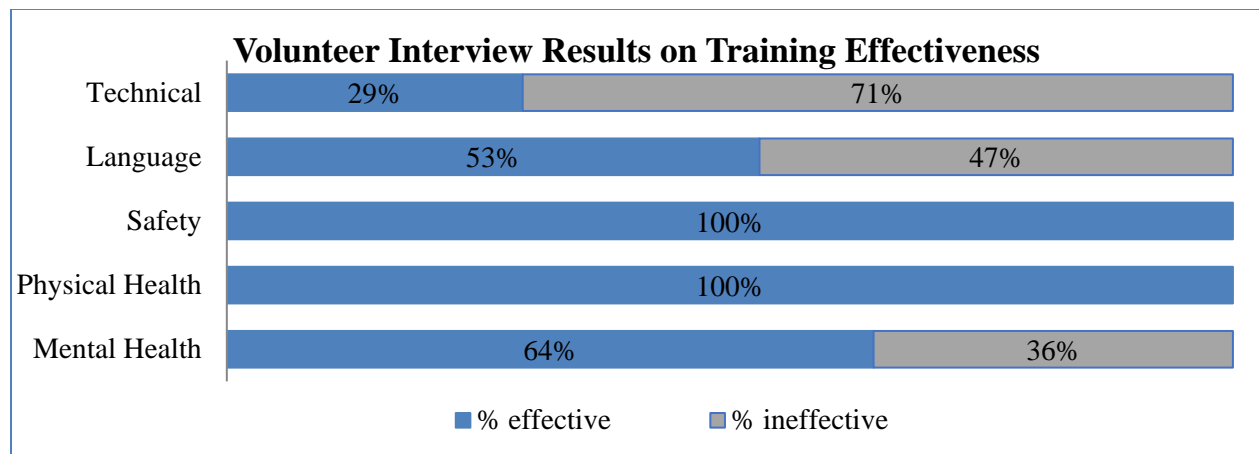


Figure 3: Volunteer Interview Results on Training Effectiveness. Source: Volunteer interviews conducted by OIG evaluators. Every Volunteer did not answer every question. For Technical, Language, and Physical Health n=17; for Safety n=16; for Mental Health n=14.

AREAS OF NO CONCERN

Physical health training was effective. In interviews, 100 percent of Volunteers reported that training prepared them effectively to maintain their physical health. Volunteers in both training groups spoke highly of the two Peace Corps medical officers (PCMOs) who had delivered their respective physical health training sessions.

Mental health training was effective. Although only 64 percent of interviewed Volunteers reported that their mental health training prepared them effectively to maintain their health at site, very few Volunteers expressed concerns with their mental health training. When asked about the quality of training, 4 of the 18 interviewed Volunteers reported that the question was not applicable to them—2 of the 4 said this was because they enjoyed excellent mental health. Multiple Volunteers in the older cohort reported that they appreciated having the visiting regional mental health officer (RMHO) from South Africa deliver a session. One Volunteer said the RMHO's visit was useful for reinforcing that there were resources available to Volunteers.

Safety and security training was effective. All Volunteers interviewed by OIG reported that the safety and security training was effective. Multiple Volunteers and staff reported that the safety and security manager (SSM) was a skilled trainer who prepared Volunteers effectively to live and work safely at their sites. Two Volunteers told us about a live demonstration of public transportation that they thought was good practice, in which they rode a bus and experienced some of the typical frustrations of public transportation. The Volunteers did not realize until later that the driver and other passengers had been hired by Peace Corps staff to simulate in-country travel.

Cross cultural training prepared Volunteers to form positive relationships in their community. Eighty-one percent of Volunteers reported that Peace Corps training provided them with the skills and cultural understanding they needed to form positive relationships in their community. Volunteers reported that the training covered relevant topics, such as norms and mores, dress, holidays, celebrations, etc. Those who were dissatisfied with the training, generally commented that it focused on the cultural norms on the main island and failed to address possible cultural differences on the other two islands. However, staff presented the most conservative aspects of Comoros's culture so that Volunteers would be prepared, with the understanding that Volunteers would adjust their behavior accordingly.

AREAS OF TRAINING THAT REQUIRED MANAGEMENT ATTENTION

The evaluation uncovered some training areas that required management attention, particularly technical training, language training, and trainee assessment. The remainder of this section provides more information about these topics.

Technical training did not prepare Volunteers effectively for their primary assignment.

According to *Peace Corps Manual Section 201*, “To qualify for selection for overseas service as a Peace Corps Volunteer, [trainees] must demonstrate that they possess the following personal attributes: ... Technical competence. Proficiency in the technical skills needed to carry out the assignment.”

Peace Corps/Comoros participated in the agency’s teaching English as a foreign language (TEFL) certificate program, a program that, when completed, awards Volunteers with an internationally recognized TEFL certificate validated by the Center for Applied Linguistics. While an evaluation by headquarters staff indicated that the post had successfully carried out the TEFL certificate program and that the program had increased the caliber of Volunteers’ teaching, we determined that Volunteers in Comoros did not feel that their TEFL technical training was effective. Only 29 percent of interviewed Volunteers reported that their technical training prepared them to perform their primary assignment. Many Volunteers complained that technical training was too theoretical and covered techniques that were not practical to their teaching situations. Others reported that the training failed to cover important aspects of the Comorian education system, such as the grading scale or curriculum.

There were several factors that contributed to the poor technical training, including: training was not tailored to the Comorian context, model school did not provide sufficient practical experience, and technical trainers were ineffective.

As part of the TEFL certificate program, technical trainers have to deliver approximately 80 hours of standardized training during pre-service training (PST), and although they have some flexibility to tailor it to the host country context, staff told us that the amount they could tailor the sessions was limited, and they did not have sufficient time to do the tailoring.

During PST, trainees participated in a 10-hour teaching practicum known as ‘model school.’ Many of the Volunteers we interviewed thought model school could be improved. Some Volunteers reported that, because students’ attendance at model school was optional and only highly-motivated students attended, it did not provide trainees with an accurate understanding of what it was like to teach and what obstacles they might encounter. One Volunteer explained that the model school experience was not realistic because the students at the model school had a high level of English comprehension already, whereas the students he typically taught at site did not speak any English. Others thought that the practicum should be lengthened to allow for additional teaching practice, and several reported that they would have appreciated more constructive feedback from staff.

For the most recent cohort, the programming and training assistants (PTAs), who were responsible for delivering the TEFL certificate training, invited a local teacher to assist with some of the technical sessions. Volunteers felt that the local teacher struggled with the sessions

and seemed ill-prepared. Many commented how the local teacher frequently resorted to reading from presentation slides. One Volunteer explained that it seemed that the local teacher had a slide show that she had not even looked at before reading it to trainees. Another Volunteer remarked that the training, which emphasized a student-centered approach, was not delivered in a student-centered manner. Volunteers generally agreed that the PTAs did a better job, but the PTAs admitted that they were often too busy to fully prepare and often struggled to deliver the technical sessions.

At the time of our interviews with them in January 2019, 94 percent of Volunteers we spoke to reported that they felt qualified to perform their technical assignments. However, many Volunteers also reported that they felt ill-prepared to teach in Comorian schools at the end of pre-service training, when they first arrived at their sites. Some Volunteers perceived their first several months in the classroom as failures, one referring to her first trimester as a teacher as a ‘disaster.’ Without a good understanding of how to teach in Comorian schools, Volunteers may not be as effective in their classrooms, and may get off to a poor start with their students. One staff member observed that Volunteers often taught too quickly and attempted to cover more material in a lesson than a Comorian teacher would, and that this approach to teaching could impede the students’ ability to learn.

We recommend:

- 3. That the country director and the program manager work with the agency’s education specialist to modify the TEFL training sessions in both pre-service and in-service training to incorporate more information about teaching in Comorian schools.**
- 4. That the country director and the program manager improve the model school experience during pre-service training to provide trainees with a more relevant practicum that reflects what Volunteers will face in a typical Comorian classroom.**
- 5. That the country director and the program manager improve training for any temporary technical trainer to ensure that he or she is well prepared to present the TEFL technical training during pre-service or in-service training events.**

Volunteers were sworn in with insufficient language ability.

The Peace Corps Act stipulates that “[n]o person shall be assigned to duty as a volunteer under this chapter in any foreign country or area unless at the time of such assignment he possesses such reasonable proficiency as his assignment requires in speaking the language of the country or area to which he is assigned.” Volunteers in Comoros received training during PST in one of the three dialects of Shikomori, depending on the island where they were placed.⁶ As stated in Peace Corps/Comoros’s training handbook, “The best way to integrate into a foreign culture is through the native language.” The handbook says that trainees are expected to achieve a language proficiency of ‘intermediate low’ Shikomori as measured in the language proficiency interview (LPI) by the end of PST, and “no Volunteer may swear in without demonstrable proficiency in the target language.”

OIG found that 52 percent of active Volunteers⁷ swore in with a language proficiency level below intermediate low. Four current Volunteers swore in with a proficiency level of ‘novice low.’ According to the American Council on the Teaching of Foreign Languages a proficiency level of novice low means the Volunteer has “no real functional ability and, because of their pronunciation, may be unintelligible.” The post had never refused to swear in a Volunteer because of a low language proficiency level. If a Volunteer failed to meet the minimum in the final LPI during PST, the post offered additional language training, but the Volunteer’s access to training depended on the island where he or she was placed.

While some Volunteers commented that they really enjoyed their language training, Volunteers and staff reported several problems with the training. First, while the post had worked hard to improve their language training curriculum, staff and Volunteers reported that some of the language and cross-cultural facilitators (LCFs) struggled to teach with it. One staff member commented that the post needed to increase training for LCFs prior to PST. The second concern with Volunteer language learning was that there were limited training opportunities after PST. While post staff encouraged Volunteers to hire local language tutors at their sites and reimbursed costs, very few Volunteers took advantage of the opportunity. Staff reported that Volunteers struggled to find adequate tutors. For example, one Volunteer explained that he was unable to find someone fluent enough in English who could tutor him in the local language. Lastly, because the local language varied by island, the host families who trainees stayed with during PST often did not speak the dialect that the trainees were learning, limiting the trainees’ ability to practice their language skills outside the classroom.

Only 53 percent of interviewed Volunteers reported that their local language training prepared them to communicate at their site. Without proper language training during PST, many Volunteers struggled to communicate in the local language at their site. Thirty-four percent of

⁶ French, while one of the official languages in Comoros, is not widely spoken outside of the capital.

⁷ Active as of November 28, 2018.

interviewed Volunteers reported that they communicated poorly with people in the local language at their site. One Volunteer, after being at site for over four months, admitted still being unable to understand the local language. Several staff members commented that many Volunteers' language skills did not improve or got worse between PST and mid-service training.

We recommend:

- 6. That the country director and the language and culture coordinator increase training for language and culture facilitators prior to pre-service training.**
- 7. That the country director and the language and culture coordinator explore ways to improve ongoing language training opportunities for Volunteers.**

Staff were not utilizing the trainee assessment portfolio to measure trainees' readiness to serve.

In January 2015, an official agency memo required all posts to fully integrate the assessment of global learning standards for global core and global sector content into PST by January 1, 2016. Agency guidance requires all posts to measure trainee achievement of terminal learning objectives using the trainee assessment portfolio (TAP). The TAP allows training staff to monitor trainees' progress, provide additional support if necessary, and clarify expectations and areas for improvement. It also provides staff with an objective resource to help them decide whether a trainee is eligible to swear in.

Although the post was assessing Volunteers on language and TEFL technical training, Peace Corps/Comoros was not utilizing the TAP to determine whether or not trainees had achieved the terminal learning objectives and were eligible to swear in. At the time of evaluation, the post did not have a DPT or a TM responsible for overseeing training. The current CD had the role of DPT but had not attended the agency's training for new DPTs and was unaware of the TAP requirement prior to this evaluation. The previous CD had implemented weekly online assessments during PST using an online document sharing application that had not been approved for use by Peace Corps, and the current CD stopped using it when instructed by Africa Region.

Without the TAP, staff were unable to monitor trainees' progress throughout PST for all learning objectives and implement corrective actions when necessary. As a result, multiple staff members admitted that they had sworn in trainees who were not prepared to serve as Volunteers in Comoros.

We recommend:

- 8. That the country director implement the trainee assessment portfolio to provide formative assessments to trainees, determine which trainees will be allowed to swear in, and document the assessment process.**

SITE MANAGEMENT

In our evaluation, we assessed site management using the following researchable question to guide our work:

Are sites, housing, and work assignments appropriate and meeting all established criteria?

AREAS OF NO CONCERN

Volunteer sites generally met the post's programmatic and safety site selection criteria, except for housing criteria. Most Volunteers we interviewed were satisfied with their site placement. As part of this evaluation, we assessed Volunteer sites we visited against the post's programmatic and safety site selection criteria. For the programmatic and safety criteria that were well-defined, we found that most Volunteer sites met the criteria.

However, we identified some programmatic and safety criteria that were too vague and required updating. In addition, we found that Volunteer housing did not consistently meet post's housing criteria. Both of these issues will be discussed in findings below.

Most Volunteers had motivated and supportive counterparts. During our interviews, 78 percent of Volunteers said that they had at least one motivated and supportive counterpart. Of those interviewed, 89 percent said that at least one of the counterparts they worked with was identified by the Peace Corps. Post staff said they trained counterparts during pre-service training, which included a description of the role of a Volunteer. In addition, the safety and security manager did regional community workshops before the Volunteers arrived at site; the workshops included supervisors or counterparts.

Post staff were orienting host families as required. Some Volunteers lived with host families, depending on the availability of housing in their community. We found that the post was orienting host families as required. In our interviews, 77 percent of Volunteers who lived with a host family said they had a positive relationship with the family.

AREAS OF SITE MANAGEMENT THAT REQUIRED MANAGEMENT ATTENTION

The evaluation uncovered some areas of site management that required management attention, particularly staff approaches to site development, Volunteer housing, medical unit involvement, and site visits. The remainder of this section provides more information about these topics.

Staff approaches to site development were inconsistent due to insufficient site management controls and oversight.

OIG found that site identification was not always done consistently, and approaches to identifying sites sometimes varied depending on the staff member doing site development. In interviews, we learned that programming and training staff had inconsistent priorities for site identification. We reviewed a random sample of site history files, and we found that programming and training assistants had different ways of maintaining and organizing site history files.

A programming and training staff member admitted that due to a lack of direct oversight the PTAs were sometimes improvising and therefore doing site development differently. Particular site development internal controls were missing. Specifically, the post did not have a site identification strategy, programming site selection criteria was insufficient, the post did not have a standard operating procedure (SOP) for site history files, and documentation of site approval was not systematic.

Site identification strategy. According to the Peace Corps' *Programming, Training, and Evaluation Guidance*, "PMs, along with many other staff, work in consultation with host country partner organizations to develop a site selection strategy." The guidance document explains that a site strategy sets the priorities for site identification, including the "project's geographic focus, clustering strategy, use of rural versus urban sites, site selection criteria, and length of project assistance at each site." The post did not have a documented site identification strategy in their staff site development guidance.

Programmatic site selection criteria. The Peace Corps' *Programming, Training, and Evaluation Guidance* states that systems and criteria that help ensure the selection of quality sites are key components of an effective site preparation process. OIG found weaknesses in the post's programmatic site selection criteria. Staff told us that they expected Volunteers to have a specific minimum number of hours of teaching each week, but this minimum was not recorded in their criteria. In addition, several Volunteers we spoke to said that volunteers from another organization also taught English in or near their sites which made it harder for them to establish clubs or work enough hours in the school, so one Volunteer suggested that staff take into consideration whether there were other organizations active there before selecting a site.

Site history files. *Safety and Security Instruction 401* requires that each post “develop a [standard operating procedure (SOP)] that describes the system and processes for maintaining and using site history information.” The post did not have a site history file SOP.

Site approval. Africa Region’s site development guidance requires that posts document approval of Volunteer sites on the site selection criteria checklist. Although the post had site approval meetings in which the PTAs, SSM, and country director made decisions on whether to approve each site, staff did not review and sign site selection checklists⁸. In our review of site history files, we found that none of the site selection checklists we reviewed had all required signatures.

The lack of consistent strategies and approaches to site development led to two known problems. First, the post was not meeting its TEFL project objective 1.3 that “teachers will implement more student-centered teaching, effective classroom management techniques, classroom-based assessment and/or content-based instruction.” Second, Volunteers often did not have enough hours in the classroom. Although staff set an expectation that Volunteers should have 18-22 hours in the classroom per week, the average number of hours was 11, and several Volunteers had fewer than half the expected hours per week. In addition to these issues, inconsistently organized site history files and a lack of review of site selection checklists during site approval could lead staff to approve sites to host a Volunteer without complete information.

We recommend:

- 9. That the country director work with programming staff to develop a site identification strategy.**
- 10. That the program manager more carefully define programming site selection criteria so that staff select schools and communities demonstrating sufficient demand for a Peace Corps Volunteer English teacher.**
- 11. That the country director develop standard operating procedures for the post’s site history files.**
- 12. That the country director ensure that site approval is documented as required.**

Volunteer housing did not meet established housing criteria.

Manual Section 270 states that all Volunteer “housing or host family arrangements must be inspected by post staff (or a trained designee) prior to occupancy to ensure each house and/or homestay arrangement meets all minimum standards as established by the Peace Corps and the

⁸ The post called site selection checklists “site approval forms.”

post.” The post’s housing checklist contained 13 criteria. During our evaluation, we visited 18 Volunteer houses and compared the houses to each of these criteria.

Our evaluation found that with the exception of the criteria described below, housing criteria were met by at least 80 percent of the houses we visited. Three criteria did not meet this threshold. Only 28 percent of houses met the criteria “Anti-mosquito screens required on doors, windows and ventilation holes.” Only 56 percent met the requirement that “Doors and windows must be metal or wood. There should be no space under the door that a reptile, mouse, etc. could get under.” The common issue for Volunteer housing was the second part of that criterion—that there should be no space under the door. We found that most of the doors and windows were metal or wood. Only 78 percent of houses met the requirement that “No scorpion, mouse, or rodent should be in the house.”

OIG learned that Volunteers were expected to install their own mosquito screens which many Volunteers did not do. Programming and safety staff admitted that some of the other criteria did not make sense, so they were not able to follow it. For example, wooden doors typically had a gap under the door due to the risk of flooding that could cause the door to expand. The housing checklist was copied from another Peace Corps post and had not been fully updated to reflect conditions in Comoros.

Placing Volunteers in homes that did not comply with housing criteria increased potential health and safety risks to Volunteers, including the risk of contracting malaria.

We recommend:

- 13. That the country director improve the processes post uses to install mosquito screens in Volunteer homes prior to occupancy, and ensure that screens have been installed at the housing of currently serving Volunteers.**
- 14. That the country director work with programming staff and the safety and security manager to review and update Volunteer housing criteria.**

The medical unit was not sufficiently involved in site identification and placement.

PCMOs are required under *Office of Health Services (OHS) Technical Guideline 110* to be involved in site selection including the evaluation of Volunteers’ living, work, and training sites. The post’s *Staff Guide to Site Development* requires that the PCMO or medical assistant be involved in site approval as well as in decisions on where to place Volunteers.

During calendar year 2018, the post had temporary duty assignment (TDY) PCMOs for most of the year, and the medical assistant—who had been involved in site visits in the past—was on leave. During that year, the post did not systematically involve medical unit staff in site approval or site placement decisions.

One of the mechanisms to ensure that necessary staff were involved in site selection was the signature block on site selection forms. There was space for the PCMO to sign, signaling medical approval of the sites. Our review of site history files revealed that most of the forms had not been signed by any staff members, and the ones that did have some signatures were missing the PCMO's signature.

While OIG recognizes that not having a PCMO or medical assistant who was familiar with Volunteer sites in Comoros presented a challenge for site approval in 2018, we assessed that not involving the medical unit in site approval posed a vulnerability to the health of Volunteers. For example, the medical site selection criterion was vague and lacked specificity. It required that “The site meets Peace Corps Comoros’ minimum health standards (access to food, safe water, health facility & good sanitation)” without specifying, for example, how far safe water should be from the Volunteer’s house or whether access to a health facility means access to a Peace Corps approved facility or how far it should be from the site. When we asked program staff how they knew whether a site was conducive to Volunteer health, they said they depended on the medical unit to make that determination. Without involving a medical unit staff member in site selection, the post risked placing a Volunteer in an unsafe situation due to insufficient medical site selection criteria.

At the time of fieldwork, the post was in the process of hiring a new PCMO, and the medical assistant had just returned from leave.

We recommend:

15. That the country director and Peace Corps medical officer update medical site selection criteria and train programming staff who use it when carrying out site identification activities.

16. That the country director ensure that medical staff is included in site approval decisions.

Official programming site visits were not happening and were not documented as required.

According to *Manual Section 270*, “Each post must establish protocols and schedules for periodic staff visits with Volunteers in their sites to monitor and address issues related to work assignments, living arrangements, adaptation, and security. Reports of visits must be documented

and maintained by the post.” Africa Region’s *Site Development and Site Monitoring Standards and Procedures* from June 2013 requires that program staff visit each Volunteer at least twice during their service, and it suggests conducting the first site visit within the first six months after Volunteers swear-in. The regional guidance further states that “Programmatic site visits should include meeting with local counterparts, community leaders, and host families when possible, and should be long enough to allow completion of the Site Visit Form.”

Programming staff said that they regularly visited Volunteers informally or they did classroom observations as required by the TEFL certificate program. However, OIG found that programming staff were not consistently scheduling official required site visits, and visits were not consistently being documented. Programming staff reported that they were very busy with other duties or doing informal site visits, so they did not always have time for more extensive visits. Programming staff also said that they had documented site visits in the past when they were using an online application to share and organize files, but they had stopped documenting the visits after being directed to stop using the application. We determined that another reason for the failure to document site visits was a lack of oversight over the site visit process, a function normally overseen by a DPT.

Volunteers often did not see Peace Corps staff as a resource for TEFL support. Several Volunteers in interviews said that they would like a greater staff presence on Anjouan and Moheli. One Volunteer expressed feeling that Volunteers outside of the main island were forgotten about because they were far away. Because staff were not doing full site visits, they were missing an opportunity to assess the Volunteer’s TEFL project work, address concerns related to health and safety, and provide timely and effective support to Volunteers in the field.

We recommend:

- 17. That the country director establish and oversee implementation of more effective protocols, schedules and documentation requirements for programmatic site visits.**

VOLUNTEER SAFETY AND SECURITY SUPPORT

In our evaluation, we assessed Volunteer safety and security support using the following researchable questions to guide our work:

- Is the post sufficiently prepared to respond to emergencies and security incidents?
- Are preventative safety and security measures adequate?

AREAS OF NO CONCERN

The post performed risk assessments as required. The SSM is required to conduct an annual risk assessment that considers factors such as political or social development and trends,

environmental hazards, and the host country's ability to respond to and manage these events. We found that in 2018 the SSM performed a risk assessment and updated the post's emergency action plan accordingly. Headquarters and Embassy safety and security staff members who visited Peace Corps/Comoros were satisfied with the post's ability to prevent and respond to safety risks.

The post had recently updated and tested its emergency action plan. The post updated its emergency action plan in January 2019. The post had to activate the plan in October 2018 as a result of political unrest on the island of Anjouan. All Volunteers were successfully consolidated to the island of Grande Comore. A senior staff member at post acknowledged that there were some lessons learned from the consolidation, and the plan was subsequently updated. Africa Region staff said they were satisfied with the post's ability to evacuate Volunteers in an emergency.

Volunteers knew the location of their consolidation points. All Volunteers we interviewed knew the location of their consolidation point. Volunteers interviewed during our evaluation had all been consolidated in October 2018, and many raised concerns about their ability to reach their consolidation points in an emergency. However, we found that the SSM had properly inspected and evaluated the consolidation points according to the post's own criteria as required, and headquarters staff who had visited the post were satisfied that consolidation points were reasonable. The post had chosen the consolidation points in order to be able to evacuate Volunteers from the islands quickly by plane or boat.

Volunteers were satisfied with the post's response to security incidents. In our interviews, most Volunteers who had been the victim of a crime said that the crime response was handled well by staff—only one was not satisfied with the response. Several headquarters staff members said that post staff were very responsive and empathetic. Approximately 83 percent of all Volunteers we interviewed said that if a crime happened to them in the future that they would report it to the Peace Corps. Of the rest who said they were unsure, two of the three said they would report the crime if it was serious.

Volunteers felt integrated into their communities. In our interviews, 89 percent of Volunteers reported that they were well integrated into their communities. Post staff generally agreed that Volunteers were integrated, though they said that Volunteers in smaller communities were more integrated than those in large cities.

We reviewed other areas of Volunteer safety and security support and found that Volunteers felt safe at their sites, the post was addressing Peace Corps Safety and Security Officer recommendations, and the transportation policy was adequate.

VOLUNTEER HEALTH SUPPORT

In our evaluation, we assessed Volunteer health support using the following researchable question to guide our work:

Is the health care program meeting Volunteers' needs?

Volunteers said that the healthcare they received met their needs. In interviews, 82 percent of Volunteers said that the healthcare they received from the Peace Corps met their medical health needs, and similarly 82 percent said that it met their mental health needs. Seventy-three percent of Volunteers felt that the Peace Corps had trained and supported them to successfully navigate the challenges of service. However, several Volunteers wanted greater medical staff presence on the islands of Anjouan and Moheli which will be discussed in a finding below.

The post had assessed local healthcare providers in accordance with agency guidelines. The post had assessed local medical providers in-country within the past 3 years as required by OHS technical guideline. Due to the poor quality of hospitals, only one hospital in all of Comoros was approved for use in medical emergency situations to stabilize a Volunteer prior to a medical evacuation. The post had assessed additional hospitals that were not ultimately approved. The post had also done evaluations of consultants who could be used in the event of an emergency on the islands of Anjouan or Moheli, where there is no approved hospital. We found that although they had assessed hospitals, OHS staff questioned whether the post was able to maintain sufficient relationships with local providers, as described below.

We reviewed other areas of Volunteer health support and found that most Volunteers had heard of the quality nurse, and Volunteers generally trusted that the medical unit would keep their visits confidential.

AREAS OF VOLUNTEER HEALTH SUPPORT THAT REQUIRED MANAGEMENT ATTENTION

OIG conducted a review of the circumstances surrounding the January 2018 death of a Volunteer in Comoros. The review resulted in a management advisory report released in April 2019 in which we identified several vulnerabilities in the Volunteer health care system at the post.⁹ In the report, we made seven recommendations to the Peace Corps to address these vulnerabilities. These recommendations included:

- Deployment of a minimum of two medical officers to the post;
- Improvements in training for medical officers;
- Updates to medical technical guidelines for the prevention, diagnosis, and treatment of malaria;

⁹ [Management Advisory Report: Review of the Circumstances Surrounding the Death of a Volunteer in Peace Corps/Comoros \(IG-19-04-SR\)](#)

- Analysis of the threshold for clinical escalation;
- Tracking and enforcement of Volunteers' required adherence to antimalarial medication schedule.

The evaluation uncovered some additional areas of Volunteer health support that required management attention, particularly the readiness and adequacy of the medical unit due to weak medical infrastructure in the country. The remainder of this section provides more information about this topic.

The post should attend to concerns regarding the medical unit's ability to respond to emergencies and provide care for Volunteers on outer islands.

Manual Section 262 requires that a “comprehensive health care program for [Volunteers/trainees] is managed and implemented in-country by the post PCMO under administrative supervision of the Country Director (CD) and with professional guidance and oversight from [the Office of Medical Services].”

As stated in the Peace Corps program and host country background sections of this report, Comoros suffered from weak medical infrastructure. Medical resources were especially limited on the islands of Anjouan and Moheli. The public hospital in Moroni, the capital, was the only hospital in Comoros approved by the Peace Corps to treat Volunteers, and even then, only the intensive care unit was approved. Last year regional medical officers did a special assessment of medical facilities in Comoros and determined there were several private clinics that could provide overnight support, but they should only be used for Volunteers with stable conditions who would not potentially need escalation of care. Given the challenge of providing care to Volunteers in an environment with limited resources, having a high-quality medical unit was important. We identified concerns about the readiness and adequacy of the medical unit related to relationships with local medical providers, regional medical action plans, medical unit standards, and support for Volunteers on outer islands. We assessed that all of these issues were vulnerabilities for the post's ability to respond to Volunteer medical issues, particularly during an emergency.

Relationships with local medical providers. Peace Corps/Comoros had not had a permanent PCMO since January 2018; they depended on short-term TDY PCMOs to care for Volunteers. Several OHS staff members we interviewed were concerned about the post's ability to build and maintain relationships with local medical providers while there were short-term PCMOs for so long. Maintaining relationships with local providers is important due to the frequent absenteeism of hospital staff; the PCMO may need to call a doctor directly in the event of an emergency.

Regional medical action plans. The post also did not have regional medical action plans for each island, as required by OHS *Technical Guideline 385*. They had a post medical action plan, but it

was not split by island into regional medical action plans. An OHS staff member said this was an important step, given the challenges with medical resources in Comoros.

Medical Unit Standards. At the time of fieldwork, the physical space for the post's medical unit had not been set up to the standard of most Peace Corps health units. Specifically, the PCMO and medical assistant shared the same office space which also included an exam table and bed for a sick Volunteer. Due to the lack of space to treat sick Volunteers on medical hold, the post had relied on a nearby hotel to serve as a sick bay. Peace Corps/Comoros was in the process of moving to a new office in 2019, and OHS was confident that the medical unit there would have more of the equipment and private space for the PCMO to see and treat Volunteers.

Support for Volunteers on Outer Islands. Many Volunteers we interviewed on the outer islands—Anjouan and Moheli—said they would like regular PCMO visits to their islands to bring medical supplies or to hold office hours so that Volunteers did not have to go to the capital for minor medical issues. We learned from a post senior staff member that the PCMO used to visit the outer islands approximately every 6 weeks, but that practice stopped when that PCMO left in January 2018. The post planned to start these visits again once a permanent PCMO could be hired and the post was no longer dependent on TDYs. Some Volunteers also told us they thought the threshold to bring Volunteers into the Peace Corps medical unit was higher for Volunteers on outer islands than for Volunteers on the main island because of the extra cost of a plane ticket. They thought they more often had to wait to see if their condition improved before the PCMO decided to bring them in to the medical unit. One Volunteer said she did not call the PCMO when she had an issue for fear that the PCMO would just tell her to take oral rehydration salts and wait it out.

Two regional medical officers performed a special assessment of medical facilities in Peace Corps/Comoros in July and August of 2018. The assessment resulted in 44 recommendations that addressed a range of concerns with the health program in Comoros, including the concerns cited above. An OHS staff member we interviewed stressed the importance of addressing all recommendations in that report, and OIG encourages the agency to make use of that report to strengthen the post's health unit in addition to the recommendations we make below.

We recommend:

18. That the country director and Peace Corps medical officer develop a plan to formalize relationships with local medical providers.

19. That the country director and Peace Corps medical officer develop regional medical action plans for each island.

20. That the country director and Peace Corps medical officer develop a plan to ensure the medical unit meets Peace Corps standards.

21. That the country director and Peace Corps medical officer develop a plan to provide regular, scheduled staff support for Volunteers on Anjouan and Moheli.

VOLUNTEER ADMINISTRATIVE SUPPORT

In our evaluation, we assessed volunteer administrative support using the following researchable question to guide our work:

Does the administrative unit provide sufficient support to Volunteers, including allowances and reimbursements?

AREAS OF NO CONCERN

Volunteers were satisfied with their living allowances. All Volunteers we interviewed said that their living allowances were adequate. The post conducted a living allowance survey and market basket surveys in 2018, as required. The results of the surveys did not justify an increase to the living allowance, and staff determined that a need for location-based differentiation of allowances was not supported by the data—though they continued to consider this option to supplement allowances for Volunteers living in the capital city.

Volunteers were satisfied with their settling-in allowances. All Volunteers we interviewed said that their settling-in allowances were adequate. The post had performed a settling-in allowance survey for 2018, and no Volunteers in our interview sample reported spending more than the allotted funds.

LIST OF RECOMMENDATIONS

WE RECOMMEND:

1. That the country director develop a plan to improve communication with the Volunteer Advisory Council regarding the status of efforts to address issues raised through the council.
2. That the chief of operations for the Africa Region work with post leadership to develop a plan to implement the post's transition to a new staffing model and clarify staff roles and responsibilities.
3. That the country director and the program manager work with the agency's education specialist to modify the TEFL training sessions in both pre-service and in-service training to incorporate more information about teaching in Comorian schools.
4. That the country director and the program manager improve the model school experience during pre-service training to provide trainees with a more relevant practicum that reflects what Volunteers will face in a typical Comorian classroom.
5. That the country director and the program manager improve training for any temporary technical trainer to ensure that he or she is well prepared to present the TEFL technical training during pre-service or in-service training events.
6. That the country director and the language and culture coordinator increase training for language and culture facilitators prior to pre-service training.
7. That the country director and the language and culture coordinator explore ways to improve ongoing language training opportunities for Volunteers.
8. That the country director implement the trainee assessment portfolio to provide formative assessments to trainees, determine which trainees will be allowed to swear in, and document the assessment process.
9. That the country director work with programming staff to develop a site identification strategy.
10. That the program manager more carefully define programming site selection criteria so that staff select schools and communities demonstrating sufficient demand for a Peace Corps Volunteer English teacher.
11. That the country director develop standard operating procedures for the post's site history files.

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12. That the country director ensure that site approval is documented as required.
13. That the country director improve the processes post uses to install mosquito screens in Volunteer homes prior to occupancy, and ensure that screens have been installed at the housing of currently serving Volunteers.
14. That the country director work with programming staff and the safety and security manager to review and update Volunteer housing criteria.
15. That the country director and Peace Corps medical officer update medical site selection criteria and train programming staff who use it when carrying out site identification activities.
16. That the country director ensure that medical staff is included in site approval decisions.
17. That the country director establish and oversee implementation of more effective protocols, schedules and documentation requirements for programmatic site visits.
18. That the country director and Peace Corps medical officer develop a plan to formalize relationships with local medical providers.
19. That the country director and Peace Corps medical officer develop regional medical action plans for each island.
20. That the country director and Peace Corps medical officer develop a plan to ensure the medical unit meets Peace Corps standards.
21. That the country director and Peace Corps medical officer develop a plan to provide regular, scheduled staff support for Volunteers on Anjouan and Moheli.

APPENDIX A: OBJECTIVE, SCOPE, AND METHODOLOGY

In 1989, OIG was established under the Inspector General Act of 1978 and is an independent entity within the Peace Corps. The purpose of OIG is to prevent and detect fraud, waste, abuse, and mismanagement and to promote economy, effectiveness, and efficiency in government. The Inspector General is under the general supervision of the Peace Corps Director and reports both to the Director and Congress.

The Evaluation Unit provides senior management with independent evaluations of all management and operations of the Peace Corps, including overseas posts and domestic offices. OIG evaluators identify best practices and recommend program improvements to comply with Peace Corps policies.

The Evaluation Unit announced its intent to conduct an evaluation of the post on November 16, 2018. For post evaluations, we use the following researchable questions to guide our work:

- A. Programming:
 - Is the program focused on the country's development priorities, in the poorest areas of the country?
 - Are Volunteers achieving project objectives?
- B. Training:
 - Do trainings prepare Volunteers for service?
- C. Site Management:
 - Are sites appropriate and meeting all established criteria?
- D. Volunteer Safety and Security Support:
 - Is the post sufficiently prepared to respond to emergencies and security incidents?
 - Are preventative safety and security measures adequate?
- E. Volunteer Health Support:
 - Is the health care program meeting Volunteers' needs?
- F. Volunteer Administrative Support:
 - Does the administrative unit provide sufficient support to Volunteers, including allowances and reimbursements?
- G. Communication and Collaboration:
 - Do staff effectively communicate and collaborate with each other, Volunteers, and other stakeholders?
- H. Staffing Resources Management:
 - Has leadership effectively managed staffing and staff capacity?

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The evaluation team conducted the preliminary research portion of the evaluation between November 16, 2018 and January 3, 2019. This research included a review of agency and post documents provided by headquarters and post staff; interviews with headquarters staff representing Africa Region, Safety and Security, Office of Health Services, Overseas Programming and Training Support, and Volunteer Recruitment and Selection, and inquiries to the Office of Victim Advocacy.

In-country fieldwork occurred from January 7 to 23, 2019, and included interviews with post leadership and staff in programming, training, and support roles. We interviewed embassy personnel from the U.S. Embassy in Antananarivo, Madagascar which supports Peace Corps/Comoros, including the charge d'affair by telephone and an assistant regional security officer in person in Moroni. We met with five host country government ministry officials. We interviewed a stratified judgmental sample of 18 Volunteers (60 percent of Volunteers serving at the time of our visit) plus two additional Volunteers who were not in our sample and inspected 18 Volunteer living spaces. In addition, we requested to speak with 16 Returned Peace Corps Volunteers from the two most recent cohorts who had departed service early; 6 of whom agreed to a brief interview or email exchange.

The scope of the evaluation encompassed 3 years, from January 2015 through January 2019, to include the 27-month span in-country of most Volunteers (which includes 3 months of training) and additional time for Volunteers that extended their service beyond 2 years.

This evaluation was conducted in accordance with the Quality Standards for Inspections, issued by the Council of the Inspectors General on Integrity and Efficiency. The evidence, findings, and recommendations provided in this report have been reviewed by agency stakeholders affected by this review.

APPENDIX B: INTERVIEWS CONDUCTED

As part of this post evaluation, interviews were conducted with 20 Volunteers,¹⁰ 9 staff in-country, and 24 key stakeholders, including Peace Corps headquarters staff, officials with the U.S. Embassy in Madagascar, and host country ministry officials.

The following table provides demographic information for the entire Volunteer population in Comoros. The Volunteer sample was selected to represent these demographics in addition to length of service, geographic location, and ethnicity.

Table 1: Volunteer Demographic Data

Project	Percentage of Volunteers
Teaching English as a Foreign Language	100%
Gender	Percentage of Volunteers
Female	60%
Male	40%
Age	Percentage of Volunteers
25 or younger	67%
26-29	17%
30-49	13%
50 and over	3%

Source: Volunteer Information Database, January 2019.

Note: Percentages may not total 100 percent due to rounding.

¹⁰ Two additional requests for an interview of Volunteers not in the sample were accommodated; thereby increasing the total number of Volunteers interviewed to 20

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At the time of our field visit, the post had 15 permanent staff positions. The post periodically employed temporary staff to assist with training, however these positions were not staffed at the time of our visit. We interviewed 9 staff.

Table 2: Interviews Conducted with Post Staff

Position	Interviewed
Cashier	
Country Director	X
Director of Management and Operations	X
Driver	
Financial Assistant	
General Services Assistant	
General Services Manager	
IT Specialist	
Language & Culture Coordinator	X
Medical Assistant	X
Program Manager	X
Programming & Training Assistant (2)	X
Safety & Security Manager	X
Voucher Examiner/Travel Coordinator/Receptionist	X

Data as of February 2019.

We conducted 24 additional interviews with key stakeholders during the preliminary research phase of the evaluation and in-country fieldwork.

Table 3: Interviews Conducted with Key Stakeholders

Position	Organization
Charge D’Affair	US Embassy
Assistant Regional Security Officer	US Embassy
Minister	Comoros Ministry of National Education, Higher Education and Scientific Research
Director of Cabinet	Comoros Ministry of National Education, Higher Education and Scientific Research
Director of Secondary Education for Anjouan	Comoros Ministry of National Education, Higher Education and Scientific Research
Secretary General of Education for Anjouan	Comoros Ministry of National Education, Higher Education and Scientific Research
Minister	Comoros Ministry of Foreign Affairs and Cooperation
Regional Director	PC Headquarters/Africa Region
Chief of Operations	PC Headquarters/Africa Region
Chief Administrative Officer	PC Headquarters/Africa Region
Senior Advisor in Programming, Training & Evaluation	PC Headquarters/Africa Region
Regional Security Advisor	PC Headquarters/Africa Region
Country Desk Officer	PC Headquarters/Africa Region
Associate Director	PC Headquarters/Office of Health Services
Director, Counseling and Outreach Unit	PC Headquarters/Office of Health Services
Director, Office of Medical Services	PC Headquarters/Office of Health Services
Regional Medical Officer (4)	PC Headquarters/Office of Health Services
TDY PC Medical Officer	PC Headquarters/Office of Health Services
PC Safety & Security Officer	PC Headquarters/Safety and Security
Volunteer Placement & Assessment Specialist	PC Headquarters/Volunteer Recruitment and Selection
Education Specialist	PC Headquarters/Overseas Programming & Training Support

APPENDIX C: LIST OF ACRONYMS

CD	Country Director
DPT	Director of Programming and Training
LCF	Language and Cross-Cultural Facilitator
LPI	Language Proficiency Interview
MS	Medical Secretary
OHS	Peace Corps Office of Health Services
OIG	Peace Corps Office of Inspector General
PCMO	Peace Corps Medical Officer
PM	Program Manager
PST	Pre-Service Training
PTA	Programming and Training Assistant
RMHO	Regional Mental Health Officer
RMO	Regional Medical Officer
SSM	Safety and Security Manager
SOP	Standard Operating Procedure
TAP	Trainee Assessment Portfolio
TDY	Temporary Duty Assignment
TEFL	Teaching English as a Foreign Language
TM	Training Manager
VAC	Volunteer Advisory Council

APPENDIX D: AGENCY RESPONSE TO THE PRELIMINARY REPORT



MEMORANDUM

To: Kathy Buller, Inspector General

Through: Anne Hughes, Chief Compliance Officer *AH*

From: Johnathan Miller, Regional Director, Africa Region *JM*
Randa Wilkinson, Country Director, Comoros

Date: June 3, 2019

CC: Jody K. Olsen, Director
Michelle K. Brooks, Chief of Staff
Matthew McKinney, Deputy Chief of Staff/White House Liaison
Maura Fulton, Senior Advisor to the Director
Robert Shanks, General Counsel
Tim Hartman, Chief of Operations, Africa Region
Patrick Young, Associate Director, Office of Global Operations
Shawn Bardwell, Associate Director, Office of Safety and Security
Karen Becker, Associate Director, Office of Health Services
Tami Loeffler, Director of Management and Operations, Comoros

Subject: Agency Response to the Preliminary Report on the Evaluation of Peace Corps/Comoros (Project No. 19-EVAL-01)

This memo represents the agency's response to the recommendations made by the Inspector General for Peace Corps/Comoros as outlined in the Preliminary Report on the Evaluation of Peace Corps/Comoros (Project No. 19-EVAL-01) given to the agency on April 19, 2019.

Recommendation 1

That the country director develop a plan to improve communication with the Volunteer Advisory Council regarding the status of efforts to address issues raised through the council.

Concur

Response: The Volunteer Advisory Council (VAC) met with the Country Director (CD) in February and April of 2019 and both parties agreed to correspond on a monthly basis if not more frequently to improve communication. The CD requested that VAC review and update their charter, and the Country Director has provided VAC with examples from other Posts. Procedures will also be included in the updated charter to track items needing follow-up. Additionally, the CD has reached out to other Posts for examples of how they conduct VAC meetings, and conferred with Africa Regional leadership.

Both the CD and VAC members are committed to fostering a more cooperative and collaborative environment and a part of that collaboration will be to ensure more staff are involved in the VAC meetings moving forward.

Documents Submitted:

- Updated VAC Charter
- Example monthly email to the CD from the VAC

Status and Timeline for Completion: July 2019

Recommendation 2

That the chief of operations for the Africa Region work with post leadership to develop a plan to implement the post's transition to a new staffing model and clarify staff roles and responsibilities.

Concur

Response: The staffing model for PC/Comoros is not new, it has been in Integrated Planning and Budget System (IPBS) plans for the past two years. Post is now in its fifth year of operations and the long term strategy has been to add Programming and Training staff members. Due to events at post, recruitment for the Program Manager (PM) and Training Manager (TM) were delayed, however their onboarding is currently underway.

In the Programming and Training Alignment scheduled for Q1 FY20, staff will spend time reviewing and working on roles and responsibilities. Additionally, Post has requested region input during an upcoming staff retreat to help establish clear roles and responsibilities for the current and incoming staff.

The CD has been working closely with Africa Regional leadership on the mentoring and training for these new positions. Regular coaching calls with the PM to Region and PC/Rwanda are happening and later this year the PC/Comoros PM will go to PC/Rwanda for a cross training opportunity. Once the TM is onboard in July 2019, they will receive training and coaching with the Regional Program and Training Advisor, and be assigned to a TM for mentoring.

Documents to be Submitted:

- Organizational Chart 2019
- Staff retreat agenda
- Coaching call agenda
- Review of PC/Comoros time in PC/Rwanda
- Programming and Training Alignment

Status and Timeline for Completion: December 2019

Recommendation 3

That the country director and the program manager work with the agency's education specialist to modify the TEFL training sessions in both pre-service and in-service training to incorporate more information about teaching in Comorian schools.

Concur

Response: The Program Manager observed a TEFL session facilitated by the TEFL Programming and Training Assistant for PC/Ethiopia for Volunteers while they were on consolidation in Ethiopia. The PM is reviewing the content of all the TEFL training sessions, and is expertly positioned to improve the content to reflect teaching on Comoros due to experience as a teacher and principal in Comorian Public Schools. The PM will also consult with the agency's education specialist on the new training sessions.

Documents to be Submitted:

- Examples of updated TEFL training sessions
- Communication with OPATS on TEFL direction

Status and Timeline for Completion: October 2019

Recommendation 4

That the country director and the program manager improve the model school experience during pre-service training to provide trainees with a more relevant practicum that reflects what Volunteers will face in a typical Comorian classroom.

Concur

Response: The timing and implementation of Model School during last year's Pre Service Training (PST) was impacted by a weeklong consolidation due to political issues. This year, with the new PM in place, whose background is teaching in Public Schools, and the recruitment of the temporary TEFL technical trainer, who is well respected and recognized as one of the top English teachers in Comoros, Post is confident that the Model School will provide the Trainees (PCTs) a relevant Practicum that reflects actual Comorian classroom conditions.

For the past two years, Model School has been held in the host community primary school so the physical conditions are similar to what the trainees will find in their communities. In addition, PST will incorporate films taken of current Volunteers teaching in their schools. PST will also incorporate several sessions for the Trainees to observe three of the top Comorian English Teachers teach grammar and composition. These sessions replace an activity in previous years of visiting and observing Comorian teachers teaching in private English centers.

Documents to be Submitted:

- Schedule of Model School
- Videos of classroom teaching
- COTE PST 2019

Status and Timeline for Completion: August 2019

Recommendation 5

That the country director and the program manager improve training for any temporary technical trainer to ensure that he or she is well prepared to present the TEFL technical training during pre-service or in-service training events.

Concur

Response: PC/Comoros has changed the job description for the TEFL technical trainer to reflect a higher degree of competency and experience. Post is fortunate to have recruited a very experienced English Teacher to present the TEFL technical training for this year's PST. Language Training of Trainers (LTOT) has increased by four days for both the TEFL technical trainer and the Language Culture Facilitators (LCFs) to allow enough time to cover more technical aspects of teaching English. Additionally, time has been scheduled each week for review, feedback and planning during PST to adjust the training content if needed.

Documents to be Submitted:

- SOW for TEFL technical trainer
- COTE for Global Training of Trainers (GTOT) and LTOT
- COTE PST

Status and Timeline for Completion: August 2019

Recommendation 6

That the country director and the language and culture coordinator increase training for language and culture facilitators prior to pre-service training.

Concur

Response: PC/Comoros has recruited new LCFs for the upcoming PST who are able to teach on their own without co-teaching. Each trainee will be learning with a maximum of three other trainees in their group. The LTOT is now seven days instead of three days and the demonstration language teaching class time has been increased. The language manuals, which were developed by the Language Advisor who provided on-site technical advice in FY18, have been reviewed and modified to reflect last year's PCTs' evaluations.

This upcoming PST, the LCFs will follow the manual closely and receive weekly reviews and evaluation from the Language and Culture Coordinator (LCC). The LCFs will also be required to attend technical sessions during PST to help them increase their skills in teaching.

Documents to be Submitted:

- COTE for LTOT
- COTE 2019
- Updated language manual

Status and Timeline for Completion: August 2019

Recommendation 7

That the country director and the language and culture coordinator explore ways to improve ongoing language training opportunities for Volunteers.

Concur

Response: Moving forward, the LTOT for LCFs will be seven days instead of four days. The Language and Culture Coordinator (LCC) will observe language classes each week and provide feedback to LCFs during their weekly meeting. LCFs will teach a maximum of four Trainees in their class.

The 2019 PST COTE language training now includes 137 hours of language and cultural learning; Language Lunches twice a week, language training on Saturday mornings, and an intensive two-day language immersion scheduled on each of the islands after the site visits during week six.

During the 27-month training calendar, each In-Service Training will include language sessions with LCFs and not just Programming and Training staff as had been done in the past.

We have added a three-day intensive language IST in month five of service before the beginning of the second trimester of school. The LCC will also visit those Volunteers who are having problems identifying formal and informal tutors during their first three months at site.

Documents to be Submitted:

- 2019 PST COTE
- 27 month training Calendar
- Sample of new activities

Status and Timeline for Completion: October 2019

Recommendation 8

That the country director implement the trainee assessment portfolio to provide formative assessments to trainees, determine which trainees will be allowed to swear in, and document the assessment process.

Concur

Response: The CD has been working with the acting Programming, Training and Evaluation Expert to review and plan the implementation of the Trainee Assessment Portfolio (TAP). While parts of the TAP were used in previous PSTs, there was not a collaborative approach to assessing together all the aspects of TAP.

Coaching by the DPT and PM in Benin on how to use the TAP tools has been helpful to fully implement the TAP and continued skype calls will be scheduled if necessary.

The COTE has been adjusted to include PST staff evaluations at mid and final weeks of PST. Weekly meetings to discuss progress of Trainees and other issues will follow the tools of TAP.

Documents to be Submitted:

- Global Learning Standards: Education Sector TEFL Projects Trainee assessment Portfolio
- Completed TAP for each trainee at the end of PST

Status and Timeline for Completion: August 2019

Recommendation 9

That the country director work with programming staff to develop a site identification strategy.

Concur

Response: PC/Comoros has been working on improving overall site management. The Africa Region issued a new Site Management document six months ago and Post updated their site management documents based on the Region's template. Post is currently using the revised site management documents.

Documents to be Submitted:

- Comoros Site Management Package
- Africa Region Site Management Guidance

Status and Timeline for Completion: Completed, June 2019

Recommendation 10

That the program manager more carefully define programming site selection criteria so that staff select schools and communities demonstrating sufficient demand for a Peace Corps Volunteer English teacher.

Concur

Response: In February, Post signed a MOU with the Ministry of Education. The MOU stipulates that Volunteers require a minimum number of teaching hours. In conjunction with the signing of the MOU, the Minister of Education drafted a letter which will be sent before the beginning of each school year to schools with Volunteers outlining the agreement. The letter is an official document similar to what Comorian teachers have when they receive their appointment to a new school. This official letter will provide Volunteers with an endorsed assignment for the start of each academic year.

To help Volunteers better integrate into their schools, PST will have a session on school integration as well as community integration. Increasing opportunities for Volunteers to interact with their peers and school administration will help improve the number of hours Volunteers teach and are engaged at school.

Documents to be Submitted:

- Letter of assignment by the Minister of Education
- Copy of the MOU with the Ministry of Education
- Form for Requesting a Volunteer

Status and Timeline for Completion: Completed, June 2019

Recommendation 11

That the country director develop standard operating procedures for the post's site history files.

Concur

Response: Africa Region's site management guidance provides clear guidelines on the management of site history files. The CD plans to contact other posts for examples of their SOPs to assist in creating one for PC/Comoros. Post plans to update current and future files into the new VIDA. Past site history files will also be uploaded into the new VIDA.

Documents Submitted:

- SSI 401 Site History File Guidance
- New Site History Files, SOP

Status and Timeline for Completion: November 2019

Recommendation 12

That the country director ensure that site approval is documented as required.

Concur

Response: The CD will verify that all signatures are complete before Trainees go on site visits during PST. The form has been edited to collect the appropriate signatures and it will be uploaded into the new VIDA once all signatures are collected.

Documents to be Submitted:

- Site Approval form
- Screenshots of example forms in VIDA

Status and Timeline for Completion: July 2019

Recommendation 13

That the country director improve the processes post uses to install mosquito screens in Volunteer homes prior to occupancy, and ensure that screens have been installed at the housing of currently serving Volunteers.

Concur

Response: PC/Comoros took proactive measures to assist those current Volunteers who had not yet installed mosquito screens in their homes to complete the installation. All current volunteers are now fully compliant. Additionally, the Housing Check list now includes the task of installing mosquito screens in their rooms for PST homes stay and in their new houses before the PST site visit.

Documents to be Submitted:

- Housing Criteria Document
- Housing Survey
- Site development signoff sheet for current and arriving PCVs

Status and Timeline for Completion: August 2019

Recommendation 14

That the country director work with programming staff and the safety and security manager to review and update Volunteer housing criteria.

Concur

Response: The annual volunteer survey results from 2018 reflected that 100% of Volunteers like and feel safe at their site and over 90% reported they feel supported by their local community. Despite high satisfaction rates for overall site experience, PC/Comoros understands there is always room for improvement with certain aspects such as housing criteria. The updated housing criteria was completed in January at the request of Safety and Security and Region and has been fully implemented at post.

Documents to be Submitted:

- Housing Criteria 2019

Status and Timeline for Completion: Completed, June 2019

Recommendation 15

That the country director and Peace Corps medical officer update medical site selection criteria and train programming staff who use it when carrying out site identification activities.

Concur

Response: This site selection criteria has been updated though not specifically for medical conditions. However, Post will review the site selection criteria with the new PCMO once they are onboard.

Documents to be submitted:

- Site selection criteria checklist

Status and Timeline for Completion: November 2019

Recommendation 16

That the country director ensure that medical staff is included in site approval decisions.

Concur

Response: With the previous PCMO, site selection meetings were held with the SSM, PCMO and CD to review and approve site selection. Due to the frequent and short term TDY PCMOs last spring, and the lateness in finalizing sites, Post did not formally meet with the TDY PCMO to review the site assignments. Post will hold a meeting before site placement is finalized this year and make sure this meeting happens before site assignments moving forward. Additionally, the CD will make sure that the site selection memo is signed by the PCMO, the SSM and the CD.

Documents to be submitted:

- Site selection criteria check list

Status and Timeline for Completion: Completed, June 2019

Recommendation 17

That the country director establish and oversee implementation of more effective protocols, schedules and documentation requirements for programmatic site visits.

Concur

Response: The country director will work with the PM and TM to develop clear protocols and schedules for programmatic site visits. A more deliberate focus on site visit protocol will improve communications between staff and Volunteers. The forms to document site visits have already been updated and are being used. Currently, the country director visits every Volunteer at least once during their service, the PM has been to all Volunteers sites since at least twice a year, and the PTAs visit for TPI observations twice during their service.

Documents to be Submitted:

- Protocols for site visits
- Schedule FY20 for site visits
- Volunteer Site Visit Form

Status and Timeline for Completion: November 2019

Recommendation 18

That the country director and Peace Corps medical officer develop a plan to formalize relationships with local medical providers.

Concur

Response: Once the permanent PCMO arrives, the country director and the PCMO will make visits to currently identified and vetted local medical providers on all three islands. Formalizing current relationships will be explored by the CD, the director of management operations, and the Peace Corps medical officer. An annual visit of local medical providers will be carried out during medical officer site visits to Volunteers.

Documents to be submitted:

- Lists of medical providers in the MAP

Status and Timeline for Completion: November 2019

Recommendation 19

That the country director and Peace Corps medical officer develop regional medical action plans for each island.

Concur

Response: The Medical Action Plan (MAP) for each island was completed in October 2018 and updated March 2019. This document will be updated annually or more frequently if needed.

Documents to be Submitted:

- TG 385 - Post Medical Action Plans for the three islands.

Status and Timeline for Completion: Completed, March 2019

Recommendation 20

That the country director and Peace Corps medical officer develop a plan to ensure the medical unit meets Peace Corps standards.

Concur

Response: Once the permanent PCMO arrives at post, the country director and PCMO will review and verify that all the Peace Corps medical unit standards are now being met with the new office configuration.

Documents to be Submitted:

- Proof of consultation with OHS concerning the standards of the medical unit.
- Finalized plan of improvements to the medical unit

Status and Timeline for Completion: December 2019

Recommendation 21

That the country director and Peace Corps medical officer develop a plan to provide regular, scheduled staff support for Volunteers on Anjouan and Moheli.

Concur

Response: Historically, the PCMO made visits for Volunteer support to the outer islands during regularly scheduled trainings – Moheli in April and Anjouan in September. Any staff going to the islands always checks with the medical unit before leaving for Anjouan or Moheli and often brings prescription refills.

Once the permanent PCMO arrives at post, the CD and PCMO will review the plan to provide regular, scheduled staff support for Volunteers on Anjouan and Moheli.

Documents to be Submitted:

- Schedule of PCMO visits to Moheli and Anjouan

Status and Timeline for Completion: December 2019

APPENDIX E: OIG COMMENTS

Management concurred with all 21 recommendations, which all remain open. In its response, management described actions it is taking or intends to take to address the issues that prompted each of our recommendations. We wish to note that in closing recommendations, we are not certifying that 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.

OIG will review and consider closing recommendations 1-3, 5-7, 11-14, 17, 20, and 21 when the documentation reflected in the agency's response to the preliminary report is received. For recommendations 4, 8, 9, 10, 15, 16, 18, and 19, additional documentation is required. These recommendations remain open pending confirmation from the chief compliance officer that the documentation reflected in our analysis below is received.

Recommendation 4

That the country director and the program manager improve the model school experience during pre-service training to provide trainees with a more relevant practicum that reflects what Volunteers will face in a typical Comorian classroom.

Concur

Response: The timing and implementation of Model School during last year's Pre Service Training (PST) was impacted by a weeklong consolidation due to political issues. This year, with the new PM in place, whose background is teaching in Public Schools, and the recruitment of the temporary TEFL technical trainer, who is well respected and recognized as one of the top English teachers in Comoros, Post is confident that the Model School will provide the Trainees (PCTs) a relevant Practicum that reflects actual Comorian classroom conditions.

For the past two years, Model School has been held in the host community primary school so the physical conditions are similar to what the trainees will find in their communities. In addition, PST will incorporate films taken of current Volunteers teaching in their schools. PST will also incorporate several sessions for the Trainees to observe three of the top Comorian English Teachers teach grammar and composition. These sessions replace an activity in previous years of visiting and observing Comorian teachers teaching in private English centers.

Documents to be Submitted:

- Schedule of Model School
- Videos of classroom teaching
- COTE PST 2019

Status and Timeline for Completion: August 2019

OIG Analysis: In addition to the documents listed above OIG requests that the post provide a summary of Volunteer feedback about the model school practicum after the Volunteers have been teaching at their permanent sites for a few months following swearing-in.

Recommendation 8

That the country director implement use of the trainee assessment portfolio to provide formative assessments to trainees, determine which trainees will be allowed to swear in, and document the assessment process.

Concur

Response: The CD has been working with the acting Programming, Training and Evaluation Expert to review and plan the implementation of the Trainee Assessment Portfolio (TAP). While parts of the TAP were used in previous PSTs, there was not a collaborative approach to assessing together all the aspects of TAP.

Coaching by the DPT and PM in Benin on how to use the TAP tools has been helpful to fully implement the TAP and continued skype calls will be scheduled if necessary.

The COTE has been adjusted to include PST staff evaluations at mid and final weeks of PST. Weekly meetings to discuss progress of Trainees and other issues will follow the tools of TAP.

Documents to be Submitted:

- Global Learning Standards: Education Sector TEFL Projects Trainee assessment Portfolio
- Completed TAP for each trainee at the end of PST

Status and Timeline for Completion: August 2019

OIG Analysis: Please ensure that the documents submitted demonstrate that the post is using the TAP to determine whether a trainee will be allowed to swear in.

Recommendation 9

That the country director work with programming staff to develop a site identification strategy.

Concur

Response: PC/Comoros has been working on improving overall site management. The Africa Region issued a new Site Management document six months ago and Post updated their site management documents based on the Region's template. Post is currently using the revised site management documents.

Documents to be Submitted:

- Comoros Site Management Package
- Africa Region Site Management Guidance

Status and Timeline for Completion: Completed, June 2019

OIG Analysis: Please ensure that the site management package or other documentation submitted includes the site identification strategy.

Recommendation 10

That the program manager more carefully define programming site selection criteria so that staff select schools and communities demonstrating sufficient demand for a Peace Corps Volunteer English teacher.

Concur

Response: In February, Post signed a MOU with the Ministry of Education. The MOU stipulates that Volunteers require a minimum number of teaching hours. In conjunction with the signing of the MOU, the Minister of Education drafted a letter which will be sent before the beginning of each school year to schools with Volunteers outlining the agreement. The letter is an official document similar to what Comorian teachers have when they receive their appointment to a new school. This official letter will provide Volunteers with an endorsed assignment for the start of each academic year.

To help Volunteers better integrate into their schools, PST will have a session on school integration as well as community integration. Increasing opportunities for Volunteers to interact with their peers and school administration will help improve the number of hours Volunteers teach and are engaged at school.

Documents to be Submitted:

- Letter of assignment by the Minister of Education
- Copy of the MOU with the Ministry of Education
- Form for Requesting a Volunteer

Status and Timeline for Completion: Completed, June 2019

OIG Analysis: OIG appreciates the extra efforts the agency is making to improve sufficiency of demand for Peace Corps Volunteer English teachers through the relationship with the Ministry of Education and Volunteer training. OIG also requests that the post provide updated programming site selection criteria that defines more specifically demand for Volunteers.

Recommendation 15

That the country director and Peace Corps medical officer update medical site selection criteria and train programming staff who use it when carrying out site identification activities.

Concur

Response: This site selection criteria has been updated though not specifically for medical conditions. However, Post will review the site selection criteria with the new PCMO once they are onboard.

Documents to be submitted:

- Site selection criteria checklist

Status and Timeline for Completion: November 2019

OIG Analysis: OIG requests additional documentation that demonstrates that programming staff who use medical site selection criteria have been trained on the criteria.

Recommendation 16

That the country director ensure that medical staff is included in site approval decisions.

Concur

Response: With the previous PCMO, site selection meetings were held with the SSM, PCMO and CD to review and approve site selection. Due to the frequent and short term TDY PCMOs last spring, and the lateness in finalizing sites, Post did not formally meet with the TDY PCMO to review the site assignments. Post will hold a meeting before site placement is finalized this year and make sure this meeting happens before site assignments moving forward. Additionally, the CD will make sure that the site selection memo is signed by the PCMO, the SSM and the CD.

Documents to be submitted:

- Site selection criteria check list

Status and Timeline for Completion: Completed, June 2019

OIG Analysis: Please additionally provide evidence that the PCMO was included in the site approval decisions. For example, the post could provide a sample of signed site selection memos for 2019 or a record of the site selection meeting in which the PCMO attended and reviewed site assignments.

Recommendation 18

That the country director and Peace Corps medical officer develop a plan to formalize relationships with local medical providers.

Concur

Response: Once the permanent PCMO arrives, the country director and the PCMO will make visits to currently identified and vetted local medical providers on all three islands. Formalizing current relationships will be explored by the CD, the director of management operations, and the Peace Corps medical officer. An annual visit of local medical providers will be carried out during medical officer site visits to Volunteers.

Documents to be submitted:

- Lists of medical providers in the MAP

Status and Timeline for Completion: November 2019

OIG Analysis: Please ensure that the list of medical providers in the MAP or other documentation submitted includes evidence of formalized relationships or understandings with the medical providers listed. For example, a description of the agency's understanding with the provider could be included in the 'notes/comments' section on the MAP for each provider.

Recommendation 19

That the country director and Peace Corps medical officer develop regional medical action plans for each island.

Concur

Response: The Medical Action Plan (MAP) for each island was completed in October 2018 and updated March 2019. This document will be updated annually or more frequently if needed.

Documents to be Submitted:

- TG 385 - Post Medical Action Plans for the three islands.

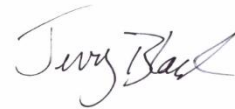
Status and Timeline for Completion: Completed, March 2019

OIG Analysis: According to Technical Guideline 385 Medical Action Plan, the post medical action plan and regional medical action plan are distinct components of the medical action plan. OIG received the post medical action plan during the course of the evaluation. We additionally request that the post submit a regional medical action plan for each island.

APPENDIX F: PROGRAM EVALUATION COMPLETION AND OIG CONTACT

PROGRAM EVALUATION COMPLETION

This program evaluation was conducted under the direction of Assistant Inspector General for Evaluations Jerry Black, by Program Analyst Alexandra Miller. Additional contributions were made by Senior Evaluators Kaitlyn Large and Paul Romeo.



OIG CONTACT

Following issuance of the final report, a stakeholder satisfaction survey will be distributed to agency stakeholders. If you wish to comment on the quality or usefulness of this report to help us improve our products, please contact Assistant Inspector General for Evaluations Jerry Black at jblack@peacecorpsig.gov.

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

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