



Peace Corps
Office of Inspector General
Semiannual Report to Congress

April 1, 2016 to September 30, 2016



Office of Inspector General

TOGETHER WE MAKE A BETTER PEACE CORPS

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Vision:

Provide high-impact work products that agency management acts upon to increase the Peace Corps' efficiency and effectiveness.

Mission:

Through audits, evaluations, and investigations, the Office of Inspector General (OIG) provides independent oversight of agency programs and operations in support of the goals set forth in the Peace Corps Act while making the best use of taxpayer dollars.

The goals of OIG are as follows:

- To promote integrity, efficiency, effectiveness, and economy
- To prevent and detect waste, fraud, abuse, and mismanagement
- To identify risk and vulnerabilities and offer expert assistance to improve Peace Corps programs and operations

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

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Highlights from this Report

Message from the Inspector General



I am pleased to present the Peace Corps Office of Inspector General's (OIG) Semiannual Report to Congress for the period of April 1, 2016 to September 30, 2016. Our work underscores OIG's commitment to promoting efficiency, effectiveness, and accountability within the Peace Corps.

During this reporting period, my office identified the most significant management and performance challenges facing the Peace Corps: security of information technology, Volunteer health and safety, excessive personnel turnover, overseas staff training, acquisitions and contract management, and business processes.

My office released several special reports to Peace Corps management this period. The Recurring Issues report summarized common challenges found at multiple posts around the world from 2012 to 2015, as well as recurring issues found through OIG investigative activities. This report identifies areas where management attention could result in wide-reaching improvements for post efficiency and effectiveness. We also released management advisory reports on Volunteer site history files and agency conference cost reporting. The former discussed common deficiencies in site history file maintenance, organization, and use which may have increased safety and security risks to Volunteers. The latter identified opportunities for the agency to improve compliance in reporting and managing conference costs.

The Audit Unit issued a congressionally-mandated report on the security of Peace Corps computer systems that contain sensitive information, and final reports on post audits of Indonesia, Senegal, and Colombia. The unit initiated or continued work on post audits of China, Georgia, Zambia, and the Eastern Caribbean, and continued a peer review of the audit organization of the Library of Congress OIG.

The Evaluation Unit issued a final country program evaluation of Rwanda and initiated evaluations of agency programs in South Africa and Kosovo. The unit continued work on an evaluation of the agency's sexual assault risk reduction and response program, as required by the Kate Puzey Peace Corps Volunteer Protection Act of 2011. This report will be provided to Congress by November 21, 2016.

The Investigation Unit conducted investigations of waste, fraud, abuse, and mismanagement in Peace Corps programs and operations. The unit had 26 cases and 108 inquiries open at the beginning of this period, and opened an additional 22 cases and 181 inquiries. During this period, the unit closed 23 cases and 97 inquiries. In addition to other work, the unit responded to an allegation that two Volunteers were involved in the distribution of illegal drugs. As has been the case in past inquiries, this investigation revealed widespread use of illegal drugs by a significant number of Volunteers in-country.

This period, my office presented an Inspector General Award to Assistant Port Director and Returned Peace Corps Volunteer Kevin Pfeiffer for his respectful support in the past three years in repatriating fallen Volunteers who passed away during service. Finally, I am honored to share that the Council of Inspectors General on Integrity and Efficiency has announced that my office will receive two awards at its annual award ceremony scheduled for October.



Kathy A. Buller
Inspector General

Management and Administration

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Management and Administration

Agency Context

As of September 30, 2016, there were 7,213 Peace Corps Volunteers and trainees serving in 65 countries at 61 posts. This total includes 836 Volunteers and trainees funded by the President's Emergency Plan for AIDS Relief to work on HIV/AIDS projects at 17 posts, and 286 Peace Corps Response Volunteers serving in short-term assignments at 33 posts.

Peace Corps Volunteers and programs were supported domestically by approximately 771 direct hire staff and experts/consultants at headquarters, 136 direct hire staff at regional recruiting offices, 276 direct hire staff at post, and 3,037 personal services contractors at post.

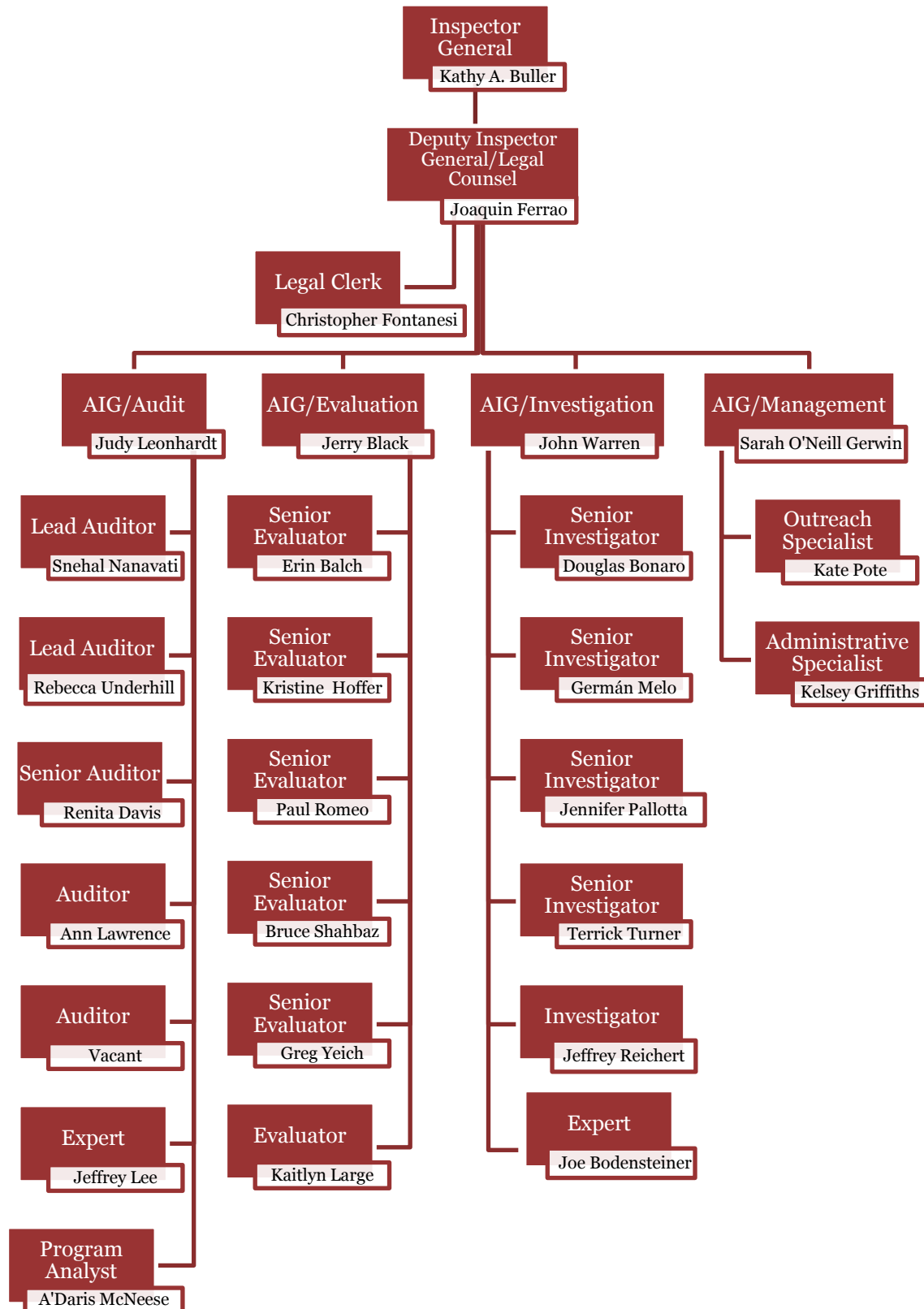
The Peace Corps had additional domestic and international corporate contracts including agreements for security, Volunteer training and healthcare, information technology, communications, and other services.

Staffing

Kelsey Griffiths joined OIG as an administrative specialist in June 2016. She had been with OIG on a temporary appointment since September 2015. Kelsey served as an education Volunteer with Peace Corps/South Africa from 2011 to 2014, implementing literacy and HIV prevention initiatives for rural youth. She previously provided program management support to a number of youth development non-profits operating in Africa and the Middle East. Before that, she was an office assistant at the American Civil Liberties Union of Ohio. Kelsey holds a bachelor's degree in French and English with honors research distinction from the Ohio State University.

A'Daris McNeese joined OIG as a program analyst in September 2016, having worked as OIG's evaluation apprentice since September 2015. Previously, she was an engagement specialist with Chicago Youth Centers, where she implemented family enrichment and community engagement events. A'Daris holds a master's degree in public policy analysis from Carnegie Mellon and a bachelor's degree in anthropology and international studies from Northwestern University, where she was a Gates Millennium Scholar.

OIG Organizational Chart



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Management and Performance Challenges

Inspector General's Statement

In accordance with the Reports Consolidation Act of 2000, the Office of Inspector General is submitting what it has determined to be the most significant management and performance challenges facing the Peace Corps. The challenges discussed in the attachment to this memo are to be included in the Agency Financial Report for fiscal year (FY) 2016.

OIG has concluded that the following six areas present significant challenges at the Peace Corps:

- Information Technology Security Management (first reported in FY 2009)
- Business Processes (first reported in FY 2011)
- Excessive Personnel Turnover (first reported in FY 2012)
- Training Overseas Staff (first reported in FY 2014)
- Acquisitions and Contract Management (FY 2015)
- Volunteer Health and Safety (new for FY 2016)

These challenges illustrate the most significant areas OIG believes need improvement in order for the Peace Corps to effectively manage its resources and minimize the potential for fraud, waste, and abuse occurring in its operations. Addressing the issues related to these challenge areas will enable the agency to increase operational efficiencies and improve mission effectiveness.

FY 2016 Challenges

Information Technology Security Management

Why This Is a Challenge

Effective information technology (IT) security programs help protect agency data from being misused by both internal and external sources, and minimize the risk of having sensitive data compromised. Federal laws and regulations governing IT security are designed to strengthen an agency's management of its operations. They also provide significant guidance to help prevent serious information security incidents. The Federal Information Security Management Act of 2002 (FISMA), as amended, is central to the

federal IT security program.¹ The objective of FISMA is to develop a comprehensive framework to protect government information, operations, and assets. Since FY 2009, OIG has reported in its management and performance challenges that the Peace Corps has not achieved full compliance with FISMA or fully implemented an effective IT security program. Some of the identified issues have been outstanding for over seven years, and the agency has struggled to implement corrective actions.

Further complicating this challenge, the Peace Corps has been trying to modernize its IT environment. Despite good intentions, the agency has not paid adequate attention to IT security and its implications for the network and sensitive information. For example, in FY 2015, the Peace Corps participated in a cloud email pilot program with the General Services Administration. This program did not follow the proper acquisition policies or processes, and the agency did not conduct a standard security assessment prior to initiating the pilot. Based on an OIG recommendation, the agency began implementing policies to review IT security as a key part of acquisition when pursuing cloud services. However, since 2013 there has been an outstanding FISMA finding that the agency has not adequately tracked or monitored contract agreements and memorandums of understanding in its official security repository.

Progress in Addressing the Challenge

Peace Corps management has made some progress in strengthening IT security management programs and FISMA compliance, beginning with the onboarding of a new chief information security officer. The agency has developed and implemented user security awareness training and has begun implementing multi-factor authentication for network logins. However, a number of FISMA issue areas discussed in prior years' challenge statements have not been fully resolved.

For example, although management has started a continuous monitoring program, including documenting some agency systems and their associated risk, the program does not contain all the required components and remains incomplete. Some configuration management processes have not been fully implemented, and systems security assessment documentation has not been completely updated and is not being reviewed periodically by key stakeholders. In addition, the Peace Corps has not fully implemented a comprehensive agency-wide risk management program that is effective in monitoring, identifying, and assessing security weaknesses, and resolving related problems at the entity, business process, and information system levels, in line with the National Institute of Standards and Technology Risk Management Framework.

¹ FISMA was amended in December 2014 by the Federal Information Security Modernization Act of 2014 (Pub. L. No. 113-283).

What Needs to Be Done

Achieving full compliance with FISMA and other federal laws and regulations that apply to managing the Peace Corps' IT security infrastructure is critical to having a program that is effective in ensuring the agency's information, operations, and assets are adequately protected.

The Peace Corps needs to place greater emphasis on improving its information security program, including accomplishing greater FISMA compliance and timely remediation of IT security weaknesses that have been identified internally and through the annual FISMA audit and other reviews.

The Peace Corps will need to place a sharper focus on improving its IT security program by assigning sufficient qualified personnel, and prioritizing the time and resources necessary to become fully FISMA compliant and eliminate weaknesses. Implementation of the Risk Management Framework will facilitate the tailoring of an information security program that meets the Peace Corps' mission and business needs across a decentralized organization.

Key OIG Resources

[Peace Corps' FY 2015 Performance and Accountability Report](#)

[Management Advisory Report: The Peace Corps' Cloud Computing Pilot Program](#)

[OIG Semiannual Report to Congress, October 1, 2015 to March 31, 2016](#)

[Report on Protecting Sensitive Information in Peace Corps Computer Systems](#)

[FY 2015 Review of Peace Corps' Information Security Program](#)

Business Processes

Why This Is a Challenge

Although the Peace Corps continues to improve key business processes and critical Volunteer support functions, as well as streamline its operations, it is constrained by decentralized processes and a lack of modern systems. Specifically, the agency continues to be challenged in areas related to data and property management.

Data Management

Although the Peace Corps is working to modernize its businesses processes, OIG audits and evaluations have found that several essential business functions remain largely paper-based, including processes for travel, medical supply management, payment vouchers, and several human resource functions (performance appraisals, training records, and travel compensation computation). In addition, the Peace Corps has updated certain HR functions, replacing previously automated processes with

paper processes. The Peace Corps' lack of automated business processes has led to inefficiencies and a duplication of efforts, making data more prone to human error.

Property Management

At year end, the Peace Corps reported having a total property net book value of \$38.3 million. OIG and external audits at the Peace Corps have continued to find issues with the accuracy and completeness of property records. Effective property management can significantly reduce the risks associated with theft, fraud, or unexplained losses of agency assets. It also serves to improve the accuracy of financial reporting.

Progress in Addressing the Challenge

This section has been modified to reflect agency progress in improving safety and security business processes. The agency's safety and security program has begun to mature in recent years, with the development of more vigorous roles and responsibilities for the safety and security manager position, updated guidance materials, and more formal involvement of security experts in the hiring of overseas security personnel. The agency is currently working with the Department of State to revise and update the memorandum of understanding formalizing the relationship for overseas safety and security regarding Peace Corps staff and Volunteers.

The Peace Corps has implemented, and is working to implement, several systems to better manage agency records. Specifically, the Office of Volunteer Recruitment and Selection implemented the Database of Volunteer Experience to manage Volunteer applicant data, and in August 2012, the Office of Health Services implemented a medical applicant exchange system. The agency has completed piloting an electronic medical records system that will provide online storage of Volunteer medical data. The system was fully implemented in October 2015.

In FY 2015 the agency initiated the development of a case management system which became operational in FY 2016.

Progress is also being made to address property management deficiencies. In FY 2015, the agency began implementing a new property management system to improve accountability over its assets. Presently, Peace Corps headquarters operations and approximately 40 percent of its overseas posts have taken the necessary steps to fully implement the new property management system. The remaining posts are in various stages of implementation while agency efforts continue to move toward transitioning 100 percent of its property into the new system.

What Needs to Be Done

The agency needs to continue to assess its operations and modernize its business processes accordingly. Furthermore, agency business processes must also support effective internal control and provide for access to reliable data. Additionally, the Peace Corps needs to continue its focus on developing or acquiring more modern and automated systems to replace business processes that are manual or rely on inadequate systems. As automated systems are introduced in the Peace Corps environment, the agency must be diligent in ensuring that proper IT security controls are in place, as IT security has been a reported challenge area since 2009. See the Management Challenge section titled *Information Technology Security Management*.

Key OIG Resources

[Program Evaluation Report: Follow-up Evaluation of the Volunteer Delivery System](#)

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

[Audit Report: Peace Corps Applicant Screening Process](#)

[OIG's FY 2017 Annual Plan](#)

[Management Advisory Report: Certification of Volunteer Payments](#)

[Recurring Issues Report: Common Challenges Facing Peace Corps Posts, FYs 2012-2015](#)

Excessive Personnel Turnover

Why This Is a Challenge

In June 2012, OIG issued a report on the impact of the “five-year rule” (FYR) on Peace Corps operations. The FYR became law in 1965 and limited employment of Peace Corps’ U.S. direct hire personnel to five consecutive years. OIG’s evaluation found that the FYR, as intended, enabled the agency to create a constant flow of new employees including Returned Peace Corps Volunteers; avoid the inflexibility associated with the civil service system; and prevent employees from working their entire career at the Peace Corps. However, the FYR accelerated the annual pace of employee turnover to between 25 percent and 38 percent, quadruple the average turnover rate in the federal government. OIG estimated that over the five-year period from 2005 to 2009, excessive turnover driven by the FYR accounted for approximately 60 percent of \$20.7 million in total turnover management costs.²

Excessive personnel turnover at the Peace Corps exacerbated a range of common management challenges. It has undermined the agency’s ability to retain employees on

² This estimate only included direct costs and did not take into account costs that were more difficult to quantify, including the loss of expertise when high-performing staff appointments ended, reductions in productivity, or gaps in institutional memory and knowledge.

the basis of performance; to conduct succession planning; to manage the continuity and transfer of essential knowledge, skills, and abilities; to provide training and professional development to staff; and to deploy its workforce efficiently. In addition, the FYR weakened the agency's ability to attract and retain highly qualified professionals in the areas of contracting, financial management, information technology, human resources management, and medical support. It has also led to frequent staffing gaps in mission-critical positions overseas.

In 2013, OIG reported on challenges related to hiring overseas staff in its audit report on Peace Corps Overseas Staffing. OIG reported that the agency struggled to maintain a robust pool of qualified applicants and ensure positions were filled in a timely manner. It had difficulty managing hiring and administrative timelines for open positions, maintaining consistency in the interview and hiring process, planning for transfers, and dealing with unexpected vacancies. These challenges were aggravated by the agency's accelerated rate of overseas staff turnover.

Progress in Addressing the Challenge

In May 2016, the agency proposed legislative reforms to its hiring authorities as part of its efforts to reduce the rate of employee turnover. The agency also took action to address two open recommendations from OIG's FYR evaluation related to employee performance issues and unwanted, early employee resignations. Based on documentation the agency provided, OIG was able to close three of the five open recommendations from our 2012 evaluation report.

The agency has also taken steps that could provide the Director with additional authority to recruit and retain some employees with special skills needed for critical management functions while preserving the five-year rule for most employees.

What Needs To Be Done

The agency should address the two remaining open recommendations from OIG's 2012 report on the impacts of the FYR: to identify which functions should be subject to periodic turnover, and implement a process to manage turnover; and to identify the core business functions and positions that suffer from frequent staff turnover, and determine and implement a process for acquiring and retaining qualified personnel.

In addition, the agency should take action to close the remaining six audit recommendations OIG made in our report on overseas staffing to improve how it hires certain overseas staff.

Key OIG Resources

[Evaluation Report: Impacts of the Five-Year Rule on Operations of the Peace Corps](#)
[Audit Report: Peace Corps Overseas Staffing](#)

Training Overseas Staff

Why This Is a Challenge

The Peace Corps relies on its overseas staff to ensure the success of its programs around the world. Overseas staff members have many responsibilities, including identifying assignments where Volunteers can be productive and contribute to host country development needs, managing financial and administrative operations, and ensuring Volunteer health and safety. Even though they work outside of the United States, overseas staff members often have to abide by the rules of the federal government, including those related to ethics, contracting, and whistleblower protection. Ensuring overseas staff members have the skills and information they need for their jobs requires training.

In September 2014, OIG issued a report on the Peace Corps' training of overseas staff, which uncovered a number of challenges. An underlying problem was that the agency did not have a central office to develop, manage, and coordinate overseas staff training. This responsibility was largely decentralized, with different headquarters offices and posts responsible for identifying training needs, developing and delivering training, and tracking training participation. There was no senior official to develop a learning strategy for the entire agency and ensure the Peace Corps had the financial and human resources needed to implement the strategy.

Another significant challenge was that the agency did not have a training coordinator for host country nationals (HCNs), who make up over 90 percent of the Peace Corps' overseas workforce. The agency's primary training and orientation for overseas staff members, called overseas staff training (OST), was not available to every staff member. As of November 2013, only 18 percent of all overseas staff (and nine percent of HCNs) hired between 2008 and 2013 had attended OST. The agency lacked an alternate mechanism for orienting new overseas staff members. Without a comprehensive, standardized orientation and training program for all overseas staff, each post decided what information would be provided to new staff. This created variability in the quality of staff training, and there was no assurance that new staff was properly trained on important policies and procedures.

OIG also reported that the agency lacked training records and a robust learning management system. As a result, it was challenging for the agency to identify everyone who needed to take certain trainings and track training completion. The Peace Corps

could not ensure that employees had received training on mandatory and job-essential topics.

Finally, as OIG reported in the management challenge titled *Excessive Personnel Turnover*, time-limited staff appointments under the FYR created an accelerated rate of turnover and underscored the need for a comprehensive staff training program to fully prepare new hires to perform their jobs.

Progress in Addressing the Challenge

In October 2015, the agency established the Office of Staff Learning and Development (OSLD) in order to “promote a culture of learning and professional development for Peace Corps staff.” The agency has reported taking steps to address the need for a more consistent learning and development strategy for all domestic and overseas staff. These include a focus on developing new employee onboarding and supervisory training, and defining learning and development needs at specific phases in each employee’s tenure. The agency has dedicated a staff person to creating a learning strategy for overseas programming, training, and evaluation staff. Further, OSLD has engaged with other offices to support the agency’s goal of putting in place a more robust learning management system to deliver and track completion of training to a widely dispersed workforce.

Additionally, the agency has taken steps to address specific staff training recommendations in the 2014 OIG report, including recommendations related to training for travel cards and classified information, and ethics training for staff hired since January 1, 2015. The agency has continued to develop and implement trainings needed to comply with federal laws, such as a training program for sexual assault response liaisons, a sexual assault policy training for all overseas staff, and supervisory training.

What Needs To Be Done

OIG issued 25 recommendations in its 2014 report, and has closed 12 as of October 2016. The agency addressed a number of recommendations to provide specific types of training required by law or agency policy. Most of the recommendations aimed at addressing the systemic issues uncovered during the evaluation remain open and need to be addressed, including: implementing a training needs assessment process; creating a standardized training program for new overseas staff; and implementing an improved learning management system.

The agency should ensure that all overseas staff receives training on the Standards of Ethical Conduct for Employees of the Executive Branch. Recent OIG investigative activity indicates that not all overseas staff is knowledgeable of their ethical

obligations. As part of the training effort, the agency should ensure that overseas staff members hired prior to January 2015 have read and understood their ethical obligations. Additionally, documentation of ethics training should be maintained by the agency.

Key OIG Resources

[Program Evaluation: The Peace Corps' Training of Overseas Staff](#)

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

[Recurring Issues: OIG Post Audits and Evaluations FY 2009-2011](#)

Acquisitions and Contract Management

Why This Is a Challenge

During FY 2016 the Peace Corps obligated \$175.5 million in contract costs for goods and services, or approximately 42 percent of its total annual budget. This included about \$76 million for domestic contractual costs and \$99.5 million related to overseas operations. The cost of contracts at the Peace Corps represents a significant part of the agency's budget. As a result, agency management must efficiently manage the associated risks commensurate with dollars invested. Managing federal contracting more effectively has continuously appeared on the Government Accountability Office's "High Risk List" since 1990. For the Peace Corps, the timely and cost-effective acquisition of essential goods and services is critical to supporting its Volunteers assigned to remote areas throughout the world, and in accomplishing the agency's mission. To improve its operations and minimize the inherent risks associated with contracts, it is critical that the agency consistently follow laws, regulations, and Peace Corps policies that relate to government procurement.

We included acquisitions and contract management as one of the agency's greatest management and performance challenges last year and in both FYs 2009 and 2010. Specifically, past challenges highlighted insufficient acquisition staff resourcing within the Peace Corps as a significant root cause challenging the agency's ability to effectively manage its contracting workload. Acquisition staff resourcing includes recruiting and retaining a sufficient number of experienced and qualified contracting professionals to manage the workload and efficiently meet the needs of its customers.

Progress in Addressing the Challenge

During FY 2016 the Peace Corps authorized six additional positions to strengthen its acquisition workforce. The agency has filled five of the six positions, of which three are senior-level contracting professionals. Although the acquisition organization experienced some personnel turnover in FY 2016, it recently achieved close to full authorized personnel strength through more effective recruiting, hiring, and retaining of

professional staff. The Peace Corps also made good progress in remediating a number of open recommendations contained in two separate OIG reports on agency contracting issued during FYs 2015 and 2016. Management has placed greater emphasis on compliance with applicable laws, regulations, and policies by establishing clearer lines of authority, responsibility, and accountability within the acquisition workforce. Further, the acquisition organization is focusing more on ways to improve customer service by restructuring its communication channels and engaging customers through regular outreach efforts.

Although progress since last year is apparent, the Peace Corps is still in the process of implementing many needed improvements. Several improvements are presently in varied stages of completion, and will require a considerable investment of time and effort. In addition, managing challenges associated with retaining qualified and skilled contracting professionals, and the timely replacement of personnel as vacancies occur, will likely continue to be a significant challenge for the Peace Corps. Personnel turnover within the agency's acquisition workforce is directly linked to a legislatively-mandated five year term limitation on most agency employees. We identified this as a root cause of the agency's inability to consistently maintain a sufficiently staffed acquisition workforce. OIG reported this negative impact on the Peace Corps' personnel recruitment and retention due to limited term assignments in a 2012 report. This area continues to be a significant challenge and is discussed in more detail in the management and performance challenge titled *Excessive Personnel Turnover*.

What Needs to Be Done

Peace Corps management needs to ensure they consistently maintain an acquisition workforce that possesses the necessary experience and skill sets capable of effectively managing its contracting workload. To accomplish this, they need to continue improving their programs for recruiting, retaining, and training the agency's contracting professionals. Significant improvements in reducing excessive personnel turnover can be achieved through implementation of recommendations made in our 2012 report on impacts of the five-year rule. The agency also needs to aggressively pursue its efforts in continuing to make improvements in its contracting policy and addressing procedural weaknesses related to governance compliance, acquisition planning, and contract surveillance.

Key OIG Resources

[Audit Report: Peace Corps Process for Soliciting, Awarding, and Administering Contracts](#)

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

[Management Advisory Report: Peace Corps' Volunteer Health Care Administration Contract](#)

[Audit Report: Peace Corps' Volunteer Healthcare Benefits Administration Contract](#)

Volunteer Health and Safety

Why This Is a Challenge

The Peace Corps works to prioritize the safety, security, and physical and emotional health of its Volunteers. However, OIG country program evaluations and audits have identified aspects of the agency's safety and security and Volunteer medical care programs that present management challenges. Based on OIG's work in recent years, these challenges relate to: aspects of the Volunteer health care program, processes for selecting and approving sites for Volunteers, and procedures and documents that prepare the agency to respond to emergencies.

Volunteer Health Care

In 2009, OIG conducted a review of the medical care provided to Volunteers following the death of a Volunteer in Morocco. The review found that the methods used to measure and monitor the quality of Volunteer health care were insufficient. A follow-up review conducted in March 2016 found that the agency had enhanced its oversight of health units and its quality improvement program, taken steps to enforce its clinical escalation policy, and developed a scope of practice policy. However, some aspects of the Volunteer health program still remain a challenge.

The agency has expanded its regional medical officer (RMO) model with the goal of improving Peace Corps medical officer (PCMO) oversight and encouraging mentoring. However, the role of the RMO in PCMO supervision is not well-defined, and RMOs were not consistently consulted for PCMO performance evaluations. Without sufficient authority over PCMOs, the ability of RMOs to contribute to the agency's oversight and quality improvement efforts is limited.

In addition, OIG has found that the agency's chart review process for PCMOs focused too much on chart completeness rather than on the quality of clinical decisions, a measure that would better help PCMOs improve their quality of care.

Finally, the agency has implemented a sentinel event policy to assess unfortunate or unexpected outcomes by conducting root cause analyses to identify causal factors that led to the negative outcomes. However, too many events were considered sentinel to be reviewed effectively, sentinel event committee members often had conflicts of interest with the cases, and root cause analyses were not comprehensive. As a result, the reviews have not resulted in systemic change.

Volunteer Site Selection and Approval

OIG found issues with site development at a number of posts and regions, which could result in Volunteers being inadvertently placed in unsafe living situations. The agency requires that posts maintain site history files with relevant safety and security information, and that post staff review these files when considering Volunteer site placement. However, between 2012 and 2016, OIG found site history files were incomplete, insufficiently organized, or not being used to inform site selection in multiple posts and regions.

OIG also found that several posts did not comply with their self-identified housing criteria, and appropriate staff (including the safety and security manager) was not always sufficiently included in the site development process. Without housing checks and proper site development, the agency may place Volunteers in houses and sites that impose increased security risks.

OIG has also found that PCMOs were not conducting regular assessments of local medical facilities. The lack of expectations and guidance on how frequently such assessments should be conducted, combined with insufficient oversight by country directors, contributed to this problem. If PCMOs do not assess local facilities and Volunteer sites, they may have incomplete information about medical resources locally available to Volunteers. This may make the agency less equipped to respond to Volunteer medical care needs in an effective manner.

Emergency Preparedness

During emergencies, posts' ability to locate Volunteers, maintain detailed emergency plans, and communicate those plans to Volunteers is critical. However, more than half the posts evaluated between 2012 and 2015 did not maintain complete and accurate site locator forms. These forms contain contact information and site location details, and are designed to locate Volunteers in an emergency. OIG also found that whereabouts reporting policies designed to help staff locate out-of-site Volunteers during an emergency were not implemented as intended.

In addition to these risks, OIG post evaluations identified five posts with emergency action plans that were not up to date and accessible to Volunteers. At approximately half of the posts that were evaluated from 2012 to 2015, Volunteers were unaware of their emergency consolidation points. Outdated emergency action plans and a lack of communication to Volunteers about the plans and consolidation points increased the risk that Volunteers would be unable to respond quickly and appropriately in an emergency.

Finally, we have found gaps in emergency preparedness at posts. Medical evacuation ("medevac") plans were often incomplete and missing important information that could

be needed in an emergency. Guidance from the agency on medevac plans was unclear, and sometimes outdated or difficult to comply with. A lack of clear oversight responsibility further contributed to the incompleteness of the plans.

Progress in Addressing the Challenge

Volunteer Health Care

The Peace Corps has launched a new electronic medical records system which, if appropriately implemented, may lead to improved access to and assessment of medical charts. The agency also switched to a weighted review process with an emphasis on the quality of clinical decisions over chart completeness.

Volunteer Site Selection and Approval

The Peace Corps initiated processes to address elements of this management challenge, including a review of its guidance related to site history file documentation and use during the site approval process. Further, the agency clarified guidance for PCMOs and set clear expectations regarding their assessments of local medical facilities and providers.

Emergency Preparedness

The agency updated its guidance on Volunteer site location management in 2015, replacing site locator forms with site contact forms. Volunteers are required to submit these forms within their first 30 days at site, and staff are expected to collect GPS coordinates of Volunteer housing and sites if feasible during the site development process. OIG has not yet evaluated the implementation and effectiveness of this new policy. Also, the agency recently clarified guidance to staff and Volunteers regarding the whereabouts reporting policy and related procedures.

The Office of Health Services (OHS) provided clear guidance on requirements for medevac plans and on how and when overseas staff should conduct medical emergency preparedness drills.

What Needs to Be Done

Volunteer Health Care

The RMO's role in PCMO oversight and supervision needs clarification. Also, to improve the sentinel review process, OHS should implement a screening process that considers severity and frequency of negative outcomes, provide sufficient and appropriate staffing for sentinel event case reviews, include key components (such as root cause identification) in the analyses, and improve staff understanding of best practices in this area. Reviews need to be conducted in a way that focuses on and addresses systemic issues.

Volunteer Site Selection and Approval

The agency needs to develop stronger oversight mechanisms and clearer guidance and procedures for overseas staff responsible for site history files. It should also consider designing and implementing a system to help overseas staff manage this information electronically.

Proper housing checks and involvement of appropriate staff during the site selection process is necessary to increase Volunteer safety. Posts need to conduct housing checks in a way that is consistent with the specified housing criteria. Safety and security managers also need to be involved in site selection to ensure that housing and surroundings meet safety and security standards.

Emergency Preparedness

OIG has not yet evaluated through its country program evaluations the implementation and effectiveness of the agency's new policy on Volunteer site location management.

Key OIG Resources

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

[Recurring Issues Report: Common Challenges Facing Peace Corps Posts, FYs 2012-2015](#)

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

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Advice and Assistance Provided to the Agency and Others

Recurring Issues Report: Common Challenges Facing Peace Corps Posts, Fiscal Years 2012 – 2015

IG-16-04-SR

In September 2016, OIG issued a recurring issues report in order to alert Peace Corps leadership to common challenges found at overseas posts that required management attention to remediate. The report summarized the most frequently recurring issues and recommendations from 38 post audit and evaluation reports, as well as data from OIG investigative activities, between fiscal years 2012 and 2015.

Audits

Between FYs 2012 and 2015, OIG conducted 19 post audits. The most frequently recurring audit issues were related to:

- **Billing and Cash Management:** 89 percent of post audits.
- **Medical Supplies:** 63 percent of post audits. Though still a frequently recurring issue, the number of recommendations in this area has decreased since FY 2012.
- **Property Management:** 58 percent of post audits. This improved substantially since the last recurring issues report in 2012, which had reported that 92 percent of audits contained this recommendation type.
- **Grant Programs:** 53 percent of post audits. This is a new recurring issue that was not identified prior to 2012.

Evaluations

Between FYs 2012 and 2015, OIG conducted 19 post evaluations. The most frequently recurring evaluation issues included:

- **Programming and Training:** 89 percent of post evaluations. Challenges included stakeholder coordination, technical training, and training needs assessments.
- **Safety and Security:** 84 percent of post evaluations. Challenges included use of site locator forms, Volunteer awareness of consolidation points, and emergency access plans.

- **Site Development:** 74 percent of post evaluations. Challenges included site history file maintenance and use, site selection criteria, and staff involvement in site development.

Investigations

Between FYs 2012 and 2015, OIG opened 819 cases, including both inquiries and full investigations. The most frequently recurring allegations were related to:

- **Administration:** 318 allegations, including complaints about housing, safety, separation from service, health care, mismanagement, and waste.
- **Theft:** 93 allegations. Half of the cases occurred within the Africa region.
- **Fraud:** 61 allegations. Half of the cases occurred within the United States.
- **Sexual Assault, Harassment, and Stalking:** 58 cases alleged to be committed by Peace Corps staff or Volunteers.
- **The PROTECT Act:** 31 cases involving alleged sexual contact with a minor.
- **Illegal Drugs:** 25 allegations, nearly half of which occurred in FY 2015.

Management Advisory Report: Site History Files

IG-16-02-SR

OIG issued a report bringing to Peace Corps management's attention systematic deficiencies with site history files that we found at multiple Peace Corps posts. The purpose of site history files is to ensure that relevant, site-specific safety and security information is collected and made available to programming staff. This is critical for the site development process in order to reduce potential safety and security risks to Volunteers.

Site history file deficiencies have been noted in both our 2012 and 2016 recurring issue reports, indicating that this is a longstanding issue. OIG has continued to receive complaints from Volunteers alleging that posts placed them in unsafe sites despite previously having been notified that sites were dangerous. Inadvertently placing a Volunteer in an unsafe site could have serious consequences.

Between 2012 and 2016, 42 percent of evaluated posts (8 of 19) across multiple regions had site history files that were incomplete, insufficiently organized, or not being used to inform site selection. In 2012, we found issues with site history files at a ninth post during a special review conducted at the request of the U.S. House Committee on Foreign Affairs. Insufficient oversight and a lack of agency-wide guidance and systems on site history files contributed to these deficiencies.

OIG issued three recommendations to the agency to address oversight, guidance, and systems intended to improve the maintenance and use of site history files. The agency concurred with all three recommendations, which remained open at the end of this period.

Management Advisory Report: Conference Cost Reporting

IG-16-03-SR

OIG issued a report bringing to Peace Corps management's attention certain opportunities for improvement in complying with federal conference cost management and reporting requirements.

Peace Corps policies and procedures for managing and reporting on conferences generally complied with federal law and guidance. We found that the agency provided adequate guidance and developed processes to enable agency offices to comply with requirements for initiating, reviewing, approving, and reporting conference expenses. However, the agency had not fully complied with all reporting requirements.

OIG found that the agency did not fully report all items required by appropriations law to the Inspector General. The agency provided OIG with conference cost reports in 2015 and 2016, but these reports were missing the required descriptions of the contracting practices followed.

Furthermore, the agency did not comply with the requirement to notify OIG of all conferences with costs exceeding \$20,000. In fiscal year 2013, the agency failed to report 75 percent of held conferences (15 of 20) to OIG. That year, unreported conferences accounted for \$2.1 million out of \$2.4 million spent on all conferences. However, major offices hosting conferences did not have adequate time to comply with all the requirements for all fiscal year 2013 funds because the appropriations law was enacted late into the fiscal year. In fiscal year 2014, the agency failed to report 42 percent of conferences held (14 of 33). This represented \$1.8 million of \$3.3 million spent.

In addition, we found that a conference coordinator failed to comply with agency contracting policy by paying for services without first creating a valid obligating document. This report made four recommendations to address the noted concerns. All four recommendations remained open at the end of this period.

Participation in Overseas Staff Trainings

OIG participated in overseas staff trainings in June and July, briefing 21 staff on best practices and common deficiencies noted by OIG. Participants included country

directors, directors of programming and training, training managers, directors of management and operations, program managers, Volunteer support staff, and financial assistants. OIG staff also presented at country director conferences in each region. 60 country directors received training on their responsibility to report fraud, waste, and abuse in the Peace Corps.

Investigation Unit Outreach

OIG investigators continued to work on an outreach initiative started in fiscal year 2012. During this period, the initiative reached 21 Peace Corps staff members, educating them about the role of OIG investigators, the mission of OIG, the types of allegations typically referred to OIG, and OIG's readiness to respond to allegations. Additional discussion topics included ways to detect potential fraud, waste, and abuse of Peace Corps resources. Briefings were followed by an open forum to answer questions and address any concerns.

Update on Management Advisory Report: the Peace Corps' Drug-Free Workplace Plan

As reported in previous Semiannual Reports to Congress since 2012, OIG issued a management advisory report on August 16, 2012 about the agency's non-compliance with Executive Order (E.O.) 12564, which mandates a drug-free federal workplace.

The Peace Corps reported that during the past six months, it issued an updated drug-free workplace plan, a policy, implementing procedures, and a list of testing designated positions (TDP).³ It has also commenced random drug testing.

The Peace Corps currently excludes overseas staff from its drug testing program. The TDP list was last updated in October 2015, and includes 146 domestic positions. The Peace Corps has reported that it will annually test 20 percent of employees on the TDP list by testing five percent each quarter. It reports having so far met that goal by testing eight designated staff in September 2016. The agency further reports that it will begin employment applicant testing in FY 2017. It has not yet developed supervisor trainings outlined in the plan.

³ These positions include those identified as sensitive or potentially impacting public safety, such as employees who carry firearms or operate motor vehicles carrying passengers, positions that require access to national security classified information, presidential appointees requiring senate confirmation, and others. Positions in "presumptive" or "preferred" testing categories require written justification and approval to be excluded from the TDP list contained in the agency's Drug Free Workplace plan.

OIG has not independently verified these statements, but will continue to monitor the agency's progress towards meeting its drug-free workplace plan.

OIG Support of U.S. Government Background Checks

OIG's Investigation Unit worked with various agency offices to incorporate OIG database checks as part of the records checks performed during Peace Corps employment inquiries. Through OIG efforts, Peace Corps offices that respond to employment checks on former Peace Corps Volunteers now also include an OIG database check. This program has enhanced the agency's employment inquiry and security process. During this period, more than 89 checks of OIG records were conducted.

Review of Agency Regulations, Policies, and Procedures

OIG continues to provide advice and assistance to the Peace Corps Senior Policy Committee and other offices by commenting on drafts of new or updated policies, procedures, and other documents governing agency organization or practice. During this reporting period, OIG reviewed 45 policies, procedures, policy attachments, guidelines, diagrams, and charters on numerous topics, including agency retention of legal counsel for Volunteers and staff, early termination of Volunteers, staff performance, Privacy Act and records management, and crimes against Volunteers.

During this reporting period the following key policies were changed subsequent to OIG advice or assistance:

MS 650 Drug-Free Workplace Program

On August 16, 2012, OIG issued a management advisory report about the agency's non-compliance with E.O. 12564, which mandates a drug-free federal workplace. On June 6, 2016, the agency issued Manual Section (MS) 650, establishing policies and procedures implementing the agency's drug free workplace plan, a key step in achieving full compliance with E.O. 12564. For additional details on the progress of the implementation please see *Update on Management Advisory Report: the Peace Corps' Drug-Free Workplace Plan*, earlier in this section.

MS 261 Medical Offices and Peace Corps Medical Officers

In our 2016 report, *Follow Up Evaluation of Issues Identified in the 2010 PC/Morocco Assessment of Medical Care*, OIG made a number of recommendations aimed at improving the use and efficacy of back-up medical providers. Notably, one recommendation was "that the associate director of the Office of Health Services clarify guidance and expectations for training and use of back-up providers."

In June 2016, the agency amended MS 261 to require each post to contract with a local medical provider to serve as a medical back-up for the Peace Corps medical unit. According to the agency, the policy revisions outline minimum requirements for back-up provider coverage and training, and delineate responsibilities for ensuring that back-up providers are properly supported and supervised.

MS 899 Breach Notification Response Plan

On August 1, 2016, the agency issued revisions to MS 899, *Breach Notification Response Plan*, covering actions that should be taken when personally identifiable information (PII) in the possession or control of the Peace Corps has been compromised. Amongst other comments, OIG made suggestions to strengthen the requirements to notify relevant parties of any suspected or known breach of PII or other categories of sensitive information. OIG also unsuccessfully advocated for a greater role for the Office of Acquisition and Contract Management in ensuring that agency contracts adequately provide for the protection of sensitive information.

Advised Congress on Issues Related to Access to Agency Information

During the reporting period, OIG responded to two congressional requests for, amongst other things, a description of any attempts to interfere with IG independence and a description of any instance where the agency has restricted or delayed access to information. The first request was from the chairman of the Senate Committee on Homeland Security and Government Affairs and the chairman of the Senate Committee on the Judiciary. The second request was from the chairman and a ranking member of the House Oversight and Government Reform Committee. OIG's responses outlined the ongoing issue of the Peace Corps denying OIG access to information included in restricted reports of sexual assaults reported by Peace Corps Volunteers.

In our responses, we highlighted the former Peace Corps general counsel's (GC's) erroneous interpretation of Section 8A(f)(2) of the Kate Puzey Peace Corps Volunteer Protection Act ("Kate Puzey Act"), upon which the agency has continued to deny OIG access to information relevant to OIG's oversight over the agency's restricted reporting program. Section 8A(f)(2) mandates that victims have access to a restricted reporting mechanism that allows them to receive services without automatically triggering an official investigative process. Section 8A also provides that if a victim makes a restricted report, the victim's personally identifiable information can only be shared with specified individuals unless an exception applies. One enumerated exception is when another federal law requires disclosure (e.g. the IG Act). The law also provides exception for serious or imminent risk to the health and safety of the victim or others. Despite the availability of the exceptions, the former GC's legal opinion asserts that restricted reports should not be accessible to OIG. Given that the agency established restricted

reporting as the default reporting system for all sexual assaults, the legal opinion effectively justifies keeping OIG in the dark about a potentially substantial number of sexual assault cases. The former GC's legal opinion, and the policies based on it, deny OIG access to the case information necessary to review the effectiveness of the agency's sexual assault program, and limit OIG oversight over Volunteer safety and security.

Section 8E(d)(1)(B) of the Kate Puzey Act specifically mandates several roles for OIG in ensuring the agency adequately responds to sexual assault and other crimes, effectively implements and trains on the Sexual Assault Risk Response and Reduction (SARRR) policy and program, and delivers services to sexual assault victims. The Kate Puzey Act requires that OIG conduct an evaluation on this matter and provide reports to Congress by November 2013 and November 2016. The Act requires that the reports include a case review of a statistically significant number of sexual assault cases. The agency policies denying OIG access are contrary to these legislatively mandated oversight roles.

Our responses also noted that, after nearly two years of discussions with the agency and members of Congress, two congressional hearings, negative press coverage, and, ultimately, the signing of a Memorandum of Understanding (MOU) between the agency and OIG, the majority of the access-denying policies and procedures were rescinded on October 17, 2014; however, the underlying legal opinion supporting those policies and procedures is still in place.⁴

While the agreement is a good step forward, and we are optimistic that it will allow us to conduct our oversight duties, we remain concerned about the impact of the access denying policies on our ability to oversee the agency's response to Volunteers who are victims of sexual assaults. For example, our inability to access personally identifiable information in restricted reports during our mandated SARRR evaluation impeded our ability to verify that we received complete, relevant documentation for the cases we reviewed.⁵ Even with the MOU in place, the agency has yet to adequately train employees on what information can and must be provided to OIG, inserting confusion into one of the agency's most sensitive programs.

OIG believes that unless that legal opinion is retracted, the door remains open for the agency to withhold or delay OIG access to information in the future. Its existence sets a dangerous precedent for other agencies to interpret laws as denying OIG access to information.

⁴ Agency policy continues to prohibit OIG access to a victim's personally identifying information and explicit details of the sexual assault incident under restricted reporting.

⁵ OIG was able to identify some cases where dates or other details that were not redacted appeared to conflict, and the Peace Corps was generally responsive in resolving or explaining these inconsistencies.

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Audits

Overview

The Audit Unit conducts audits of agency programs and operations. These include overseas posts, regional recruitment offices, and headquarters offices and functions. Audits are conducted in accordance with *U.S. Generally Accepted Government Auditing Standards* issued by the Comptroller General of the United States. In addition, the unit oversees the annual audit of the agency's financial statements, and the review of information systems security performed by an independent public accounting firm.

The objective of OIG audits is to independently examine the financial and administrative operations of the Peace Corps, promote economy and efficiency, and ensure compliance with federal law, regulations, and Peace Corps policy. Audits are wide ranging, covering agency activities carried out at overseas posts, as well as agency-wide operations that affect multiple offices. Auditors report their conclusions and recommendations based on data and document analysis, interviews, and direct observation.

At overseas posts, auditors review the financial and administrative operations for operational efficiency and effectiveness, financial stewardship, and compliance with agency policies and federal regulations. OIG's overseas post audits frequently identify recurring issues and trends. Audit reports contain recommendations to posts and headquarters for strengthening controls to prevent and detect systemic weaknesses. OIG also monitors the agency's progress in correcting systemic weaknesses identified in audit reports by obtaining and assessing evidence of corrective actions, reviewing the implementation of policy and procedural revisions, and conducting follow-up audits when necessary.

Along with the final reports described below, the Audit Unit issued a management advisory report regarding agency reporting on conference costs. For more information on this report, see the previous section titled *Advice and Assistance Provided to the Agency and Others*. The unit announced or continued work on audits of Peace Corps posts in China, Georgia, Zambia, and the Eastern Caribbean. It also continued work on a peer review of the audit organization of the Library of Congress OIG.

Agency-wide Audits

Report on Protecting Sensitive Information in Peace Corps Computer Systems

The Consolidated Appropriations Act of 2016 required OIGs to provide Congress with a report describing controls used by their agencies to protect sensitive information maintained, processed, and transmitted by agency computer systems. OIG contracted with accounting and management consulting firm Williams, Adley & Company-DC to perform the review.

Overall, the Peace Corps had in place overarching logical access policies and practices. However, we found that the access control policies for two out of four systems we reviewed did not consistently follow federal information security guidance and standards. Furthermore, the Peace Corps did not have formal policies or procedures for managing software inventories. The Peace Corps reported having limited exfiltration capabilities, utilizing some tools to help with forensics and network visibility.

The Peace Corps had developed information security policies and procedures for managing contracted and hosted information systems. Based on an OIG recommendation, the agency implemented policies to review IT security as a key part of acquisition when pursuing cloud services. However, since 2013 there has been an outstanding Federal Information Security Management Act (FISMA) finding that the agency has not adequately tracked or monitored contract agreements and memorandums of understanding in its official security repository.

While the agency had dedicated more resources to IT security in the year and a half preceding this report, OIG remains concerned about the quality of the IT security program, especially considering the sensitive data that the Peace Corps maintains. The agency not only generates and possesses standard personally identifiable information, but also maintains health records and sexual assault incident information about Peace Corps Volunteers. The lack of controls related to sensitive information, including the use of multi-factor authentication, undermines IT security.

Our report noted that the statements regarding the Peace Corps system security environment were provided by officials from the Office of the Chief Information Officer and have not been verified through testing. This testing will occur as part of the 2016 annual FISMA review, which will be summarized in the next Semiannual Report to Congress.

The Peace Corps' FY 2016 Financial Statement Audit

During this reporting period, OIG engaged the accounting firm Kearney & Company to perform an audit of the Peace Corps' FY 2016 financial statements. As of September 30, 2016, the audit was ongoing. When it has been completed, OIG will provide Kearney's audit report to the Peace Corps Director. The auditor's report will be included in the Peace Corps' Agency Financial Report for FY 2016. Details regarding the audit results will be included in the next Semiannual Report to Congress.

Review of the Peace Corps' FY 2016 Information Security Program

FISMA requires federal agencies to establish effective security over their sensitive information and establish a program to protect information systems from unauthorized access, use, disclosure, modification, and other harmful impacts. In addition, FISMA requires that each OIG review its agency's information security program and report results to the Office of Management and Budget (OMB) annually.

To meet this requirement, OMB has developed an online data collection system for FISMA reporting from federal agencies and their respective OIGs. During this reporting period, OIG engaged Williams, Adley & Company-DC to conduct the FY 2016 FISMA review. This review will be the first to address whether the agency is meeting the requirements of the Federal Information Security Modernization Act of 2014, enacted in December of 2014. OIG will complete its FISMA reporting by November 10, 2016. The review was ongoing as of September 30, 2016. Comments on the FY 2016 review results will be covered in OIG's next Semiannual Report to Congress.

Audits of Operations Abroad

Peace Corps/Indonesia: Audit

IG-16-03-A

OIG issued an audit of Peace Corps/Indonesia in June 2016. More than 363 Volunteers have served in Indonesia since the program was initiated in 1963. In 1965, the program was closed due to political unrest and safety concerns. It was reopened in 2009 following an invitation from the Indonesian government and a Peace Corps team's reassessment of the program's feasibility. At the time of the audit, over 117 Volunteers were working in Peace Corps/Indonesia's one project sector, teaching English as a foreign language. The post had three U.S. direct hires, a third country national, 39 full-time personal services contractors, and six vacant positions. The post's FY 2015 spending was approximately \$2.0 million. In addition, the Europe, Mediterranean, and

Asia region at headquarters incurred an average cost of approximately \$490,000 per overseas post.

The post's financial and administrative operations were effective and generally complied with agency policies and applicable federal laws and regulations. However, we noted a few areas in need of improvement. The director of management and operations did not perform sub-cashier cash verification. The medical secretary purchased and dispensed medicine without recording it in inventory tracking worksheets. The post paid two vendors without adequate support, and paid other vendors without recording the vendor names as payees in the financial system. Finally, post management did not have adequate controls over timesheets and did not monitor the accuracy of staff credit hours.

Management concurred with all 12 recommendations. At the end of this reporting period, two recommendations remained open.

Funds Put to Better Use

Recommendation Number 7: Verify accuracy of vendor invoices – \$437,000

Peace Corps/Senegal: Audit

IG-16-04-A

OIG issued an audit of Peace Corps/Senegal in July 2016. More than 3,325 Volunteers have served in Senegal since the first group of Volunteers arrived in 1963. At the time of our audit, over 280 Volunteers were working in the following project sectors: community economic development, agroforestry, health, and agriculture. The post had four U.S. direct hires, four foreign service nationals, three U.S. personal services contractors and 62 full-time local personal services contractors. The post's FY 2015 spending was approximately \$2.9 million. In addition, at headquarters, the Africa region incurred an average cost of approximately \$490,000 per overseas post.

The post's financial and administrative operations did not fully comply with agency policies and applicable federal laws and regulations. The post had not properly implemented the necessary controls and safeguards over imprest fund operations and medical supply inventory. The post also did not have adequate processes to oversee the following areas: Value Added Tax exemption, Volunteer allowances, bank fee processing, grant projects, personal services contractors, cash withdrawals from Volunteer bank accounts, and transactions for certain standard services provided by the U.S. Embassy.

Management concurred with all 21 recommendations. At the end of the reporting period, four recommendations remained open.

Questioned Costs/Unsupported Costs

Recommendation Number 1: Implement procedure to ensure compliance – \$166
 Recommendation Number 16: Inadequate Volunteers allowances controls – \$424
 Recommendation Number 20: Personal Services Contractor overpayment – \$370

Funds Put to Better Use

Recommendation Number 14: Exempt VAT charges – \$1,500
 Recommendation Number 18: Identify errors in processing bank fees – \$3,000
 Recommendation Number 19: Implement adequate grant monitoring – \$28,000

Peace Corps/Colombia: Audit

IG-16-05-A

OIG issued an audit of Peace Corps/Colombia in September 2016. Approximately 4,650 Peace Corps Volunteers have served in Colombia since the program's inception in 1961. The post had been suspended in 1981 due to safety and security concerns and reopened in 2010. At the time of our audit, there were three U.S. direct hires, two foreign service nationals, and 18 full-time personal services contractors. The post had 34 Volunteers, serving in teaching English as a foreign language and community economic development projects. The post's FY 2015 spending was approximately \$2 million. In addition, at headquarters, the Inter-America and Pacific region incurred an average cost of \$450,000 per overseas post.

OIG found that the post lacked an effective process to recover payments for living allowances, which resulted in the embezzlement of funds. A staff member was able to withdraw funds from departed Volunteers' bank accounts without post management's knowledge. In addition, the post allowed drivers to operate as unofficial sub-cashiers. OIG also detected internal control issues with creating bills of collection, reconciling grant files, and contracting for residence leases.

However, OIG also identified a best practice that post management had put in place. The post created a system called "i-request" that effectively assisted with the management of day-to-day requests for office supplies, equipment, vehicles, travel, and leave.

Management had concurred with all five recommendations, which remained open by the end of this reporting period.

Questioned Costs/Unsupported Costs

Recommendation Number 1: Uncollected overpayment of living allowances for departed Volunteers – \$2,260

Funds Put to Better Use

Recommendation Number 1: Delay in the collection of an overpayment of living allowances for a departed Volunteer – \$565

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Evaluations

Overview

The Evaluation Unit provides the agency with independent evaluations of Peace Corps programs, operations, and management at overseas posts and domestic offices and programs. Evaluations promote greater efficiency and effectiveness by identifying best management practices and recommending program improvements. Evaluators also participate in cross-functional reviews of agency operations, undertaken with OIG auditors or investigators.

Evaluations are conducted under the direction and guidance of the assistant inspector general for evaluations and in accordance with the Council of Inspectors General for Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*. These standards are instrumental in maintaining impartiality, reliability, and credibility, and set the bar for competency, independence, professional judgment, and internal quality controls.

The Evaluation Unit produced a final report on the evaluation of Peace Corps/Rwanda, detailed in this section. It also issued a management advisory report on systemic deficiencies in the maintenance, organization, and use of site history files that OIG found at multiple posts, potentially increasing safety and security risks to Volunteers. This report is summarized in the previous section titled *Advice and Assistance Provided to the Agency and Others*.

The Evaluation Unit continued work on an evaluation of the implementation and effectiveness of the agency's sexual assault risk-reduction and response program, as required by the Kate Puzey Peace Corps Volunteer Protection Act of 2011. Our final report on the results of this evaluation are due to Congress by November 21, 2016.

Additionally, the unit initiated a country program evaluation of Peace Corps/South Africa.

Peace Corps/Rwanda: Country Program Evaluation

IG-16-02-E

OIG issued a final country program evaluation of Peace Corps/Rwanda in August 2016. Over 600 Peace Corps Volunteers have served in Rwanda since the program began in 1975. All Volunteers were evacuated in 1993 and the post closed in 1994. In 2008, the post re-opened. At the time of the OIG's visit, 39 staff were supporting 108 Volunteers serving in the health and teaching English as a foreign language sectors. The post's fiscal year 2016 budget was approximately \$2.3 million.

OIG found that Peace Corps/Rwanda coordinated well with the Rwandan government in implementing projects designed to meet the country's development needs. The post placed Volunteers in communities where they had a Rwandan counterpart and sufficient work opportunities related to their primary assignments. Additionally, effective communication between the medical and administrative teams resulted in an impressive emergency readiness protocol. The post's training program was effective in preparing Volunteers for some aspects of Peace Corps service, particularly with local language, Rwandan culture, and maintaining personal health.

OIG identified problems related to Volunteer support, housing, and technical training. OIG assessed there was a need for post leadership to maintain higher standards regarding key aspects of Volunteer service, including expectations for time spent in their communities, community integration, and culturally appropriate behavior. The post allowed some Volunteers to spend an excessive amount of time away from their communities, including early in their service when Volunteer focus should be on community integration. We found more than 25 percent of Volunteers in Rwanda were away from their sites five or more days per month for reasons other than allotted vacation, emergency, or medical leave. We also found that a lack of management, planning, and communication among staff during the housing approval process resulted in Volunteer placement in homes that did not meet the post's housing standards.

The post's technical training did not provide Volunteers with the necessary skills to achieve their project objectives. Technical training for Volunteers in the teaching English as a foreign language project relied too much on Volunteer assistant trainers and not enough on qualified technical staff. The post had recently shifted the focus of the health project, but had not adjusted the new group of health trainees' technical training to align with the new project goals. This left health Volunteers unprepared for technical work when they arrived to their sites.

Management concurred with all 12 recommendations. At the end of the reporting period, seven recommendations remained open.

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Investigations

Overview

The Investigation Unit is authorized to conduct investigations of waste, fraud, abuse, and mismanagement in Peace Corps programs and operations, both domestically and internationally. OIG investigators have full law enforcement authority including the authority, upon probable cause, to seek and execute warrants for arrest, search premises, and seize evidence. They are authorized to make arrests without a warrant while engaged in official duties and to carry firearms. The unit investigates allegations of both criminal wrongdoing and administrative misconduct involving Peace Corps staff, contractors, Volunteers, and other individuals conducting transactions with the Peace Corps. Allegations are made by Peace Corps stakeholders such as Volunteers, trainees, staff, contractors, other federal entities, and the general public. OIG receives these allegations through audits, evaluations, hotline complaints, and other means.

During this period, the Investigation Unit responded to an allegation that two Volunteers were involved in the distribution of illegal drugs. While no evidence was found of drug distribution, the investigation disclosed widespread use of illegal drugs by a significant number of Volunteers in-country.

OIG continued to rely upon the investigative support of the Department of State, Bureau of Diplomatic Security, and welcomed the assignment of a Diplomatic Security agent on detail to the unit from the Criminal Investigative Liaison Branch.

Finally, OIG presented the Inspector General Award to Assistant Port Director (APD) Kevin Pfeiffer of U.S. Customs and Border Protection at the Port of Atlanta. The award recognizes APD Pfeiffer's support in repatriating fallen Volunteers who passed away in service during the past three years. APD Pfeiffer, who is also a Returned Peace Corps Volunteer, always ensured that each fallen Volunteer's final return home was accomplished with dignity, efficiency, and respect.



Peace Corps OIG Assistant Inspector General for Investigations John Warren (right) presents Assistant Port Director Kevin Pfeiffer (center) with the Inspector General Award.

Criminal and Misconduct Related Investigations

Homicide Investigation at a Post in West Africa

The investigation of a 2009 Volunteer homicide remained open. OIG continued to engage with the host country, law enforcement partners in the field, and the U.S. Embassy.

Failure of Senior Peace Corps Staff to Report Possible Child Sexual Abuse

OIG investigated an allegation that senior level Peace Corps managers failed to report possible child sexual abuse by a Volunteer to OIG in violation of agency policy. Following the results of the investigation, the senior most manager involved retired from service, and four other managers were orally admonished.

Volunteer Sexual Assault in West Africa

OIG investigated an allegation that a male Volunteer violated the agency's sexual misconduct policy by attempting to kiss a female Volunteer without consent on two separate occasions. The male Volunteer admitted that he had attempted to kiss the female Volunteer twice, that she told him "no" on both occasions, and that she had to push him away on the second occasion. He resigned following the interview.

Alleged Volunteer Drug Distribution at a Post in Northern Africa

OIG received an allegation that two Volunteers were distributing illegal drugs to other Volunteers. Although no evidence of distribution was found, the investigation disclosed that 19 Volunteers had used illegal drugs. Two Volunteers resigned, and 17 resigned in lieu of administrative separation.

Staff Fraternization and Alleged Sexual Assault in South America

OIG received an allegation that a staff member at a post in South America had consensual sexual relations with Volunteers in violation of the agency's fraternization policy. It was further alleged that the staff member made nonconsensual sexual contact with another Volunteer by repeatedly attempting to kiss the Volunteer. During an OIG interview, the staff member admitted to having consensual sexual contact with three Volunteers. The staff member claimed to not recall attempting to kiss the fourth

Volunteer, stating that the event occurred when the staff member was very intoxicated. The staff member resigned shortly after the interview.

False Statements by Volunteer in South America

During the course of investigating an allegation of staff misconduct, OIG received information indicating that a previously interviewed Volunteer had knowingly provided OIG with inaccurate and incomplete information, and attempted to influence another witness to do the same. The U.S. Department of Justice (DOJ) declined to prosecute the Volunteer in favor of administrative remedies. The Volunteer resigned in lieu of administrative separation.

Alleged Volunteer Sexual Assault of Host Country Nationals in Asia

OIG investigated an allegation that a Volunteer had sexually assaulted several local teachers at a Peace Corps-sponsored training conference. It was alleged that the Volunteer had slapped two female teachers on the buttocks at a social event hosted for the conference attendees. The Volunteer admitted to becoming very intoxicated at the event but denied touching any woman on the buttocks. The Volunteer resigned before the investigation was completed as a result of his involvement in another, unrelated incident.

Alleged Volunteer Sexual Assault at a Post in West Africa

OIG investigated an allegation that a male Volunteer had sexually assaulted a female Volunteer while she was incapacitated by alcohol and unable to provide effective consent. The alleged perpetrator admitted to OIG that he and the victim were using illegal drugs at the time of the alleged assault. He resigned from the Peace Corps in lieu of administrative separation. The DOJ declined to prosecute.

False Travel Claims by Staff in Southern Africa

OIG received an allegation that a significant number of post staff had committed potential fraud involving falsified travel vouchers. OIG and post management conducted a full review of in-country travel vouchers submitted by staff from October 1, 2014 through April 30, 2016 and identified 41 employees as responsible for submitting 142 questioned hotel receipts totaling approximately \$13,000. The amount that staff inflated the receipts totaled approximately \$4,900. The DOJ declined to prosecute staff for travel voucher fraud in favor of administrative remedies.

Staff implicated in the report received a letter of reprimand and were required to reimburse the Peace Corps for all fraudulent travel charges submitted, and all staff received cautionary guidance. Additionally, the post issued a revised travel policy and a system whereby many hotels within country will directly bill the post for employee lodging expenses. Further, the post increased per diem rates to address inflation and administered training to staff to educate them on the revised policy and post expectations.

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Tables

1: List of Reports: Audits, Program Evaluations, and Reviews

Agency-wide

Management Advisory Report: Site History Files (IG-16-02-SR)

Management Advisory Report: Conference Cost Reporting (IG-16-03-SR)

Recurring Issues Report (IG-16-04-SR)

Report on Protecting Sensitive Information in Peace Corps Computer Systems

Post Audits

Peace Corps/Indonesia: Audit (IG-16-03-A)

Peace Corps/Senegal: Audit (IG-16-04-A)

Peace Corps/Colombia: Audit (IG-16-05-A)

Post Program Evaluations

Peace Corps/Rwanda: Country Program Evaluation (IG-16-02-E)

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

Report	Questioned Costs ⁶	Unsupported Costs ⁷	Funds Put to Better Use ⁸
Peace Corps/Indonesia: Audit (IG-16-03-A)	-	-	\$437,600
Peace Corps/Senegal: Audit (IG-16-04-A)	-	\$960	\$32,500
Peace Corps/Colombia: Audit (IG-16-05-A)	-	\$2,260	\$565
Subtotal	-	\$3,220	\$470,665
Total of All Questioned Costs, Unsupported Costs, and Funds Put to Better Use			\$473,885

⁶ Questioned Costs – costs that are alleged violations of government or Peace Corps regulations. For example: prohibited purchases and expenditure of funds for purposes that do not relate to the Peace Corps mission.

⁷ Unsupported Costs – costs that are not supported by adequate documentation.

⁸ Funds Put to Better Use – costs that could be used more efficiently, such as costs for unnecessary goods or services.

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

Recommendation Status	Number of Reports	Questioned Costs	Unsupported Costs
A. No management decision made by the start of the reporting period	1	-	\$4,400,000
B. Issued during the reporting period			
(i) Audits	2	-	\$3,220
Total [A+B]	3	-	\$4,403,220
C. Management decision made during the reporting period			
(i) Disallowed costs	1	-	\$590
(ii) Costs not disallowed	-	-	-
Subtotal	1	-	\$590
D. Total for which no management decision had been made by the end of the reporting period [(A+B) – Subtotal C]⁹	3	-	\$4,402,630

⁹ For one report issued in this SARC period, management made some decisions for recommendations with unsupported costs; however, there were still open recommendations where management had not made a decision.

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

Recommendation Status	Number of Reports	Funds Put to Better Use
A. No management decision made by the start of the reporting period	-	-
B. Issued during the reporting period		
(i) Audits	3	\$470,665
Total [A + B]	3	\$470,665
C. Management decision made during the reporting period		
(i) Dollar value of recommendations agreed to by management	2	\$470,100
(ii) Dollar value of recommendations not agreed to by management	-	-
Subtotal	2	\$470,100
D. Total for which no management decision had been made by the end of the reporting period [(A+B) – Subtotal C]	1	\$565

5: Recommendations on which Corrective Action has not been Completed

Audits and Evaluations

Report	Date Issued	Total Open Recs.	Agency Concurrence ¹⁰		
			Concur	Non	Partial
A. Open Recommendations: 60 to 119 Days					
PC/Indonesia: Audit (IG-16-03-A)	6/17/16	2	2	-	-
PC/Senegal: Audit (IG-16-04-A)	7/26/16	4	4	-	-
	Total (A)	6	6	-	-
B. Open Recommendations: 120 to 179 Days					
	-	-	-	-	-
	Total (B)	-	-	-	-
C. Open Recommendations: More than 180 Days					
PC/HQ Office of Chief Information Officer Budget Formulation and Management: Audit (IG-10-05-A)	1/11/10	1	1	-	-
PC/HQ Volunteer Delivery System: Evaluation (IG-11-01-E)	12/6/10	2	2	-	-
PC/HQ The Impact of the Five-Year Rule on Operations of the Peace Corps: Evaluation (IG-12-05-E)	6/20/12	2	2	-	-
PC/HQ Implementation of Guidelines and Protocols Related to Volunteer Victims of Sexual Assault: Review (IG-12-08-E)	9/27/12	1	1	-	-
PC/HQ 50th Anniversary Program: Audit (IG-13-01-A)	10/25/12	2	2	-	-
PC/HQ Overseas Staffing: Audit (IG-14-01-A)	11/21/13	9	9	-	-
PC/HQ Sexual Assault Risk-Reduction and Response Training: Evaluation (IG-14-01-E)	11/21/13	1	1	-	-
PC/HQ Volunteer Sexual Assault Policy: Evaluation (IG-14-02-E)	11/21/13	2	2	-	-
PC/HQ Applicant Screening Process: Audit (IG-14-04-A)	6/10/14	3	3	-	-
PC/HQ Training of Overseas Staff: Evaluation (IG-14-07-E)	9/30/14	14	14	-	-
PC/HQ Safety and Security Program: Audit (IG-03-A)	3/12/15	1	1	-	-
PC/HQ Health Care Benefits Administration Contract: Audit (IG-16-02-A)	1/21/16	9	8	1	-
PC/HQ Follow-Up of Issues Identified in 2010 PC/Morocco Assessment of Medical Care: Evaluation (IG-16-01-E)	3/23/16	18	18	-	-
	Total (C)	65	64	1	-
Total Recommendations Open More Than 60 Days		71	70	1	-

¹⁰ The sum of open recommendations in the *Agency Concurrence* columns equals the number in the *Total Open Recommendations* column.

Special Reports and Management Advisory Reports

Report	Date Issued	Total Open Recs.
A. Open Recommendations: 60 to 119 Days		
-	-	-
Total (A)		-
B. Open Recommendations: 120 to 179 Days		
-	-	-
Total (B)		-
C. Open Recommendations: More than 180 Days		
PC/HQ 2012 Medical Supply Issues: Capstone (IG-13-01-SR)	8/26/13	2
PC/HQ Bill of Collections: Capstone (IG-14-01-SR)	9/30/14	1
PC/HQ Agency Policies Related to Volunteer Sexual Assault Allegations: Management Advisory Report (IG-15-02-SR)	11/21/14	1
PC/HQ Cloud Computing Pilot: Management Advisory Report (IG-15-01-SR)	3/17/15	1
PC/HQ Volunteer Healthcare Administration Contract: Management Advisory Report (IG-15-03-SR)	3/31/15	5
PC/HQ Management of Freedom of Information Process (IG-16-01-SR)	3/10/16	1
Total (C)		11
Total Recommendations Open More Than 60 Days		11

*Financial Statement and FISMA Recommendations*¹¹

Fiscal Year Issued	Open Recommendations	Agency Concurrence ¹²		
		Concur	Non	Partial
PC/HQ FY 2015 Financial Statement Audit				
FY 2015	2	2	-	-
FY 2014	1	1	-	-
FY 2013	2	2	-	-
FY 2009	1	1	-	-
FY 2004	2	2	-	-
Total	8	8		
PC/HQ FY 2015 Information Security Program Audit				
FY 2015 ¹³	-	-	-	-
FY 2014	-	-	-	-
FY 2013	7	7	-	-
FY 2009	1	1	-	-
FY 2008	2	2	-	-
FY 2007	1	1	-	-
Total	11	11		

¹¹ All recommendations issued in conjunction with these two reports are part of a normal 12-month audit cycle. As a result, recommendations made during a given fiscal year will remain in an open status during the entire subsequent fiscal year. At the beginning of each new fiscal year, the auditors will notify management of whether sufficient corrective actions have been taken regarding the prior year recommendations and issue their current notification of findings and recommendations.

¹² The sum of open recommendations in the *Agency Concurrence* columns equals the number in the *Total Open Recommendations* column.

¹³ Prior year findings and recommendations may be reissued if management has not taken sufficient corrective actions. The recommendations from FY 2013 were reissued in FY 2014 and FY 2015.

6: Summary of Investigative Activities and Outcomes¹⁴

Investigative Activities

Description	Preliminary Inquiries ¹⁵	Cases
Opened as of 4/1/2016	108	26
Opened during 4/1/2016 – 9/30/2016	181	22
Closed during 4/1/2016 – 9/30/2016	97	23
Total Open as of 10/1/2016	192	25

Outcomes

Referrals	
Referrals to Department of Justice	8
Referrals to Agency for Administrative Action	3
Other Referrals to Agency Management	87
Referrals to Other Agencies	2
Court Actions	
Trial(s) Pending	-
Ongoing Prosecution ¹⁶	1
Convictions	-
Judgments	-
Fines/Restitution	-
Administrative Actions	
Employees (Resignations and Terminations) ¹⁷	27
Other Employee Actions	6
Suspension/Debarment Referrals	-
Monetary Results	
Annual Savings	-
Recoveries/Restitution	-
Cost Avoidance	-

¹⁴ Volunteers/trainees are included as Peace Corps staff for the purpose of reporting investigative activity.

¹⁵ Preliminary inquiries are initiated for complaints which either (1) are received from a Peace Corps source (e.g., staff, Volunteer, contractor) or (2) relate to a matter within the jurisdiction of OIG. A preliminary inquiry is limited in scope to the verification of information in a complaint or allegation and the confirmation that it falls within the jurisdiction of OIG.

¹⁶ Includes arrests, criminal indictments or information, and overseas criminal proceedings.

¹⁷ Includes all Peace Corps staff and Volunteers.

7: Summary of Hotline and Other Complaints

Complaints Received	
Hotline Complaints Received	185
Non-Hotline Complaints Received ¹⁸	41
Total Complaints from All Sources	226

Results of Complaint Activity ¹⁹	
Resulted in Investigations	11
Resulted in Preliminary Inquiries	173
Resulted in Audits or Evaluations	1
Referred to Agency Management	86
Referred to Other Agency	2
No Action Needed	29

¹⁸ These complaints are largely a result of outreach by OIG staff and were received through email, phone call, and conversation.

¹⁹ The following actions summarize the disposition of complaints received by OIG. Please note that in some instances one complaint can result in multiple actions. In other cases, multiple complaints may be received about the same issue, resulting in one referral or result.

8: References to Reporting Requirements of the Inspector General Act

Act Reference	Reporting Requirements	Section
Section 4(a)(2)	Review of legislation and regulations	Review of Agency Regulations, Policies, and Procedures
Section 5(a)(1)	Significant problems, abuses, and deficiencies	Advice and Assistance; Evaluations
Section 5(a)(2)	Significant recommendations for corrective actions	Advice and Assistance; Evaluations; Audits
Section 5(a)(3)	Prior significant recommendations on which corrective action has not been completed	Table 5
Section 5(a)(4)	Matters referred to prosecuting authorities	Investigations; Table 6
Section 5(a)(5)	Summary of instances where information was refused	Advised Congress on Issues Related to Access to Agency Information
Section 5(a)(6)	List of audit reports, including evaluations, inspections, and reviews	Table 1
Section 5(a)(7)	Summary of significant reports	Advice and Assistance; Evaluations; Audits
Section 5(a)(8)	Statistical table - questioned and unsupported costs	Table 3
Section 5(a)(9)	Statistical table - funds to be put to better use	Table 4
Section 5(a)(10)	Summary of previous audit reports without management decisions	Table 5
Section 5(a)(11)	Significant revised management decisions	n/a
Section 5(a)(12)	Significant management decisions with which the Inspector General disagrees	Advised Congress on Issues Related to Access to Agency Information
Section 5(a)(13)	Information under Federal Financial Management Improvement Act of 1996	n/a

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Appendices

A. Reporting of Peer Reviews

Pursuant to Section 989C of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Public Law No. 111-203),²⁰ OIG reports on the following peer review information:

Audit Unit

On March 27, 2014, the National Endowment for the Humanities OIG issued its peer review report of the Peace Corps OIG Audit Unit for the period ending September 30, 2013. The Audit Unit received a rating of “pass,” concluding that the system of quality control has been suitably designed to provide OIG with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects.

During the reporting period, the Peace Corps OIG initiated a peer review of the Library of Congress OIG Audit Unit for the period ending March 31, 2016. We expect to deliver a final report in October 2016.

Investigation Unit

During this semi-annual reporting period, the Federal Housing Finance Agency, OIG conducted a peer review of the Peace Corps OIG Investigation Unit. The on-site review took place from April 18-20, 2016. The review focused on the Peace Corps OIG’s internal safeguards and management procedures for its investigative operations. The review team found all of the examined areas to be compliant with the Council of Inspectors General for Integrity and Efficiency *Quality Standards for Investigations and Quality Assessment Review Guidelines*, and the Attorney General *Guidelines for Office of Inspectors General with Statutory Law Enforcement Authority*.

B. Contract Audit Reports

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

²⁰ Section 989C of the Dodd-Frank Wall Street Reform and Consumer Protection Act amends Section 5(a) of the Inspector General Act of 1978 (5 U.S.C. App.)

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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