

# Peace Corps Office of Inspector General Semiannual Report to Congress

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# PEACE CORPS

## OFFICE OF INSPECTOR GENERAL

#### 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.

#### OIG:

- Promotes integrity, efficiency, effectiveness, and economy
- Prevents and detects waste, fraud, abuse, and mismanagement
- Identifies risk and vulnerabilities and offers expert assistance to improve Peace Corps programs and operations

Established in February 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.

Semiannual Report to Congress

*April 1 – September 30, 2012* 

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# **Table of Contents**

Highlights from this Report	1
Message from the Inspector General	1
Management and Administration	4
Agency Context	4
OIG Staffing	4
Outreach Committee	5
OIG Organizational Chart	6
Advice and Assistance Provided to the Agency and Others	8
Safety and Security Oversight in PC/Cameroon	8
Investigative Outreach Initiative	8
Management Advisory Report: Peace Corps Drug-Free Workplace Plan	8
Management Advisory Report: Breakdown of Internal Controls of PC/Burkina Faso Medical Unit	9
Recurring Issues: OIG Post Audits and Evaluations Fiscal Years 2009 - 2011	9
Policies and Procedures	10
Management and Performance Challenges	12
Inspector General's Statement	12
Audits	20
Agency-wide Audits	20
Peace Corps FY 2012 Financial Statement Audit	20
Annual Review of Peace Corps FY 2012 Information Security Program	21
Audits of Overseas Operations	21
PC/Lesotho: Audit	21
PC/China: Limited Scope Audit	22
PC/Jordan: Audit	22
PC/Tonga: Audit	23
Contract Audits	23
Entrena, S.A. Contract Closeout Audit	23
Evaluations	26
Agency-wide Evaluations	27
Impacts of the Five-Year Rule on Operations of the Peace Corps	27
Review of the Peace Corps' Implementation of Guidelines Related to Volunteer Victing Rape and Sexual Assault	

Country Program Evaluations	29
PC/China: Country Program Evaluation	29
PC/Uganda: Country Program Evaluation	30
PC/Indonesia: Country Program Evaluation	31
Investigations	34
Legacy Cases	35
Homicide Investigation at a Post in Africa	35
Conviction of a Former Peace Corps Volunteer	35
Criminal and Misconduct Related Investigation Highlights	35
Nepotism Allegation at Peace Corps Headquarters	35
Medical Supply Problems at a Post in Africa	35
Reprisal Allegation at a Post in Europe	36
Vehicle Auction Rigging at a Post in Asia	36
Conflict of Interest at a Post in Asia	36
Conversion of Grant Funds at a Post in Africa	36
Breach of Confidentiality at a Post in South America	37
Violation of Small Business Development Regulations	37
Tables	40
1: List of Reports: Audits and Evaluations	40
2: Reports with Questioned Costs, Unsupported Costs, and Funds Put to Better Use	41
3: Status of Reports Issued by OIG with Questioned and Unsupported Costs	42
4: Status of Reports Issued by OIG with Funds to be Put to Better Use	43
5: Recommendations on which Corrective Action has not been Completed	44
6: Summary of Investigative Activities and Outcomes	46
7: Summary of Hotline and Other Complaints	47
8: References to Reporting Requirements of the Inspector General Act	48
Appendixes	50
A: Reporting of Peer Reviews	50
B: Contract Audit Reports	50
C: Review of Legislation and Regulations	51

### **Highlights from this Report**

#### **Message from the Inspector General**



I am pleased to present the Peace Corps OIG's Semiannual Report to Congress (SARC) for the period of April 1, 2012-September 30, 2012. During this reporting period, OIG issued two significant agency-wide evaluations.

The first, on the impact of the rule limiting staff terms, known as "the five-year rule" (FYR), found that the FYR caused unique retention problems as well as exacerbated common management and performance challenges related to attracting and retaining personnel. The FYR has accelerated annual employee turnover to between 25 and 38 percent, quadruple that of the rest of the federal government. Average employee

tenure over the past 10 years has been just under three years and, for the five-year period from 2005-09, we estimated the FYR cost the agency between \$12.6 million and \$15.5 million. OIG has identified excessive turnover as a management and performance challenge in fiscal year (FY) 2012. The second report was a review of the agency's implementation of protocols and procedures in responding to Volunteer rape or sexual assault victims. The review found that the victims OIG interviewed whose incidents occurred in 2009-11 were generally satisfied with the quality of the agency's response, along with the support they received in the aftermath of their assaults. However, the agency still has work to do in implementing its sexual assault risk reduction and response training.

Our office also published *Recurring Issues: OIG Post Audits and Evaluations Fiscal Years* 2009-2011, which identified issues that have continued to be problems for posts and require management's attention to help remediate. Through this report, OIG also identified recurring management and performance challenges associated with the agency's ability to effectively place, train, and support Volunteers and with implementing controls over medical supplies, including controlled substances. We recently issued a *Management Advisory Report: Breakdown of Internal Controls of PC/Burkina Faso Medical Unit*, which illustrates the risk of not addressing a recurring issue. OIG's review highlighted the post's failure to maintain an accurate and complete medical supply inventory, and the post lost accountability more than \$52,000 worth of medical supplies it received from another post. The review also found the post permitted a non-medical staff member to dispense prescription pharmaceuticals to Volunteers without proper consultation with a medical doctor, likely placing Volunteers at risk.

The Audit Unit issued final reports for post audits of Jordan, Lesotho, and Tonga, and a limited scope audit of China. It also initiated post audits on Malawi and South Africa. At headquarters, the Audit Unit issued a preliminary report on the funding supporting the Peace Corps' 50th anniversary program. Work is continuing on a review of the agency's management of external funds and grants for Volunteer projects.

The Evaluation Unit issued final reports on post evaluations of China, Indonesia, and Uganda, and initiated post evaluations of Malawi and Namibia.

The Investigation Unit closed five investigations and 90 preliminary inquiries. It also engaged with the Recovery, Accountability and Transparency Board to research potential fraud and conducted field investigation and interviews to verify continued eligibility for Federal Employees' Compensation Act (FECA) benefits.

On June 27, former PC/South Africa Volunteer Jesse Osmun pleaded guilty to one count of traveling from the United States to South Africa to engage in illicit sexual conduct with children. Osmun has admitted that he sexually abused four girls, all under age 6, while he was a Volunteer. Osmun's sentencing is scheduled to be held in October 2012.

OIG continues to monitor the agency's progress in implementing the requirements of the Kate Puzey Peace Corps Volunteer Protection Act of 2011 (Public Law 112-57, hereafter the Kate Puzey Act), which enhances Volunteer safety and security. In May 2012, the Peace Corps and the Department of State, Bureau of Diplomatic Security (DS) signed a memorandum of understanding formalizing, among other matters, how the two agencies will respond to crimes against Volunteers and staff. OIG signed its own agreement on overseas investigations with DS, which provides for formal channels for information sharing, cooperation, and mutual assistance.

Finally, I am pleased to announce the Council of the Inspectors General on Integrity and Efficiency (CIGIE) recognized OIG for excellence for its audit of the Peace Corps' budget formulation process and for its program evaluation of Peace Corps/Peru. The awards will be presented in October 2012.

Kathy A. Buller Inspector General

# **Management and Administration**



Acting Director Carrie Hessler-Radelet with OIG Interns (I-r): William Genschow, Erin Collins, Logan Davis, and Michael Barfield at an agency intern appreciation event.

### **Management and Administration**

#### **Agency Context**

As of September 30, 2012, 8,073 Peace Corps Volunteers and trainees were serving in 76 countries at 70 posts. This total includes 753 Volunteers and trainees funded by the President's Emergency Plan for AIDS Relief (PEPFAR) to work on HIV/AIDS projects in 21 countries at 19 posts and 163 Peace Corps Response Volunteers serving in short-term assignments in 40 countries at 37 posts.

The Volunteers and their programs are supported by 896 American direct-hire staff members, including 600 at headquarters, 192 overseas, and 104 in regional recruiting offices. Approximately 2,900 locally hired personnel complete post staffing. The Peace Corps also has corporate contracts domestically and overseas, principally for guard services and training, and hires expert consultants, primarily for training and financial management.

#### **OIG Staffing**

Christopher Fontanesi joined OIG as an administrative assistant in April 2012. Fontanesi served as a community economic development Volunteer in Romania from 2007-11, working both with Habitat for Humanity Romania as a program manager and assisting PC/Romania with its programming and training. For his service, Fontanesi was awarded both the John F. Kennedy Service Award by Peace Corps (2011) and Habitat for Humanity International Linda Fuller Award for Volunteering Excellence (2010). Fontanesi holds a bachelor's degree in political science from the University of California Santa Barbara and is currently studying law part-time at American University Washington College of Law.

John Warren joined OIG as the assistant inspector general for investigation in April 2012. Warren has over 17 years of federal law enforcement experience. He previously served as assistant special agent in charge at the Department of Homeland Security OIG's Houston Field Office, where he managed the conduct of border corruption and disaster fraud investigations. He has also served as the Department of State's regional security officer (RSO) at the U.S. Consulate-General in Ciudad Juarez and assistant RSO at the U.S. embassies in Santiago and Karachi. Warren has also been a special agent at the U.S. Customs and Border Protection Office of Internal Affairs, the Department of Justice OIG, and the U.S. Immigration and Naturalization Service. He served with the U.S. Army in Saudi Arabia during Operation Desert Shield/Desert Storm and is a graduate of George Mason University, where he received a bachelor's degree in international studies.

Logan Davis joined OIG as an outreach committee intern in March 2012. She was hired for summer 2012 as an administrative support clerk and returned as an intern for the 2012-13 school year. Davis is currently a senior majoring in Asian studies at the Elliott School of International Affairs at George Washington University.

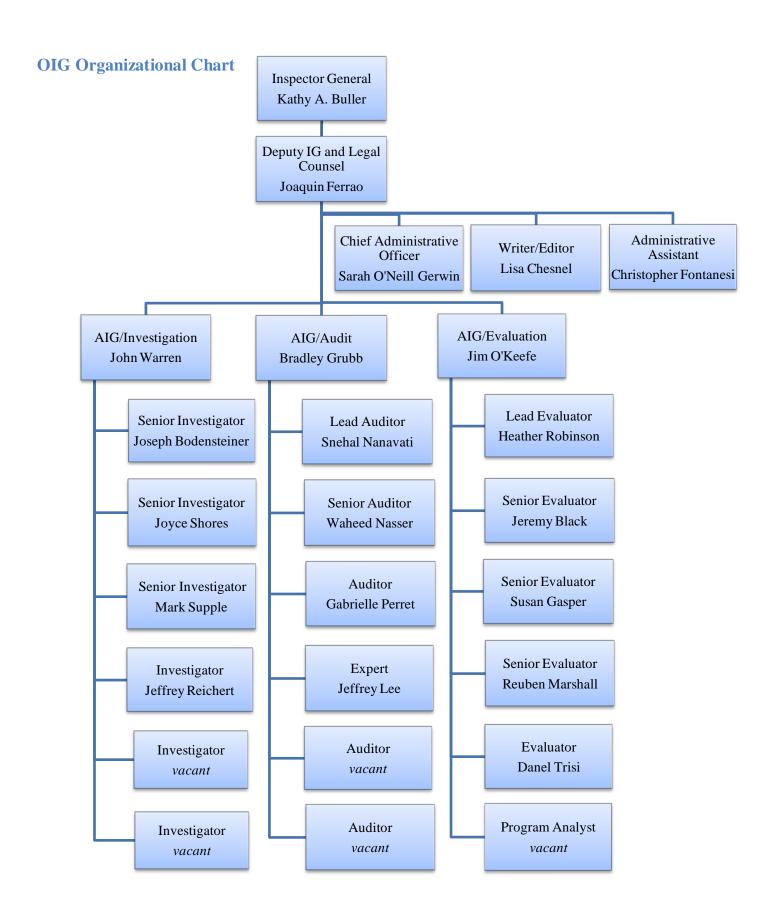
Tim Shaw joined OIG as an Evaluation Unit apprentice in September 2012. He is currently a public policy and management graduate student at Carnegie Mellon University. Shaw was a

Coro Fellow in public affairs and has worked as a researcher and analyst in the economic development, drug policy, and human services fields.

David Kierski joined OIG as a temporary executive assistant from May-October 2012, during which he edited all OIG publications and communications. Kierski is an RPCV who served in Cambodia from 2009-11. He was previously an editor of a catalog, editor-in-chief of a magazine, and a freelance writer and editor in journalism, education, marketing, travel, and business.

#### **Outreach Committee**

The OIG Outreach Committee (OC) aims to increase staff and Volunteer awareness of OIG functions and responsibilities and to encourage the reporting of fraud, waste, and abuse. During this reporting period, the OC launched a Twitter account and created a video about the role of OIG. The OC is currently creating luggage tags in an effort to provide trainees with OIG contact information at pre-service staging in compliance with the Kate Puzey Act, as well as USB drives with OIG contact information to give to Volunteers.



# Advice and Assistance Provided to the Agency and Others



# Advice and Assistance Provided to the Agency and Others

#### Safety and Security Oversight in PC/Cameroon

In response to concerns raised to the House Committee on Foreign Affairs regarding PC/Cameroon, OIG reviewed elements of the post's response to crimes committed against Volunteers, its development and approval of Volunteer work sites, and the safety and security information provided to trainees and Volunteers. OIG did not find evidence that the allegations brought to the committee regarding site development and housing were well-founded. However, the review did identify weaknesses related to Volunteer housing check documents, site history files, and the authority and responsibilities of the post's safety and security coordinator. OIG transmitted that information to regional and post managers for their information and action. In addition, a separate OIG investigation related to this matter is ongoing.

#### **Investigative Outreach Initiative**

OIG investigators continued an outreach initiative started during the last SARC reporting period. During the current reporting period, the initiative reached 113 Peace Corps staff members and Volunteers, educating them about the role of OIG investigators, the mission of OIG, the types of allegations typically referred, and OIG's readiness to respond to allegations. Additionally, discussions included ways to detect potential fraud, waste, and abuse of Peace Corps resources. Briefings were followed by an open forum to address any concerns and answer questions.

#### Management Advisory Report: Peace Corps Drug-Free Workplace Plan

OIG issued this Management Advisory Report about the agency's noncompliance with Executive Order 12564, issued in 1986, which broadly mandates a drug-free federal workplace and makes refraining from illegal drug use on or off duty a condition of federal employment. It also created two more specific mandates: first, that all executive agencies create detailed, agency-specific programs to ensure a drug-free workplace and, second, that all employees serving in "sensitive positions" are randomly tested for drug use.

In 1988, the Peace Corps developed a Drug-Free Workplace Plan (DFWP), which was subsequently reviewed and certified by the Department of Health and Human Services as having met all the essential requirements of federal law. However, there is no evidence the plan was implemented or that any employees have ever been tested.

OIG recommended that random drug testing commence immediately, that the DFWP be updated, revised, and implemented, and that the Peace Corps consider the feasibility of the DFWP's mandatory drug testing to include employees working in sensitive positions abroad.

# Management Advisory Report: Breakdown of Internal Controls of PC/Burkina Faso Medical Unit

Controlling and tracking medical supplies continues to be a struggle for Peace Corps posts. The lack of internal controls over medical supplies has been a recurring issue identified in OIG audits from 2009-11. OIG responded to an especially egregious situation at PC/Burkina Faso based on information received from OMS. In a spot review, OMS identified 14,065 individual unit differences for 31 unique medicines (including seven controlled substances) in the post's last four medical supply inventories. PC/Burkina Faso had the fourth highest medical costs per Volunteer-year in the Africa region.

During the site visit, OIG identified a lack of adequate oversight, poor controls, and the disregard of essential Peace Corps policies by Peace Corps medical officers (PCMOs) and the country director. The post did not have an effective process for tracking medical supplies to prevent misappropriation and improper dispensing. Without completing an accurate medical supply inventory workbook, the post did not have the information necessary to identify discrepancies during physical inventory counts. Further, the post did not limit access to controlled and specially designated drugs and failed to properly document controlled substances in the Drug Enforcement Administration logbook. In addition, the post permitted a non-medical staff member to dispense medical supplies, including specially designated items that require a medical prescription, likely placing Volunteers at risk. Volunteers freely requested and received such medical supplies without proper consultation with a doctor or verification of Volunteer medical charts and records.

In addition, the post did not fully document the transfer of medical supplies from another post and did not conduct a proper transfer of excess medical supplies to the U.S. Embassy. Based on interviews and documentation, OIG determined that the post circumvented controls by diverting medical supplies to a private entity as a donation and failed to maintain accountability of more than \$52,000 worth of transferred medical supplies.

#### Recurring Issues: OIG Post Audits and Evaluations Fiscal Years 2009 - 2011

In April 2012, OIG summarized the recurring issues identified during fiscal years (FYs) 2009-11 to identify systemic and longstanding weaknesses. The report compiled OIG reports on 42 post audits and country program evaluations covering 35 overseas posts, highlighting recurring issues regarding the safety and security of Volunteers, controls over business processes, and programming and Volunteer training. The report demonstrated that posts often struggle with similar issues and highlighted areas that need headquarters' focus attention and training.

OIG identified that the majority of posts visited struggled to fully implement agency safety and security policies and procedures, specifically with regard to emergency action plans and consolidation points, housing checks, site locator forms, and staff security background certifications. Most posts had not developed effective controls over common business processes, including managing personal property and vehicles, complying with policies for imprest fund management, and implementing agency controls over medical supplies. These processes were largely manual operations that relied heavily on the knowledge and expertise of the staff. Many

posts OIG visited needed to improve their programming and Volunteer training, specifically in the areas of site development, adequacy and applicability of Volunteer training, and coordination with host country ministries and project partners.

#### **Policies and Procedures**

OIG continues to provide advice and assistance to the Peace Corps Senior Policy Committee (SPC) by commenting on drafts of new or updated policies and procedures. The agency has been engaged in a robust effort to update and develop new policies and procedures when deemed appropriate. During this reporting period, the SPC has reviewed 29 "Peace Corps Manual" sections (MS), corresponding procedures, and interim policy statements (IPS). OIG's proactive engagement is intended to help support efforts to improve the effectiveness and efficiency of Peace Corps programs and operations. Revisions made to MS 702, "The Budget Process," and MS 126, "Volunteer Recruitment and Selection," addressed earlier OIG recommendations. MS 861, "Office of Inspector General," was revised, reorganized, and updated to incorporate changes in federal legislation and agency policy and to clarify staff and Volunteer reporting requirements.

As the agency moves toward implementation of its Kate Puzey Act requirements, OIG has provided comments and concerns on a number of draft IPS's and revised MS's. In particular, OIG has provided detailed comments concerning policies related to Volunteer sexual misconduct, a sexual assault hotline, restricted reporting, and the assignment of inherently governmental functions to personal services contractors. OIG will continue to provide comments that uphold and recognize the proper role, independence, and statutory authority of the IG, support compliance with existing law, and promote internal controls and efficient business practices.

# **Management and Performance Challenges**



### **Management and Performance Challenges**

#### **Inspector General's Statement**

In accordance with the Reports Consolidation Act of 2000, OIG is submitting what it has determined to be the most significant management and performance challenges facing the Peace Corps. The challenges, discussed in the attachment to this memo, are to be included in the agency's PAR for FY 2012. OIG has concluded that three of the five areas it identified as management and performance challenges in previous years continue to present significant challenges at the Peace Corps. Further, for FY 2012 OIG has included two challenge areas (Property Management and Protection of Personally Identifiable Information (PII)) under "Business Processes and Information Systems" that were previously presented separately. In addition, OIG has identified three new challenge areas.

This year's challenge areas are:

- Information Technology (IT) Management (first reported in FY 2009)
- Effective and Timely Remediation of OIG Findings and Recommendations (FY 2010)
- Business Processes and Information Systems (FY 2011)
- Excessive Personnel Turnover (new)
- Programming and Volunteer Training (new)
- Accountability of Medical Supplies (new)

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

#### **FY 2012 Challenges**

#### **Challenge** IT Management

As noted in previous years the most significant risk for this challenge area is ensuring that limited resources will be put to use where most needed. The Office of the Chief Information Officer (OCIO) has made significant progress in managing IT resources by improving its customer service through enhancements in how it responds to meet customer requirements and restructuring and streamlining its operations. OCIO has also aligned IT resources with the agency's business processes by establishing programs to better link goals and objectives to resources and developing a business process five-year enterprise and architecture and a roadmap to guide its work. Further, OCIO management continues to make substantial IT upgrades at overseas locations.

Management has also made good progress in strengthening Peace Corps' IT security management and further improvements to the process are ongoing. However, some issues associated with the Federal Information Security Management Act (FISMA) compliance that were discussed in prior year challenges statements have not been fully resolved. For example, some processes for configuration management have not been completely implemented; various contingency plan testing weaknesses still exist at both overseas posts and headquarters; and some risk assessment and systems security planning documentation have not been completely updated. Achieving full compliance with federal laws and regulations that apply to managing the Peace Corps' IT infrastructure are continuing management challenges. Resourcing issues continue to have a major impact on OCIO priorities as evidenced by high personnel turnover in key technical areas due in large part from term limited personnel appointments imposed by law and availability of qualified resources to fill vacant positions. As a result, throughout the past fiscal year OCIO has been about 20 percent below its programmed staffing strength.

**Challenge** Effective and Timely Remediation of OIG Findings and Recommendations

Over the last two years OIG has been reporting a challenge related to untimely remediation of OIG findings and recommendations. Although management has made progress in remediating findings and recommendations, it continues to not be timely in taking corrective actions necessary to remediate the deficiencies noted in OIG reports. During FY 2012 management fully remediated 121 recommendations of the 245 recommendations issued in FY 2012 and took actions to close 96 prior year's recommendations. The table below indicates the total number of recommendations open for more than 180 days for the last eight years.

**OIG Open Audit/Evaluation Report Recommendations** 

Old Open Additievaluation Report Recommendations		
Fiscal Year OIG	Number of Open	Number of Open
Report Issued	Post and Agency-	FISMA and Financial
	wide	Statement Audit
	Recommendations	Recommendations
2012*	27	N/A
2011	34	6
2010	7	3
2009	2	5
2008	5	4
2007	0	5
2006	0	0
2005	0	1
2004	0	1
Total No. of Open		
Recommendations	75	25

<sup>\*</sup>Includes only those open since March 31, 2012. The FY 2012 FISMA and Financial Statement Audit Recommendations have not been included.

The lack of effective and timely remediation of OIG findings and recommendations is a trend that has continued through the current fiscal year. There are a number of significant audit and evaluation findings and recommendations that have remained in an open status for two to eight

years. Although the agency generally remediates recommendations for overseas posts in a timely and efficient manner, remediation of some of the more complex recommendations requiring corrective actions that change how the agency operates as a whole or have wide-ranging impact has not been closed timely. More complex recommendations often involve a more substantial level of effort and broader coordination and communication. For example, some recommendations having an impact on information security and property accountability have been open for more than two years. OIG believes agency management needs to place greater emphasis on improving its overall remediation process to include focusing on the higher priority and long outstanding recommendations.

#### **Challenge** Business Processes and Information Systems

Although the Peace Corps continued to streamline operations and improve the technology that supports key business processes and critical Volunteer support functions, it is constrained by limited resources and inadequate planning. A responsive management team that provides quality support services to Volunteers will require enhanced business processes and modern IT systems.

Agency business processes must also support effective internal controls and access to reliable data. During the past fiscal year, OIG's work has disclosed some common problems related to maintaining effective internal controls. According to the Office of Management and Budget (OMB) Circular A-123, "Management is responsible for establishing and maintaining internal control to achieve the objectives of effective and efficient operations, reliable financial reporting, and compliance with applicable laws and regulations." It is imperative agency management implements the necessary automated and manual controls throughout their processes to ensure the desired results are achieved. The agency is improving its controls through recent revisions to policies and procedures and automated solutions in areas such as Volunteer payments, property management, and bills of collection. However, some important initiatives to improve business processes have been delayed or postponed. Further, management must develop monitoring mechanisms to ensure their controls are operating effectively. As shown in OMB Circular A-123, "Monitoring the effectiveness of internal control should occur in the normal course of business. In addition, periodic reviews, reconciliations or comparisons of data should be included as part of the regular assigned duties of personnel. Periodic assessments should be integrated as part of management's continuous monitoring of internal control, which should be ingrained in the agency's operations."

Although progress has been made, the agency still requires improvements in critical mission areas such as:

#### Property Management

The Peace Corps reported having property valued at \$35.2 million in FY 2012. Accountability over Peace Corps property, such as vehicles, furniture, and computer equipment, continues to present challenges for management. The agency's new property accountability system was deployed in the fourth quarter of FY 2011. The Office of Management (OM) assisted posts in rectifying some of the initial system implementation issues and provided additional hands-on training to general services managers in August 2012. OM continues to work closely with staff members responsible for property management. However, OIG's FY 2012 audits found that

posts were still struggling to design work processes around the new system and that the initial data loaded into the system had inaccuracies. In addition, OIG's external auditor continues to report that the agency has not taken the necessary corrective actions to ensure accurate tracking of assigned laptop computers at headquarters. Management has acknowledged the internal control deficiencies found by the external auditor and recently initiated corrective actions.

#### Safety and Security

The agency continues to improve aspects of its safety and security program however it has not yet established some critical processes, such as developing a system to ensure safety and security recommendations are implemented by posts. The majority of the 42 posts visited by OIG in 2009–2011 struggled to fully implement agency safety and security policies and procedures, specifically with regards to emergency action plans and consolidation points, Volunteer housing, site locator forms, and security background certifications for staff. For example, while the agency has established instructions to assist in these areas, additional training and monitoring are needed to ensure consistent implementation at posts. Similarly, the agency made progress by entering into a memorandum of understanding (MOU) with DS in May 2012 defining the roles and responsibilities for responding to staff and Volunteer safety and security incidents overseas. The execution of the MOU was included in a recommendation in the 2010 audit of the Volunteer safety and security program and subsequently mandated by the Kate Puzey Act. While the execution of the MOU is an important milestone, dissemination of the MOU, follow up guidance from the Office of Safety and Security (SS), and training will determine how effectively the MOU will be implemented. Given the decentralized nature of the Volunteer safety and security program and the number of overseas personnel with safety and security roles, it will be a management challenge to adequately train and oversee staff to ensure posts are fully complying with agency policies and guidance, a finding that was reported in OIG's 2008 Final Program Evaluation Report: Volunteer Safety and Security.

#### Data Management

As the agency automates business processes, proper data management is essential to ensure the accessibility of useful and accurate data. Several new systems that will streamline operations and provide more robust data for management analysis and decision making are being developed. For example, the agency deployed systems to automate fleet vehicle management and process requests for personnel actions, and is piloting an e-solution to automate the process for approving employee leave. However, progress in modernizing the Peace Corps' timekeeping system has been delayed due to the inability of current available products to fulfill the timekeeping requirements for overseas staff. Further, the Peace Corps continues to process travel requests and reimbursement submissions manually. Although the General Services Administration has recently awarded a new vendor contract for a government-wide e-travel system slated to begin in FY 2013, the agency's review of system capabilities and necessary subsequent training may push actual Peace Corps' implementation of the new system to sometime in FY 2014. Another major initiative is the new electronic medical records system to be fully deployed in FY 2014, which will have a component that will give the agency access to data on medical expenditures and other important related information. These systems are essential for recording and tracking useful data to help managers make informed decisions.

#### Protection of PII

This challenge was identified by OIG in FY 2009, and although the number of reported breaches decreased during FY 2012, the issue continues to be of concern. The agency reported six PII breaches in FY 2012 compromising the data of 17 individuals. One of the reported breaches involved 40 boxes of information containing post files that went missing. The extent to which those boxes contain PII and the number of affected individuals is unknown. In a separate incident, a box of records containing completed confidential financial disclosure report forms (OGE Form 450) was lost during an office move. Agency officials concluded that this loss was not a PII breach. Although OGE Form 450 does not ask for PII, it is possible some agency staff members provided such information with the forms submitted. Since FY 2009, the agency has updated incident response policy and modified breach notification policy, provided training in New Employee Orientation, with additional training offered after a confirmed breach; and reduced paper files containing PII through the Database of Volunteer Experience (DOVE) automated system. The agency is in the process of automating the medical records, which will further reduce the paper files containing PII.

#### **Challenge** Excessive Personnel Turnover

In June 2012 OIG issued its final report on the impacts the 'five-year rule' (FYR) has had on operations of the Peace Corps. Peace Corps management concurred with the report's five recommendations and is in the process of formulating its plan for reform. The FYR, which became law in 1965, generally limits employment of Peace Corps' U.S. direct hire personnel to five consecutive years (two 30-month tours). The purpose of the FYR was to create a constant flow of new employees including returned Peace Corps Volunteers (RPCVs) and overseas staff; avoid the inflexibility associated with the civil service system; and prevent employees from working their entire career at Peace Corps. OIG's evaluation found that the FYR has enabled the agency to attract a mission-driven, energetic workforce and to employ RPCVs extensively, including in leadership positions at overseas posts. However, the FYR has caused unique employee retention problems and exacerbated a range of common management challenges.

The FYR has accelerated the annual rate of employee turnover to between 25 and 38 percent, quadruple that of the rest of the federal government. Most employees do not stay for five years; average employee tenure over the past 10 years has been just under three years. High turnover has undermined the agency's ability to retain its employees on the basis of performance, conduct succession planning, ensure continuity of needed skills and abilities, provide training and professional development to staff; and deploy its workforce efficiently.

The FYR has weakened the agency's ability to attract and retain highly qualified professionals in the areas of contracting, financial management, IT, human resources management, and medical support functions. It has also led to frequent staffing gaps in key management positions overseas. Further, the practice of employing staff on 30-month tours has compromised performance management by allowing supervisors to avoid actively managing underperforming employees. Finally, OIG estimated that over the five-year period from 2005-2009, excessive turnover driven

<sup>&</sup>lt;sup>1</sup> Final Evaluation Report: Impacts of the Five-Year Rule on Operations of the Peace Corps

by the FYR accounted for approximately 60 percent of \$20.7 million in total turnover management costs.<sup>2</sup>

#### **Challenge** Programming and Volunteer Training

Programming and Volunteer training is at the heart of the Peace Corps' operations and enables the agency to achieve its primary mission. In 2012 OIG issued the report *Recurring Issues: OIG Post Audits and Evaluations Fiscal Years 2009–2011*, which identified recurring management and performance challenges associated with the agency's ability to effectively place, train, and support Volunteers. OIG has continued to identify and report challenges related to programming and Volunteer training in its country program evaluation reports issued in 2012, with common problem areas being site development, the adequacy and applicability of Volunteer training, and coordination with host country ministries and project partners.

#### Site development

Placing Volunteers in sites where they are safe, healthy, and productive is essential to their success. Insufficient site development can result in inappropriate sites where Volunteers struggle to achieve programming goals. Sixty-nine percent of OIG evaluation reports issued in FYs 2009–2011 contained recommendations related to site development. Posts frequently had not established or documented clear site development processes, nor ensured that staff had been sufficiently trained to carry out their site development responsibilities. To mitigate site development weaknesses, the agency presented training sessions on site identification and preparation at their worldwide conferences in 2012 for country directors and directors of programming and training. Additionally, the agency added an indicator in the FY 2012 annual performance plan that measures Volunteers' satisfaction with site selection and preparation to underscore the importance of this issue and to promote the identification of opportunities for performance improvement.

#### Volunteer Training

Training provides Volunteers with important knowledge and skills needed for productive and fulfilling service. Seventy-five percent of the posts OIG evaluated in FY 2009–2011 had training deficiencies. Language and technical training were two areas commonly in need of improvement. In some posts, technical training lacked relevance to Volunteers' sites or was not practical enough to prepare them to carry out primary assignments. Some posts needed to make improvements in language training, particularly in local language instruction or access to tutors or other self-directed language training methods during service. Posts frequently needed better methods to assess training effectiveness and take well-informed steps to improve training. The agency's "Focus In/Train Up" initiative should help improve training if posts implement the changes needed to focus programming and deliver relevant training.

#### Host Country/Project Partner Coordination

OIG evaluations have consistently reported that post relationships with host country ministries and project partners often need improvement. Some posts have not adequately engaged key

<sup>&</sup>lt;sup>2</sup> This estimate only includes 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.

project partners in programming, including project design and implementation. Others have not sufficiently communicated project results and Volunteer achievements to host partner ministries and organizations. Not all posts had established formal communication methods that brought multiple parties together, such as project advisory committees. Without a structured way to work with project partners, posts were not able to take full advantage of their partners' expertise. Some posts had not developed and maintained MOUs with host country ministries and project partners. The agency is encouraging the use of project advisory committees (PACs) to ensure local partners are consulted throughout the cycle of a project. The FY 2012 annual performance plan also includes an indicator that sets targets for program managers' use of PACs to improve performance and gather best practices. As a result, PACs use increased from 33 percent of all projects in FY 2011 to 69 percent of projects in FY 2012.

#### **Challenge** Accountability of Medical Supplies

Audit and investigative work performed during FY 2012 has clearly shown that agency management needs to continue to place strong emphasis on improving accountability of medical supplies. The Peace Corps maintains medical supplies to provide Volunteers with needed vaccinations, medications, and emergency medical support. Peace Corps posts spend approximately \$5 million a year on medical supplies. In FY 2008, the Peace Corps substantially revised its medical supply policies and procedures to provide adequate separation of duties; track the purchasing, dispensing, and disposing of medical supplies; and mitigate the risk of loss or theft. During FY 2012 the Office of Medical Services (OMS) further revised its policies and procedures by issuing technical guidance and provided training on the policies and procedures to country directors, Peace Corps medical officers and other overseas staff. It also regularly communicated with posts to provide support. In the past year OMS further enhanced support by providing on-site assistance to four posts, and performing detailed analyses of medical supply inventory submissions from posts. Also, management has been reviewing options for automating elements of medical supply inventory which could potentially strengthen accountability.

Although OMS has taken an active role in improving accountability of medical supplies, OIG has found that many posts have continued to struggle with implementing policy requirements, including separating medical supplies custody from recordkeeping responsibilities; establishing proper workflow processes; and maintaining accurate and complete medical supply inventories. Without sufficient oversight and compliance of the policies and procedures associated with internal control, the Peace Corps has been unable to maintain accountability and adequately ensure that medical supplies were not vulnerable to theft, loss, and spoilage. This lack of effective oversight by post management contributed to opportunities for fraud, waste, and abuse. For example, a recent OIG review of an African post found that post management did not enforce policies and procedures or maintain accurate and complete inventory records and failed to document receipt and dispensing of controlled substances as required by federal regulations. In addition, prescription medications at the post were being dispensed without consultation of a medical professional, potentially placing Volunteers at risk. Further, there was no accountability of over \$52,000 worth of medical supplies it received from another post. Effective control over medical supplies is crucial to ensuring that Volunteers receive proper medical services and minimizing exposure to loss, theft, and misuse of expensive medical supplies including controlled substances.

# **Audits**



PC/Lesotho Volunteer Eric Pierce and Senior Auditor Waheed Nasser with an HIV support group in Pierce's village.

#### **Audits**

#### Overview

The Audit Unit conducts audits of agency programs and operations that support the Peace Corps' mission, including overseas posts, regional recruitment offices, and headquarters functions. Audits are conducted in accordance with 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 review of information system security performed by an independent public accountant (IPA).

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 document and data 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. Its reports contain recommendations to headquarters for strengthening controls to prevent and detect systemic weaknesses. In response to OIG's work, the Peace Corps has revised and strengthened policies and procedures on bills of collections and has enhanced oversight and monitoring of medical supplies. OIG continues to review the implementation of policy and procedural revisions, in addition to other areas of concern noted in previous audits. The Audit Unit also monitors the agency's progress in correcting systemic weaknesses.

Along with the final reports described below, the unit initiated work on post audits of Malawi and South Africa and has issued a preliminary report on the agency's funding of its 50th anniversary program. The Audit Unit is continuing to review the Peace Corps' management of external funds and grants for Volunteer projects.

#### **Agency-wide Audits**

#### **Peace Corps FY 2012 Financial Statement Audit**

During this reporting period, OIG engaged an IPA firm to conduct an audit of the Peace Corps' FY 2012 financial statements. As of September 30, 2012, the audit was ongoing. OIG intends to issue the IPA's reports through a transmittal memorandum by the Office of Management and Budget-mandated reporting date of November 15, 2012. Details regarding the audit results will be included in the next SARC.

#### **Annual Review of Peace Corps FY 2012 Information Security Program**

FISMA requires federal agencies to establish security protections and a program to secure 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 OMB annually. To meet this requirement, OMB has developed an online data collection system for FISMA reporting from federal agencies and their respective OIGs. The OIG review of the information security program was ongoing as of September 30, 2012. Comments on final review results will be covered in the next SARC.

### **Audits of Overseas Operations**

PC/Lesotho: Audit

IG-12-05-A

OIG issued its audit report of PC/Lesotho in June 2012. The post's financial and administrative operations required improvement in a number of areas and did not fully comply with agency policy. Specifically, the audit found the following:

- The post did not properly secure the medical supply room, exposing its contents to risks
  associated with fraud, waste, and abuse. The post had not implemented the necessary
  processes to record and track medical supplies, resulting in incomplete and inaccurate
  medical supply inventories.
- The post lacked an adequate control over value-added tax (VAT) refunds to ensure that all allowable VAT refunds were identified, claimed, and collected in a timely manner. Further, the post did not pursue eliminating the VAT at point of sale. OIG identified \$64,670 for potential VAT refunds that went unclaimed.
- The post had not established policies limiting the personal use of telephones and cell
  phones. Personal calls impose additional fees charged to the Peace Corps and add the
  administrative burden of tracking and billing individual users.

Management concurred with all 22 recommendations. At the end of the reporting period, all 22 recommendations are closed.

#### **Funds to be Put to Better Use**

Recommendation Number 5: Bills of Collection inappropriately voided - \$2,374 Recommendation Number 13: Estimated VAT refunds unclaimed FYs 2007-11 - \$64,670

#### **PC/China: Limited Scope Audit**

IG-12-06-A

OIG issued its limited scope audit report of PC/China in August 2012. In FY 2012, the Audit Unit conducted reviews of 15 overseas posts using information from headquarters management offices covering FYs 2010-12, including vouchers, bills of collection, purchase and travel cards, staff security certifications, and medical supplies. The objective of these reviews was to identify weak controls, report on areas of noncompliance, and assess financial and administrative risks. OIG used the reviews to plan overseas posts audits, as the reviews informed OIG of overseas posts that have high risks and weak controls. Based on the review, auditors determined that a site visit to Peace Corps/China was not necessary. The limited scope audit report communicated the results of the review to enable the post and its regional management to better assess and enhance its financial and administrative controls. Based on the limited scope audit, OIG determined the following:

- The post did not always clear interim advances in a timely manner and used a revolving advance to cover medical care and supplies.
- The post was not receiving VAT reimbursement even though the country agreement exempted it from taxes. The post explained that Peace Corps did not have tax exempt status, but would work with the U.S. embassy to find a possible solution.
- The post could increase the use of credit cards to reduce the amount of imprest fund activity.

Management concurred with all seven recommendations. At the end of the reporting period, five recommendations remain open.

#### **PC/Jordan: Audit**

IG-12-07-A

OIG issued its audit report of PC/Jordan in September 2012. The post's financial and administrative operations were effective and in overall compliance with agency policies and federal regulations. However, auditors noted control weaknesses in the post's billing and collection process, the tracking of expenditures associated with an interagency agreement between the post and the U.S. Agency for International Development, and information technology management. In addition, auditors recommended that the post request reductions in its international cooperative administrative support services (ICASS) administered by the U.S. Embassy, which could save the post up to \$9,300 over the next three years.

Management concurred with all 17 recommendations. At the end of the reporting period, 11 recommendations remain open.

#### Funds to be Put to Better Use

Recommendation Number 6: Reduction in ICASS costs - \$9,300

#### PC/Tonga: Audit

IG-12-08-A

OIG issued its audit report of PC/Tonga in September 2012. The country director, director of management and operations, and the Office of the Chief Financial Officer (OCFO) suspected the cashier may have misappropriated approximately \$7,350 in imprest funds. OIG determined that the cashier had potentially misappropriated an additional \$12,400. This amount remained undetected due to the lack of monitoring and follow-up of overdue bills of collection (BOCs) and adequate controls over voided BOCs for the sale of a Peace Corps vehicle and unpaid Volunteer allowances. Based on OIG's recommendations, the OCFO has revised BOC and imprest fund procedures to enhance monitoring and detection controls worldwide.

Although management has reduced staff costs, auditors noted that PC/Tonga remains a high cost-per-Volunteer post. OIG also identified that the post did not retain support and implement proper separation of duties over BOC and the collection of VAT refunds from the government of Tonga.

Management concurred with all 10 recommendations. At the end of the reporting period, six recommendations remain open.

#### **Questioned Costs**

Recommendation Number 3: Lack of Controls over voided BOC for Sale of Vehicle - \$7,100 Recommendation Number 3: Lack of Controls over voided BOC for Volunteer Allowances - \$2,300

Recommendation Number 13: Inadequate Controls over the sale and disposal of Peace Corps vehicles - \$3,000

#### **Contract Audits**

#### **Entrena, S.A. Contract Closeout Audit**

As requested by the Peace Corps Office of Acquisitions and Contract Management, OIG conducted an audit of training contractor Entrena, S.A. The audit included the evaluation of recorded direct and indirect costs to determine final contract costs for its performance from January 1, 2007-December 31, 2010, under contract number PC-07-2-0001. OIG reviewed the contractor's accounting procedures and practices, internal controls, and compliance with contract provisions, applicable cost accounting standards, and Federal Acquisition Regulations. It was determined that the contractor had taken significant steps to improve its internal controls and no current significant internal control weaknesses were identified. However, OIG found that the contractor overbilled the Peace Corps \$34,382 for fixed-fee payments. The audit results were provided to the contracting officer for resolution.

#### **Ouestioned Costs**

Overbilled for total costs, including fixed fees - \$34,382

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# **Evaluations**



View of the Yangtze River from the city of Wanzhou, a Volunteer site in the province of Chongqing, China.

#### **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. It promotes greater efficiency and effectiveness by identifying best management practices and recommending program improvements and means by which to comply with Peace Corps policies and federal regulations.

During this reporting period, OIG continued to provide management with comprehensive assessments of how effectively overseas country programs and headquarters operations are functioning. Along with the final reports described on the following pages, evaluations of Colombia, Malawi, and Namibia have been initiated. The Evaluation Unit also began planning and designing evaluation activities for FY 2013 work required by the Kate Puzey Act.

Evaluations are conducted under the direction and guidance of the assistant inspector general for evaluations and in accordance with the CIGIE's *Quality Standards for Inspection and Evaluation*. Country program evaluations include interviews, reviews of relevant documents and data, physical observations, and analyses by evaluators. OIG evaluators interview Volunteers, headquarters and post staff, and key host country and U.S. government officials. For the interviews, evaluators select a representative sample of currently serving Volunteers based on length of service, site location, project focus, gender, age, marital status, and ethnicity. Evaluators conduct most of the Volunteer interviews at the Volunteers' homes and worksites; they inspect housing and assess Volunteer safety and health care using post and agency-defined criteria. The period of review for a country program evaluation is one full Volunteer cycle (typically 27 months).

For country program evaluations, OIG uses the following researchable questions to guide its work:

- Has the post developed and implemented programs intended to increase the capacity of host country communities?
- Does training prepare Volunteers for Peace Corps service?
- Has the post provided adequate support and oversight to Volunteers, including health care and personal safety?
- Are post resources and agency support effectively aligned with the post's mission and agency priorities?
- For posts receiving PEPFAR funding, is the post able to adequately administer the PEPFAR program, support Volunteers, and meet its PEPFAR objectives?

#### **Agency-wide Evaluations**

# **Impacts of the Five-Year Rule on Operations of the Peace Corps** *IG-12-05-E*

OIG issued its final report on the impacts of the "five-year rule" (FYR) on operations of the Peace Corps in June 2012. The FYR, which became law in 1965, generally limits Peace Corps employment to five consecutive years. It was put in place to create a constant flow of new employees, including returned Peace Corps Volunteers (RPCVs), to avoid the administrative inflexibility associated with the civil service system, and to prevent employees from spending their entire careers at the Peace Corps.

The FYR has resulted in a mission-driven, energetic, and optimistic workforce attracted to the Peace Corps in spite of the time-limited appointments. The FYR has allowed the agency to extensively hire RPCVs, whom the agency has employed in a wide range of functions, including leadership positions at overseas posts.

However, the evaluation found the FYR has created unique problems as well as exacerbated common management challenges. The average tenure of Peace Corps' direct hires over the past 10 years has been just under three years. The FYR has accelerated the pace of employee turnover at the Peace Corps to between 25 percent and 38 percent per year, which is quadruple that of the rest of the federal government. High turnover has undermined the agency's ability to retain employees on the basis of performance, conduct meaningful succession planning, ensure continuity of needed skills and abilities, provide training and education to improve performance, and deploy its workforce efficiently.

The FYR has compromised the agency's ability to attract and retain highly qualified personnel to perform contracting, financial management, information technology, human resources management, and medical support functions. Excessive turnover has led to frequent staffing gaps in key direct-hire management positions overseas, negatively affecting staff workload and morale, Volunteer support, programming, training, and other areas. In addition, the policy of employing staff on 30-month tours has weakened the agency's culture of performance management, allowing supervisors to avoid the unpleasant task of managing underperforming employees during their service.

Although managers overseas are frequently RPCVs, from 2000-10 only 24 percent of the agency's senior staff positions at Peace Corps headquarters have been filled by RPCVs. Finally, OIG determined that, from 2005-09, the FYR contributed between \$12.6 million and \$15.5 million of a total \$20.7 million in turnover management costs.<sup>3</sup>

<sup>&</sup>lt;sup>3</sup>This estimate only includes 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.

Management concurred with all five recommendations. At the end of the reporting period, five recommendations remain open.

# Review of the Peace Corps' Implementation of Guidelines Related to Volunteer Victims of Rape and Sexual Assault *IG-12-08-E*

OIG issued its final review of the Peace Corps' implementation of guidelines related to Volunteer victims of rape and sexual assault in September 2012. During 2010 and 2011 RPCV rape and sexual assault victims brought their concerns regarding the agency's response to the rapes or sexual assaults they experienced during their service to the Peace Corps Director, elected officials, OIG, and the media. The victims said the agency's response was inadequate, uncompassionate, victim-blaming, and ineffective and cited a lack of staff accountability and oversight of the response effort. OIG's review examined agency guidelines and protocols, made recommendations to improve support to Volunteer victims of sexual assault, and identified best practices observed at selected posts.

OIG found the agency accomplished a number of initiatives in 2011 to address concerns raised by sexual assault victims. A *Commitment to Sexual Assault Victims* was issued, spelling out a framework for response to sexual assaults predicated on compassion, safety, open communication, and respect for the privacy of victims. A victim's advocate was hired to work with Volunteers and staff to enhance support for victims of sexual assault and other serious crimes. The agency implemented new guidance and training for staff through its *Guidelines for Responding to Rape and Sexual Assault (Response Guidelines)*. While the *Response Guidelines* established a uniform notification and response protocol for Volunteer or trainee sexual assault incidents at all Peace Corps posts, OIG found the agency needs to take additional steps to ensure its response to sexual assault incidents is consistent, that staff is accountable, and there are systems in place to assess and address any shortcomings.

OIG found the rape and major sexual assault victims it interviewed were generally satisfied with the agency's response to their incidents. However, Volunteers who reported sexual assault incidents not classified as a rape or major sexual assault were not consistently receiving medical consultations, follow-up care, or support that some of them needed. OIG found the agency did not use a centralized case-management system to verify, track, and assess required sexual assault response protocols. The lack of a centralized system made it difficult to confirm the quality and consistency of victim care and to identify and correct lapses in services to victims.

OIG identified several issues related to the *Response Guidelines* and related training that requires attention. The participation of country directors (CDs) and post medical officers in the *Response Guidelines* training had been inconsistent. Some CDs were not familiar with country-specific information relative to sexual assault crimes and the legal process in their host countries, and staff members assigned as acting CDs were not consistently trained to conduct incident responses or oversee sexual assault incident management.

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

#### **Country Program Evaluations**

**PC/China: Country Program Evaluation** 

*IG-12-04-E* 

OIG issued its final country program evaluation report of PC/China in May 2012. Over 700 Volunteers have served in China since the program began in 1993. At the time of OIG's visit, 24 staff supported 163 Volunteers working in the teaching English as a foreign language sector. The post's FY 2011 budget was \$1.97 million<sup>4</sup>.

The evaluation of PC/China revealed a post performing well in many areas. The post's local staff was experienced, capable, and dedicated to the Peace Corps mission; American staff members were hardworking and focused on addressing key challenges. Volunteers were generally successful with their work activities and very satisfied with the support they received from post staff.

The evaluation uncovered areas that required management attention. Internal office communications were constrained by cultural differences, monitoring by the Chinese government, poor communications infrastructure, and an unusually busy and stressful year. Senior staff had taken some steps to improve this, and the OIG report recommended additional actions to strengthen the quality of intra-office communications.

Many Volunteers envisioned a "mud hut" experience but found they were living in large cities in modern apartments on large university campuses, far removed from China's many poor rural communities. This created a number of integration challenges. OIG encouraged the post to continue to develop and implement additional strategies to extend Volunteer placements to sites more advantageous to cultural integration, although site placements and housing selection remained tightly controlled by the Chinese government. Nonetheless, Volunteers were satisfied their work addressed China's development needs by training teachers to become primary and middle school English teachers in poor rural areas. Volunteer morale in China was high and the rate of Volunteer resignations has remained consistently below regional and global averages.

The report also identified additional programmatic weaknesses, including the ineffectiveness of the Volunteer leader program and confusion among Volunteers regarding their emergency consolidation points.

Management concurred with all eight recommendations. At the end of the reporting period, three recommendations remain open.

<sup>&</sup>lt;sup>4</sup> The budget figures listed in this SARC for all program evaluation reports do not include the salaries, benefits, and related costs of U.S. direct hires assigned to posts and other costs the agency has determined should be centrally budgeted.

# **PC/Uganda: Country Program Evaluation** *IG-12-06-E*

OIG issued its final country program evaluation report of PC/Uganda in July 2012. Over 1,000 Peace Corps Volunteers have served in Uganda since the program was first launched in 1964. The program was terminated in 1972 due to civil unrest, reopened in 1991, and was again suspended in May 1999 because of security issues. Volunteers and a full staff returned in 2001.

At the time of the OIG's visit, 147 Volunteers were serving in the education, community health, and economic development sectors. The post's FY 2011 appropriated budget was approximately \$2 million, which was supplemented by \$1.4 million of FY 2011 PEPFAR funds.

The post experienced significant leadership turnover from September 2009 to July 2011. The post had five country directors during this period, while at the same time Volunteer numbers increased and the post expanded into new geographic areas. These factors negatively impacted the quality of post programming and Volunteer safety and security systems and procedures. Administrative gaps, such as the lack of regular annual performance appraisals, also surfaced.

While the post had required safety and security systems in place, many components, such as emergency consolidation points, site locator forms, plans for emergency action, and medical evacuation, had not received sufficient attention. OIG found that Volunteers were not reporting crimes and U.S. Embassy personnel were not receiving incident reports through Peace Corps' reporting system. OIG also found that some Volunteer sites did not have reliable access to approved transportation and that medical and health factors were not sufficiently considered when developing Volunteer sites.

The post has made modifications to the programming and training staffing structure and is moving in the right direction. OIG identified some areas for improvement. The education project's structure, with two sub-components and differing project activities, impacted the effectiveness of technical training and Volunteer support. The post did not have project advisory committees and did not publish an annual report for stakeholders.

Management concurred with all 26 recommendations. At the end of the reporting period, 18 recommendations remain open.

# **PC/Indonesia: Country Program Evaluation** *IG-12-07-E*

OIG issued its final country program evaluation of PC/Indonesia in September 2012. Nearly 50 Peace Corps Volunteers served in Indonesia when the program first operated from 1963-65. After a 45-year absence, the program reopened in March 2010. At the time of OIG's visit, 23 staff members were supporting 39 Volunteers serving in the English teaching and teacher training sector. There were also 46 trainees participating in pre-service training. The post's FY 2012 budget was \$1.8 million.

Due to interest from the Department of State and the U.S. presidential administration, the post opened with an accelerated reentry timeline, which did not allow a sufficient amount of time to establish operations. This negatively impacted Volunteer training, staff hiring, and host country partner relations. However, since the initial reopening, the staff has done an impressive job developing its systems and processes, and most interviewed Volunteers were placed in sites where they could be productive, develop counterpart relationships, and receive effective support from staff. The post staff also developed collaborative relationships with Indonesian project partners.

Although the post was performing well in many areas, the evaluation uncovered areas for improvement. Staff reported that the responsibilities of the programming positions were not well-differentiated, with some staff members performing similar duties regardless of their skill, experience, and salary levels. Interviewed Volunteers also noted that technical training needed further improvement. Secondary language training was generally considered to be ineffective, and some interviewed Volunteers questioned its usefulness.

The evaluation also noted weaknesses in an otherwise strong safety and security system. The post had not tested the emergency action plan (EAP) using alternate communications, which is required by Peace Corps policy, and had not developed a process to distribute critical EAP updates to staff and Volunteers. In addition, 42 percent of interviewed Volunteers could not correctly identify their emergency consolidation point.

Management concurred with all 12 recommendations. At the end of the reporting period, 11 recommendations remain open.

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# **Investigations**



## **Investigations**

#### Overview

OIG is authorized to conduct investigations on waste, fraud, abuse, and mismanagement in Peace Corps programs and operations both domestically and overseas. OIG investigators have full law enforcement authority. They investigate both criminal and administrative misconduct allegations involving Peace Corps staff, contractors, and Volunteers, including violations of Peace Corps and U.S. government standards of conduct. Allegations are forwarded to OIG through multiple means, including OIG audits and evaluations, hotline complaints, and by Peace Corps stakeholders, including Volunteers, trainees, staff, contractors, and other federal entities, as well as the general public.

During this SARC period, OIG experienced a 12-percent increase in allegations and complaints submitted to its office over the previous reporting period. At the end of FY 2012, the investigative unit handled 244 complaints and allegations, a 112-percent increase over FY 2011. As OIG continues to enhance its outreach activities, the number of complaints received is expected to grow.

In September 2012, then-Director Aaron Williams issued a letter reminding Peace Corps employees, staff, and Volunteers of their obligation to cooperate with the Office of Inspector General. The Director's message recognized the value of OIG's work to the agency, and should improve agency cooperation with OIG special agents during investigations. OIG will continue to work with the agency to communicate the importance of complying with the Inspector General Act, federal regulations, and Peace Corps policies.

OIG and the Department of State, Bureau of Diplomatic Security (DS), implemented the terms of a memorandum of understanding (MOU) signed in May 2012. The separate agreement with OIG, part of the broader Peace Corps/DS MOU, formalizes channels for information sharing, cooperation, and mutual assistance among law enforcement personnel. During the SARC period, OIG received exceptional support from DS, which greatly enhanced the effectiveness of OIG's investigations.

OIG renewed its efforts to proactively identify fraud by Federal Employees' Compensation Act recipients. OIG engaged with partners at the Recovery Accountability and Transparency Board to research potential fraud and conducted field investigations and interviews to verify continued eligibility for benefits.

Finally, in preparation for a report required under the Kate Puzey Act of 2011, OIG continued to gather data concerning Volunteers' allegations of misconduct, mismanagement, and/or policy violations of Peace Corps staff, breaches of Volunteer confidentiality, and actions taken to assure the safety of Volunteers.

### **Legacy Cases**

#### Homicide Investigation at a Post in Africa

The investigation of a 1998 Volunteer homicide remains open and ongoing. OIG continues to work with the regional security officer, the FBI, and a local attorney in support of efforts to properly secure additional evidence in the case.

#### **Conviction of a Former Peace Corps Volunteer**

OIG, U.S. Immigration and Customs Enforcement, and the South African National Police investigated an allegation that a former Peace Corps Volunteer, Jesse Osmun, had engaged in illicit sexual conduct with children at an AIDS center in South Africa in violation of the Prosecutorial Remedies and Other Tools to end the Exploitation of Children Today Act while serving as a Peace Corps Volunteer. On June 27, 2012, Osmun pleaded guilty to one count of traveling from the United States to South Africa to engage in illicit sexual conduct with children. Osmun admitted he had sexually abused four girls, all under age six, while he was a Volunteer. Osmun's sentencing is scheduled to be held in October 2012.

### **Criminal and Misconduct Related Investigation Highlights**

#### **Nepotism Allegation at Peace Corps Headquarters**

OIG received an allegation from an employee who was at the time under investigation for misuse of a government computer. The alleger stated a supervisor hired friends and family, preferred to hire employees who had worked at the U.S. Agency for International Development, and was biased against employees who had worked for the Department of Defense. A review of the supervisor's hiring practices did not support the allegation.

#### Medical Supply Problems at a Post in Africa

OIG received information from OMS that the medical unit at the post was exhibiting a high number of discrepancies in pharmaceutical inventory and very high medical supply costs, which indicated potential theft. A joint investigations and audit team, accompanied by a representative from OMS, conducted an unannounced inspection of the post's medical unit. The inspection did not disclose theft, but exposed a major breakdown of internal controls resulting in the loss of controlled substances, improper dispensing of medication by unqualified personnel, the unauthorized disposal of up to \$52,000 in medical supplies to unknown private entities, unnecessary destruction of drugs, and wasteful purchasing practices. The contracts of the PCMO and the medical secretary were terminated, and the post and OMS took immediate action to implement internal controls.

#### Reprisal Allegation at a Post in Europe

OIG received an allegation from a post manager who claimed that both post and headquarters senior management had retaliated against the manager for the manager's involvement in an OIG investigation. OIG determined that the manager engaged in protected activity by reporting alleged child sexual abuse by a Volunteer to headquarters, contrary to the guidance he received from his supervisor, a CD. The investigation found that his superiors had knowledge of the protected activity and took personnel actions affecting the manager close in time to the protected activity. The OIG investigation disclosed sufficient evidence to warrant referral to the U.S. Office of Special Counsel.

#### **Vehicle Auction Rigging at a Post in Asia**

OIG received a complaint about the alleged rigging of auctions of excess government-owned vehicles (GOVs). The investigation disclosed that a locally hired Peace Corps driver conspired with the post's general services manager (GSM) to obtain two GOVs from a post auction. In doing so, the driver violated federal conspiracy, theft, and wire fraud statutes, as well as Peace Corps policy precluding staff from bidding on GOVs auctioned by the Peace Corps. OIG determined the loss to the Peace Corps was between \$6,700 and \$16,100. The Department of Justice declined to prosecute in lieu of administrative remedies.

#### Conflict of Interest at a Post in Asia

OIG received an allegation that a GSM used his/her position to direct printing contracts to a printing company owned or operated by the brother of the GSM. OIG determined the GSM's brother had been employed as a printer, but there was no evidence the GSM steered business to him or his employer.

It was also alleged that the GSM frequently borrowed money from subordinates. One employee reported feeling pressured to provide the GSM a loan for fear that the employee's vacation request would not be approved. The investigation disclosed the GSM knowingly violated the federal government's standards of conduct related to conflicts of interest by using the GSM position to coerce subordinate employees to provide a private gain in the form of personal loans. The Department of Justice declined to prosecute in lieu of administrative remedies.

#### **Conversion of Grant Funds at a Post in Africa**

OIG received an allegation that two Volunteers used small project assistance (SPA) grant money to obtain an equity stake in a local business. OIG's investigation disclosed that the two Volunteers and their business partners in the U.S. invested funds in a for-profit cashew-processing business at one of the Volunteers' sites. Both Volunteers admitted to obtaining the SPA grant to fund the purchase of cashew-processing machinery and obtain a stake in the enterprise. The Department of Justice declined to prosecute. Both Volunteers resigned in lieu of administrative separation and repaid the SPA grant funds.

#### Breach of Confidentiality at a Post in South America

OIG investigated a complaint that post management had inadvertently disclosed the identity of a Volunteer who had reported another Volunteer for using and distributing drugs. Prior to reporting the drug-related matters to OIG, post management questioned the subject Volunteer about the allegation at the post. The subject Volunteer denied the allegation, and was asked to wait outside an office while post management called the alleger on speakerphone. While waiting outside the office, the subject Volunteer overheard the conversation and the subject Volunteer was able to identify the alleger. The subject Volunteer resigned during the OIG investigation.

#### **Violation of Small Business Development Regulations**

OIG continues to investigate allegations related to violations of small business development regulations by Peace Corps contractors. OIG made two related suspension/debarment referrals on this matter during the SARC period.

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### **Tables**



The OIG Outreach Committee developed a Twitter account as another means of reaching OIG's stakeholders and furthering OIG's mission. Follow OIG on <a href="#page-2009">PCOIG</a>.

## **Tables**

## 1: List of Reports: Audits and Evaluations

Agency-wide
Review of the Peace Corps' Implementation of Guidelines Related to Volunteer Victims of Rape and
Sexual Assault (IG-12-08-E)
Impacts of the Five-Year Rule on Operations of the Peace Corps (IG-12-05-E)
Post Audits
PC/Lesotho: Audit (IG-12-05-A)
PC/China: Limited Scope Audit (IG-12-06-A)
PC/Jordan: Audit (IG-12-07-A)
PC/Tonga: Audit (IG-12-08-A)
Country Program Evaluations
PC/China: Country Program Evaluation (IG-12-04-E)
PC/Uganda: Country Program Evaluation (IG-12-06-E)
PC/Indonesia: Country Program Evaluation (IG-12-07-E)

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

Popowt	Questioned	Unsupported	Funds Put to
Report	Costs <sup>5</sup>	Costs <sup>6</sup>	Better Use <sup>7</sup>
PC/Lesotho: Audit (IG-12-05-A)			
Bills of collection inappropriately voided			\$2,374
Estimated amount of potential value-added tax refunds unclaimed			\$64,670
from FY 2007 – 2011			
PC/Jordan: Audit (IG-12-07-A)			
Reduction in costs related to International Cooperative			¢0.200
Administrative Support Services projected over the next three years			\$9,300
PC/Tonga: Audit (IG-12-08-A)			
Lack of controls over voided bills of collection for sale of vehicle		\$7,100	
Lack of controls over voided bills of collection for Volunteer		\$2,300	
allowances		\$2,300	
Inadequate controls over the sale and disposal of Peace Corps vehicles		\$3,000	
Entrena S.A. Contract Closeout Audit			
Overbilled for fixed-fee payments	\$34,382		
Management Advisory Report on the Breakdown of Internal			
Controls of the PC/Burkina Faso Medical Unit		Φ <b>52</b> 000	
Unaccounted-for medical supplies transferred from another PC post		\$52,000	
Total		\$175,126	

 $<sup>^{5}</sup>$  Questioned Costs – a cost that is an alleged violation of government or Peace Corps regulations. For example: prohibited purchases or expenditure of funds for purposes that do not relate to the Peace Corps mission.

Georgia Total Control of Government of Teace Corps regulations: Total Control of Government of Teace Corps regulations: Total Corps mission.

Georgia Total Corps regulations: Total Corps reg

services.

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

	Number of Reports	Questioned Costs	Unsupported Costs
A. Reports issued prior to this period			
For which no management decision has been made on any issue	-	-	-
For which some decisions had been made on some issues	-	-	-
B. Reports issued during this period	3	\$34,382	\$64,400
Totals of Categories A and B	3	\$34,382	\$64,400
C. For which final management decisions were made during this period			
Dollar value of disallowed costs	3	\$34,382	\$64,400
Dollar value of costs not disallowed	-	-	-
D. For which no management decisions were made during this period	-	-	-
E. For which management decisions were made on some issues during this period	-	-	-
Totals of Categories C, D, and E	3	\$34,382	\$64,400
Total questioned costs and unsupported costs	3	\$98,782	

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

	Number of Reports	Funds Put to Better Use
A. Reports issued prior to this period		
For which no management decision has been made on any issue	-	-
For which some decisions had been made on some issues	-	-
B. Reports issued during this period	2	\$76,344
Totals of Categories A and B	2	\$76,344
C. For which final management decisions were made during this period		
Dollar value of recommendations agreed to by management	2	\$76,344
Dollar value of recommendations not agreed to by management	-	-
D. For which no management decisions were made during this period	-	-
E. For which management decisions were made on some issues during this period	-	-
Totals of Categories C, D, and E	2	\$76,344

### 5: Recommendations on which Corrective Action has not been Completed

#### Audits and Evaluations

Open Recommenda	tions 60 to 1	119 Days			
-		-		Agenc curre	
Report	Date Issued	Total Open Recommendations	Concur	Non	Partial
PC/Uganda: Country Program Evaluation (IG-12-06-E)	7/6/2012	18	18	-	-
Impacts of the Five-Year Rule on Operations of the Peace Corps (IG-12-05-E)	6/20/2012	5	5	-	-
PC/Lesotho: Audit (IG-12-05-A)	6/29/2012	1	1	-	-
	Total	24	24	-	-
Open Recommenda	tions 120 to	179 Days			
•	Date Date	Total Open			
Report	Issued	Recommendations			
PC/China: Country Program Evaluation (IG-12-04-E)	5/24/2012	3	3	_	-
, ,	Total	3	3	-	-
			Į.		
Open Recommendation	ns More tha	an 180 Days			
Report	Date	Total Open			
	Issued	Recommendations			
PC/HQ Medical Clearance System: Evaluation (IG-08-08-E)	3/31/2008	5	5	-	_
PC/Guinea: Audit (IG-09-09-A)	3/31/2009	2	2	-	-
PC/HQ Office of Chief Information Officer: Budget Formulation and Management Audit (IG-10-05-A)	1/11/2010	7	7	-	-
PC/HQ Volunteer Delivery System: Evaluation (IG-11-01-E)	11/6/2010	14	14	-	-
PC/Mozambique: Audit (IG-11-05-A)	3/31/2011	1	1	-	-
PC/Ukraine: Audit (IG-11-06-A)	3/31/2011	6	5	1	-
PC/Swaziland: Country Program Evaluation (IG-11-06-E)	8/19/2011	2	2	-	-
PC/Liberia: Country Program Evaluation (IG-11-07-E)	9/8/2011	11	11	-	-
PC/Fiji: Country Program Evaluation (IG-12-01-E)	11/30/2011	2	2	-	-
PC/Kyrgyz Republic: Country Program Evaluation (IG-12-02-E)	12/6/2011	3	3	-	-
PC/HQ The Process for Formulating and Executing Peace Corps' Budget: Audit (IG-12-02-A)	11/30/2011	9	8	1	-
Teace corps Baaget: Haart (16 12 02 11)	1				
PC/Costa Rica: Audit (IG-12-03-A)	3/9/2012	2	2	-	-
	3/9/2012 3/22/2012	11	10	1	-

 $<sup>^{8}</sup>$  The sum of open recommendations in the Agency Concurrence columns equals the number in the Total Open Recommendations column.

Financial Statement and FISMA Recommendations<sup>9</sup>

				\genc	
			Con	curre	ence
Fiscal Year Issued	Open Recommendations		Concur	Non	Partial
PC/HQ FY 2011 Finance	cial Statement Audit (IG-	11-00	)-A)		
FY 2011	4		3	1	-
FY 2010	2		2	ı	-
FY 2009	2		2	1	-
FY 2007	1		1	ı	-
FY 2005	1		1	ı	-
FY 2004	1		1	-	-
Total	11		10	1	-
PC/HQ FY 2011 Inform	nation Security Program	Aud	it (IG-	11-99	)-A)
FY 2011	2		2	ı	-
FY 2010	1		1	-	-
FY 2009	3		3	-	_
FY 2008	4		4	-	-
FY 2007	4		4	-	-
Total	14		14	-	-

<sup>&</sup>lt;sup>9</sup> 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. Prior year findings and recommendations may be reissued if management has not taken sufficient corrective actions.

### 6: Summary of Investigative Activities and Outcomes<sup>10</sup>

Investigative Activities

	Preliminary Inquiries <sup>11</sup>	Cases
Opened as of 4/1/2012	32	13
Opened during 4/1/2012–9/30/2012	86	7
Closed during 4/1/2012–9/30/2012	90	5
Total Open as of 10/1/2012	28	15

#### Referrals

Referrals to Department of Justice	14
Referrals to Agency for Administrative Action	9
Other Referrals to Agency Management	28
Referrals to Other Agencies	4

#### Court Actions

Ongoing Prosecution <sup>12</sup>	2
Convictions	1
Judgments	-
Fines/Restitution	\$10,000

#### Administrative Actions

Employees (Resignations and Terminations)	5
Other Employee Actions	2
Suspension/Debarment Referrals	3

#### Monetary Results

Annual Savings	-
Recoveries/Restitution	\$20,350
Cost Avoidance	\$6,700 <sup>13</sup>

<sup>&</sup>lt;sup>10</sup> Volunteers/trainees are included as Peace Corps employees for the purpose of reporting investigative activity.

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

12 Includes arrests, indictments, information, and overseas criminal proceedings.

<sup>&</sup>lt;sup>13</sup> The cost avoidance was between \$6,700 and \$16,100.

### 7: Summary of Hotline and Other Complaints

Hotline Complaints Received	101
Non-Hotline Complaints Received <sup>14</sup>	28
Total Complaints from all Sources <sup>15</sup>	129
	T
Resulted in Investigations	7
Resulted in Preliminary Inquiries	75
Resulted in Audits or Evaluations	2
Referred to Agency Management	28
Referred to Other Agency	3
No Action Needed	6

<sup>14</sup> These complaints are largely a result of outreach by OIG staff and were received by email, phone calls, and

conversations.

15 In some instances, OIG received multiple complaints for the same issue, which resulted in fewer actions (investigations, preliminary inquiries, audits, evaluations, referrals, or no action) than complaints received.

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

Act Reference	Reporting Requirements	Page
Section 4(a)(2)	Review of legislation and regulations	51
Section 5(a)(1)	Significant problems, abuses, and deficiencies	34-37
Section 5(a)(2)	Significant recommendations for corrective actions	8-23
Section 5(a)(3)	Prior significant recommendations on which corrective action has not been completed	44-45
Section 5(a)(4)	Matters referred to prosecuting authorities	34-37
Section 5(a)(5)	Summary of instances where information was refused	n/a
Section 5(a)(6)	List of audit reports, including evaluations, inspections, and reviews	40
Section 5(a)(7)	Summary of significant reports	20-31
Section 5(a)(8)	Statistical table - questioned and unsupported costs	41
Section 5(a)(9)	Statistical table - funds to be put to better use	43
Section 5(a)(10)	Summary of previous audit reports without management decisions	n/a
Section 5(a)(11)	Significant revised management decisions	n/a
Section 5(a)(12)	Significant management decisions with which the Inspector General disagrees	n/a
Section 5(a)(13)	Information under Federal Financial Management Improvement Act of 1996	n/a

# **Appendixes**



PC/Indonesia Volunteer Robert Buhagiar and Lead Evaluator Heather Robinson with Buhagiar's eleventh grade class.

## **Appendixes**

## **A: Reporting of Peer Reviews**

Pursuant to Section 989C of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Public Law No. 111-203), <sup>16</sup> the Peace Corps OIG reports the following peer review information:

During the reporting period, there were no peer reviews conducted of the Peace Corps OIG. The Audit and Investigation Units are required to conduct peer reviews and be subject of a peer review every three years.

#### **Audit Unit**

In June 2011, the U.S. Government Printing Office OIG conducted a peer review of the Audit Unit of the Peace Corps OIG in effect for the year ending September 30, 2010. In its comment letter, the GPO OIG issued findings that were not considered to be of sufficient significance to affect the opinion expressed in that report. Peace Corps OIG initiated action to update its audit policies and procedures, enhance working paper documentation, and formalize the process for overseeing independent public auditors.

#### **Investigation Unit**

The Investigation Unit is expected to undergo a peer review in early 2013. The Investigation Unit was recently included in the CIGIE peer review schedule after having been granted authority from the U.S. attorney general to exercise statutory law enforcement powers.

### **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 contract audit reports with significant audit findings.

<sup>&</sup>lt;sup>16</sup> 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.).

### C: Review of Legislation and Regulations

### **Implementation Highlights of the Kate Puzey Act**<sup>17</sup>

The agency reports it has taken a number of steps to implement its Sexual Assault Risk Reduction and Response (SARRR) Program. The agency reported it has developed a framework, performance measures, and timeline for the SARRR program. The agency informed OIG it created new training for Volunteers on sexual assault awareness, risk-reduction strategies, reporting and response protocols, and bystander intervention. The agency reports 200 overseas staff members have been instructed in how to deliver the training to Volunteers and 385 overseas staff members have received, or will receive, training on the agency's sexual assault protocols and how staff can support Volunteer victims of sexual assaults. The agency revised policies and procedures for Volunteers who are medically evacuated as a result of a sexual assault or other serious crime and created a new Medevac Support Program. The agency also created the Peace Corps' Sexual Assault Advisory Council, consisting of RPCVs and leading experts and professionals. The council held its first meeting in July 2012. In addition, the agency hired a sexual assault nurse examiner and formally established and hired staff for an Office of Victim Advocacy.

The agency reports it began systematically tracking arrests, prosecutions, and incarcerations for crimes against Volunteers. The agency issued guidance to overseas staff on specific procedures to follow when Volunteers express concerns about their safety and situations that threaten their well-being. Under new agency policy, any Volunteer who feels at risk of imminent bodily harm at his or her site must, upon request, be expeditiously removed from that site. The agency issued an internal policy enhancing its authority to pay attorney and court costs for Volunteers participating in criminal proceedings overseas. In May 2012, the Peace Corps and the Department of State's, Bureau of Diplomatic Security (DS) signed an MOU formalizing how the two agencies will respond to crimes against Volunteers. The MOU was published in the *Foreign Affairs Manual* and disseminated to all CDs. The Peace Corps and DS are coordinating efforts to implement instructions for regional security officers and Peace Corps staff overseas.

While the reported progress is encouraging, OIG is concerned that the agency has not yet established several key components in its SARRR program. Specifically, the agency has not yet designated or deployed sexual assault response liaisons at all posts to respond to reports of sexual assault. A system for restricted reporting of sexual assault as defined by the Kate Puzey Act has not yet been put in place and a 24-hour sexual assault hotline for Volunteers to report sexual assaults and receive counseling and information on reporting and response procedures is not yet operational.

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<sup>&</sup>lt;sup>17</sup> As part of the Kate Puzey Act, OIG will report on (1) the implementation of the agency's SARRR program training and policy, including case studies; (2) how the agency hires/terminates its CDs, including an assessment of CD performance plans as well as how CDs hire post staff; and (3) Volunteers' allegations of misconduct, mismanagement, and/or policy violations by Peace Corps staff, any breaches of victim confidentiality, and any actions taken to assure the safety of Volunteers.

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

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

# **Contact OIG**

### **Reporting Hotline:**

U.S./International: 202.692.2915 Toll-Free (U.S. only): 800.233.5874

Email: OIG@peacecorps.gov

Web Form: <a href="www.peacecorps.gov/OIG/ContactOIG">www.peacecorps.gov/OIG/ContactOIG</a>

Mail: Peace Corps Office of Inspector General

P.O. Box 57129

Washington, D.C. 20037-7129

### **For General Information:**

Main Office: 202.692.2900

Website: <a href="http://www.peacecorps.gov/OIG">http://www.peacecorps.gov/OIG</a>

Twitter: <a href="https://twitter.com/PCOIG">https://twitter.com/PCOIG</a>

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