To: Carol Spahn, Acting Director  
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From: Kathy A. Buller, Inspector General  

Date: July 16, 2021  

Subject: Final Report on the Follow-Up Review of Peace Corps/Moldova (IG-21-01-E)  

Transmitted for your information is our final report on the Follow-Up Review of Peace Corps/Moldova.

Management concurred with all 3 recommendations. In its response, management described actions it is taking to address the issues that prompted each of our recommendations. The agency provided documentation of its actions during the 45-day preliminary report review period. OIG reviewed the documents, and we will close recommendations 1, 2, and 3 based on the documents provided.

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

Our comments, which are in the report as Appendix F, address these matters.

You may address questions regarding follow-up or documentation to Acting Assistant Inspector General for Evaluation Reuben Marshall at 202.692.2946.

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

cc: Dave Noble, Chief of Staff  
    Jackie Dinneen, Deputy Chief of Staff  
    Lila Jaafar, White House Liaison  
    Carl Sosebee, Senior Advisor to the Director  
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    Shawn Bardwell, Associate Director, Safety & Security  
    Moldova Desk
Students of a health education Volunteer participate in a STEM project to promote girl scientists.
EXECUTIVE SUMMARY

BACKGROUND

The Office of Inspector General (OIG) conducted a follow-up review of issues identified in the Final Report on the Program Evaluation of Peace Corps/Moldova (IG-13-04-E). We followed up on five findings from this 2013 report that were significant areas of concern, namely:

- Security incidents were not properly documented in the post’s site history files.
- Volunteers placed in urban sites faced challenges integrating into their communities.
- The post was not utilizing the results from language proficiency interviews.
- The post’s trainee assessment tool did not incorporate available data sources and was time consuming to use.
- The post staff used inconsistent housing checklist templates that did not clarify all required housing standards.

WHAT WE FOUND

We found that, overall, Peace Corps/Moldova (hereafter referred to as “the post”) had improved use of the trainee assessment portfolio (TAP) and housing checklists. OIG found that between 2014 and 2019 Volunteers who were placed in urban sites reported fewer challenges integrating into their communities compared to previous years. In addition, the post incorporated the TAP and used resulting data to make decisions on Volunteers’ readiness to serve, and staff reported that the TAP was more comprehensive and easier to use.

OIG noted three challenges that required management attention. First, the post had updated its site management manual to align with agency policy, but responsible staff did not document safety and security incidents in the site history files as required. Second, though the post had lowered its local language proficiency benchmark and increased the number of language hours during pre-service training (PST), four Volunteers did not reach the language benchmarks between 2018 and 2019. The post attempted to support each of the four Volunteers who swore-in without meeting the language benchmark with a 3-month Volunteer language improvement action plan, but the effectiveness of the action plans was unclear. OIG could not assess if Volunteers had completed their language improvement action plans or achieved the post’s language proficiency standard during their service. Third, our review found that the post’s housing checklist template had been improved, and that most staff used the same housing checklist when inspecting potential housing for Volunteers. This represented an improvement over what we reported in 2013. However, we also found that staff conducting housing checks had not fully documented their inspections. Almost half of the housing checklists we reviewed were incomplete. It was unclear if approved houses had met all the post’s health and safety requirements for Volunteer housing.

RECOMMENDATIONS IN BRIEF

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

In September 2013, OIG issued its Final Report on the Program Evaluation of Peace Corps/Moldova (IG-13-04-E). The report made 11 recommendations in total, with which agency management concurred. All were closed as of June 2015 based on a review of documentation indicating corrective actions had been implemented.

This limited-scope review is a follow-up to our 2013 country program evaluation of Peace Corps/Moldova. The objective was to determine if the agreed upon corrective actions taken in response to certain recommendations made in our 2013 report were fully implemented and had the intended effects.

We reviewed the following five findings from the 2013 report that were significant areas of concern at the time:

- Security incidents were not properly documented in the site history files.
- Volunteers placed in urban sites faced challenges integrating into their communities.
- The post was not utilizing the results from language proficiency interviews.
- The post’s trainee assessment tool did not incorporate available data sources and was time consuming to use.
- The post staff used different housing checklists, and checklists did not clearly identify all housing elements that were necessary to meet the post’s minimum housing standards.

In March 2020, in response to the COVID-19 pandemic, the Peace Corps suspended all of its Volunteer operations and evacuated all Volunteers to the United States. At the time of this follow-up review, Volunteers had not returned to Moldova since evacuation and staff at the post were teleworking from home. In 2013, the post had four project sectors. Prior to evacuation, there were three active project sectors in Moldova: community economic development, education, and health. Moldova typically received one trainee input per year in June. In early 2021, leadership at the post was transitioning to a new country director who started her role at Peace Corps/Moldova in April.
SUMMARY OF RESULTS

SITE MANAGEMENT

In this follow-up evaluation, we attempted to answer the following site management researchable question:

*Have responsible staff, including the safety and security manager and programming staff, properly documented safety and security incidents in electronic, centralized site history files?*

AREA THAT REQUIRED MANAGEMENT ATTENTION

*Safety and security incidents were not documented in the site history files and stored in the Volunteer Information Database Application (VIDA).*

Peace Corps manual section (MS) 270 Volunteer/Trainee Safety and Security states that posts must maintain a system for recording the history of a site, and the site history must capture security issues that could affect future Volunteer placement. Agency guidance further directs posts to include the following in the site history documentation:

Information should include safety or security incidents that occur in the community, Volunteer concerns about a location, and other conditions that could affect a future decision to place a Volunteer in that location.

According to Safety and Security Instruction (SSI) 401, posts are required to maintain site history files. Guidance clearly states that relevant security incidents and/or concerns must be recorded in VIDA under “security incidents” in the notes section for the site along with the consolidated incident reporting system (CIRS)\(^1\) identification number for serious crimes, stalking, burglaries, and recurring safety and security incidents. SSI 401 also says that other incidents or events that could raise concerns for the safety of future Volunteers must be documented as a note. Further, the SSI directs each post to develop its own standard operating procedure (SOP) that describes who at post “is responsible for filing specific components of site history, and how posts will use site history files within the site identification and Volunteer placement process.” The post’s most recent SOP for site history files was revised in December 2019, and it included procedures that align with SSI 401 guidance. The SOP says that “the [safety and security manager] will work with the programming staff to identify the types of information and/or documents that must be stored in an electronic, centralized site history file.” The SOP also states that as of January 2019, staff should maintain safety and security information relevant to a Volunteer site in the new VIDA. The agency updated VIDA to VIDA 2.0 along with SSI 401 in 2018. In 2019, the post began the transfer of files, for example housing checklists and contact information for host families and counterparts, to the new database system and trained staff on using VIDA 2.0. For current site history files, the post’s SOP states that they have to be uploaded to the new VIDA or maintained in their current location until their 10-year anniversary.

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\(^1\) The Office of Safety and Security announced on April 15, 2021, that CIRS and the coordinated agency response case management system (CARS CMS) are offline and will be replaced by a new database.
The report from our 2013 evaluation detailed several ways in which the post’s adherence to its established site management processes and procedures needed improvement. Specifically, we found that site history files did not always contain information about security incidents, and four security incidents that occurred were not properly documented in the electronic site history files. At the time, the post lacked a centralized location for site history files, and there was no documented procedure to ensure that relevant security information was regularly entered by staff into the site history files.

For the purposes of this follow-up, OIG looked for evidence that safety and security incidents have been properly documented in the site history files and stored in an electronic centralized location, as recommended in the 2013 report.

We reviewed a random sample of previous security incidents and safety concerns in the site history files from 2018 to 2019 and found that only 1 out of 14 incidents were noted in VIDA. In accordance with agency policy, the post started using VIDA 2.0 in 2019, and for the first few months staff said they imported important files from VIDA to VIDA 2.0. Responsible staff told OIG that they had not completed transferring and entering safety and security incidents into VIDA 2.0. As a result, incident information could only be found in other systems, including CIRS and CARS CMS, depending on the date of the incident. A 2019 Peace Corps Safety and Security Officer (PCSSO) trip report found that most of the necessary information for site history files were saved, but they were not centrally located or easy to search by site.

Responsible staff we interviewed explained that when deciding whether to add serious incidents into VIDA 2.0, they considered if the circumstances of the incident were important for site placement decisions, like a theft that happened with the host family or neighbor. Moreover, when OIG asked staff to clarify how they added safety and security related notes about a site into VIDA, they acknowledged that they had not completed transferring and entering safety and security incidents into VIDA 2.0 and had not been properly documenting safety and security incidents. Insufficient documentation of safety and security information in the post’s site history files raised the risk, as we had reported in 2013, that post would place “…future Volunteers in inappropriate work sites or with inappropriate host families...” In sum, OIG concluded that the post had not been adhering to SSI 401 or the post’s SOP. While we recognized that the post required more time to make effective use of VIDA 2.0, we concluded that the post needed to improve oversight of site history file management.

We recommend:

1. That the director of programming and training and the country director develop and implement a plan to perform periodic, random reviews of site history files for evidence that they contain required information.
**Urban Placement**

In this follow-up evaluation, we attempted to answer the following site management researchable question:

*Did Volunteers placed in urban sites report any challenges with community integration compared to Volunteers in semi-urban or rural sites, based on Annual Volunteer Survey (AVS) data?*

**Area of No Concern**

*Volunteers placed in urban placements did not report challenges with integration.*

In 2013, we found that 19 percent of Volunteers were serving in three urban sites, and Volunteers placed in urban sites reported facing challenges integrating in their communities. At the time of our 2013 evaluation, the post had not developed a uniform policy for placing Volunteers in urban sites. As a result, programming staff were not using a consistent approach to guide urban placement decisions. At that time, we also noted that post leadership had expressed interest in reducing the number of urban placements with the next trainee input group.

For this review, OIG looked for evidence that the post established specific criteria for placing Volunteers in urban sites, as recommended in 2013. Further, we wanted to know if Volunteers placed in urban sites reported any challenges with community integration compared to Volunteers in other site placements.

We reviewed the AVS data for 2014 to 2019 related to Volunteer integration and site placement. Moreover, we interviewed staff about the rationale, process, and benefits of placing Volunteers in urban placements, and if they noticed any problems with urban community integration between 2018 and 2019.

Our review identified several actions that staff had undertaken to establish specific criteria for placing Volunteers in urban sites. In the post’s most recent site management manual, the criteria were clear for placing Volunteers in urban sites stating that the capital city was prohibited for 2-year Volunteers and acceptable for 3rd-year Volunteers. According to the Peace Corps’ *Programming and Training Guidance: Project Design and Evaluation*, many projects have a strategy for placing a small number of Volunteers in urban sites and such higher-level assignments are usually appropriate for “more experienced Volunteers or 3rd-year Volunteers.” Also, staff reported they had shifted to placing Volunteers in large villages. We found that the post reduced integration challenges in urban sites by placing fewer Volunteers in the capital. Volunteers who arrived in country after 2014 reported higher levels of community integration in urban sites on the AVS compared to prior training groups. The post now limits placements in the capital to 3rd year Volunteers. We do not have concerns about the criteria that the post employed through 2019 when considering whether to place a Volunteer in an urban site.

**The 2013 OIG report recommended:**

2. That the country director establish specific criteria for placing Volunteers in urban sites.
**HOUSING CHECKLISTS**

In this follow-up evaluation, we attempted to answer the following site management researchable questions:

- Did staff consistently use the correct housing checklists?
- Did the housing checklist templates clearly identify the required housing elements for the post to approve the housing?

**AREAS OF NO CONCERN**

**Most staff used the same housing checklist to inspect potential Volunteer housing.**

Per MS 270.6.4 “Housing Standards,” all housing or host family arrangements must be inspected by trained staff prior to occupancy to ensure that each house and/or homestay arrangement meets all minimum standards. It also says that reports of the inspections must be documented and maintained by the post.

In 2013, our evaluation reported that the post had established housing standards, but they were documented in two different versions of the housing checklist that were inconsistent. In the 2019 PCSSO trip report, the PCSSO found that the post’s site management manual had two different versions of the housing checklists but neither of them were the versions used by staff in the site history files. The PCSSO recommended that the post select one version of the housing checklist to be used consistently by staff.

For this review, OIG looked for evidence that staff were consistently using the appropriate housing checklist. We selected a random sample of site history files from 2018 to 2019 to determine if staff were consistently using the same housing checklist. In addition, we interviewed staff on the housing checklist process and their understanding of the required housing elements.

We reviewed a sample of housing checklists and found that staff had used the November 2015 version of the checklist 94 percent of the time; a small number of checklists were different versions (a February 2015 checklist and two housing checklists with no version date). We concluded that the post had recently made sufficient progress on consistently using the same housing checklist, and that the post’s recent efforts to update its site management manual should result in use of a common housing checklist.

**The post had improved their housing checklist template to clarify required housing standards.**

SSI 410 states that housing must be inspected prior to occupancy to ensure Volunteers or trainees live in acceptable housing, and the guidance lists the minimum housing standards that must be addressed for a house to be approved. The post updated its site management manual in December 2020, and the housing checklist instructions dictate that the form “must be completed by [Peace Corps]/Moldova staff prior to a [Volunteer/trainee] moving into a house. The house cannot be approved until all requirements are met.” The site management manual states that all housing
must be inspected by post staff prior to occupancy to ensure each house meets all minimum standards as established by the post. We compared the housing checklist in the post’s site management manual with SSI 410, and they had the same guidance on the required housing standards.

In our 2013 evaluation, we noted that the post’s housing checklist templates did not clearly identify which housing elements were required to be met prior to Volunteer placement. As a result, Volunteers could be put at risk if placed in housing that did not meet the post’s minimum housing standards.

For this review, we analyzed the housing checklist form to review if it clearly identified the required housing elements that staff had to inspect and document in order for a house to be approved.

We reviewed the housing checklist in the post’s site management manual and found that it clearly identified minimum housing standards. In our interviews, staff said they knew the required housing standards for a house to be approved. Four staff told us they knew which housing items were required, and one of them said they “know everything by heart.” Staff expressed that they could differentiate between required versus not required housing checklist elements. As a result, we did not have concerns about the clarity of the post’s housing checklist template that will be used to inspect and approve future Volunteer housing in Moldova. However, we did identify an area for improvement in the post’s housing inspection process, as presented below.

**AREA THAT REQUIRED MANAGEMENT ATTENTION**

**Staff did not fully document their housing inspections.**

Per SSI 410, anyone involved in the housing selection process should be trained in the post’s requirements, and the safety and security manager should provide annual staff training on how to inspect housing. The post’s site management manual says that “No Volunteers will be permitted to live in housing that has not been inspected and approved by a qualified staff member.”

In our review of 35 housing checklists completed by staff between 2018 and 2019, we found that 16 had missing information on the minimum housing standards post required for Volunteer housing. For one housing checklist, the form lacked information about 9 out of 33 required checklist items:

- the electric wiring/fuse box in the house looks safe
- If there is a separate water heater, does it look safe?
- plumbing/pipes look safe
- parasites, rodents in the house
- mold in the house
- drinking in the family
- metal bars on the windows if it is apartment on the ground floor

The 2013 OIG report recommended:

11. That the country director ensure that the housing checklist clearly identifies the required elements and that all staff use the appropriate housing checklist(s).
- bars/discos in immediate vicinity
- outdoor pets

In the 2019 PCSSO trip report, the PCSSO found that the post’s site management manual had missing checklists/forms, duplications, and some inconsistency in approach to safety and security across sectors, as well as other discrepancies. Also, the housing checklist forms were not complete.

During interviews, staff described lack of time and quality control as reasons for the missing information on the housing checklists. Two staff told us they filled out many forms in a hurry and should have checked the form again for mistakes when they returned to the office. Staff who were involved in the site development process were supposed to review the Site Development Tracking Sheet at weekly programming and training meetings. Staff said these weekly meetings and discussions helped them make sure that the housing criteria were being met. Sometimes information was not documented because things needed to be fixed, and it would get documented after the fact but not during the staff discussions. Moreover, staff said that the post had many experienced program managers who had been checking housing for a long time and did not need to be trained on how to inspect housing. In addition, the November 2015 housing checklist lacked a place for staff to sign to indicate their review and approval of the house. OIG observed that the revised housing checklist form did include space for appropriate staff (the program manager, safety and security manager, and director of programming and training) to sign the form, indicating their review and approval of the house.

Based on the incomplete housing checklists we received from the post, as well as interviews with staff, we identified that staff made housing decisions without sufficient information concerning each house or homestay’s compliance with the post’s required minimum housing standards. As a result, the post may have placed Volunteers in housing that did not meet health and safety standards and could have put Volunteer safety and security at risk.

We recommend:

2. That the director of programing and training ensure staff conducting housing checks have sufficient time to document their observations about each required housing elements on the housing checklists.
**LANGUAGE TRAINING**

In this follow-up evaluation, we attempted to answer the following language training researchable questions:

- Did the post support Volunteers who swore-in without meeting the language proficiency interview (LPI) minimum score?
- What were the expectations and deadlines for implementing the Volunteer language improvement action plans?

In 2013, our evaluation found that language was one of Volunteers’ greatest challenges to integrate into their communities. The post was not using the results from the language proficiency interviews in meaningful ways to identify Volunteers who needed additional support with their language learning. At the time, the post tested a trainee’s language skills by administering a language proficiency interview (with four levels in the proficiency scale: superior, advanced, intermediate, and novice). Trainees were expected to achieve the minimum language proficiency of “intermediate mid” level in Romanian and “intermediate low” level in Russian before swearing-in as Volunteers.

Per the *Peace Corps Act*, “no person shall be assigned to duty … unless at the time of such assignment he possesses such reasonable proficiency as his assignment requires in speaking the language of the country or area to which he is assigned.” According to the Global Learning Standards FAQs, staff at posts, with guidance from Regions and General Counsel, determine eligibility for swearing in and language proficiency benchmarks. When a minimum language level is not attained, some posts may choose to provide conditional swear-in with required follow up steps. During our evaluation, we noted that all trainees were officially sworn-in as Volunteers regardless of their language proficiency level. The purpose of this follow-up review was not to examine the post’s decision to swear-in Volunteers who did not meet the language benchmarks, but rather to assess the post’s efforts to support Volunteers’ language after pre-service training. For this review, OIG looked for evidence that the post had defined how language proficiency interview results were to be used for swearing-in decisions and had defined a course of action for trainees who fail to meet minimum language proficiency requirements by the end of pre-service training, as recommended in 2013.

We reviewed records of LPI scores and Volunteer language improvement action plans for Volunteers between 2018 and 2019. Moreover, we interviewed staff to learn how the post supported Volunteers who swore-in without meeting the language proficiency minimums and about expectations and deadlines for implementing Volunteer language improvement action plans.

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2 According to MS 207 3.0 (a) Individuals who satisfy the standards for enrollment as a Volunteer must swear or affirm the required oath to become a Volunteer.
**AREA THAT REQUIRED MANAGEMENT ATTENTION**

*The effectiveness of the Volunteer language improvement action plans and related language proficiency tests were unclear.*

Per the post’s 2019 *Pre-Service Training Manual* guidance, trainees are required to achieve language proficiency of either “Romanian Language Proficiency at Intermediate Low level or Russian Novice High” before swearing-in. Peace Corps policy requires trainees/Volunteers to be given the LPI tests towards the end of PST, at mid-service training, and within 3 months of their close of service date.

In our review, we found that the post identified and supported Volunteers who swore-in without meeting the language requirements for swearing-in. Staff said that after the 2013 OIG report, the post lowered their language benchmarks and increased the number of language hours during PST, which made it easier for trainees to achieve the new language benchmark by the end of training. Neither the post’s 2019 PST guidance nor its Volunteer handbook established expectations for Volunteers concerning what would happen if they swore-in without meeting the required language proficiency benchmarks.

Despite the post lowering its language benchmarks, LPI scores for trainees between 2018 and 2019 revealed that four trainees in group 34 didn’t meet the LPI minimum language proficiency benchmark by the end of PST.

| Table 1: Language Proficiency Interview Results for Trainees in Group 34 at the End of Pre-Service Training |
|---------------------------------------------|---------------------------------------------|
| Romanian | Russian |
| Intermediate High | 0 | 0 |
| Intermediate Medium | 24 | 0 |
| Intermediate Low * | 20 | 0 |
| Novice High ** | 3 | 0 |
| Novice Medium | 0 | 1 |

* Benchmark for Romanian
** Benchmark for Russian

In our interviews, one staff member explained that initially “the narrative” was that if a person did not reach the benchmark level, they would not swear-in, but later, the post supported those Volunteers. Staff efforts since the 2013 evaluation led them to develop language improvement action plans for Volunteers who failed to meet the minimum language proficiency benchmarks as trainees between 2018 and 2019. The post submitted evidence that they identified the four Volunteers who did not meet the LPI benchmark and outlined three goals for them to accomplish during their first 3 months of Volunteer service. Staff described to us how the Volunteer language improvement action plan had deadlines for the Volunteers to submit assignments to the language and community integration coordinator.

The post should have checked the Volunteers’ language learning progress 3 months later, according to the post’s correspondence to the Volunteers. One of the four Volunteers re-tested during in-service training and met the required benchmark for Russian. The remaining three Volunteers refused to get re-tested, so the post decided to check their language assignments instead and talk with their tutors and local partners to continue to support them.

Staff acknowledged that the final LPI score was important because it showed progression, and a low score didn’t mean the Volunteers would be sent home. When we asked staff if they would do anything different in the future should a Volunteer refuse a language proficiency re-test, some
said they would reinforce the need for the second test when they developed the Volunteer’s language improvement action plan and would have the Volunteer sign a form agreeing to re-test after 3 months. Another staff member said she would not force anyone to take the test if someone refused in the future.

Based on the documentation we received from the post, as well as interviews with staff, it was unclear to OIG if Volunteers had pursued or completed their language improvement action plans. The post lacked documentation of completed assignments or LPI test scores after swearing-in. We found that the post did not have clear guidance and expectations for implementing the Volunteer language improvement action plans with Volunteers, including guidance about in-service LPI exams. As a result, OIG could not find evidence that the language improvement action plans were effective, and Volunteers may have served in Moldova without ever achieving the agency’s local language proficiency standards.

We recommend:

3. That the director of programming and training update the Peace Corps Volunteer Handbook and any correspondence to trainees and Volunteers to clarify the post’s expectations for trainees and Volunteers regarding cooperating with staff to monitor their language progress.
**Trainee Assessment**

In this follow-up evaluation we attempted to answer the following training researchable question:

*Did various staff think the post’s trainee assessment tool was comprehensive and usable?*

**Area of No Concern**

**Staff stated the post’s trainee assessment tool was comprehensive and usable.**

In 2013, our evaluation found that the post used a trainee assessment tool that was time consuming to use and did not evaluate trainees on all their learning competencies. For instance, the trainee assessment tool did not include results from the LPI or the test results from the safety and security training questionnaire. At the time, the assessment tool did not incorporate any feedback from the Peace Corps medical officers (PCMOs) or the trainees on their acquisition of health concepts to serve safely as a Volunteer, and staff stopped using the tool. It should be noted that at the time of our 2013 evaluation, the post had planned to revise the trainee assessment tool before the next trainee input in June 2013. According to the agency’s *Programming and Training Guidance*, the Peace Corps adopted the new trainee assessment portfolios (TAP) in 2014 and had the following three global competencies to support Volunteers: integrate into the community, exemplify professional Peace Corps service, and facilitate participatory community development.

For this review, OIG looked for evidence that the post had developed and implemented a comprehensive and usable trainee assessment tool, as recommended in 2013.

We reviewed records of the PST trainee assessment guides between 2018 and 2019. In addition, we reviewed staff assessments of trainee performance for training group 34 and received the 2018 to 2019 TAPs for the health education, community organizational development, and English education sectors. We also interviewed staff to learn if the trainee assessment process incorporated available data sources and if it was easier to use. We asked staff if the TAP helped them track trainees’ achievement of learning objectives and assess their readiness to swear-in and serve.

Our review identified several actions that staff took to improve the trainee assessment tool, now called the TAP. Staff completed detailed observations and notes for each Peace Corps trainee in training group 34. We also reviewed the TAPs for 2018 to 2019 and found no concerns.

We reviewed a sample of trainee “readiness to serve” statements. We found no concerns with Volunteers’ completed readiness to serve assessments for 2018 to 2019 and the post’s trainee assessment portfolios.

In our interviews, some staff mentioned that the TAP was being piloted in 2013 and it took them a while to understand it. Seven staff agreed that the TAP was sufficiently comprehensive and enabled them to track trainee progress and achievements during PST.

Our follow-up review found that the post’s TAP was comprehensive, and staff confirmed during interviews that the TAP was easy to use by various staff members, including the PCMOs. Because staff appeared able to use the TAP effectively, we had no concerns.

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The 2013 OIG report recommended:

5. That the director of programming and training ensure the post develops and implements a comprehensive and usable trainee assessment tool.
LIST OF RECOMMENDATIONS

We recommend:

1. That the director of programming and training and the country director develop and implement a plan to perform periodic, random reviews of site history files for evidence that they contain required information.

2. That the director of programing and training ensure staff conducting housing checks have sufficient time to document their observations about each required housing elements on the housing checklists.

3. That the director of programming and training update the Peace Corps Volunteer Handbook and any correspondence to trainees and Volunteers to clarify the post’s expectations for trainees and Volunteers regarding cooperating with staff to monitor their language progress.
APPENDIX A: RELEVANT FINDINGS AND RECOMMENDATIONS FROM OIG’S 2013 PROGRAM EVALUATION OF PEACE CORPS/MOLDOVA

Finding: Recent security incidents were not properly documented in the site history files.
Recommendation:
1. That the safety security coordinator establish a process to ensure that safety and security incidents are properly documented in the post’s site history files in a centralized location.

Finding: Volunteers placed in urban sites faced challenges integrating into their communities.
Recommendation:
2. That the country director establish specific criteria for placing Volunteers in urban sites.

Finding: The post was not utilizing the results from language proficiency interviews.
Recommendation:
4. That the post define how language proficiency interview results are to be used for swearing-in decisions, and define a course of action for trainees who fail to meet minimum language proficiency requirements by the end of pre-service training.

Finding: The post’s trainee assessment tool did not incorporate available data sources and was time consuming to use.
Recommendation:
5. That the director of programming and training ensure the post develops and implements a comprehensive and usable trainee assessment tool.

Finding: The post staff used inconsistent housing checklists.
Recommendation:
10. That the country director ensure that the housing checklist clearly identifies the required elements and that all staff use the appropriate housing checklist(s).
APPENDIX B: OBJECTIVE, SCOPE, AND METHODOLOGY

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

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

The Evaluation Unit announced its intent to conduct a follow-up review of issues identified in the 2013 evaluation of Peace Corps/Moldova on December 4, 2020. The objective of this limited scope follow-up review was to determine if the agreed upon corrective actions taken in response to the 2013 report’s recommendations were fully implemented and had the intended effects.

The follow-up review concerned specific findings from our 2013 report that pertained to training and site management at the post. This review was conducted from Peace Corps headquarters without travel to the post.

The evaluator reviewed agency documents provided by the post and conducted interviews via Zoom with staff at Peace Corps/Moldova. The eight members of post staff interviewed include those whose job functions include programming, site management, Volunteer training, and Volunteer support responsibilities.

The evaluator reviewed a sample of 14 Peace Corps/Moldova site history files to verify documentation requirements.

This follow-up review was conducted in accordance with the Quality Standards for Inspection and Evaluation, issued by the Council of the Inspectors General on Integrity and Efficiency.
At the time of our review, the post had 37 staff positions. We interviewed eight members of post staff. We conducted interviews with staff who have oversight responsibilities related to the scope of the review.

**Table 1: Interviews Conducted with Post Staff**

<table>
<thead>
<tr>
<th>Position</th>
<th>Interviewed</th>
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</thead>
<tbody>
<tr>
<td>Acting Country Director, Director of Programming and Training</td>
<td>X</td>
</tr>
<tr>
<td>Cashier</td>
<td></td>
</tr>
<tr>
<td>Director of Management and Operations</td>
<td></td>
</tr>
<tr>
<td>Drivers (4)</td>
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<tr>
<td>Security Guards (4)</td>
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<tr>
<td>Budget and Finance Specialist</td>
<td></td>
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<tr>
<td>Finance Specialist</td>
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</tr>
<tr>
<td>Documentation &amp; Grant Specialist/ Back up Cashier</td>
<td></td>
</tr>
<tr>
<td>MRE/ Grants Coordinator</td>
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</tr>
<tr>
<td>General Services Manager</td>
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</tr>
<tr>
<td>General Service Assistant</td>
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</tr>
<tr>
<td>Communications &amp; Admin Assistant</td>
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</tr>
<tr>
<td>Maintenance Specialist</td>
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<tr>
<td>Information Technology Specialist</td>
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<tr>
<td>Cleaners (2)</td>
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</tr>
<tr>
<td>Language and Community Integration Coordinator</td>
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<tr>
<td>Peace Corps Medical Assistant</td>
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<tr>
<td>Peace Corps Medical Officers (2)</td>
<td>X (2)</td>
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<tr>
<td>Program Managers (3) – EE Project Manager is vacant</td>
<td>X (2)</td>
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<tr>
<td>Project Specialists (3)</td>
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<tr>
<td>Safety and Security Manager</td>
<td>X</td>
</tr>
<tr>
<td>Youth Dev. Coordinator</td>
<td></td>
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<tr>
<td>Community Outreach Coordinator</td>
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<tr>
<td>Training Manager</td>
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</tr>
</tbody>
</table>

Data as of January 2021.
### APPENDIX D: LIST OF ACRONYMS

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>AVS</td>
<td>Annual Volunteer Survey</td>
</tr>
<tr>
<td>CARS CMS</td>
<td>Coordinated Agency Response System Case Management System</td>
</tr>
<tr>
<td>CIRS</td>
<td>Consolidated Incident Reporting System</td>
</tr>
<tr>
<td>LPI</td>
<td>Language Proficiency Interview</td>
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<tr>
<td>MS</td>
<td>Peace Corps Manual Section</td>
</tr>
<tr>
<td>OIG</td>
<td>Office of Inspector General</td>
</tr>
<tr>
<td>PCMO</td>
<td>Peace Corps Medical Officer</td>
</tr>
<tr>
<td>PCSSO</td>
<td>Peace Corps Safety and Security Officer</td>
</tr>
<tr>
<td>PST</td>
<td>Pre-Service Training</td>
</tr>
<tr>
<td>SOP</td>
<td>Standard Operating Procedure</td>
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<tr>
<td>SSI</td>
<td>Safety and Security Instruction</td>
</tr>
<tr>
<td>TAP</td>
<td>Trainee Assessment Portfolio</td>
</tr>
<tr>
<td>VIDA</td>
<td>Volunteer Information Database Application</td>
</tr>
</tbody>
</table>
MEMORANDUM
To: Kathy Buller, Inspector General
Through: Colin M. Jones, Acting Chief Compliance Officer
From: Mark Vander Vort, Acting EMA Regional Director
      Susan Martin, Country Director, Moldova
Date: July 14, 2021
CC: Carol Spahn, Acting Director
    Dave Noble, Chief of Staff
    Jackie Dinneen, Deputy Chief of Staff
    Scott Beale, Associate Director, Office of Global Operations
    Carl Sosebee, Senior Advisor to the Director
    Chip Taylor, Acting General Counsel
    Joaquin Ferrao, Deputy Inspector General & Legal Counsel
    Erin Balch, Acting Assistant Inspector General for Evaluations
    Shawn Bardwell, Associate Director, Office of Safety and Security
    David Reside, Chief of Operations, EMA Region
    Marian Fortner, Chief of Programming and Training, EMA Region
    Hannah Gardi, Director of Programming and Training, Moldova
    Elaina Ateke, Supervisory Country Desk Officer, EMA Region
Subject: Agency Response to the Report on the Follow-Up Review of Peace Corps/Moldova (Project No. 21-Eval-01)

Enclosed please find the agency’s response to the recommendations made by the Inspector General for Peace Corps/Moldova as outlined in the Preliminary Report on the Follow-Up Review of Peace Corps/Moldova (Project No. 21-Eval-01) given to the agency on May 18, 2021.

The agency takes this additional opportunity to recognize and pay tribute to Assistant Inspector General for Evaluations Jeremy (“Jerry”) Black, a dedicated member of the Peace Corps family. Jerry, a former Peace Corps Volunteer in Comoros from 1992 to 1994, served at the agency for over 14 years. He conducted more than a dozen evaluations and contributed significantly to the agency’s operations and the mission of the Office of Inspector General. We honor Jerry’s memory and his many contributions to the mission of the Peace Corps.
Recommendation 1
That the director of programming and training and the country director develop and implement a plan to perform periodic, random reviews of site history files for evidence that they contain required information.

Concur
Response: Post will update the Site History File SOP to include a process for periodic, random reviews of site history files on a quarterly basis at a minimum. These reviews shall be conducted by a designated staff member and the results of the reviews will be provided to the Director of Programming and Training and/or the Country Director for review. The new periodic, review process will be communicated to appropriate staff during the review of updates to Post’s Site Management Guidance and Site History Files SOP.

Documents Completed:
- Updated Site History File SOP
- Updated Site Management Guidance that includes the Site History SOP
- Email to staff regarding the updated Site History File SOP

Status and Timeline for Completion: Completed, June 2021

Recommendation 2
That the director of programming and training ensure staff conducting housing checks have sufficient time to document their observations about each required housing elements on the housing checklists.

Concur
Response: Post will update the Site Management Manual to provide more time for staff to conduct housing checks during site development and highlight the importance of taking the appropriate time to collect accurate information. Post staff will receive an additional one month of time to conduct site visits during site development process. This timeline update will include additional visits to each potential Volunteer site (e.g. new sites three visits and reoccurring sites two visits). Additionally, post will communicate to appropriate staff the importance of taking time to conduct housing checks. Post has also updated two forms (e.g., the Site Survey form and Housing Standard and Checklist form) as fillable PDFs for site identification to be used by staff which may be completed on laptops during site visits. These forms also reinforce the importance of taking the needed time to collect accurate information. Once completed, these forms require clearance from the Safety and Security Manager, Peace Corps Medical Officer, and Director of Programming and Training.

Documents Completed:
- Fillable PDF Site Identification forms (e.g., Site Survey form and Housing Standard and Checklist form)
- Updated Site Management Manual
- Email to appropriate staff containing with updated the Site Management Manual, including a reminder reinforcing taking the needed time to collect accurate information

Status and Timeline for Completion: Completed, June 2021
Recommendation 3
That the director of programming and training update the Peace Corps Volunteer Handbook and any correspondence to trainees and Volunteers to clarify the post’s expectations for trainees and Volunteers regarding cooperating with staff to monitor their language progress.

Concur
Response: Post has updated the Peace Corps/Moldova Volunteer Handbook to inform Volunteers of the specific expectations regarding Language Training, LPI testing and Language Improvement Plans. Also, these expectations have been included on the Post’s Pre-Departure page within LearningSpace which will be shared with Trainees at Pre-Service Training (PST). At PST, Trainees will be asked to sign an agreement (e.g., Language Learning Commitment form) to confirm their receipt and understanding of Post’s language requirements and expectations.

Documents Completed:
- New Language Learning Commitment Form
- Updated Peace Corps/Moldova Volunteer Handbook
- Screen Shot of Pre-departure page
- Updated Session Outline and PowerPoint for Pre-Service Training Introduction to Language and Culture Session
- Email to staff regarding update to the language requirements and expectations

Status and Timeline for Completion: Completed, June 2021
APPENDIX F: OIG COMMENTS

Management concurred with all 3 recommendations. In its response, management described actions it is taking to address the issues that prompted each of our recommendations. The agency provided documentation of its actions during the 45-day preliminary report review period. OIG reviewed the documents, and we will close recommendations 1, 2, and 3 based on the documents provided.

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

REVIEW COMPLETION

This limited scope follow-up review was conducted under the direction of Assistant Inspector General for Evaluations Jeremy Black and Acting Assistant Inspector General for Evaluations Reuben Marshall by Evaluations Program Analyst Kareen Sanchez. Additional support was provided by Senior Evaluators Alexandra Miller and Kris Hoffer.

OIG CONTACT

If you wish to comment on the quality or usefulness of this report to help us improve our products, please contact Reuben Marshall at rmarshall2@peacecorpsig.gov or 202.692.2946.
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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.

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**Mail:** Peace Corps Office of Inspector General
Paul D. Coverdell Peace Corps Headquarters
1275 First Street NE
Washington, D.C. 20526

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- Website: peacecorps.gov/oig
- Twitter: twitter.com/PCOIG