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

Management concurred with all 16 recommendations. We closed 3 recommendations based on a review of corrective actions and supporting documentation. Recommendations 1-12 and 16 will remain open pending confirmation from the chief compliance officer that the documentation identified in management’s response has been received. In its response, management described actions it is taking or intends to take to address the issues that prompted each of our recommendations. OIG will review and consider closing recommendations 1, 4, 6-7, 9-12, and 16 when the documentation reflected in the agency’s response to the preliminary report is received. For recommendations 2, 3, 5, and 8 additional documentation is required.

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

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.

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

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

cc: Michelle Brooks, Chief of Staff
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Maura Fulton, Senior Advisor to the Director
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Final Country Program Evaluation
Peace Corps/Paraguay
IG-19-04-E
July 2019

A Volunteer and his rabbit.
EXECUTIVE SUMMARY

BACKGROUND

The Office of the Inspector General (OIG) conducted an evaluation of Peace Corps/Paraguay (hereafter referred to as “the post”) from August 27 to September 14, 2018. Approximately 4,173 Peace Corps Volunteers have served in Paraguay since 1967, making it one of the agency’s oldest continuously operating posts. There are currently four projects in Paraguay: agriculture (AG); community economic development (CED); environment (ENV); and health (HE). At the onset of this evaluation, the post had 181 Volunteers and trainees. The post had over 50 full-time staff and a Fiscal Year (FY) 2019 operating budget of approximately $4 million.

WHAT WE FOUND

At the time of OIG’s arrival at the post, leadership was implementing significant management decisions, including moving the post’s training center and executing budget cuts. In addition, the director of management and operations (DMO) had left the post in August 2018, and the post was preparing for the arrival of its fourth country director in the last 6 years.

Our evaluation found that programming addressed many of Paraguay’s stated development priorities and that the post placed Volunteers in some of the poorest areas of the country. In addition, we found that Volunteers were integrated and felt safe in their communities, and the post effectively mitigated the most significant safety risks to Volunteers.

However, the post faced several challenges that required management attention. The post struggled to train Volunteers for working in their primary assignments and to identify and prepare community stakeholders for hosting and working with Volunteers. In addition, OIG found deficiencies in the post’s emergency preparations, support for Volunteers who reported harassment and mental health challenges, handling of sensitive Volunteer information, and analyses of Volunteer allowances.

RECOMMENDATIONS IN BRIEF

Our report contains 16 recommendations, which, if implemented, should strengthen post operations and correct the deficiencies detailed in the accompanying report.
TABLE OF CONTENTS

Executive Summary ....................................................................................................................................... i

Host Country Background .......................................................................................................................... 1

Peace Corps Program Background ............................................................................................................. 2

Evaluation Results ......................................................................................................................................... 3

Programming ............................................................................................................................................... 3

Training ...................................................................................................................................................... 4

Site Management ......................................................................................................................................... 7

Volunteer Safety and Security Support ........................................................................................................ 10

Volunteer Health Support ........................................................................................................................... 12

Other Volunteer Support Concern .............................................................................................................. 14

Volunteer Administrative Support ............................................................................................................. 15

Leadership and Management: Staffing Resources ...................................................................................... 17

Leadership and Management: Communication and Collaboration ............................................................ 17

List of Recommendations ........................................................................................................................... 19

Appendix A: Objective, Scope, and Methodology ..................................................................................... 21

Appendix B: Interviews Conducted .............................................................................................................. 23

Appendix C: List of Acronyms ..................................................................................................................... 26

Appendix D: Agency Response to the Preliminary Report ......................................................................... 27

Appendix E: OIG Comments ......................................................................................................................... 40

Appendix F: Program Evaluation Completion and OIG Contact ................................................................ 45
HOST COUNTRY BACKGROUND

Paraguay is a landlocked country in South America that is slightly smaller than California in land area, bordering Brazil, Argentina, and Bolivia. It has held relatively free and regular presidential elections since the country returned to democracy in 1989 after over 3 decades of military dictatorship. Paraguay’s population of nearly seven million is roughly 95 percent mestizo, reflecting a mix of Spanish and Amerindian ancestry.

As of 2015, 22 percent of Paraguay’s population lived below the poverty line, a number that fell in recent years but remains high, particularly in rural areas. Paraguay’s Human Development Index (HDI) rank increased from 1990 through 2014, but it has plateaued in recent years.\(^1\) It was 110\(^{th}\) in the world according to 2017 data. Compared to other Latin American countries, Paraguay has higher rates of income inequality and child and maternal mortality, and lower rates of immunization, water potability, sanitation, and secondary school enrollment.

Paraguay’s economy has grown 4 percent annually since 2014. A large number of Paraguayans are reliant upon agriculture and subsistence farming, and the economy has a significant number of small businesses. The unemployment rate was estimated at 6.5 percent in 2017.

Paraguay’s environmental issues include water pollution, inadequate urban waste disposal, and loss of wetlands. In addition, the Gran Chaco -- accounting for 60 percent of Paraguay’s territory but only two percent of its population -- has one of the world’s highest deforestation rates. Roughly 17,000 square miles of this semi-arid lowland plain has been converted into farmland or grazing pasture since 1985.

Paraguay ranks 72\(^{nd}\) in the world for life expectancy at 77.4 years, and approximately 85 percent of the population is younger than 55. Paraguay’s risk for infectious disease transmission is classified as “intermediate.” Bacterial diarrhea, hepatitis A, and typhoid fever are the most common food- or water-borne diseases and dengue fever is the most common vector-borne disease.

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

Prior to this evaluation, OIG last conducted a program evaluation of Peace Corps/Paraguay in 1999 and audited the post in 2010.

The Peace Corps has operated in Paraguay uninterrupted since 1967, with 4,173 Volunteers having served in the country. The post receives approximately 50 trainees each April and September and had 181 Volunteers and trainees in country at the time of fieldwork. As of June 2018, the post employed 58 full-time staff members, and its operating budget for FY 2019 was approximately $4 million. The post had four project areas:

- **Agriculture (AG).** Volunteers help small farmers optimize their use of available resources for improved food security. Typical AG Volunteer activities focus on soil conservation and recuperation, permaculture and organic gardening, reforestation, bee-keeping and small animal husbandry, and overall environment awareness. At the time of fieldwork, the AG project framework revision was in process but had not yet been endorsed by management. Under the new framework, AG Volunteers would be placed in agricultural schools, a strategy piloted in 2017, to provide more structured work environments and focused technical training.

- **Community Economic Development (CED).** Volunteers help communities improve civic engagement and the general economic well-being of its citizens. CED Volunteers help communities increase economic opportunities and income levels, focusing activities on promoting entrepreneurship, family finance, computer technology, business planning skills, and an entrepreneurial culture among youth. At the time of fieldwork, the post had planned to start the CED project framework revision process in 2019.

- **Environment (ENV).** Volunteers help Paraguayans conserve the biodiversity of their communities through better environmental practices and promotion of environmental awareness, biodiversity, and sustainable resource management. At the time of fieldwork, the ENV project framework revision was in process but had not yet been completed or endorsed by management.

- **Health (HE).** Volunteers boost national and local efforts to improve individual and community health through a wide range of activities that promote healthy practices and lifestyles. HE Volunteers focus on disease prevention education and training, including working with community members on the prevention of non-communicable diseases, HIV, and sexually-transmitted infections. At the time of fieldwork, the post had planned to start the HE framework revision process in 2019.

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

PROGRAMMING

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

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

AREAS OF NO CONCERN

Programming aligned with the country’s stated development priorities. National non-governmental organization (NGO) and ministerial representatives, as well as embassy representatives, stated that the Peace Corps program was aligned with Paraguay’s development goals, citing Volunteer work in rural and remote areas that were difficult for them to reach without the Peace Corps. Project frameworks and the post’s strategic plan matched several of Paraguay’s stated priorities, including economic development, education, civic engagement, reforestation, agriculture extension and environmental conservation, community health, and work with youth.

Volunteers were serving in the poorest areas of the country. We found that Volunteers worked in rural and remote areas. Post and embassy staff, host-country partners, and Volunteers agreed that Volunteers were serving in some of the country’s poorest and most underserved regions.

The post had established memoranda of understanding (MOUs) that supported its projects. The post recognized the need for stronger ties with national partners over the last 2 years and had established four broad MOUs with ministries and national partners since 2017. These MOUs support Volunteers across all four project sectors in a variety of activities related to education, tourism, health, and environment. The agreements included an MOU with the Technical Secretariat of Planning, a government office that exchanged information and coordinated with the Peace Corps about national, regional, and local programs and initiatives and identified areas of need across Paraguay. In addition, the post had established project advisory committees (PACs) for its agriculture and environment projects, and staff thought that PACs would get established for the HE and CED projects after completion of the framework revision process.

Volunteers reported making a positive impact in their communities through a range of activities. Volunteers and staff thought Volunteers were having a positive impact in their
communities, citing activities with youth, women, and small community groups when asked for examples of those who have benefited from their placements.

**Volunteers were conducting community needs assessments.** According to our OIG survey, most Volunteers reported that they had conducted community needs assessments at their sites.

**AREAS OF PROGRAMMING THAT REQUIRED MANAGEMENT ATTENTION**

We did not identify any areas of programming that required management attention, though ineffective technical training (addressed below) affected Volunteers’ ability to achieve project objectives.

**TRAINING**

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

Do trainings prepare Volunteers for service?

**AREAS OF NO CONCERN**

The post assessed and documented Volunteer readiness to serve. During pre-service training (PST), the post monitored trainees’ progress towards meeting learning objectives with the trainee assessment portfolio (TAP). They documented trainees’ achievement of terminal learning objectives for language, medical, safety and security, and technical training. Trainees from each program sector were provided detailed guides during PST regarding the TAP process and objectives by which they were measured.

**AREAS OF TRAINING THAT REQUIRED MANAGEMENT ATTENTION**

The evaluation uncovered some training areas that required management attention, including preparing Volunteers to use appropriate language and practical strategies to cope with harassment. In addition, we found that Volunteers did not receive the technical training necessary for them to achieve primary assignment objectives. The remainder of this section provides more information about these topics.

**Volunteers were not sufficiently prepared to cope with harassment.**

Training Volunteers to cope with unwanted attention is one of the agency’s global terminal learning objectives and required by Safety and Security Instruction (SSI) 310. In addition, Peace Corps Manual Section (MS) 270 states, “Each post must ensure that [Volunteer/trainee] safety and security training is integrated into language, technical, cross-cultural, health, and other aspects of training where such integration is beneficial.”
The post provided training on unwanted attention during PST, however, Volunteers we interviewed reported that the training was not practical enough and did not sufficiently prepare them for the harassment they experienced.

Volunteers indicated that the training on unwanted attention focused too much on identifying harassment rather than on providing examples or methods by which they could respond to and mitigate the harassment. Volunteers also wanted better integration of language and cultural training into discussions about how they should cope with harassment. For example, Volunteers said:

- “If someone is giving these sex signals, [I want] to know the culturally appropriate way to deal with it. Dealing with these situations wasn’t covered well.”
- “A lot of the sexual harassment training was done in English, but then you are in a situation and you don’t have the skills to deal with it.”
- “I did not know how to respond to cat calls with my language skills.”

According to 2017 Annual Volunteer Survey (AVS) results, 38 percent of Volunteers in Paraguay responded that they could communicate their personal boundaries in situations that made them feel uncomfortable, which was below IAP averages. Multiple Volunteers we interviewed stated that they did not have the skills they needed to deal with the harassment they faced.

We recommend:

1. **That the director of programming and training work with staff and Volunteers to integrate training on harassment into language, cultural, and other aspects of trainings so that Volunteers in Paraguay learn appropriate and practical ways to mitigate and respond to harassment they may experience.**

Technical training did not prepare Volunteers to meet project objectives.

MS 201 “Eligibility and Standards for Peace Corps Volunteer Service” stipulates that the Peace Corps should ensure that each Volunteer possesses sufficient technical competence to carry out his or her assignment as a Volunteer.

Nine of the Volunteers we interviewed explained that they struggled in their primary assignments. In response to our interview question about how well Volunteer work at site contributed to primary assignment goals and objectives, one Volunteer stated, “When I…was looking over goals I realized that there was a bunch of stuff in training…not directly in our sector. I think having clarity and focus on things that are in our sector would have been helpful. When I first got to site we did recycling art projects but that was not actually in our framework.”
Another Volunteer stated, “They are doing the redesign so hopefully they will narrow down the resources. With nutrition we did not have a curriculum. Or for diabetes. They added maternal health as a goal with my [training group] and they did not do an effective job of getting us trained. Volunteer satisfaction that technical training achieved the depth necessary for them to perform sector-specific work fell below IAP averages, and each of the post’s four sectors scored below global averages for their respective sectors.

Peace Corps “Programming and Training Guidance” states that well-designed, focused project plans are necessary for staff to identify and provide more effective, in-depth technical training aligned with a limited set of goals and objectives. During fieldwork, programming staff from each sector reported that the projects had too many indicators and were too broad to deliver focused technical training, though the current project frameworks were established after the implementation of the agency’s Focus In/Train Up strategy.3 One staff member called their method for technical training a “shotgun approach” that lacked depth. A Volunteer stated, “Peace Corps presents a very broad, shallow knowledge” in reference to technical training, and another Volunteer reported, “I think the training was similar to the service – throw a lot of things at them and see what sticks.”

In addition to technical training that lacked the depth Volunteers needed, we also heard that the programming and training teams did not collaborate effectively. According to “Characteristics and Strategies of a High Performing Post,” programming staff should have an active role in planning and delivering training, and overall communication between training and programming staff is critical for the identification, development, and delivery of effective technical training. Staff reported that the training team managed PST while the programming staff managed in-service training (IST), and that the programming team was not sufficiently involved in PST. Improving teamwork between the programming and training units was an ongoing senior staff priority.

Unfocused project frameworks and a lack of collaboration between the programming and training staff made training less effective. As mentioned in the Peace Corps Background section above, each of the four projects were in the process of getting revised at the time of fieldwork. Ineffective technical training resulted in Volunteers from each project area not contributing to some project objectives. CED Volunteers did not achieve targets in four of eight project objectives, while AG Volunteers fell short in four of seven objectives. ENV Volunteers fell short of targets in three of five objectives. The post reported that the HE sector would drop the maternal health goal altogether from its new framework because most Volunteers could not impact this area.

3 The Peace Corps’ “Focus In/Train Up” (FITU) strategy came out of the Peace Corps’ “Comprehensive Agency Assessment” from June 2010. A goal of the FITU initiative from 2010 to 2015 was to prioritize activities that Volunteers could be effectively trained to perform and that had measurable impact.
We recommend:

2. That the director of programming and training ensure that project framework revisions are appropriately limited in focus to facilitate more in-depth technical training that prepares Volunteers to carry out their primary assignments.

3. That the director of programming and training improve collaboration between the programming and training teams in the design and delivery of technical training for Volunteers.

SITE MANAGEMENT

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

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

AREAS OF NO CONCERN

Volunteer housing met the post’s standards. OIG inspection of Volunteer houses during fieldwork revealed that Volunteer housing met the post’s established housing criteria.

AREAS OF SITE MANAGEMENT THAT REQUIRED MANAGEMENT ATTENTION

The evaluation uncovered some areas of site management that required management attention, particularly with site history files, site identification and selection criteria, and the overall efficiency of the site identification process. The remainder of this section provides more information about these topics.

The post’s management and use of site history files did not meet agency standards.

Manual Section 270.6.7 establishes agency policy for site history file documentation and requires that the post “maintain a system for recording the history of a site from the time that initial evaluation begins.” In addition, Safety and Security Instruction 401: Site History Files requires each post to develop a standard operating procedure for managing and using site history files. Finally, the post has established that its site history files must include the Volunteer request form, site selection criteria checklist or approval form, the site identification survey, and the housing inspection checklist.

We reviewed 20 randomly selected site history files and found that they were missing required documentation, including 8 Volunteer request forms, 7 site approval forms, and 11 signed
housing checklists. All 12 consolidated incident reporting system (CIRS) incidents selected for review, however, were thoroughly documented in site history files.

We found that post did not use a standard operating procedure for managing site history files and did not use site history files to inform site identification or approval decisions. In addition, staff used different versions of documents for the same site identification activities and processes. The post had tried to organize site history files prior to our visit, but we found them to be incomplete.

These deficiencies in the post’s approach to maintaining site history files could limit the amount of information available to staff to make good site approval and placement decisions. Incomplete site history files also raised the risk that staff would place a Volunteer at a site without sufficient consideration of prior Volunteer experiences at the site.

We recommend:

4. That the director of programming and training improve completeness, management, and use of site history information consistent with agency guidance on site history files.

The post’s site identification and selection process and criteria needed improvement.

Manual Section 270.6.1 states that, “Each post must establish and apply a process for developing, selecting, and approving sites,” and that site development and monitoring must include site selection criteria that emphasize the site’s potential for Volunteer work and integration, health and safety, and support services. In addition, the agency’s Programming, Training and Evaluation guidance emphasizes that each post’s site selection criteria “should take into account…the identification of…at least one enthusiastic work partner or community contact who can support the Volunteer.”

We found that the post had not implemented an effective site identification and selection process, and lacked some relevant criteria for the selection of host families and counterparts. Although the post’s written site identification and selection guidelines had been reviewed and updated in recent years, we found that the guidelines had not been well implemented or followed consistently. Staff described each program team as its own island during the site identification process, because site identification procedures were applied differently across sectors and exceptions to site approval procedures were commonplace. In addition, the post had not been using a site identification strategy when conducting its site identification activities, though one had been finalized just prior to our fieldwork.

Staff and Volunteers reported that program staff did not spend enough time at each site to complete site identification and preparation activities effectively. Staff reported that the programming and training calendar of activities resulted in staff being too busy at times to make Volunteer site preparation and placement decisions as well as they would prefer. For example,
the post organized many in-service training events each year: “As a post, we have 18 IST events per year. Staff is exhausted and feels like the machine never stops running.” Volunteers relayed to us their perception that programming staff were rushing through the site identification process. Programming staff reported to us that the fatigue from travel during the site identification process negatively affected the quality of their site assessment and preparation activities. Programming staff said that extensive time on the road and self-driving left them exhausted and less effective when they needed energy to have meaningful conversations with host families, counterparts, and other community members. As one staff member explained, “It’s not always safe. We are trying to reduce our time on the road. I believe that if we could get organized, we could finish what we have to do in a shorter period of time and have less need to be on the road constantly. Having a driver would help for long distance. A week ago I did 2,000 km in 5 days.”

We also found that the post lacked sufficient selection criteria for host families and counterparts on its site identification forms. We did not see evidence that staff considered who lived in the homes, whether the family would include the Volunteer’s counterpart, or other relevant factors. In addition, the post’s site approval checklist did not take into account the identification of enthusiastic work partners, though it did require three potential contacts. As noted in the previous finding, files we reviewed lacked Volunteer request forms where potential work partners describe their motivation for working with a Volunteer. Three of the four program teams reported challenges with site identification, including one that underscored insufficient preparation of counterparts and another that cited the poor identification of counterparts. One senior staff member stated, “I would like some more concrete demonstration of commitment from counterparts and host families.”

These process inefficiencies and insufficient criteria negatively affected the quality of site identification in Paraguay. Some Volunteers and staff reported that counterparts and contacts were not supportive or did not want to work with Volunteers and that community members were ill-prepared for work with Volunteers. Of the 27 Volunteers we interviewed, 17 reported that sites were not well prepared, including several who remarked that their site lacked counterparts or organizations interested in working with them. Eleven Volunteers described negative host-family experiences that included difficulties bridging cultural misunderstandings. For example, Volunteers said:

> [Counterparts] did not have a solid understanding upfront of what it meant to work with a Volunteer. Maybe they get the message, but it needs to be hammered in.

> This site did not seem to get assessed – the [organization], the host family, and the community need. [My] host mother…didn’t want a Volunteer, she was pressured to accept one by her husband.

> It seems that the site development visits are checking boxes.

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4 OIG recently issued a report, “Case Study of Effective Site Development Practices” in December 2018, which addresses counterpart and host family selection and preparation, among other site identification topics.
In sum we found that the post’s site identification and selection process needed more effective oversight of staff activities and that the process would benefit from the use of clearer criteria for the identification and selection of host families and counterparts.

We recommend:

5. That the country director and director of programming and training develop a plan to improve management and oversight of a more consistent and efficient site identification and selection process.

6. That the director of programming and training develop, document, and implement site identification criteria that help the post select suitable host families, counterparts, organizations, and communities.

Volunteer Safety and Security Support

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

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

Areas of No Concern

The post worked effectively to mitigate, prevent, and respond to the most significant safety risks to Volunteers. Volunteers felt safe in their sites and throughout Paraguay. The most significant safety risks to Volunteer safety were robbery, non-aggravated sexual assaults, theft, and natural disasters. The post had a risk-mitigation action plan that identified common problems and mitigation techniques, and staff and Peace Corps Volunteer Coordinators (PCVCs) thought that the post sufficiently prevented and responded to safety risks.

The post’s Emergency Action Plan (EAP) had been tested, updated, and shared with the U.S. Embassy. The post’s most recent EAP test was in May 2018, and the EAP was last updated in July 2018. The post’s EAP has been shared with the Embassy and incorporated into the Embassy EAP.

Volunteer wardens were aware of their responsibilities. Wardens reported that they had been trained and understood their responsibilities regarding Volunteer consolidation during emergencies.
Volunteers stated that they reported crimes to the Peace Corps and that the post’s response was sufficient and appropriate. All Volunteers interviewed during fieldwork who acknowledged having been victims of crime had reported the crime to post. Eighty-five percent of Volunteers stated that if a crime happened to them in the future, they would report it to the post. The remainder answered “unsure” if the crime was minor. Ninety-four percent of Volunteers surveyed reported that the safety and security manager (SSM) was either “very” or “somewhat supportive,” and the majority of Volunteers interviewed during fieldwork stated that they were confident in the safety and security team’s competence and empathy.

The post had adequately addressed recommendations from the Peace Corps safety and security officer (PCSSO). All but one of the recommendations from the 2015 and 2017 PCSSO reviews have been closed. The remaining recommendation is in the process of being addressed.

Most Volunteers and staff reported that Volunteers were well integrated into their communities. Of Volunteers interviewed during fieldwork, 88 percent reported that they were well integrated into their communities, and 77 percent thought they were provided with the skills and cultural understanding to integrate into their communities. Nearly 90 percent of post staff surveyed thought that Volunteers were well integrated into their communities.

Areas of Volunteer Safety and Security Support That Required Management Attention

Some Volunteers were not aware of their consolidation points.

The EAP Testing and Training Standard Operating Procedures states, “The SSM will ensure that all Volunteers are familiar with the name and location of their respective consolidation point. Changes to the location of any consolidation point will be reported to the Volunteers immediately.”

The post communicated consolidation points to Volunteers multiple times during the trainee/Volunteer lifecycle. In addition, the SSM conducted regional consolidation point drills, and all of the Volunteers who participated in a regional drill reached their consolidation points within the timeliness standard established by the SSM for each drill. All of the Volunteers we interviewed who had been through one of these regional consolidation drills correctly identified their consolidation point. However, we found that 30 percent of the Volunteers we interviewed could not identify their exact consolidation point, including 4 who could not name the correct town or city for consolidation. The Volunteers who did not correctly identify their consolidation point had not participated in a regional drill and had all served at their sites for over 8 months.

Based on the results of our fieldwork we concluded that Volunteers who had not participated in a regional consolidation drill were less likely to know where to go in an emergency.
We recommend:

7. That the country director and safety and security manager plan for more timely testing to reinforce Volunteer knowledge of consolidation points.

**Volunteer Health Support**

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

Is the health care program meeting Volunteers’ needs?

**Areas of No Concern**

**Staffing and logistical support for the medical unit was sufficient.** Data, conversations with Office of Health Services staff, and fieldwork revealed no concerns with medical staffing levels. Fieldwork also revealed no concerns with logistic support.

**Peace Corps medical officers (PCMOs) reported that they could adequately support Volunteers with medical accommodations.** Interviews with OHS and post staff showed that the post’s PCMOs had no concerns supporting the number of medically accommodated Volunteers in Paraguay.

**Areas of Volunteer Health Support That Required Management Attention**

The evaluation uncovered some areas of Volunteer health support that required management attention, particularly with the post’s preparation for medical emergencies and support for Volunteer mental health challenges.

**The post was insufficiently prepared for medical emergencies.**

TG 385 on the Medical Action Plan (MAP) outlines the requirement of every post to “develop, document, and regularly update post-specific plans to properly handle potential urgent or emergent medical needs of its Volunteers.” The guidelines require country director oversight of the MAP, which should be kept in a hard-copy binder that contains all MAP documentation and information. In addition, TG 380 on Medical Evacuation, requires country directors to establish procedures to ensure that a Peace Corps vehicle and driver are always available for medical emergencies.

In 2017, the Office of Health Services (OHS) closed a recommendation that the post complete its MAP, indicating that the recommendation had been implemented. However, our review of the post’s MAP binder showed that the post’s MAP was incomplete and not compliant with several requirements. Some of the documents in the MAP binder, such as the site contact forms and
other information sheets, were illegible or incomplete. For instance, in place of the instructions for using specialized communications during an emergency, such as satellite phones, we found instructions to contact the SSM for guidance. In addition, the list of Volunteers did not include required information, such as passport numbers and other data; the transportation resources information required for all parts of the country was not completed for Asuncion; and two health facility assessments were missing. OIG identified that the country director, who had not signed the MAP as required by agency guidelines, provided insufficient oversight of the post’s MAP. The post’s incomplete medical action plan could limit its ability to manage medical emergencies.

During fieldwork, we also learned that the on-call medical duty driver for emergencies outside of normal work hours could be up to an hour away from a PCMO managing an emergency, which could prevent the PCMO from being able to use the duty driver in that situation. We concluded that this arrangement could require a PCMO to spend time solving a transportation problem while responding to a medical emergency.

OIG identified that there was insufficient oversight over the post’s MAP by the country director, who did not sign the MAP as required by agency guidelines. In addition, the Office of Health Services (OHS) had closed a recommendation in 2017 that the MAP be completed, however, our review during fieldwork revealed that the MAP was still incomplete. The post’s incomplete medical action plan could limit its ability to manage medical emergencies.

We recommend:

8. That the country director establish procedures to ensure more timely availability of a driver for medical emergency response.

9. That the country director review and approve the post’s completed medical action plan and submit it to the office of health services for review, feedback, and approval.

The post was not following agency guidance for supporting Volunteer adjustment, resilience, and mental health.

The Peace Corps’ FYs 2018-2022 Strategic Plan promotes Volunteer resiliency outside of the clinical environment, helping Volunteers navigate the challenges of service by increasing “the range of individuals from whom Volunteers can seek support when facing adjustment challenges during service.” In addition, to address the mental health support needs of Volunteers, Technical Guideline (TG) 510 requires PCMOs to establish “therapeutic relationships with all Volunteers” and conduct the initial assessment and care of Volunteers’ mental health before referring Volunteers to licensed mental health care providers.
We found that some programming and training staff were unsure about how to support Volunteers facing adjustment challenges, because there was a lack of clarity and training on their roles in this area. One stated that staff felt fear and uncertainty regarding how to promote Volunteer resiliency and wanted additional training in this area. We also found that some staff bypassed care and referral protocols laid out in TG 510, issuing referrals for local counseling services without the required initial screenings by PCMOs. For example, Volunteers reported being able to make appointments with a counselor in Asuncion by calling or texting staff without PCMO involvement.

The agency’s Counseling and Outreach Unit (COU) had recommended that staff in Paraguay receive training about how to support Volunteer emotional health and when to refer Volunteers to the PCMOs. The post acknowledged that it had not clearly defined roles and expectations for staff or ensured that they were trained to effectively perform their Volunteer support roles. The COU had also made several recommendations to strengthen the PCMO-Volunteer relationship through better communication and trust, as well as recommendations to improve how PCMOs handle Volunteer emotional and mental health support needs.

Twenty-nine percent of Volunteers interviewed during fieldwork were dissatisfied with how the Peace Corps helped them to cope with the challenges of service. Some Volunteers expressed their dissatisfaction with PCMO mental health training and support. Volunteer satisfaction with mental health training in Paraguay was 19 percentage points lower than satisfaction with physical health training. Some Volunteers believed that they would get judged or sent home if they shared anxieties about their personal mental health. Another claimed that dissatisfaction with staff support for adjustment challenges was “the biggest area that Peace Corps can improve, both in terms of training and resources available.”

**We recommend:**

10. That the country director and Peace Corps medical officers adhere to Technical Guideline 510, and clarify to medical staff and Volunteers the referral process for providing mental health counseling support to Volunteers.

11. That the country director clarify roles and train staff to support Volunteer resiliency and adjustment challenges.

**OTHER VOLUNTEER SUPPORT CONCERN**

The post did not consistently protect sensitive Volunteer information.

Manual Section 294 and the post’s staff handbook provide guidance for all staff members on maintaining sensitive and protected Volunteer information. Several Volunteers and staff reported seeing test results with personally identifying information laying on desks in the office, and some
noted that training sessions included real-life examples from which the audience could deduce who was being discussed. Some Volunteers also thought that their medical confidentiality was jeopardized, in part because the medical office was set up in a way that made it easy to overhear what was being discussed and to notice who was entering or leaving the office. The COU also uncovered Volunteer concerns about the sharing of sensitive information at the post and recommended that the post review fund disbursement processes for medical services by non-medical staff to better ensure Volunteer medical confidentiality.

Staff confirmed that breaches in confidentiality, including the pressure to share sensitive information, had occurred under a previous country director. Both staff and Volunteers remarked that maintaining confidential Volunteer information had improved under the country director in place at the time of fieldwork due to corrective actions she had implemented. However, some staff and Volunteers expressed concerns over the post’s lapses in protecting sensitive information. OIG determined that these concerns may keep Volunteers from sharing and reporting important information to staff.

**We recommend:**

12. That the country director develop a process to identify and address Volunteer concerns about the protection of sensitive and confidential Volunteer information.

**Volunteer Administrative Support**

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

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

**Areas of Volunteer Administrative Support That Required Management Attention**

The evaluation uncovered concerns with the collection and analysis of living and settling-in allowance data that required management support.

*The post did not sufficiently analyze Volunteer living-allowance data.*

MS 221 requires that posts conduct living allowance surveys and analyses annually that include data from market-basket surveys and sites of different types, sizes, or locations. OIG found that the post’s living allowance base had remained unchanged since 2010, but Paraguay averaged slightly more than 4 percent annual inflation from 2010 through 2017. One member of senior staff acknowledged that Paraguay has gotten more expensive.
We found that critical data that would inform living allowance analyses was either not collected or not considered by the post. The post reported that it had not conducted a market-basket survey since 2013. These surveys collect prices of staple items listed in the living allowance surveys, verify costs across the country, and are a required part of the allowance analysis process. Additionally, the living allowance was fixed across the post for all Volunteers. The post had not considered costs from different site settings or sizes in the provision of its living allowance.

Nearly one-third of interviewed Volunteers reported concerns that their living allowances were not adequate, citing the lack of differentiation in types or locations of sites as critical factors that impact the adequacy of living allowances.

We recommend:

13. That the director of management and operations conduct annual market-basket surveys as required by MS 221 to inform living allowance analyses.

14. That the country director and director of management and operations ensure that the living allowance survey analyses include consideration of data from different regions of the country, as well as the size and type of sites (i.e. rural or urban).

The post did not sufficiently analyze Volunteer settling-in allowance data.

MS 221 requires that posts conduct settling-in allowance surveys within 3 months of Volunteers receiving their settling-in allowance. The post reported that, like the living allowance, the settling-in allowance also remained unchanged since 2010.

OIG found that the post was not issuing the settling-in allowance survey sufficiently. One member of senior staff reported that the post conducted settling-in allowance surveys once annually. Since the post has two inputs each year spread approximately 6 months apart, Volunteers cannot complete the settling-in allowance survey within the 3-month period allotted by MS 221 if the survey is issued only once per year. In addition, only 12 Volunteers filled out the most recent settling-in survey at the time of fieldwork, which limits the data necessary to make informed decisions. Further, the post did not consider pertinent settling-in data with its analyses. For example, several Volunteers informed us that they relied upon personal savings to supply their home with high-cost items not provided by their host families or donated by previous Volunteers, such as refrigerators or beds. OIG found that 49 percent of the Volunteers surveyed reported that their settling-in allowance was inadequate.
We recommend:

15. That the director of management and operations conduct a settling-in allowance survey within 3 months of Volunteers receiving the settling-in allowance, as required by Manual Section 221.

16. That the country director and director of management and operations work with Volunteers to increase settling-in allowance survey participation and the post’s understanding of Volunteer settling-in challenges.

**LEADERSHIP AND MANAGEMENT: STAFFING RESOURCES**

In our evaluation, we assessed the post’s management of staffing resources using the following researchable question to guide our work:

Has leadership effectively managed staffing and staff capacity?

**AREAS OF NO CONCERN**

**Position duties were well defined.** Staff agreed that their duties and responsibilities were clear and well defined.

**Staff was fully compliant with the sexual assault risk reduction and response (SARRR) training required by the Kate Puzey Volunteer Protection Act of 2011.** We found that 100 percent of staff had received SARRR training as required, including a 100 percent certification of designated staff.⁵

**LEADERSHIP AND MANAGEMENT: COMMUNICATION AND COLLABORATION**

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

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

**AREAS OF NO CONCERN**

**The post had an effective relationship with the U.S. Embassy.** The working relationship between the post and the Embassy was excellent, with one Embassy staff member calling this an “A-plus relationship.” All Embassy staff interviewed emphasized their confidence in the country

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⁵ Designated staff at the post are PCMOs, Sexual Assault Response Liaisons (SARLs), and SSMs who have special responsibilities in sexual assault response and have access to restricted reports of sexual assaults against Volunteers.
director, and both groups cited the Peace Corps’ significant role and positive impact in overall Paraguay-U.S. relations.

The Volunteer Advisory Committee (VAC) was effective. Volunteers reported that the VAC was representing their concerns to staff. Staff expressed that the VAC was thoughtful and professional in sharing its recommendations with them. VAC meetings occur four times per year, and can include ministerial representatives and partners, in addition to staff and Volunteers.

The post had open communication and an effective working relationship with headquarters. The post reported that it communicates with headquarters openly and systematically to better ensure efficiency and support. The Inter-America and Pacific Region indicated that the country director communicated effectively, and headquarters-Peace Corps/Paraguay relations are good.

Areas of Communication and Collaboration That Required Management Attention

Above we indicated that insufficient collaboration between programming and training contributed to ineffective Volunteer technical training.
WE RECOMMEND:

1. That the director of programming and training work with staff and Volunteers to integrate training on harassment into language, cultural, and other aspects of trainings so that Volunteers in Paraguay learn appropriate and practical ways to mitigate and respond to harassment they may experience.

2. That the director of programming and training ensure that project framework revisions are appropriately limited in focus to facilitate more in-depth technical training that prepares Volunteers to carry out their primary assignments.

3. That the director of programming and training improve collaboration between the programming and training teams in the design and delivery of technical training for Volunteers.

4. That the director of programming and training improve completeness, management, and use of site history information consistent with agency guidance on site history files.

5. That the country director and director of programming and training develop a plan to improve management and oversight of a more consistent and efficient site identification and selection process.

6. That the director of programming and training develop, document, and implement site identification criteria that help the post select suitable host families, counterparts, organizations, and communities.

7. That the country director and safety and security manager plan for more timely testing to reinforce Volunteer knowledge of consolidation points.

8. That the country director establish procedures to ensure more timely availability of a driver for medical emergency response.

9. That the country director review and approve the post’s completed medical action plan and submit it to the office of health services for review, feedback, and approval.

10. That the country director and Peace Corps medical officers adhere to Technical Guideline 510, and clarify to medical staff and Volunteers the referral process for providing mental health counseling support to Volunteers.

11. That the country director clarify roles and train staff to support Volunteer resiliency and adjustment challenges.
12. That the country director develop a process to identify and address Volunteer concerns about the protection of sensitive and confidential Volunteer information.

13. That the director of management and operations conduct annual market-basket surveys as required by MS 221 to inform living allowance analyses.

14. That the country director and director of management and operations ensure that the living allowance survey analyses include consideration of data from different regions of the country, as well as the size and type of sites (i.e. rural or urban).

15. That the director of management and operations conduct a settling-in allowance survey within 3 months of Volunteers receiving the settling-in allowance, as required by Manual Section 221.

16. That the country director and director of management and operations work with Volunteers to increase settling-in allowance survey participation and the post’s understanding of Volunteer settling-in challenges.
APPENDIX A: OBJECTIVE, SCOPE, AND METHODOLOGY

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

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

The Evaluation Unit announced its intent to conduct an evaluation of the post on June 26, 2018. For post evaluations, we use the following researchable questions to guide our work:

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

B. Training:
   • Do trainings prepare Volunteers for service?

C. Site Management:
   • Are sites, housing, and work assignments appropriate and meeting all established criteria?

D. Volunteer Safety and Security Support:
   • Is post sufficiently prepared to respond to emergencies and security incidents?
   • Are preventative safety and security measures adequate?

E. Volunteer Health Support:
   • Is the health care program meeting Volunteers’ needs?

F. Volunteer Administrative Support:
   • Does the administrative unit provide sufficient support to Volunteers, including allowances and reimbursements?

G. Communication and Collaboration:
   • Do staff effectively communicate and collaborate with each other, Volunteers, and other stakeholders?

H. Staffing Resources Management:
   • Has leadership effectively managed staffing and staff capacity?
The evaluation team conducted the preliminary research portion of the evaluation between June 26 and August 24, 2018. This research included a review of agency and post documents provided by headquarters and post staff; interviews with headquarters staff representing the Inter-America and Pacific Region, the Office of Safety and Security, the Office of Health Services, the Office of Programming and Training Support, and the Office of Global Health and HIV; and inquiries to Peace Corps Response and the Office of Victim Advocacy. We also conducted online surveys that were completed by 105 Peace Corps/Paraguay Volunteers and 29 Peace Corps/Paraguay staff.

In-country fieldwork occurred from August 27 through September 14, 2018 and included interviews with post leadership and staff in programming, training, and support roles. At the U.S. Embassy in Asuncion we met with the U.S. Ambassador, deputy chief of mission, and the regional security officer. We met with five host country government ministry officials. In addition, we interviewed a stratified judgmental sample of 27 Volunteers (15 percent of Volunteers serving at the time of our visit) and 4 Peace Corps Volunteer Coordinators, and inspected 26 Volunteer living spaces.

The scope of the evaluation encompassed 3 years, from 2015 to 2018, to include the 24-month span in-country of most Volunteers.

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

As part of this post evaluation, interviews were conducted with 31 Volunteers, 6 staff in-country, and 26 key stakeholders, including Peace Corps headquarters staff, officials with the U.S. Embassy in Paraguay, and host country ministry officials.

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

Table 1: Volunteer Demographic Data

<table>
<thead>
<tr>
<th>Project</th>
<th>Percentage of Volunteers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture</td>
<td>33.3</td>
</tr>
<tr>
<td>Community Economic Development</td>
<td>14.8</td>
</tr>
<tr>
<td>Health</td>
<td>18.6</td>
</tr>
<tr>
<td>Environment</td>
<td>33.3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Gender</th>
<th>Percentage of Volunteers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female</td>
<td>66.7</td>
</tr>
<tr>
<td>Male</td>
<td>33.3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Age</th>
<th>Percentage of Volunteers</th>
</tr>
</thead>
<tbody>
<tr>
<td>25 or younger</td>
<td>44.4</td>
</tr>
<tr>
<td>26-29</td>
<td>37.1</td>
</tr>
<tr>
<td>30-49</td>
<td>14.8</td>
</tr>
<tr>
<td>50 and over</td>
<td>3.7</td>
</tr>
</tbody>
</table>

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

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6 This includes four Peace Corps Volunteer Coordinators.
At the time of our field visit, the post had 58 permanent staff positions. The post periodically employed temporary staff to assist with training, however we did not interview these staff.

<table>
<thead>
<tr>
<th>Position</th>
<th>Status</th>
<th>Interviewed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cashier</td>
<td>PSC</td>
<td></td>
</tr>
<tr>
<td>Country Director</td>
<td>USDH</td>
<td>X</td>
</tr>
<tr>
<td>Director of Management and Operations</td>
<td>USDH</td>
<td>X</td>
</tr>
<tr>
<td>Director of Programming and Training</td>
<td>USDH</td>
<td>X</td>
</tr>
<tr>
<td>Driver</td>
<td>PSC</td>
<td></td>
</tr>
<tr>
<td>Administrative Specialist (Acting Director of Management and Operations)</td>
<td>FSN</td>
<td>X</td>
</tr>
<tr>
<td>General Services Assistant</td>
<td>PSC</td>
<td></td>
</tr>
<tr>
<td>General Services Manager</td>
<td>PSC</td>
<td></td>
</tr>
<tr>
<td>IT Specialist</td>
<td>PSC</td>
<td></td>
</tr>
<tr>
<td>Language &amp; Culture Coordinator</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Language and Cultural Facilitator (2)</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Master Trainer</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Medical Assistant</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Medical Officer (3)</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Monitoring, Reporting, &amp; Evaluation Coordinator</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Program Manager (4)</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Program Assistant (2)</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Program Specialist (2)</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Safety &amp; Security Manager</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Safety &amp; Security Assistant</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Training Director</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Technical Trainer (2)</td>
<td>PSC</td>
<td>X</td>
</tr>
<tr>
<td>Voucher Examiner/Travel Coordinator/Receptionist</td>
<td>PSC</td>
<td></td>
</tr>
</tbody>
</table>

Data as of June 2018. *PSC is personal services contractor; FSN is foreign service national.
We conducted 26 additional interviews with key stakeholders during the preliminary research phase of the evaluation and in-country fieldwork.

<table>
<thead>
<tr>
<th>Position</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S. Ambassador</td>
<td>U.S. Embassy/Paraguay</td>
</tr>
<tr>
<td>Deputy Chief of Mission</td>
<td>U.S. Embassy/Paraguay</td>
</tr>
<tr>
<td>Regional Security Officer</td>
<td>U.S. Embassy/Paraguay</td>
</tr>
<tr>
<td>Director of the Pedagogical Section</td>
<td>Paraguay Ministry of Education</td>
</tr>
<tr>
<td>Former Official(^7)</td>
<td>Paraguay Ministry of Health</td>
</tr>
<tr>
<td>Program Coordinator</td>
<td>Paraguay Ministry of Agriculture</td>
</tr>
<tr>
<td>Director</td>
<td>Association of Young Entrepreneurs of Paraguay</td>
</tr>
<tr>
<td>Director</td>
<td>World Wildlife Fund/Paraguay</td>
</tr>
<tr>
<td>Chief of Operations (2)</td>
<td>Peace Corps Headquarters, IAP</td>
</tr>
<tr>
<td>Chief of Programming and Training</td>
<td>Peace Corps Headquarters, IAP</td>
</tr>
<tr>
<td>Chief Administrative Officer</td>
<td>Peace Corps Headquarters, IAP</td>
</tr>
<tr>
<td>Country Desk Officer</td>
<td>Peace Corps Headquarters, IAP</td>
</tr>
<tr>
<td>Monitoring and Evaluation Specialist</td>
<td>Peace Corps Headquarters, IAP</td>
</tr>
<tr>
<td>Programming and Training Specialist</td>
<td>Peace Corps Headquarters, IAP</td>
</tr>
<tr>
<td>Regional Security Advisor</td>
<td>Peace Corps Headquarters, IAP</td>
</tr>
<tr>
<td>Peace Corps Safety and Security Officer</td>
<td>Peace Corps Headquarters, Office of Safety and Security</td>
</tr>
<tr>
<td>Placement Specialist</td>
<td>Peace Corps Headquarters, Office of Volunteer Recruitment and Selection</td>
</tr>
<tr>
<td>Director</td>
<td>Peace Corps Headquarters, Office of Global Health and HIV</td>
</tr>
<tr>
<td>Program Specialist</td>
<td>Peace Corps Headquarters, Office of Global Health and HIV</td>
</tr>
<tr>
<td>Acting Director</td>
<td>Peace Corps Headquarters, Office of Health Services</td>
</tr>
<tr>
<td>Director, Office of Medical Services</td>
<td>Peace Corps Headquarters, Office of Health Services</td>
</tr>
<tr>
<td>Chief, Quality Improvement</td>
<td>Peace Corps Headquarters, Office of Health Services</td>
</tr>
<tr>
<td>AG Specialist</td>
<td>Peace Corps Headquarters, Office of Programming and Training Support</td>
</tr>
<tr>
<td>CED Specialist</td>
<td>Peace Corps Headquarters, Office of Programming and Training Support</td>
</tr>
<tr>
<td>Program Specialist ENV</td>
<td>Peace Corps Headquarters, Office of Programming and Training Support</td>
</tr>
</tbody>
</table>

Data as of August 2018.

\(^7\) This individual worked in the Ministry of Health until 2018, and worked with Peace Corps in that capacity.
## APPENDIX C: LIST OF ACRONYMS

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CD</td>
<td>Country Director</td>
</tr>
<tr>
<td>COS</td>
<td>Close of Service</td>
</tr>
<tr>
<td>COU</td>
<td>Counseling and Outreach Unit</td>
</tr>
<tr>
<td>DPT</td>
<td>Director of Programming and Training</td>
</tr>
<tr>
<td>IAP</td>
<td>Inter-America and Pacific Region</td>
</tr>
<tr>
<td>LCF</td>
<td>Language and Cross-Cultural Facilitator</td>
</tr>
<tr>
<td>LPI</td>
<td>Language Proficiency Interview</td>
</tr>
<tr>
<td>MAP</td>
<td>Medical Action Plan</td>
</tr>
<tr>
<td>MS</td>
<td>Peace Corps Manual Section</td>
</tr>
<tr>
<td>OGHH</td>
<td>Office of Global Health and HIV</td>
</tr>
<tr>
<td>OHS</td>
<td>Peace Corps Office of Health Services</td>
</tr>
<tr>
<td>OIG</td>
<td>Peace Corps Office of Inspector General</td>
</tr>
<tr>
<td>PCMO</td>
<td>Peace Corps Medical Officer</td>
</tr>
<tr>
<td>PCVC</td>
<td>Peace Corps Volunteer Coordinator</td>
</tr>
<tr>
<td>PM</td>
<td>Program Manager</td>
</tr>
<tr>
<td>PSN</td>
<td>Peer Support Network</td>
</tr>
<tr>
<td>PST</td>
<td>Pre-Service Training</td>
</tr>
<tr>
<td>PTA</td>
<td>Programming and Training Assistant</td>
</tr>
<tr>
<td>RMHO</td>
<td>Regional Mental Health Officer</td>
</tr>
<tr>
<td>RMO</td>
<td>Regional Medical Officer</td>
</tr>
<tr>
<td>SARRR</td>
<td>Sexual Assault Risk Reduction and Response</td>
</tr>
<tr>
<td>SSM</td>
<td>Safety and Security Manager</td>
</tr>
<tr>
<td>SOP</td>
<td>Standard Operating Procedure</td>
</tr>
<tr>
<td>TAP</td>
<td>Trainee Assessment Portfolio</td>
</tr>
<tr>
<td>TDY</td>
<td>Temporary Duty Assignment</td>
</tr>
<tr>
<td>TEFL</td>
<td>Teaching English as a Foreign Language</td>
</tr>
<tr>
<td>TG</td>
<td>Peace Corps Medical Technical Guideline</td>
</tr>
<tr>
<td>TM</td>
<td>Training Manager</td>
</tr>
<tr>
<td>TOT</td>
<td>Training of Trainers</td>
</tr>
<tr>
<td>VAC</td>
<td>Volunteer Advisory Council</td>
</tr>
</tbody>
</table>
MEMORANDUM

To: Kathy Buller, Inspector General

Through: Anne Hughes, Chief Compliance Officer

From: Gregory Huger, Regional Director IAP Region
       Howard Lyon, Country Director, Paraguay

Date: July 5, 2019

CC: Jody K. Olsen, Director
    Michelle K. Brooks, Chief of Staff
    Matthew McKinney, Deputy Chief of Staff/White House Liaison
    Maura Fulton, Senior Advisor to the Director
    Robert Shanks, General Counsel
    Patrick Young, Associate Director, Office of Global Operations
    Shawn Bardwell, Associate Director, Office of Safety and Security
    Karen Becker, Associate Director, Office of Health Services
    Jill Carty, Director, Counseling and Outreach Unit, Office of Health Services
    Mary Kate Lowndes, Chief of Operations, IAP Region
    Lindsey Suggs, Chief of Programming and Training, IAP Region
    Gonzalo Molina Zegarra, Chief Administrative Officer, IAP Region
    Joshua O’Donnell, Regional Security Adviser, Inter-America and the Pacific
    Dawn Crosby, Director of Programming and Training, Paraguay

Subject: Preliminary Report on the Program Evaluation of Peace Corps/Paraguay (Project No. 18-Eval-09)
Enclosed please find the agency’s response to the recommendations made by the Inspector General for Peace Corps/Paraguay as outlined in the Preliminary Report on the Evaluation of Peace Corps/Paraguay (Project No. 18-Eval-09) given to the agency on May 20, 2019.

The Region and the Post have concurred with all 16 recommendations provided by the OIG in its Preliminary Report on the evaluation of Peace Corps/Paraguay and have provided documentation for four of the 16 recommendations. Post will work to address the remaining recommendations by the set target dates.

**Recommendation 1**
That the director of programming and training work with staff and Volunteers to integrate training on harassment into language, cultural, and other aspects of trainings so that Volunteers in Paraguay learn appropriate and practical ways to mitigate and respond to harassment they may experience.

**Concur**

**Response:** Post will train Volunteers on specific strategies to mitigate and respond to harassment in Paraguay and will deliver the training in both Spanish and Guarani. During the Pre Service Training (PST) “Unsafe Unwanted Attention” session, post will distribute a list of possible mitigation and response strategies to be developed with the Volunteer Advisory Committee (VAC) in English, Spanish, and Guarani.

The Director of Programming and Training (DPT) and Safety and Security Manager (SSM) have engaged the VAC to develop a list of the most common situations encountered by Volunteers to be included in the “Unsafe Unwanted Attention” session as mentioned above, and also as an annex to the Volunteer Handbook. The VAC will also develop recommendations on how to improve training on harassment mitigation and response.

The SSM will consult the Peace Corps Safety and Security Officer (PCSSO) on training recommendations for harassment mitigation and response to learn of best practices at other posts. Post will also include a panel discussion during PST, led by Host Country National (HCN) staff, in which staff shares anecdotes and strategies about how they have dealt with harassment situations, unwanted attention, and uncomfortable expressions of gender roles. Also during PST, a working lunch hosted by Peer Support Network members will be offered so that Peace Corps Trainees (PCTs) who wish to connect with sympathetic and trained peers may do so before heading out to their sites.

During the PST Host Family orientation, staff will share with host families that Trainees will be given a list of possible responses to harassment and ask that they review the list with the Trainee and practice some of the responses together. During MST, a Volunteer-developed session on “Gender in Paraguay” is being added starting in July 2019.
Documents to be Submitted:
- Updated “Unsafe Unwanted Attention” session
- VAC documentation on common harassment situations and mitigation/response strategies
- “Gender in Paraguay” session
- Updated Volunteer handbook

Status and Timeline for Completion: September 2019

Recommendation 2
That the director of programming and training ensure that project framework revisions are appropriately limited in focus to facilitate more in-depth technical training that prepares Volunteers to carry out their primary assignments.

Concur
Response: Post has undergone the Programming, Training, and Evaluation (PTE) alignment process with three of its four sectors – Agriculture, Environment and Health. All Volunteers interviewed during the OIG program evaluation had been trained and were working under the previous project frameworks that had not yet gone through PTE alignment. The first PST cohort at post trained and working under a revised Logical Project Frameworks (LPF) swore-in to service in November 2018 in the Agriculture sector, two months after data collection for the program evaluation occurred. The Agriculture and Health programs were endorsed by Region, while the Environment program has submitted for endorsement and is under region review for endorsement. All three sectors are notably more focused-in as a result of the PTE alignment process.

Post will develop and incorporate into PST technical training a series of checklists detailing Volunteer tasks to undertake for each activity in the project framework. Checklists will include a time frame and specific steps along the way, or milestones, in order to give Trainees/Volunteers a greater sense of how to go about implementing primary work activities. In addition, post will increase the participation of our Paraguayan institutional partners in PST technical training. Sessions for the Agricultural and Health sectors can be enhanced by the presence of representatives from the Paraguayan institutional partners with whom we work.

Post will also invite a successful Community Work Partner-PCV pair from the sister sector group to the PST session “Understanding Your Work Partners”. The presence of working and successful role models from the sector will enhance the relevance of this session for the Trainees and afford them greater opportunity to learn about specific strategies and activities they can use to build positive relationships with their work partners.
Recommendation 3
That the director of programming and training improve collaboration between the programming and training teams in the design and delivery of technical training for Volunteers.

Concur
Response: For improved collaboration overall post will take advantage of the PTE alignment process and its corresponding tools and processes to foster improved co-ownership of training design when redesigning the PST for all four sectors. For improved collaboration specific to PST post will advance final site approval meeting by one week to allow for more availability of program staff to participate in PST starting earlier in PST. There will also be participation of program staff during (Training of Trainers) TOTs, including and most importantly, that program staff are involved in the development of the (Calendar of Training Events) COTE. For improved collaboration for ISTs post will ensure training staff along with programming staff will participate in IST planning, design, and implementation, including the needs assessment prior to design of the event and thereafter the evaluation of the training event. Program staff will also share with training staff the feedback received from PCVs during site visits in order to consider those recommendations for both PST and ISTs.

Documents to be Submitted:
• COTE and sessions design for C-2 (Agriculture and Environment)
• Redesign of CED and Youth Health 27-month learning continuum

Status and Timeline for Completion: March 2020

Recommendation 4
That the director of programming and training improve completeness, management, and use of site history information consistent with agency guidance on site history files.

Concur
Response: Post is currently reviewing existing procedures for Records Management according to the Records Management Office’s (RMO) Annual File Plan Review and the existing Post File Plan. Post will form a working group with Programming, Safety & Security, and the Medical
Office to create Standard Operating Procedures (SOP) in accordance with Safety and Security Instruction (SSI) 401 Site History Files for the timely and effective management of site history files so that the files are complete and organized and so that relevant staff (Programming, Training, PCMO, S&S) have feasible access to these files in order to keep them up-to-date and to use them for site evaluation, approval and placement.

Post is currently reviewing examples of Site History File SOPs from PC/Panama and PC/Dominican Republic. The same working group will also develop a plan for fully populating the current site history files with any missing documentation located in other files. The SOP will include how VIDA will be utilized for site tracking, notes on visits, and other observations. Relevant staff will be trained on the SOP and utilizing VIDA for site tracking, notes, and relevant functions.

**Documents to be Submitted:**
- Post File Plan
- Site History File, SOP
- Proof of staff training

**Status and Timeline for Completion:** February 2020

**Recommendation 5**
That the country director and director of programming and training develop a plan to improve management and oversight of a more consistent and efficient site identification and selection process.

**Concur**
Response: Post will update its Site ID and Monitoring Guidelines manual. The update will take into consideration OIG’s findings during the program evaluation and will include the new SOP for Site History Files as well as written criteria for host family selection. The revised manual will be in-line with IAP’s Site ID and Monitoring Standards, as is the current one.

Post has already begun significant work to address some of issues related to this recommendation. For example, for the most recent round of sites approved in May 2019, the majority of site family surveys included a list of family members living in the house. This will be a required practice for site approval in the revised manual as well. Additionally, post has requested from the IAP Region examples from other posts on how to better evidence ‘at least one enthusiastic work partner’ for site approval.

The process of revising the Site ID and Monitoring Guidelines manual will be led by the DPT who will engage other staff for input, review, and finalization. Post will train staff on revised procedures and requirements.
Documents to be Submitted:
- Revised Post Site ID and Monitoring Guidelines manual
- CED Implementation Plan (for new LPF – not yet developed)
- Agriculture Implementation Plan (for new LPF - endorsed)
- Environment Implementation Plan (for new LPF – when endorsed)
- Youth Health Implementation Plan (for new LPF - endorsed)

Status and Timeline for Completion: February 2020

Recommendation 6
That the director of programming and training develop, document, and implement site identification criteria that help the post select suitable host families, counterparts, organizations, and communities.

Concur
Response: Post has already begun significant work to address some of issues related to this recommendation. For example, for the most recent round of sites approved in May 2019, the majority of site family surveys included a list of family members living in the house. This will be a required practice for site approval in the revised manual as well. Additionally, post has requested from the IAP Region examples from other posts on how to better evidence ‘at least one enthusiastic work partner’ for site approval.

As part of the PTE alignment process each project must have outlined in the implementation plan a site selection strategy and identify who the community level counterparts will be. Post believes that in addition to improving the site identification and selection processes and criteria, that improved project design will dramatically contribute to better site identification and selection. For example, as part of the redesign of the Health sector not only is the Ministry of Health going to participate in site selection (as the Ministry of Education now does with the Agriculture sector) but also the new project will be focused geographically in about four departments (or states) of Paraguay. The team plans to only be in two states per input. This means that program staff will be able to dedicate significantly more time to state-level and district-level relationships with institutional counterparts, and also spend much more time in each community during site identification/preparation and site visits, thus increasing the quality of the work while also reducing staff burnout.

Additionally, the revised project designs in all three sectors with new LPFs contemplate a three-generation model which means that each sector should be in approximately 50 sites for the next 6-7 years. This has significant implications for improved site identification and management as the teams will be able to invest more time and energy in each community while the workload burden for the out-generations will be notably reduced since close to all sites will be follow-up sites and that is known from the beginning of site selection for the first generation.
The process of revising the Site ID and Monitoring Guidelines manual will be led by the DPT who will engage other staff for input, review, and finalization. Post will train staff on revised procedures and requirements.

**Documents to be Submitted:**
- Revised Post Site ID and Monitoring Guidelines manual
- CED Implementation Plan (for new LPF – not yet developed)
- Agriculture Implementation Plan (for new LPF - endorsed)
- Environment Implementation Plan (for new LPF – when endorsed)
- Youth Health Implementation Plan (for new LPF - endorsed)

**Status and Timeline for Completion:** February 2020

**Recommendation 7**
That the country director and safety and security manager plan for more timely testing to reinforce Volunteer knowledge of consolidation points.

**Concur**
**Response:** Post began a series of Consolidation Point Drills in early 2018. The Consolidation Point Drills were done over that year and during the OIG visit. They were conducted in regional Department where PCVs are assigned with one Consolidation Point Drill per Department. Consolidation Point Drills are planned for 2019 on a quarterly basis as a normal practice for Post. A report of every drill conducted was provided to the PCSSO and IAP Region’s RSA and will be submitted as supporting documentation in response to this recommendation. Measures Post has implemented to provide information about the Consolidation Point name, phone number, and location include an EAP Quick Reference for PCVs, ensuring trainees confirm the information on their consolidation point it before departure to site and ensuring it is noted in the Site Contact Form that Trainees fill out.

During every PST an adhesive sticker with emergency numbers is distributed to Trainees. Consolidation Point information will now be included on this sticker. Additionally, an electronic contact card will be distributed to all PCVs to download to their cell phones. This will include a photo of the Consolidation Point with address, phone numbers, and GPS coordinates. This will be a standard practice, conducted twice a year, to ensure that PCVs have the correct information in their cell phones.
Documents to be Submitted:
- Sample of Stickers with Emergency Information
- Sample of Contact Card (.jpg format)
- Consolidation Point Drill - List of Participants March to December 2018 (8 Drills done)
- Sample of EAP Quick Reference
- Sample of Site Contact Form
- Sample of Site Survey

Status and Timeline for Completion: October 2019

Recommendation 8
That the country director establish procedures to ensure more timely availability of a driver for medical emergency response.

Concur
Response: To ensure timely availability of a designated driver for a medical emergency response, Post will strengthen its existing rotational Duty Officer system, one which utilizes a three-person team approach involving the Duty Officer, Duty PCMO, and Duty Driver. The system has been in place for many years and proven effective during emergencies. The duty roster is distributed at the beginning of each year to all personnel and thereafter on a weekly basis. A weekly e-mail is sent to all staff and the American Embassy’s RSO with the names of the respective duty staff for the week.

Post currently has five designated drivers who rotate as a Duty Driver on a weekly basis. Duty Drivers maintain a calendar of their duty weeks for the year and are on call during their rotation. A Duty Officer Handbook describes the functions and responsibilities of the Duty Officers and Drivers. The Duty Officer serves a dual function that includes that of a designated Driver if necessary. In case of an emergency, medical or otherwise, the Duty Driver or the Duty Officer performing the driving function must come to the office to pick up an official vehicle.

Documents to be Submitted:
- Duty Roster
- Weekly email sample

Status and Timeline for Completion: September 2019
**Recommendation 9**
That the country director review and approve the post’s completed medical action plan and submit it to the office of health services for review, feedback, and approval.

**Concur**
**Response:** The former Country Director reviewed and signed Post’s Medical Action Plan (MAP) in October 2018. The Office of Health Service does not review MAPs, only the table top exercises that are conducted each year. TG 385 *Medical Action Plan* outlines the process and does not state that OHS reviews the MAP. The table top exercise was conducted in August 2018 and was documented as completed by OHS on August 22, 2018.

**Documents Submitted:**
- Technical Guideline 385 *Medical Action Plan*
- Table Top Exercise scenario for 2018
- E-mail exchange with OHS on August 22, 2018, documenting that the 2018 exercise was completed
- E-mail from OHS on June 12, 2019, stating that OHS does not review MAPs
- Cover sheet of Post MAP signed by CD

**Status and Timeline for Completion:** Completed, June 201

**Recommendation 10**
That the country director and Peace Corps medical officers adhere to Technical Guideline 510, and clarify to medical staff and Volunteers the referral process for providing mental health counseling support to Volunteers.

**Concur**
**Response:** Moving forward, at senior staff and medical staff meetings time will be dedicated to describe and clarify the referral process for providing mental health counseling support to Volunteers. Trainees receive guidance about mental health support during Pre-Service Training. The referral process for providing mental health counseling is also presented at quarterly Volunteer Advisory Committee meetings. Volunteers receive guidance on mental health support and counseling services during individual consultations that require them. Quarterly newsletters will be designed and distributed to PCVs will include reminder guidance on the referral process for providing mental health counseling support to Volunteers. The referral process will also be addressed at annual Peer Support Network training for new Volunteer members.
Documents to be Submitted:
- A copy of the first quarterly Medical Newsletter
- Two Power Point mental health sessions presented during Pre-Service Training (PST) that will be adapted for presentation to staff.
- Related staff training sessions

Status and Timeline for Completion: October 2019

Recommendation 11
That the country director clarify roles and train staff to support Volunteer resiliency and adjustment challenges.

Concur
Response: The PCMOs will design a specific training for staff that clarifies roles and trains staff to support Volunteer resiliency and adjustment challenges. This will be a four-hour session, including role plays and scenarios, at a staff retreat that will be facilitated by the PCMOs, a local counselor, and Post Trainers. This training will be presented by the end of Q1, FY20. The themes of resiliency and adjustment challenges will be regularly featured in a quarterly Medical Newsletter designed for Volunteers and staff (described under Recommendation 10). Post will request that OHS’s “Resiliency Training Pilot” be adapted for use by staff to develop their own skills in supporting Volunteers

Documents to be Submitted:
- The adapted-for-staff “Resiliency Training”
- New training module facilitated by the end of Q1, FY2020

Status and Timeline for Completion: October 2020

Recommendation 12
That the country director develop a process to identify and address Volunteer concerns about the protection of sensitive and confidential Volunteer information.

Concur
Response: The country director will establish and maintain a culture of strict adherence to confidentiality guidelines throughout the office. Staff will be instructed through periodic trainings and by leadership example how to respect and protect medical confidentiality. There will be a clear expectation that part of a staff member’s annual performance evaluation will be adherence to Peace Corps principles and policies of confidentiality and privacy. The protection of Volunteer confidential and sensitive information will be periodically addressed with all personnel at every senior and all-staff meetings.
During the orientation process of new employees, the country director and human resources specialist will indicate the employee’s responsibility for protecting the confidentiality of Volunteer information to ensure that new staff clearly understand expectations and accountability in this area. The Staff Handbook will be updated to add a paragraph to ensure that staff understand the importance of protecting sensitive and confidential Volunteer information.

The medical offices have been outfitted to protect sensitive and confidential information. To properly absorb sounds, the private physician offices and examination rooms have been insulated with soundproof wall panels. Low volume music is played in the waiting area to mask any audible conversations in the offices. Hard copies of medical information are kept in locked cabinets and electronic data is password protected. Non-medical staff do not have access to areas of the medical office where they could be exposed to confidential information. PCMOs will provide annual training to staff about medical confidentiality, privacy, and the requirements of Section 264 of the HIPPA Act.

**Documents to be Submitted:**
- Sample of revised employee SOW once the paragraph on confidentiality has been added
- Updated Staff Handbook with the section on protecting confidential and sensitive Volunteer information
- Agenda for New Staff Orientation
- A Sample Staff Meeting Agenda
- Photographs of protective measures made in medical offices to protect sensitive and confidential information
- *PowerPoint confidentiality and HIPPA trainings given to all Peace Corps staff*

**Status and Timeline for Completion:** November 2019

**Recommendation 13**
That the director of management and operations conduct annual market-basket surveys as required by MS 221 to inform living allowance analyses.

**Concur**

**Response:** The market-basket survey was conducted in February-March 2019 in conjunction with the 2019 Living Allowance (LA) Survey. It served as a basis for verifying the LA survey results and justifying the corresponding increase to the LA base. In addition, the Director of Management and Operations and the Deputy Director of Management and Operations will coordinate and schedule with program and other traveling staff to compete quarterly price checks during site visits that will supplement and update the market basket data on a continuous basis.
Recommendation 14
That the country director and director of management and operations ensure that the living allowance survey analyses include consideration of data from different regions of the country, as well as the size and type of sites (i.e. rural or urban).

Concur
Response: A Living Allowance (LA) Survey was conducted in January – February 2019 with 83% Volunteer participation. Data from different regions of the country was analyzed indicated that the difference in the prices of food and household items were generally similar around the country, this due to popular grocery chains like Superseis and Stock keeping their prices consistent regardless of location. Where a price difference is most pronounced is in the housing component of the living allowance with urban areas or tourist destinations being much higher than the rural areas. The housing/site type level reflects this difference and was further adjusted in level three (small town) to account for the increase in housing costs as detailed in the survey results.

Documents Submitted:
- Living Allowance Survey Analysis
- Living Allowance Summary

Status and Timeline for Completion: Completed, February 2019

Recommendation 15
That the director of management and operations conduct a settling-in allowance survey within 3 months of Volunteers receiving the settling-in allowance, as required by Manual Section 221.

Concur
Response: The settling in allowance survey has been completed within three months of the two most recent cohorts arrival at site and this practice will continue moving forward. G-53 Settling-In (SI) Survey was conducted and analyzed in September 2018, within 3 months of G-53 receiving the SI allowance in August 2018. G-54 SI Survey was conducted in April 2019 and analyzed in May 2019, within 3 months of G-54 receiving the SI allowance in March 2019
**Documents Submitted:**
- Settling-In Allowance Summary for Groups 53 and 54

**Status and Timeline for Completion:** Completed, June 2019

**Recommendation 16**
That the country director and director of management and operations work with Volunteers to increase settling-in allowance survey participation and the post’s understanding of Volunteer settling-in challenges.

**Concur**
**Response:** A meeting with the Volunteer Advisory Committee occurred in June 2019 and a survey analysis will be performed in November 2019 to monitor the level of participation with the revised approach.

**Documents to be Submitted:**
- Revised Settling-In Allowance Survey (once discussed with VAC and implemented for Group C-1 in September 2019)
- Proposed Format for Settling-in Allowance Survey
- E-mail with VAC agenda proposing this subject for the next VAC meeting

**Status and Timeline for Completion:** December 2019
APPENDIX E: OIG COMMENTS

Management concurred with all 16 recommendations. Thirteen recommendations, numbers 1-12 and 16, remain open. Based on the documentation provided, we closed 3 recommendations: numbers 13-15. In its response, management described actions it is taking or intends to take to address the issues that prompted each of our recommendations. We wish to note that in closing recommendations, we are not certifying that the agency has taken these actions or that we have reviewed their effect. Certifying compliance and verifying effectiveness are management’s responsibilities. However, when we feel it is warranted, we may conduct a follow-up review to confirm that action has been taken and to evaluate the impact.

OIG will review and consider closing recommendations 1, 4, 6-7, 9-12, and 16 when the documentation reflected in the agency’s response to the preliminary report is received. For recommendations 2, 3, 5 and 8 additional documentation is required. These recommendations remain open pending confirmation from the chief compliance officer that the documentation reflected in our analysis below is received.

Recommendation 2
That the director of programming and training ensure that project framework revisions are appropriately limited in focus to facilitate more in-depth technical training that prepares Volunteers to carry out their primary assignments.

Concur
Response: Post has undergone the Programming, Training, and Evaluation (PTE) alignment process with three of its four sectors – Agriculture, Environment and Health. All Volunteers interviewed during the OIG program evaluation had been trained and were working under the previous project frameworks that had not yet gone through PTE alignment. The first PST cohort at post trained and working under a revised Logical Project Frameworks (LPF) swore-in to service in November 2018 in the Agriculture sector, two months after data collection for the program evaluation occurred. The Agriculture and Health programs were endorsed by Region, while the Environment program has submitted for endorsement and is under region review for endorsement. All three sectors are notably more focused-in as a result of the PTE alignment process.

Post will develop and incorporate into PST technical training a series of checklists detailing Volunteer tasks to undertake for each activity in the project framework. Checklists will include a time frame and specific steps along the way, or milestones, in order to give Trainees/Volunteers a greater sense of how to go about implementing primary work activities. In addition, post will increase the participation of our Paraguayan institutional partners in PST technical training. Sessions for the Agricultural and Health sectors can be enhanced by the presence of representatives from the Paraguayan institutional partners with whom we work.
Post will also invite a successful Community Work Partner-PCV pair from the sister sector group to the PST session “Understanding Your Work Partners”. The presence of working and successful role models from the sector will enhance the relevance of this session for the Trainees and afford them greater opportunity to learn about specific strategies and activities they can use to build positive relationships with their work partners.

**Documents to be Submitted:**
- New CET workbook design for C-2
- Sample Task checklist for primary work activity
- Revised “Understanding Your Work Partners” session plan and session objectives (to be prepared during C-2 TOT and implemented in C-2)
- Endorsed project frameworks for Agriculture and Health Sectors

**Status and Timeline for Completion:** September 2019

**OIG Analysis:** The documentation submitted should include the endorsed project frameworks for each of the four projects, as well as the project activity checklists for primary work activities for each of the projects, rather than the sample task checklist referenced in the agency’s response.

**Recommendation 3**
That the director of programming and training improve collaboration between the programming and training teams in the design and delivery of technical training for Volunteers.

**Concur**
Response: For improved collaboration overall post will take advantage of the PTE alignment process and its corresponding tools and processes to foster improved co-ownership of training design when redesigning the PST for all four sectors. For improved collaboration specific to PST post will advance final site approval meeting by one week to allow for more availability of program staff to participate in PST starting earlier in PST. There will also be participation of program staff during (Training of Trainers) TOTs, including and most importantly, that program staff are involved in the development of the (Calendar of Training Events) COTE. For improved collaboration for ISTs post will ensure training staff along with programming staff will participate in IST planning, design, and implementation, including the needs assessment prior to design of the event and thereafter the evaluation of the training event. Program staff will also share with training staff the feedback received from PCVs during site visits in order to consider those recommendations for both PST and ISTs.
Documents to be Submitted:
- COTE and sessions design for C-2 (Agriculture and Environment)
- Redesign of CED and Youth Health 27-month learning continuum

Status and Timeline for Completion: March 2020

OIG Analysis: OIG requests that the post either indicate on the documents to be submitted, or describe in a separate narrative document submitted with the listed documents, which technical training events or sessions involved improved collaboration between programming and training teams in their design or delivery.

Recommendation 5
That the country director and director of programming and training develop a plan to improve management and oversight of a more consistent and efficient site identification and selection process.

Concur
Response: Post will update its Site ID and Monitoring Guidelines manual. The update will take into consideration OIG’s findings during the program evaluation and will include the new SOP for Site History Files as well as written criteria for host family selection. The revised manual will be in-line with IAP’s Site ID and Monitoring Standards, as is the current one.

Post has already begun significant work to address some of issues related to this recommendation. For example, for the most recent round of sites approved in May 2019, the majority of site family surveys included a list of family members living in the house. This will be a required practice for site approval in the revised manual as well. Additionally, post has requested from the IAP Region examples from other posts on how to better evidence ‘at least one enthusiastic work partner’ for site approval.

The process of revising the Site ID and Monitoring Guidelines manual will be led by the DPT who will engage other staff for input, review, and finalization. Post will train staff on revised procedures and requirements.

Documents to be Submitted:
- Revised Post Site ID and Monitoring Guidelines manual
- CED Implementation Plan (for new LPF – not yet developed)
- Agriculture Implementation Plan (for new LPF - endorsed)
- Environment Implementation Plan (for new LPF – when endorsed)
- Youth Health Implementation Plan (for new LPF - endorsed)

Status and Timeline for Completion: February 2020
OIG Analysis: A cause for the finding that the post’s site identification needed improvement was process inefficiency that limited the time programming staff could spend at each site and overall quality site assessment. OIG found that the post’s site identification needed improved organization and oversight, including more consistent adherence to site identification procedures and criteria across all projects. Because it is unclear to OIG how the 4 separate implementation plans listed will facilitate improved management and oversight of site identification and selection at post, OIG requests that the post also include a plan to improve management and oversight of site identification and selection, or a narrative explanation of how the listed documents will be used by the country director and director of programming and training to improve management and oversight over the site identification and selection process at post.

Recommendation 8
That the country director establish procedures to ensure more timely availability of a driver for medical emergency response.

Concur

Response: To ensure timely availability of a designated driver for a medical emergency response, Post will strengthen its existing rotational Duty Officer system, one which utilizes a three-person team approach involving the Duty Officer, Duty PCMO, and Duty Driver. The system has been in place for many years and proven effective during emergencies. The duty roster is distributed at the beginning of each year to all personnel and thereafter on a weekly basis. A weekly e-mail is sent to all staff and the American Embassy’s RSO with the names of the respective duty staff for the week.

Post currently has five designated drivers who rotate as a Duty Driver on a weekly basis. Duty Drivers maintain a calendar of their duty weeks for the year and are on call during their rotation. A Duty Officer Handbook describes the functions and responsibilities of the Duty Officers and Drivers. The Duty Officer serves a dual function that includes that of a designated Driver if necessary. In case of an emergency, medical or otherwise, the Duty Driver or the Duty Officer performing the driving function must come to the office to pick up an official vehicle.

Documents to be Submitted:
- Duty Roster
- Weekly email sample

Status and Timeline for Completion: September 2019
OIG Analysis: A cause for the finding was that the on-call medical duty driver for emergencies could be up to an hour away from the office when needed to drive a PCMO managing a medical emergency outside of normal working hours. OIG learned that this type of delay could prevent the PCMO from being able to use the duty driver during a medical emergency. OIG requests that the post also include documentation of its procedures to ensure more timely availability of a driver to respond to medical emergencies.
APPENDIX F: PROGRAM EVALUATION COMPLETION AND OIG CONTACT

PROGRAM EVALUATION COMPLETION

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

OIG CONTACT

Following issuance of the final report, a stakeholder satisfaction survey will be distributed to agency stakeholders. If you wish to comment on the quality or usefulness of this report to help us improve our products, please contact Assistant Inspector General for Evaluations Jerry Black at jblack@peacecorpsoig.gov and (202) 692-2912.
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