



Peace Corps Office of

INSPECTOR GENERAL

Annual Plan

FISCAL YEAR 2021

The Role of the Peace Corps Office of Inspector General:

- Promote integrity, efficiency, effectiveness, and economy
- Prevent and detect waste, fraud, abuse, and mismanagement
- Identify risk and vulnerabilities and offer expert assistance to improve the Peace Corps' programs and operations

Established in February 1989, the Peace Corps Office of Inspector General (OIG) receives its legal authority from the Inspector General Act of 1978, as amended (IG Act). The IG Act establishes OIG as an independent entity within the Peace Corps. The law requires that OIG fully and currently inform the Peace Corps Director and the Congress about problems and deficiencies relating to the administration of agency programs and operations. OIG is authorized by law to review all programs and operations of the Peace Corps. OIG's work typically examines agency operational efficiency, effectiveness, financial stewardship, and compliance with federal law, regulations, and agency policy.



In accomplishing its mission, OIG is committed to:

Excellence: issuing accurate, timely, and reliable work products.

Positive change: making value-added recommendations to address issues and challenges with agency programs and operations.

Integrity: maintaining independence from the agency, meeting professional and ethical standards, and committing to continual improvement.

Collaboration: working together and promoting best practices within the office, with the agency, and with external stakeholders.

Staffing and Resources

OIG is comprised of four units: Audit, Evaluation, Investigation, and Management and Administration. Each unit develops its fiscal year (FY) work considering staff availability and FY funding. OIG has a cross-unit outreach committee responsible for informing all stakeholders (agency staff, Volunteers, Congress, and the general public) about the role, work, and resources of OIG, including promotion of the OIG Hotline.

Strategic Goals

As detailed in the OIG Strategic Plan for FYs 2021 to 2023, OIG has three strategic goals:

1	Provide independent oversight	2	Effectively communicate with stakeholders	3	Strengthen OIG
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OIG plans to meet its goals by supporting the Peace Corps through our work to improve program effectiveness, efficiency, compliance, and accountability. OIG will provide briefings, lead trainings, and conduct external engagement while working to deepen our knowledge of the Peace Corps, acquire additional subject matter expertise, improve internal controls, and engage in collaborative activities.

Focus Areas

Throughout the year, OIG will conduct audits, evaluations, investigations, and other reviews addressing the following four OIG priorities:

- Full Resumption of Overseas Post Operations, Including Volunteer Return to Service
- Agency-wide Processes, Programs, and Systems
- Overseas Post Operations
- Management Challenges Identified Annually by the IG and published in the Peace Corps' [Agency Financial Report](#) (AFR)¹

The COVID-19 Pandemic, the CARES Act, and OIG Oversight of the Peace Corps

In March 2020, the Peace Corps responded to the COVID-19 pandemic by suspending all Volunteer activities and evacuating nearly 6,900 Volunteers from approximately 60 countries of service. Evacuating all its Volunteers at the same time was unprecedented and required the agency to take extraordinary steps, including the chartering of international flights, to complete the task. The fiscal and programmatic impact of the COVID-19 pandemic on Peace Corps operations has been substantial. For the first time since its establishment in 1961, the Peace Corps is without a single active Volunteer.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act, enacted in late March 2020, provided the agency with \$88 million in supplemental funding to prevent, prepare for, and respond to coronavirus. Importantly, the law allows these monies to be used for reimbursement of accounts for related costs incurred prior to the law. The CARES Act also created the

¹ The most recent AFR covering FY 2019 was issued in November 2019. The AFR is issued annually in November covering the previous fiscal year.

Pandemic Response Accountability Committee (PRAC)² and requires the agency to submit to the PRAC a plan on how the agency will use the CARES Act funds. OIG is committed to continued independent oversight of all Peace Corps appropriations, including CARES Act funding.

While the CARES Act funding is critical for the sustainability of the Peace Corps, significant challenges remain. Prior to the global evacuation, Volunteers served in over 60 countries. The Peace Corps' plans to resume its overseas programs and operations will need to be informed by how the pandemic has affected each of the Peace Corps countries and an assessment of the impact of COVID-19 on communities where Volunteers may serve. To address these enormous challenges, Peace Corps Director Jody Olsen put together multiple working groups to advise her decision making on how to resume global operations. The working groups developed criteria and related guidance to help staff gather the information senior agency officials and the Director will need to make decisions as to which countries the agency can begin returning Volunteers to service.³ The decision to reopen Volunteer operations in a country will involve a review by a panel of subject matter experts at Peace Corps headquarters, along with approvals by senior office heads and the Director.

During this time, OIG is committed to monitoring and contributing to the agency's planning and implementation of its re-entry process. OIG oversight will include continued focus on the health and safety of the Volunteers as the agency takes the necessary steps to safely redeploy Volunteers, as well as emphasis on proper spending of taxpayer funds. Our goal is to direct OIG oversight activities in ways that help the Peace Corps safeguard its integrity, better its effectiveness, and cement its long-term success.

Advice and Assistance

In addition to our work to help address the focus areas, OIG also plans to conduct the following advice and assistance functions in support of agency goals and objectives:

- Monitor and provide advice/expertise, as appropriate, on the agency's process for planning the resumption of global operations and implementation of its re-entry plan. OIG will support the agency by providing applicable best practices and lessons learned derived from OIG work products.
- Provide technical assistance to Peace Corps managers on issues related to financial and administrative policies, procedures, best practices, and effective internal controls.
- Deliver training and best practices presentations on fraud awareness and compliance with agency internal controls.
- Initiate more proactive follow-up recommendation activities focused on closure of older and priority open recommendations.
- Present overseas staff trainings and similar orientations for staff.
- Provide Volunteers/trainees and agency staff with informational materials, guidance, trainings, and other presentations on the role, responsibilities, authority, and functions of OIG and how to effectively and confidentially report fraud, waste, abuse, mismanagement, serious administrative misconduct, or criminal wrongdoing involving Peace Corps staff, contractors, or Volunteers/trainees.

² The PRAC is currently composed of 20 federal Offices of Inspector General to "promote transparency and conduct and support oversight of covered funds and the Coronavirus response to (1) prevent and detect fraud, waste, abuse, and mismanagement; and (2) mitigate major risks that cut across program and agency boundaries." Rather than a stand-alone organization, the PRAC is a Committee of the Council of the Inspectors General on Integrity and Efficiency (CIGIE), an independent entity established within the executive branch by the Inspector General Act of 1978, as amended, that includes the 75 statutorily created federal Inspectors General.

³ The agency's re-entry guidance articulates a range of risk mitigation factors that officials will review for each post based on medical, security, programmatic, administrative, and logistical criteria.

Audit Unit

The Audit Unit conducts audits and other reviews of agency programs and financial/administrative operations that support the Peace Corps' mission and its Volunteers serving abroad. The Unit performs audits of the agency's field activities at overseas posts and its administrative support functions at headquarters and domestic recruiting offices. The Unit also contracts with independent public accounting firms to conduct an audit of the agency's financial statements and a review of the agency's compliance with the Federal Information Security Modernization Act of 2014. Audits are performed in accordance with Generally Accepted Government Auditing Standards (GAGAS) issued by the Comptroller General of the United States. These standards were updated in 2018 to place increased emphasis on internal controls and ensure adequate root cause analysis.

Most recently, the Audit Unit has focused its activities internally on implementing policy and process changes related to the issuance of new Government Auditing Standards. Additionally, we will be revising our audit program for overseas posts. This revision will incorporate the new standards and institutionalize our audit approach in response to a myriad of policy changes made by the agency. The changes will help OIG strengthen its audit oversight tools and become more efficient.

Post Audits

The COVID-19 emergency evacuation of all Volunteers disrupted our planned activities for both FY 2020 and FY 2021. Given the impact of COVID-19 on agency operations, at this time we are not able to assess whether conducting a standard post audit in FY 2021 is viable. We will re-evaluate our posture as conditions evolve.

Agency-Wide Programs and Special Reviews

The Audit Unit intends to initiate, perform, or complete a variety of audits, reviews, and follow-ups of agency-wide programs. These projects are cross-functional and may require assistance from other OIG units. For example, the Audit Unit works closely with the Investigation Unit on forensic analysis of financial data and on Federal Employees' Compensation Act⁴ issues. In addition, the Audit Unit collaborates with the Evaluation Unit when we need their expertise on programmatic issues. We will continue to review the agency's internal control program and report on its effectiveness in our audits.

For FY 2021, we plan to initiate the following program audits and reviews:

Program Audits and Reviews
Volunteer Payments and Collections at End of Service
Contract Management
Global Accounts Payable
Expenditures Under COVID-19 CARES Act ⁵

⁴ Federal Employees' Compensation Act See 5 U.S.C. §§ 8101 et seq

⁵ We also planned to initiate in late FY 2020 an audit of the disbursement of funds received from the COVID-19 CARES Act. However, Agency documentation of COVID-19 CARES Act expenditures was not yet available. As a result, we will conduct the audit in FY 2021

Legislatively Mandated Work

We will oversee the following legislatively mandated work:

Audit of the Peace Corps' FY 2020 Financial Statements	The Accountability of Tax Dollars Act of 2002 mandates that the agency annually submit its financial statements for audit. An independent public accounting firm performs this audit. OIG's role is to monitor the independent public accounting firm's work to ensure that it is of acceptable quality, in compliance with Federal laws and applicable standards, and is completed within the established milestones.
Review of the Peace Corps' Compliance with the Improper Payments Elimination and Recovery Act of 2010	The Federal Improper Payments Elimination and Recovery Act of 2010 (IPERA) requires IG's to annually assess the agency's compliance with IPERA. We will assess the agency's compliance by completing a review by May 2021.
Review of the Peace Corps' Information Security Program	OIG is responsible for annually reporting on agency compliance with the Federal Information Security Modernization Act of 2014. To perform this work, OIG contracted with an independent public accounting firm. The auditors will review the Peace Corps' information systems security program and reported related, selected data to the Office of Management and Budget.
Audit of the Peace Corps' Compliance with the Digital Accountability and Transparency Act (DATA Act)	The Digital Accountability and Transparency Act of 2014 requires us to review the agency's spending data submission to ensure compliance with the Federal reporting requirements. We will assess the agency's compliance by completing a full audit by November 2021.

Reports Initiated in FY 2020

The following audit was initiated in FY 2020 and will result in a final report issued in FY 2021:

- The Peace Corps' Management of Payroll and Benefits for U.S. Direct Hires

Evaluation Unit

The Evaluation Unit conducts independent assessments of the design, implementation, and results of agency operations, programs, and policies. The Unit's goal is to provide timely, credible, and useful information to agency managers, policymakers, and others on program operations and policy issues. We accomplish this through evaluations of the management and program operations of the Peace Corps at overseas posts and domestic offices. The Unit also participates in cross-functional reviews of agency operations undertaken with OIG auditors or investigators.

OIG evaluations promote integrity, efficiency, and effectiveness; identify best practices; and recommend program improvements and means to comply with Peace Corps policies. The Evaluation Unit conducts reviews and assessments using applicable Federal laws; regulations; and Peace Corps policies, procedures, and performance plans, including the agency's Integrated Planning and Budgeting System (IPBS) and strategic plans. Evaluations are conducted under the direction and guidance of the Assistant Inspector General for Evaluations and in accordance with the Quality Standards for Inspections and Evaluations, published by the Council of the Inspectors General on Integrity and Efficiency (CIGIE). These standards are instrumental in maintaining impartiality, reliability, and credibility; and they set the bar for staff competency, independence, professional judgment, internal quality controls, and stakeholder feedback for process improvements.

In addition to the evaluations and reviews listed below, the Evaluation Unit will work on other initiatives, including: internal improvements to our evaluation handbook and methodology, as well as development and implementation of innovative communications strategies for existing evaluation products.

Country Program Evaluations and Related Limited Scope Follow-Up Reviews

Our standard country program evaluation methodology requires input from actively serving Volunteers who have been in service for at least 4 months. At this time, it is not possible to identify which, if any, overseas programs may have sufficient numbers of Volunteers in service in FY 2021. Therefore, we anticipate that a country program evaluation will not be viable for most of FY 2021. After the agency begins the resumption of Volunteer activities overseas, we will re-assess opportunities for carrying out country program evaluations.

Pursuant to the agency's efforts to return Volunteers to service overseas and depending on the agency's progress in re-starting Volunteer activities at overseas programs, the Unit may assess at selected programs the implementation and effectiveness of the re-entry requirements outlined in the agency's re-entry guide. In addition, we plan to conduct limited scope follow-up evaluations of particular findings and recommendations we made in prior country program evaluation reports.

We have identified the following work to be initiated in FY 2021:

Country Program Evaluations and Reviews
Assessment of the Implementation and Effectiveness of Re-entry Guide Requirements (Location TBD)
Follow-up Review to OIG's 2013 Evaluation of Peace Corps/Moldova

Agency-Wide Programs and Special Reviews

Pending the availability of resources for FY 2021, the Evaluation Unit may initiate other studies, evaluations or reviews of agency-wide topics, including:

Agency-Wide Program Evaluations and Reviews
Review of Management and Human Resources Support for Overseas Staff
Review of Systems and Support for Knowledge Management ⁶
Review of Implementation and Effectiveness of the Agency's Intercultural Competence, Diversity, and Inclusion (ICD&I) Initiative
Review of Medical Technical Guidelines, Including Related Training and Oversight

Reports Initiated in FY 2020

The following review was initiated in FY 2020 and will result in a final report issued in FY 2021:

- Review of the Facts and Circumstances Surrounding the Death of a Peace Corps/Ghana Volunteer
- Recurring Issues Report: Common Challenges Facing Posts from FY 2016 to 2019

⁶ Examples of systems that may be reviewed include but are not limited to: Volunteer Reporting Tool (VRT); the agency's learning management system (LMS), the agency's Volunteer Information Database Application (VIDA); the agency's internal knowledge sharing platform ("Workspace"); and the agency's Customer Relationship Management (CRM) database.

Investigation Unit

The Investigation Unit assists the Peace Corps in maintaining integrity in its programs and operations by investigating allegations of fraud, waste, abuse, and misconduct involving grant, contract, and procurement fraud; violations of law and agency policies committed by Peace Corps personnel, contractors, and vendors; and the Federal Employees' Compensation Act⁷ claimants.

Our investigations are conducted in accordance with the IG Act, the Attorney General Guidelines for Offices of Inspectors General with Statutory Law Enforcement Authority, and the Quality Standards for Investigations issued by the President's Council on Integrity and Efficiency and affirmed by CIGIE. Our investigations can result in criminal prosecutions, civil monetary penalties, sanctions, and personnel actions, including verbal counseling, suspensions, debarments, and terminations from Peace Corps service.

OIG is authorized by the Attorney General to exercise statutory law enforcement powers pursuant to Section 6(e) of the IG Act and in accordance with the Attorney General Guidelines for Offices of Inspector General with Statutory Law Enforcement Authority. This authority provides OIG with important law enforcement tools including the authority to, upon probable cause, seek and execute warrants for arrest, search premises or seize evidence, make arrests without a warrant while engaged in official duties, and carry firearms.

Investigative Priorities

With the evacuation of all Volunteers in the field the Investigation Unit will be prioritizing completing existing investigations and will continue to pursue a variety of allegations and complaints from multiple sources, including Returned Peace Corps Volunteers who were recently evacuated, staff, and other sources. The following are our priorities:

- Investigate allegations of violations of the PROTECT Act by Peace Corps staff or by Volunteers prior to their evacuation.⁸
- Investigate allegations of sexual assaults by Peace Corps staff or Volunteers.
- Track complaints or allegations originating with Volunteers about Peace Corps staff relating to misconduct, mismanagement, or policy violations; any breaches of the confidentiality of the Volunteers; and any actions to assure the safety of Volunteers who file such complaints.
- Continue to provide technical assistance to partners and stake-holders on Volunteer deaths.
- Investigate and refer crimes occurring within the Special Maritime and Territorial Jurisdiction of the United States⁹ for U.S. prosecution.
- When appropriate, seek local prosecutions by working with the Diplomatic Security Service and host country police entities.
- Proactively work with the agency, the Audit and Evaluation Units, and external partners to review high-risk programs and contracts for fraud, e.g. FECA.
- Ensure referrals of individuals and entities for suspension and debarment, as appropriate.

⁷ See 5 U.S.C. §§ 8101 et seq.

⁸ Prosecutorial remedies and other tools to end the exploitation of children today (Pub. L. 108-21)

⁹ See generally 18 U.S.C. § 7. A number of U.S. criminal laws apply outside of the United States. In many cases these laws are meant to apply to U.S. nationals who become a victim of crime abroad, or who are perpetrators of crimes abroad under certain conditions. Examples include when the crime is committed in a property owned, leased, or used for a government purpose, such as at a Peace Corps post, training office, or similar site. Another circumstance relates to crimes occurring in residences used by the Peace Corps or its personnel, which may include residences where Volunteers or staff permanently reside.

- Ensure that allegations of whistleblower reprisal involving staff, Volunteers, and contractors are thoroughly investigated.
- Strengthen our engagement with stakeholders by providing them with briefings about OIG investigative responsibilities and mechanisms for making confidential complaints.
- Assist the agency with applicant vetting processes by expeditiously conducting namechecks of returned and evacuated Volunteers.