



PEACE CORPS
Office of Inspector General

Post Re-Entry Review

Final Report
Post Re-entry Health and Safety
Review of Peace Corps/Morocco

Project No. IG-23-07-E
September 2023



EXECUTIVE SUMMARY

OVERVIEW

On March 18, 2022, the Peace Corps notified the United States Congress that Peace Corps/Morocco (hereafter referred to as “the post”) intended to resume operations in September 2022. The first intake of 51 Volunteers arrived in September 2022. On November 21, 2022, the Office of Inspector General (OIG) announced this review to assess the post’s compliance with specific agency policies and procedures related to Volunteer and trainee health and safety, and the re-entry process.

WHAT WE FOUND

We found that the post complied with most of the policies and procedures we reviewed; however, we identified three areas of noncompliance. We found that: 1) the medical provider and facility assessments were not completed; 2) the post’s site history files did not contain documentation of some crime incidents; and 3) some staff did not participate in the annual Emergency Action Plan (EAP) refresher training.

RECOMMENDATIONS IN BRIEF

Our report contains three recommendations directed to the post. We recommend that the Peace Corps Medical Officers (PCMO) strategically prioritize which facilities and providers to include in its Medical Action Plan (MAP). We also recommend that the post improves its planning for future facility and provider assessments. Finally, we recommend that all post staff regularly take the annual EAP refresher training.

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BACKGROUND

In response to the COVID-19 pandemic, the Peace Corps evacuated all Volunteers from the overseas posts in March 2020. The agency then created the Return to Service working group in April 2020 to facilitate the process of resuming overseas operations. On June 30, 2020, the working group issued the Country Re-Entry Guide (CREG) to help overseas posts with the planning and preparation processes for returning Volunteers to service. The CREG incorporated input from various offices, including the Office of Health Services, Office of Safety and Security, Office of Global Operations, and Peace Corps' regional offices (Africa; Inter-America and the Pacific; and Europe, Mediterranean and Asia). In 2022 the agency issued "Supporting Volunteer Health, Safety and Security: Roadmap to Updated Policies and Procedures," which informs staff about new and existing guidelines and procedures that overseas posts must complete prior to the return of Volunteers and trainees.

On March 18, 2022, the Peace Corps notified the United States Congress that Peace Corps/Morocco intended to resume operations in September 2022. At the time of our review, there were 49 Volunteers in country.

OBJECTIVE, SCOPE, AND METHODOLOGY

On November 21, 2022, OIG announced this review with the objective to assess the post's compliance with specific agency policies and guidance related to Volunteer and trainee health and safety and the re-entry process.

We assessed the following questions to achieve the review's objective:

Re-Entry Process:

- Were the CREG criteria for the external and internal review processes met?

Health Care:

- Did the MAP meet the Peace Corps Medical Technical Guideline (TG) 385 requirements?
- Did the medical facility assessments meet the TG 204 requirements?
- Have Volunteers received, or are scheduled to receive, medical site visits?

Emergency Preparedness:¹

- Has the post's EAP been updated?
- Is the Volunteer contact information in the post's Volunteer Information Database Application (VIDA) up to date?

¹ Although we included an assessment of the Volunteers' familiarity with their consolidation points in our evaluation plan, we did not collect sufficient information to suitably assess the question.

Site Preparation:

- Do the site history files meet the requirements of Safety and Security Instruction (SSI) 401?
- Do the site history files include information on serious crimes, per SSI 401 and the Site History File Interim Guidance?
- Do sites and housing meet the criteria in the post's Site Management Manual?

Training:

- Are the mandatory trainee reorientation training sessions scheduled on the training calendar?
- Do training records show that post staff met the requirements for mandatory training?

The scope of this review included the post's operations from 2020 to 2022. This review was conducted from Peace Corps headquarters and two OIG evaluators traveled to the post for one week in January 2023.

We conducted our review using the following methodology:

- We verified that a certifying official designated by the agency had documented their review and certified that the post had completed the tasks listed on the external and internal factors checklists, as defined by the CREG.²
- We reviewed the post's MAP and medical facility assessments for compliance with Peace Corps TG 385 and TG 204.
- We reviewed a sample of the site history files to confirm that they contained the required documentation supporting the site's development process.
- We reviewed a sample of site history files to determine if any serious crime incidents had been noted and interviewed post staff about the process for vetting sites.
- We inspected a sample of Volunteer houses to determine if they met the criteria in the post's Site Management Manual.
- We confirmed that the Volunteer reorientation and pre-service training schedules included the required sessions.
- We checked staff training records for completion of the required training on the Sexual Assault Risk Reduction and Response procedures, Death of a Volunteer procedures, Security Incident Management System certification, and EAP refresher training.

² The agency created the external factors checklist to verify a post's "go/no-go" criteria to determine if a country's conditions are acceptable to receive Volunteers and trainees, confirm that the congressional notification should proceed, and allow the Peace Corps to invite applicants to serve in that country. External reviews cover the conditions necessary for re-entry while internal reviews assess the planning and preparation processes for re-entry. The internal factors checklist is a set of comprehensive operational and mitigation planning actions that must be completed at the post. When reviewing agency certifications of external and internal review procedures, OIG did not assess the criteria for meeting the external and internal factors.

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- We confirmed that the post's EAP was updated based on the most recent template (2019).
- We cross checked the contact information recorded in the post's VIDA against a sample of what Volunteers directly reported to be their current contact information.

To support our analyses, we conducted in-person and virtual interviews with relevant post staff in Morocco.

This review was conducted in accordance with the *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency.

REVIEW RESULTS

The results of our review are outlined in Table 1 below, which lists the policy and procedure requirements that the post met or did not meet at the time of our review.

Table 1: Results of OIG’s Review of Peace Corps/Morocco’s Compliance with Selected Policies and Procedures Related to Volunteer and Trainee Health and Safety and Re-entry

Compliance Review Results		
Areas reviewed	Result	Observations
External factors	Met	The review showed that the process, as outlined in the CREG for the external review process, was followed in reopening this post.
Internal factors	Met	The review showed that the process, as outlined in the CREG for the internal review process, was followed in reopening this post.
Medical Action Plan	Met	The review showed that PC/Morocco’s MAP met the Peace Corps Medical TG 385 requirements.
Medical facility and provider assessments	Not met	The review showed that the medical provider and facility assessments were not completed in accordance with agencywide policy.
Emergency Action Plan review	Met	The review showed that post’s EAP was based on the 2019 template.
Site contact information	Met	This review showed that Volunteer contact information was up to date in the post’s Volunteer Information Database Application.
Housing criteria	Met	This review showed that the post met their criteria for housing standards.
Crime incidents in site history files	Not met	The review showed that PC/Morocco’s site history files did not contain documentation of some crime incidents.
Site criteria	Met	This review showed that Volunteer sites were developed following the requirements of MS 270.
Volunteer and trainee training	Met	The review showed that all required topics were covered during preservice and in-service training events.
Staff training	Not met	The review showed that some staff did not take part in the annual EAP refresher training.

The medical provider and facility assessments were not completed in accordance with agency guidelines.

According to Peace Corps Medical TG 204, once every 3 years PCMOs must reassess the facilities and providers that they intend to use. We reviewed the post's MAP and found that the majority (58%) of the listed providers and facilities had not been assessed within the last 3 years.

At the time of this review, the medical unit submitted a MAP that included more than 150 facilities and providers. The post did not strategically prioritize or limit the facilities and providers listed in the MAP to the ones they intended to use. While the medical unit resubmitted the MAP after we completed our fieldwork, reducing the number of facilities and providers to 72, the medical unit only conducted 25 provider and facility assessments in the last 3 years, an average of just over 8 facilities and providers per year. We concluded that it may not be logistically feasible over a 3-year period for the medical unit to assess all 72 facilities and providers currently listed in the post's MAP and that further prioritization is warranted.

In addition, we determined that the post did not effectively plan medical site visits. For example, while the PCMOs made 3 trips to the Beni-Mellal region between 2019 and 2022, they only completed 2 assessments of the 15 providers listed in the MAP for that region. Additionally, the PCMOs visited one provider in Marrakech in August 2022. When they returned to Marrakech 5 months later, they only visited the Volunteers and overlooked three facilities and providers in that region that had not been assessed.

According to TG 204, the post needs to visit each health care facility where Volunteers may receive medical care to ensure that the location is appropriate and can provide safe and effective care for the Volunteers' needs. In addition, post medical units need to be confident that the medical consultants identified in the MAP have the appropriate training, skills, and experience to address Volunteer medical needs. Without regular assessments of the facilities and providers, Volunteer health and safety are at risk. By not strategically prioritizing the facilities and providers listed in the MAP or planning medical site visits accordingly, the health unit may be compromising their ability to regularly assess local facilities and providers.

We recommend:

- 1. The Peace Corps Medical Officers strategically prioritize the facilities and providers they intend to use and document this information accurately in the Medical Action Plan.**
- 2. The Peace Corps Medical Officers work with the Country Director and Director of Management and Operations to plan and conduct medical facility and provider visits so that each one listed in the Medical Action Plan is assessed at least once every 3 years, in accordance with Technical Guideline 204.**

The post's site history files did not contain documentation of some crime incidents.

In October 2018, the Peace Corps issued SSI 401, which required staff to record incident numbers for all “serious crimes” in VIDA. SSI 401 refers to MS 461, which lists and defines the types of serious crimes that must be reported by post staff, including the “sexual assault of a Peace Corps Volunteer”. We reviewed PC/Morocco’s site history files for active Volunteer sites and identified three non-aggravated sexual assaults that were not recorded in VIDA, as required. In April 2023, SSI 401 was republished and the requirement to record incident numbers for serious crimes in VIDA was removed³. As a result, we did not issue a recommendation.

Some staff did not attend the annual EAP refresher training.

Peace Corps SSI 101 requires that all post staff take an annual refresher training on the post’s EAP. We found that some staff did not participate in the post’s EAP training, including guards, drivers, and regional medical personnel. As stated in SSI 602, the EAP testing and training guidelines are intended to help prepare staff to respond to an emergency. We determined that as a result of not completing the annual EAP refresher training, some staff may not have been adequately prepared to respond to an emergency.

We recommend:

- 3. The Country Director ensures that all staff take the annual Emergency Action Plan refresher training, in accordance with Safety and Security Instruction 101.**

³ The requirement to record incident numbers in VIDA was removed because populating VIDA with Security Incident Management System (SIMS) numbers has become automated.

RECOMMENDATIONS

We recommend:

1. The Peace Corps Medical Officers strategically prioritize the facilities and providers they intend to use and document this information accurately in the Medical Action Plan.
2. The Peace Corps Medical Officers work with the Country Director and Director of Management and Operations to plan and conduct medical facility and provider visits so that each one listed in the Medical Action Plan is assessed at least once every 3 years, in accordance with Technical Guideline 204.
3. The Country Director ensures that all staff take the annual Emergency Action Plan refresher training, in accordance with Safety and Security Instruction 101.

APPENDIX A: INTERVIEWS CONDUCTED

As part of this review, we conducted interviews with six members of post staff. See Table 1 for more information on the positions interviewed.

Table 2: Interviews Conducted with Peace Corps/Morocco Staff

Position	Location (Post, HQ, other)
Country Director	Post
PCMO (3)	Post
Safety and Security Manager	Post
Peace Corps Safety and Security Officer	Post

APPENDIX B: LIST OF ACRONYMS

CREG	Country Re-Entry Guide
EAP	Emergency Action Plan
HQ	Headquarters
MAP	Medical Action Plan
MS	Manual Section
OIG	Office of Inspector General
PCMO	Peace Corps Medical Officer
SSI	Safety and Security Instruction
VIDA	Volunteer Information Database Application

APPENDIX C: REVIEW PURPOSE, COMPLETION AND OIG CONTACT

REVIEW PURPOSE	<p>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.</p>
REVIEW COMPLETION	<p>The Evaluation Unit provides senior management with independent evaluations and reviews of 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.</p> <p>This review was conducted under the direction of Assistant Inspector General for Evaluations Reuben Marshall, by Senior Evaluators Erin Balch and Paul Romeo. Additional contributions were made by Senior Evaluator Tanique Carter and Program Analyst Kristen Hochreiter.</p>
OIG CONTACT	<p>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 Reuben Marshall at rmarshall2@peacecorpsig.gov.</p>

APPENDIX D: AGENCY RESPONSE TO THE PRELIMINARY REPORT



MEMORANDUM

To: Joaquin Ferrao, Inspector General

Through: Emily Haimowitz, Chief Compliance & Risk Officer EMILY HAIMOWITZ Digitally signed by EMILY HAIMOWITZ Date: 2023.08.28 07:40:41 -0400

From: Rebecca Sharp, Regional Director, EMA Region REBECCA SHARP Digitally signed by REBECCA SHARP Date: 2023.08.28 12:48:28 -0400

Susan Dwyer, Country Director, Peace Corps/Morocco Dwyer, Susan Digitally signed by Susan Dwyer Date: 2023.08.28 10:22:12 -0400

Date: September 1, 2023

CC: Thomas Peng, Chief of Operations and Administration
Lauren Stephens, Chief of Staff
Scott Beale, Associate Director, Office of Global Operations
Kris Besch, Expert, Office of Global Operations
Ruchi Jain, General Counsel
David Reside, Chief of Operations, EMA Region
Mark Vander Vort, Chief of Operations, EMA Region
Tim Hartman, Quality Assurance Officer, EMA Region
Marian Fortner, Chief of Programming and Training, EMA Region
Paul Negley, Chief Administrative Officer, EMA Region
Claire Lopez, Supervisory Country Desk Officer, EMA Region
Nicholas Hake, Country Desk Officer, Morocco
Dana Abro, Regional Security Advisor, EMA Region
Shawn Bardwell, Associate Director, Office of Safety & Security
Kelly Cullen, Intermittent Expert, Office of Safety & Security
James Golden, Acting Associate Director, Office of Health Services
Jill Carty, Director, Behavioral Health and Outreach, Office of Health Services
Madeline Wilks, Acting Director, Office of Medical Services, Office of Health Services
Gregory Yeich, Compliance Officer

Subject: Agency Response to the Preliminary Report on the Post Re-Entry Health and Safety Review of Peace Corps/Morocco (Project No. 23-EVAL-01)

Thank you for the opportunity to respond to this preliminary report from the Office of Inspector General. Enclosed please find the agency's response to the recommendations made by the Inspector General as outlined in the OIG's Preliminary Report on the Post Re-Entry Health and Safety Review of Peace Corps/Morocco (Project No. 23-EVAL-01) sent to the agency on July 13, 2023.

Recommendation 1

The Peace Corps Medical Officers strategically prioritize the facilities and providers they intend to use and document this information accurately in the Medical Action Plan.

Concur

Response: In July 2023, the Post reviewed and strategically prioritized healthcare providers and facilities included in the Post's Medical Action Plan (PMAP) and Regional Medical Action Plan (RMAP). The revised PMAP and RMAP includes a reduced number of referral providers and facilities. All providers and facilities listed on the revised PMAP and RMAP have been visited within the past two years by a Peace Corps Medical Officer.

Documents Submitted:

- July 2023 version of PMAP
- July 2023 version of RMAP

Status and Timeline for Completion: September 2023

Recommendation 2

The Peace Corps Medical Officers work with the Country Director and Director of Management and Operations to plan and conduct medical facility and provider visits so that each one listed in the Medical Action Plan is assessed at least once every 3 years, in accordance with Technical Guideline 204.

Concur

Response: During the revision of the PMAP and RMAP, the Post updated their tracking log for healthcare facilities and provider assessments. The updated tracking log has information on the last assessment for all providers included in the revised PMAP and RMAP. This information includes name of provider, type of medical services, date of last visit, initials of PCMOs who conducted the last visit, and due date for next visit.

Documents Submitted:

- Updated healthcare facilities and provider assessment tracking log

Status and Timeline for Completion: September 2023

Recommendation 3

The Country Director ensures that all staff take the annual Emergency Action Plan refresher training, in accordance with Safety and Security Instruction 101.

Concur

Response:

In April 2023, Post conducted an Emergency Action Plan (EAP) All Staff training. At the time of the EAP training, one post staff member was participating in Overseas Staff Training. The Safety and Security Manager scheduled a separate one-on-one EAP Training for this staff member in May 2023. The Post will hold an additional EAP Training for regional staff, including medical

hub staff, in August 2023. In future years, the Post will ensure all post and regional staff participate in EAP training.

Documents to be Submitted:

- Attendance documentation for April 2023 EAP All Staff Training
- Documentation for one-on-one EAP Training in May 2023
- Attendance documentation for regional staff EAP training

Status and Timeline for Completion: September 2023

APPENDIX D: OIG COMMENTS

Peace Corps management concurred with the 3 recommendations made in our preliminary report and provided documentation supporting the actions it took to address these issues. OIG reviewed the documentation and will close recommendation 1. We wish to note that in closing this recommendation, we are not certifying that the agency has taken these actions or that we have reviewed their effect on the issue. 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.

Recommendations 2 and 3 require additional actions and documentation from management. OIG will review and consider closing these recommendations following confirmation from the Chief Compliance Officer that we have received the documentation reflected in our analysis below.

Recommendation 2

The Peace Corps Medical Officers work with the Country Director and Director of Management and Operations to plan and conduct medical facility and provider visits so that each one listed in the Medical Action Plan is assessed at least once every 3 years, in accordance with Technical Guideline 204.

Concur

Response: During the revision of the PMAP and RMAP, the post updated their tracking log for healthcare facilities and provider assessments. The updated tracking log has information on the last assessment for all providers included in the revised PMAP and RMAP. This information includes name of provider, type of medical services, date of last visit, initials of PCMOs who conducted the last visit, and due date for next visit.

Documents Submitted

- Updated healthcare facilities and provider assessment tracking log

Status and Timeline for Completion

September 2023

OIG Analysis:

In response to our preliminary report, Peace Corps/Morocco submitted 64 documents, including 23 that had not been submitted previously, and requested that we change the percentage of assessed facilities. In our preliminary report, we had identified 26 providers or facilities that had been assessed in the last 3 years. The new documentation included four additional providers or facilities. Therefore, we changed the percentage of providers and facilities that had been assessed in the past three years from 36% to 42% in the final report.

The submitted documents included 12 assessments that we did not initially count towards the assessment total because they did not have dates and had been completed on a 2012 version of the assessment form. We requested additional evidence, such as emails or calendar

appointments. The post resubmitted the 12 assessments and changed the file names to include the date and physically wrote the date in pen at the top of the assessments. We did not consider this sufficient evidence to demonstrate the assessment dates and we did not include these in the assessment total.

Peace Corps submitted a tracking log for facility and provider assessments. However, it only included 31 of the 41 providers and facilities listed in the PMAP and RMAP. To close this recommendation, the agency needs to submit a tracking log that covers all 41 providers and facilities listed in the PMAP and RMAP.

Recommendation 3

The Country Director ensures that all staff take the annual Emergency Action Plan refresher training, in accordance with Safety and Security Instruction 101.

Concur

Response: In April 2023, the post conducted an Emergency Action Plan (EAP) All Staff Training. At the time of the EAP training, one post staff member was participating in Overseas Staff Training. The Safety and Security Manager scheduled a separate one-on-one EAP training for this staff member in May 2023. The Post will hold an additional EAP training for regional staff, including medical hub staff, in August 2023. In future years, the post will ensure all post and regional staff participate in EAP training.

Documents to be Submitted

- Attendance documentation for April 2023 EAP All Staff Training
- Documentation for one-on-one EAP Training in May 2023
- Attendance documentation for regional staff EAP training

Status and Timeline for Completion

September 2023

OIG Analysis:

As of September 5, 2023, the staff directory listed 57 individuals at the post. Peace Corps/Morocco submitted 40 individuals' EAP training records from April 2023. To close this recommendation, management must submit the training records for the remaining 17 individuals. For any person who started working at the post after the April 2023 EAP training, the post may submit that individual's start date in lieu of an EAP training record.

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