

# Foreign Assistance to Combat HIV/AIDS, Tuberculosis, and Malaria

## Inspectors General Coordinated PEPFAR Oversight Plan

Fiscal Year 2023



U.S. Agency for  
International  
Development  
Office of Inspector  
General



U.S. Department of  
State  
Office of Inspector  
General



U.S. Department of  
Health and Human  
Services  
Office of Inspector  
General



Peace Corps  
Office of Inspector  
General

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## FOREWORD

The U.S. government provides foreign assistance to fight HIV/AIDS, tuberculosis, and malaria—three of the world’s deadliest infectious diseases—to help stem human suffering, economic loss, and political instability in developing countries. In 2003, the Bush administration established the President’s Emergency Plan for AIDS Relief (PEPFAR), and Congress passed the United States Leadership Against HIV/AIDS, Tuberculosis, and Malaria Act. The act established the Office of the U.S. Global AIDS Coordinator and Health Diplomacy (OGAC) at the U.S. Department of State (State) and gave OGAC primary responsibility for coordinating all resources and international activities of the U.S. government to combat the HIV/AIDS epidemic.

OGAC allocates funds to PEPFAR-implementing agencies, particularly the Department of Health and Human Services’ (HHS) Centers for Disease Control and Prevention (CDC) and the U.S. Agency for International Development (USAID).<sup>1</sup> The CDC and USAID, in turn, provide funds for HIV treatment, care, and prevention activities through grants, cooperative agreements, and contracts with selected implementing partners, such as U.S.-based and international nongovernmental organizations (NGOs) and partner-country governmental entities. The Peace Corps also allocates PEPFAR funds for health-related programming; its Volunteers manage some grants and serve as health Volunteers.

The offices of inspectors general (OIGs) of the implementing agencies are required to coordinate their activities and jointly develop coordinated annual plans for oversight to avoid duplication and maximize efficiency.<sup>2</sup> In addition to joint annual planning, the implementing agencies began meeting periodically in 2017 to share information and discuss planning. This closer cooperation led the respective OIGs to begin holding quarterly meetings in 2018; include the Peace Corps OIG and the Government Accountability Office; and increase cooperation on overseas audits and investigations of efforts to combat HIV/AIDS, tuberculosis, and malaria. In 2020, quarterly meetings began addressing the impacts from the COVID-19 pandemic on PEPFAR oversight efforts and identifying areas where PEPFAR and COVID-19 oversight intersect.

In 2021, the OIGs initiated a new effort to enhance and deepen coordinated oversight and established a PEPFAR Coordinated Oversight Working Group to plan contemporaneous audits addressing common themes across their respective agencies. The FY 2022 plan included a coordinated proposal for USAID and HHS OIG to examine controls over reprogramming of

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<sup>1</sup> Other implementing agencies are the Peace Corps and the Departments of State, Defense, Labor, and Commerce. Other HHS offices and agencies receiving PEPFAR resources are the Office for Global Affairs, the Food and Drug Administration, the Health Resources and Services Administration, the National Institutes of Health, and the Substance Abuse and Mental Health Services Administration.

<sup>2</sup> The coordinated plan is required by the United States Leadership Against HIV/AIDS, Tuberculosis, and Malaria Act of 2003, Public Law 108-25, as amended by the Tom Lantos and Henry J. Hyde United States Global Leadership Against HIV/AIDS, Tuberculosis, and Malaria Reauthorization Act of 2008, Public Law 110-293; the PEPFAR Stewardship and Oversight Act, Public Law 113-56; and the PEPFAR Extension Act of 2018, Public Law 115-305.

PEPFAR funds for COVID-19. This plan includes a second coordinated proposal for USAID and HHS OIG to examine PEPFAR's engagement with civil society organizations in annual planning, community-led monitoring, and COVID-19 response. While each OIG will conduct its work independently, their collective oversight of crosscutting issues is intended to provide greater insight and utility for Congress and key stakeholders.

We look forward to continued engagement by the agencies, Congress, and other key stakeholders around the world as we implement this plan during FY 2023.



/s/

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## U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT OFFICE OF INSPECTOR GENERAL

USAID reported receiving approximately 2.4 billion in FY 2021 to help strengthen developing countries' primary healthcare systems to prevent and treat communicable diseases, including HIV/AIDS, tuberculosis, and malaria. The Agency works with governments, NGOs, and private sector organizations to provide training, technical assistance, and commodities (including pharmaceuticals) to prevent and reduce transmission of these diseases and treat people living with them. To date, USAID OIG has conducted approximately 100 audits of USAID's HIV/AIDS, tuberculosis, and malaria programs, which have led to improvements in their management and operations.<sup>3</sup> In addition, our auditors and investigators coordinate closely with oversight bodies of other international donors and U.N. agencies/public international organizations that receive significant amounts of PEPFAR funds, such as the Inspector General of the Global Fund to Fight HIV/AIDS, Tuberculosis, and Malaria.

USAID OIG's audit planning process targets high-risk, strategic, and crosscutting programs of varying complexity. We also provide continued coverage in specialized areas for which we have received funding or mandates to provide our stakeholders with information on USAID operations and oversight activities. As part of the planning process, we continually assess whether changes or additional work related to HIV/AIDS, tuberculosis, or malaria are warranted and notify all relevant oversight bodies accordingly. In FY 2022, we adapted select ongoing and planned PEPFAR audits to incorporate COVID-19 oversight and will continue to adapt in the coming year.

### Ongoing Audits for Fiscal Year 2023

#### Audit of Data Quality in Selected PEPFAR Programs in Africa

PEPFAR has always been a data-driven program. Underscoring the importance of data, and thus data quality, OGAC has stated that PEPFAR uses data “to drive results and increase impact year over year without increasing financial resources.” At the same time, OGAC has placed a strong emphasis on meeting targets. Data collected by agencies support these targets and are used to make high-level decisions such as whether the PEPFAR program is effective or whether to make follow-on awards to program implementers. The central role of data to support these decisions, combined with the risks of manipulating data to meet targets, emphasizes the need for proper data quality monitoring. Further, reliable data was identified as key to sustaining U.S.-funded development, which was one of the top management challenges USAID OIG identified for USAID in 2020.<sup>4</sup> The objective of this audit is to assess the extent to which

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<sup>3</sup> This number does not include the hundreds of financial audits performed by independent audit firms that USAID OIG oversees. See “Oversight of Audits of HIV/AIDS, Tuberculosis, and Malaria Contractors and Grantees” on page 3 for more information.

<sup>4</sup> USAID OIG, [Top Management Challenges Facing USAID in Fiscal Year 2020](#), November 20, 2019.

USAID designed and implemented internal controls to provide reasonable assurance of quality PEPFAR data in selected Africa missions.

### **Audit of USAID’s Malaria Efforts in High-Burden Countries in Africa**

Although COVID-19 is now the focus of global attention, traditional diseases such as malaria continue to afflict the developing world. The World Health Organization estimates that malaria caused 405,000 deaths in 2018, of which 94 percent were in Africa. Unlike COVID-19, malaria has been a longstanding problem, and methods of prevention and treatment are well known. Similarly, USAID has been a key player in the fight against malaria for decades. In June 2022, USAID OIG began preliminary research for an audit of USAID’s malaria activities in one or more African countries with high rates of infections and deaths, such as the Democratic Republic of the Congo (DRC), where malaria accounted for 44 percent of all outpatient visits and 22 percent of deaths in 2018. More troublingly, malaria cases in the DRC increased by 7 percent and death rates remained stagnant between 2016 and 2019. This audit may assess the effectiveness of USAID’s malaria programs in reducing infections and deaths in selected high-burden countries in Africa and determine the extent to which USAID is implementing approaches to sustain results and foster host-country management of HIV/AIDS programs.

## **Planned Audits and Evaluations for Fiscal Year 2023**

### **Audit of USAID’s Use of American Rescue Plan Act Funds for PEPFAR**

The COVID-19 pandemic posed significant challenges to PEPFAR’s ability to provide health services, while lockdowns and other social distancing measures impeded beneficiaries’ ability to access them. In response, the American Rescue Plan Act of 2021 (ARPA) appropriated \$250 million to USAID and the CDC to support PEPFAR programs to prevent, prepare for, and respond to COVID-19, including mitigating the impact of the pandemic on PEPFAR and supporting recovery from its effects. USAID’s share of this funding is approximately \$124.6 million. USAID OIG plans to conduct this engagement in FY 2023 as part of a series of contracted audits utilizing additional funding appropriated for ARPA oversight.

### **Audit of USAID’s Controls Over Reprogramming Funds for COVID-19**

The rapid spread of COVID-19 required USAID, the CDC, and other Federal agencies to redirect existing resources to respond to the pandemic. PEPFAR funds were not exempt. In March 2020, OGAC issued guidance regarding the redirection of specified Global Health Programs funding. USAID expanded on this guidance several days later, stating any redirection of USAID’s HIV resources must follow the processes established by both OGAC and the Agency. Since then, Agency policy on redirection and reprogramming of existing resources for COVID-19 has been clarified and revised.

This audit—currently one of two on this topic conducted by USAID and HHS OIGs—will examine whether PEPFAR funds redirected and/or reprogrammed for COVID-19 followed established processes and were used appropriately, and in accordance with specified appropriations. The audit will also examine what effects, if any, those reprogrammed funds may

have had on associated PEPFAR programs and how USAID and the CDC responded, respectively. USAID OIG plans to conduct this engagement in FY 2023 as part of a series of contracted audits.

### **Audit of USAID’s Engagement With Civil Society Organizations During Country Operational Planning**

See “PEPFAR Oversight Working Group” section on page 11.

## **Other Ongoing Oversight Activities**

### **Fraud Awareness Briefings in Countries With USAID HIV/AIDS, Tuberculosis, and Malaria Programs**

USAID OIG’s Office of Investigations conducts worldwide fraud awareness briefings for both USAID-funded organizations and USAID personnel. These informative, relationship-building efforts help deter fraud, waste, and abuse by increasing awareness of mandatory disclosure requirements for allegations of fraud, misconduct, and sexual exploitation and abuse; educating stakeholders on the criminal, civil, and administrative consequences of programmatic misconduct; and identifying red flags for potential fraud. USAID OIG’s Office of General Counsel conducts similar briefings—individually or in conjunction with the Office of Investigations—to national and international forums of the legal counsels of NGOs. Since FY 2021, 151 fraud awareness briefings were conducted by our Africa, Europe, Latin America/Caribbean Division, which include USAID’s HIV/AIDS and malaria programming—reaching more than 8,800 participants.

### **Investigative Monitoring of USAID’s \$9.5 Billion Global Health Supply Chain Procurement and Supply Management (GHSC-PSM) Project**

For FY 2023, USAID OIG’s Office of Investigations has prioritized identifying, investigating, prosecuting, and mitigating fraud and organized crime that targets the global health supply chain for life-saving medications and commodities. This focus includes maintaining collaborative relationships with relevant USAID bureaus and missions, U.S. Department of State offices, U.N. agencies and public international organizations, and USAID-funded contractors and NGOs. To identify vulnerabilities, USAID OIG continues to track reports of theft and loss, develop trend analyses, and pursue relevant investigations in the field. Currently, there are over 10 investigations involving allegations of fraud, theft, diversion, and corruption adversely impacting USAID’s ability to procure and provide health commodities for millions of people worldwide.

### **Oversight of Financial and Internal Control Audits of USAID HIV/AIDS, Tuberculosis, and Malaria Contractors and Grantees**

USAID OIG provides oversight to financial audits of contractors and grantees that implement USAID’s HIV/AIDS, tuberculosis, and malaria programs. USAID is required by the Federal Acquisition Regulation, the Single Audit Act, and Office of Management and Budget (OMB) guidance to obtain appropriate and timely audits of its U.S.-based contractors, grantees, and enterprise funds; USAID’s own policy requires audits of those based overseas. Pursuant to



these requirements, independent audit firms perform incurred cost and financial audits of contractors and grantees. These audits may identify questioned costs, deficiencies in internal controls, noncompliance with laws and regulations, and fraud affecting Federal programs. USAID OIG reviews each resulting audit report for conformity with professional reporting standards. In FY 2021, USAID OIG conducted more than 80 reviews. If our auditors determine that a report conforms with standards, USAID OIG issues a transmittal memorandum to the Agency that may contain recommendations to take corrective actions or determine whether the Agency should recoup questioned costs. In addition, USAID OIG conducts quality control reviews of the independent audit firms that conduct these audits as time and resources allow. These quality control reviews help strengthen audit firm conformance with standards through an in-depth review of the audit firm's working papers and discussions with the auditors who performed and supervised the work for selected engagements. Quality control reviews may also turn up additional items to flag for USAID management attention, such as unreported internal control issues, noncompliance, or questioned costs.

## **U.S. DEPARTMENT OF STATE OFFICE OF INSPECTOR GENERAL**

State OIG has conducted over 60 audits, inspections, and special reviews since 2004 that included oversight of PEPFAR programs, including 21 thematic reviews and audits specifically focused on PEPFAR. In FY 2023, State OIG plans to resume inspections of high-risk posts in Africa that were deferred during the COVID-19 pandemic. State OIG will continue to prioritize inspections of embassies that operate in the 15 PEPFAR priority countries in future years.

### **Planned Work for Fiscal Year 2023**

#### **Embassy Inspections**

For FY 2023, State OIG plans to conduct inspections<sup>5</sup> at two embassies with significant PEPFAR programs: Embassy Abuja, Nigeria, and Embassy Juba, South Sudan. Embassy Abuja implements the second largest PEPFAR program in the world, with \$444 million in FY 2021 funding. Embassy Juba implements a smaller but significant program, which received \$42 million in FY 2021 funding.

In these inspections, State OIG will assess the extent to which the Chief of Mission and PEPFAR coordinator are addressing three core priorities: epidemic control, interagency coordination, and the country operational plan process. Inspections will also review how embassy PEPFAR teams are managing risks associated with supply chain management, local partner transitions, and compliance with State's OGAC budget guidance in country operational plans.

#### **Review of the PEPFAR Local Partner Transition Initiative**

In FY 2023, State OIG plans to conduct a review of PEPFAR's local partner transition initiative. In 2018, OGAC launched this worldwide initiative to transition 70 percent of PEPFAR funds from international to local partners by 2020. The intent of this initiative was to promote host-country ownership of the HIV/AIDS response and ultimately transition to full host-country management of HIV/AIDS programs. Local NGOs may lack technical and administrative capacity, raising risks of program underperformance, fraud, and mismanagement. Direct assistance<sup>6</sup> to host countries—another component of the local partner transition initiative—is a high-risk strategy in countries with extensive public corruption. In this review, State OIG will determine (1) the implementation status of OGAC's local partner transition initiative and (2) the extent to which OGAC has incorporated risk management practices required by 2 FAM 031d and OMB Circular A-123 into internal office processes and interagency agreements with PEPFAR implementing agencies.

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<sup>5</sup> OIG embassy inspections are systematic and independent assessments of mission leadership, policy implementation, resource management, and internal controls.

<sup>6</sup> Also known as government-to-government or on budget assistance, direct assistance is used by PEPFAR agencies as an implementing mechanism to deliver assistance through cash transfers to host countries.

## Other Oversight Activities

### **Fraud Awareness Briefings with Department Stakeholders and PEPFAR Implementers**

To expand outreach efforts, State OIG's Office of Investigations will proactively engage with OGAC staff and PEPFAR implementers by providing awareness briefings that will assist personnel in identifying fraud, waste, and abuse in the PEPFAR program. Educating stakeholders and implementers on how to identify and report fraud, waste, and abuse will increase awareness of mandatory reporting requirements and create stronger relationships and lines of communication between PEPFAR-funded programs and State OIG. In addition, State OIG will coordinate and collaborate with Federal and foreign law enforcement partners to identify and thoroughly investigate alleged violations of law, regulation, and policy.

## U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES OFFICE OF INSPECTOR GENERAL

For the FY 2023 coordinated oversight plan, HHS OIG plans to conduct PEPFAR program integrity and fraud prevention activities. The CDC received more than \$5.4 billion for FY 2019-2021 (about 97 percent of the funds received by HHS during the three FYs) to accelerate HIV treatment and prevention worldwide by using public health, innovation, and data-driven approaches to achieve the global goal of HIV epidemic control.<sup>7</sup>

The CDC has been working to combat HIV since the start of the HIV epidemic. As an implementing agency of PEPFAR, the CDC works side by side with ministries of health and other partners to improve methods for finding, treating, and preventing HIV.<sup>8</sup> The investments made in response to HIV will save lives, strengthen communities, and pave the way for long-term sustainability. To date, HHS OIG has conducted 31 PEPFAR audits of the CDC or recipients in 9 countries on 3 continents (Africa, Asia, and North America). HHS OIG's PEPFAR oversight has helped the CDC, HHS staff, and grant recipients learn important grant and program integrity lessons that apply to ongoing and future responses to infectious diseases.

For FY 2023, HHS OIG has four ongoing audits to complete, three planned audits to start (two domestic and one international [in-country]), a data analytics dashboard to share with the PEPFAR implementing IGs, and fraud prevention training to conduct.

### Ongoing Audits for Fiscal Year 2023

#### **Follow-up Audit of CDC Corrective Actions and National Institute of Health in Mozambique's Management of PEPFAR Funds**

Findings from the prior HHS OIG audit report included the lack of a compliant accounting system and the resultant inability to reconcile PEPFAR expenditures of \$8.5 million.<sup>9</sup> The prior audit report also included a memorandum to the CDC to alert it of the potential risk of fraud, waste, and abuse that PEPFAR funds could be subjected to in the event of future awards. Our objective is to assess any corrective actions that the CDC has taken to improve program operations at the National Institute of Health in Mozambique and to determine whether it implemented recommendations from our prior audit.

#### **Audit of Thailand Ministry of Public Health's Management and Expenditures of PEPFAR Funds**

HHS OIG received requests from the CDC to conduct a PEPFAR audit in Thailand. Also, at the CDC's request, HHS OIG's Office of Investigations presented fraud awareness training in

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<sup>7</sup> Funds are received from OGAC. See the Foreword for more details.

<sup>8</sup> CDC's partners in global health include a variety of valuable stakeholders and partners, including but not limited to foreign governments, U.S. government agencies, academic institutions, NGOs, faith-based organizations, and private sector organizations.

<sup>9</sup> HHS OIG, [The National Institute of Health in Mozambique Did Not Always Manage and Expend the President's Emergency Plan for AIDS Relief Funds in Accordance With Award Requirements](#) (A-04-16-04051), April 10, 2018.

Thailand in December 2017. Findings from our audits of ministries of health in other countries included inadequate accounting systems and ineffective internal controls, resulting in the mismanagement of PEPFAR funds. If these vulnerabilities are also present at the Thailand Ministry of Public Health, the risk of mismanaged Federal funds would further complicate the CDC umbrella cooperative agreement it was awarded. The umbrella award combines funding streams from multiple CDC programs and divisions, including PEPFAR. Our objective is to determine whether the Thailand Ministry of Public Health managed and expended PEPFAR funds in accordance with award requirements.

### **Audit of ICAP at Columbia University’s Financial Reporting of CDC PEPFAR Expenditures**

The CDC has indicated interest in an HHS OIG audit of several domestic recipients of PEPFAR funds. Our audit of ICAP at Columbia University will focus on reviewing financial controls, including a site visit to an ICAP in-country office. A prior HHS OIG investigation found that Columbia University improperly claimed and received excessive indirect costs, resulting in a \$9.5 million settlement in connection with Federal research grants. Our objective is to determine whether ICAP at Columbia University reported its CDC PEPFAR expenditures in accordance with Federal requirements during FY 2018.

### **Audit of the CDC**

OMB issued administrative relief for recipients and applicants of Federal financial assistance directly affected by COVID-19, including flexibilities extended to recipients affected by the loss of operational capacity and increased costs because of the COVID-19 crisis. This will be a collaborative audit conducted by HHS and USAID OIGs. The OIGs may assess reprogrammed and/or redirected PEPFAR funds used for COVID-19 at their respective agencies.

## **Planned Audits for Fiscal Year 2023**

### **Audit of a Domestic PEPFAR Recipient**

For FY 2019-2021, the CDC obligated more than \$912 million in PEPFAR funds to domestic recipients. HHS OIG will conduct a risk assessment and identify a recipient for audit. Our objective is to determine whether the recipient managed and expended PEPFAR funds in accordance with the award requirements.

### **Audit of In-Country PEPFAR Recipient(s)**

Multiple PEPFAR recipients in South Africa have launched the Pelebox smart locker at numerous facilities to deliver new approaches to health care. The Pelebox smart locker is an electronic pickup point where patients can collect their refill medications for chronic conditions (e.g., tuberculosis, HIV). We anticipate conducting an audit of PEPFAR recipient(s) in South Africa with a focus on the Pelebox program. Possible audit objectives may include assessing (1) the individual recipient’s Pelebox operation and controls of medication distribution through Pelebox and whether the recipient has designed and implemented controls to mitigate potential

risks or (2) the effectiveness of the Pelebox operation in distribution of medication.<sup>10</sup>

### **Audit of CDC Engagement With Civil Society Organizations During Country Operational Planning**

See the PEPFAR Oversight Working Group on page 11 for more details.

## **PEPFAR Data Analytics**

### **Analysis of PEPFAR Data**

The CDC awards billions of dollars to recipients around the world to implement HIV/AIDS Relief programs. To ensure that we capture all relevant PEPFAR data, we are compiling numerous data sources into one system for a comprehensive PEPFAR data tool. These data will be routinely updated, and we will be able to generate risk scores for both PEPFAR recipients and countries. We anticipate that PEPFAR U.S. government implementers will have access to the PEPFAR Data Analytics Dashboard.

## **Other Oversight Activities**

### **Fraud Prevention Training for CDC In-Country Staff and CDC Cooperative Agreement Recipients**

In FY 2023, HHS OIG's Office of Investigations will continue to collaborate with foreign and domestic partners to evaluate fraud and misconduct allegations to determine appropriate investigative actions. Part of this collaboration will include providing fraud awareness and anticorruption training to the CDC's in-country staff, partners, and grantees.

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<sup>10</sup> This objective may result in a series of recipient audits.

## PEACE CORPS OFFICE OF INSPECTOR GENERAL

Since 2004, the Peace Corps has been an integral part of PEPFAR. Peace Corps Volunteers around the world work in partnership with host country and local governments to enhance the capacity of organizations from the community to the national level, encouraging the adoption of healthier behaviors and working to mitigate the impact of HIV/AIDS. The Peace Corps has leveraged PEPFAR funding for vital programming and training enhancements, including supplemental Volunteer training; funding of additional 2-year Volunteers, Peace Corps Response Volunteers, third-year extensions, and staff; and activities benefiting community members, such as capacity building and community-initiated activities. The Office of Global Health and HIV is the technical and managerial focal point at Peace Corps headquarters for PEPFAR programming and funding. At the country level, there is typically a U.S. government interagency team, led by an interagency PEPFAR coordinator employed by the U.S. Department of State, with which Peace Corps posts engage to determine programming priorities and negotiate funding levels. In FY 2022, the Peace Corps received \$41.1 million for FY 2023 implementation.

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. The CARES Act provided the agency with supplemental funding to prevent, prepare for, and respond to the coronavirus. The Peace Corps developed extensive criteria to return Volunteers to service, and in March 2022, the agency announced that the first 35 Volunteers to return to service had arrived in the Dominican Republic and Zambia. In total, the agency deployed Volunteers to 21 countries between March and July 2022.

### Ongoing Audits for Fiscal Year 2023

#### Review of Peace Corps PEPFAR Expenditures After Volunteer Evacuation

As part of our FY 2022 plan, the audit unit began a review of PEPFAR expenditures. PEPFAR funds are typically allocated to posts based on the number of PEPFAR Volunteers and PEPFAR activities carried out by Volunteers. But without Volunteers at posts, it is unclear how the agency allocated funds and justified activities. The intended objective of this review is to assess the amount and appropriateness of PEPFAR-related expenditures and determine how the agency allocated indirect costs to PEPFAR funds when posts were without Volunteers.

Peace Corps OIG is committed to monitoring and contributing to the agency's planning and implementation of its reentry process. While we anticipate conducting a number of post audits and evaluations in FY 2023, we have not yet scheduled the work due to uncertainty about travel and operational contexts related to the ongoing pandemic. Peace Corps OIG oversight will include continued focus on the health and safety of the Volunteers as the agency continues to safely redeploy Volunteers, as well as emphasis on proper spending of taxpayer funds. Peace Corps OIG will announce any additional reviews involving PEPFAR funds via our website and social media.

## PEPFAR OVERSIGHT WORKING GROUP

The COVID-19 pandemic has highlighted the necessity for a coordinated, whole-of-government response. In September 2020, the Future of Global Health Oversight forum—hosted by HHS, State, USAID, Global Fund OIG, and HHS Office of Global Affairs—emphasized the importance of coordination. On January 20, 2021, President Biden issued a national security memorandum<sup>11</sup> requiring relevant agencies to develop protocols for coordinating and deploying a global response to emerging high-consequence infectious disease threats that outline the respective roles in facilitating and supporting such response operations, including establishing standard operating procedures for how USAID and the CDC coordinate their response efforts.

In 2021, representatives from USAID, State, HHS, and Peace Corps OIGs launched the PEPFAR Oversight Working Group to further enhance and deepen coordinated oversight. The working group's goals are to create a forum to share information; develop a thematic, multi-agency approach to oversight planning; and supplement traditional planning efforts by contributing at least one set of contemporaneous, crosscutting audits addressing common themes across their respective agencies to the FY 2023 plan. Topics generated by the working group were presented at quarterly meetings for discussion and input from a larger group of OIG officials, ensuring support from leadership. This year, the working group is building off prior work by State OIG to examine implementing agencies' engagement with civil society organizations (CSOs).

### Planned Audits for Fiscal Year 2023

#### **Audits of PEPFAR's Engagement With Civil Society Organizations in Annual Planning, Community-Led Monitoring, and COVID-19 Response**

CSOs constitute an important partnership for PEPFAR, helping to create sustainable health outcomes in host countries while increasing the impact of U.S. taxpayer dollars.

OGAC requires PEPFAR country teams to engage with CSOs and other community entities in developing the Country Operational Plan (COP), the annual strategic plan for U.S. government-funded global HIV activities. In 2020, State OIG reported that PEPFAR country team members across four missions expressed concerns about the short COP development timeline, which they believe hindered dialogue with local stakeholders and could have adversely affected PEPFAR implementation. In addition to COP engagement, OGAC also expects PEPFAR country teams to collaborate with CSOs and other local community entities to undertake community-led monitoring activities to gather data about HIV services and develop solutions to address identified gaps. Furthermore, the COVID-19 pandemic has impacted PEPFAR planning, implementation, and monitoring efforts, and PEPFAR aims to use existing community structures to help respond to COVID-19.

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<sup>11</sup> National Security Memorandum – 1, United States Global Leadership to Strengthen the International COVID-19 Response and to Advance Global Health Security and Biological Preparedness.



These audits—planned to be conducted by USAID and HHS OIGs examining their respective agencies—will select a sample of PEPFAR country teams and examine their efforts to engage CSOs in the COP development process and fund community-led monitoring activities. The audits can assess (1) to what extent civil society stakeholders are involved in COP development and monitoring the quality of PEPFAR-supported services, (2) whether country teams are meeting the requirement for community-led monitoring activities, and (3) how community-led monitoring can be incorporated into other U.S. government global health programs.

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