
This report is presented in compliance with Article 121 of the General Standards to Govern the Operations of the General Secretariat Prepared by the General Secretariat of the Organization of American States

Office of the Inspector General

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Luis Almagro
Secretary General to the
Organization of American States
Washington, DC

SG/OIG-15/09

Excellency:

I have the honor to submit to you the Activity Report of the Office of the Inspector General for the period January 1 to September 30, 2015.

I submit this Activity Reports to you, for forwarding to the Permanent Council, in accordance with the provisions of Article 121 of the General Standards to Govern the Operations of the General Secretariat of the Organization of American States.

Accept, Excellency, the renewed assurances of my highest consideration.

Garry LaGuerre
Interim Inspector General

Encl.
for the Period from January 1 to September 30, 2015

I. Summary

The activities of the Office of the Inspector General (OIG) are conducted in accordance to Chapter IX -Advisory Services, Auditing, and Fiscal Control- of the General Standards to Govern the Operations of the General Secretariat (General Standards), and Executive Order No. 95-05. These dispositions establish the function of internal audit that assists the Secretary General and the Governing Bodies in monitoring the proper fulfillment of the responsibilities of various levels of management with respect to the programs and resources of the General Secretariat. The objective of the OIG is to ensure the systematic revision of the operational procedures and financial transactions at Headquarters, as well as in the offices in Member States.

This report is submitted in conformity with Article 121 of the General Standards. It covers the activities of the OIG from January to September 30, 2015. During this period, the OIG:

- Focused on completing three internal audit reports from 2015 which included: Inter-American Committee against Terrorism (CICTE), Business Continuity/ Disaster Recovery Plan, and GS/OAS Office of Venezuela.
- Initiated and are in the process of completing four audits as follows: GS/OAS Fixed Assets, Disbursement Process for Specific Funds, GS/OAS Office of Trinidad and Tobago Performance Contracts (CPR) Mechanism
- Continued the process of conducting follow-up on the recommendations.
- Received five matters for investigation and carried over two Preliminary Reviews and two Investigations from the previous year.
- Closed two matters for investigation as Preliminary Reviews without opening an investigation, finding both allegations unsubstantiated, and closed one matter following a full investigation.
- Performed research to ensure that the OIG hotline is aligned with best practices.

In addition, the OIG has finalized the implementation of the Audit Management Software, TeamMate. This software has become an integral part of the audit and investigation process. As a result, the OIG now has an automated database of outstanding recommendations that will facilitate the follow-up process of these recommendations.

II. Mandate

The Article 117 of the General Standards states that: “The Office of the Inspector General shall be the dependency responsible for exercising the functions of financial, administrative, and operational auditing, for the purpose of determining the level to which the General Secretariat achieves the objectives of diverse programs and the efficiency and economy with which resources are used, as well as issuing recommendations to improve management of the General Secretariat. To achieve the aforementioned purpose, the Inspector General shall establish appropriate internal auditing procedures that reflect international best practices, to verify compliance with the standards and regulations in force, through critical, systematic, and impartial examination of official transactions and operational procedures related to the resources administered by the General Secretariat. To that end, the Secretary General shall issue an Executive Order regulating such activities.”
The International Professional Practices Framework, promulgated by the Institute of Internal Auditors, defines internal auditing as "an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes."

Executive Order No. 95-05 issued by the Secretary General on May 8, 1995 established the OIG as the dependency responsible for applying internal auditing procedures and performing related functions, and also provided the declaration of responsibility, purpose and authority with respect to internal audits, investigations and the composition of the OIG. The purpose of the OIG is to advise and assist the Secretary General and, through him, the Secretaries, Directors and other General Secretariat supervisory staff in the proper discharge of their responsibilities by providing them with appropriate analyses, evaluations, investigations, recommendations and comments on the activities reviewed. The OIG is responsible for performing a systematic review of internal management and accounting controls, for assisting in the strengthening of internal controls and for issuing recommendations to improve and promote economy, efficiency and effectiveness of operations in the General Secretariat. The OIG also provides recommendations to assist all levels of management in improving or establishing internal controls to prevent or detect fraud and abuse.

In accordance with the General Standards, audits are conducted with special emphasis on the proposals of the Board of External Auditors (BEA or Board) and the political bodies of the General Secretariat, particularly regarding the need to concentrate on areas of high risk.

Executive Order No. 05-08, Corr. 1 issued on April 14, 2005 outlines the General Secretariat's policy for encouraging the reporting of financial and administrative misconduct. This policy provides the basis for the protection for whistleblowers, informants and witnesses from retaliation in the reporting of financial and administrative misconduct and is essential in the fight against fraud. The use of the OIG confidential hotline is effective in providing an additional mechanism for reporting allegations of misconduct involving the human resources of the GS/OAS and allegations of fraudulent, corrupt, coercive and collusive practice against the GS/OAS, whether committed by staff members or other persons, parties or entities, deemed to be detrimental to the Organization.

III. Overall Efforts to Strengthen the Functions of the Office of the Inspector General

In April 2015, the BEA issued its 2013-2014 Annual Audit Report. In this report, the Board noted that the status and role of the OIG within the OAS is important to the Board since the OIG is an essential safeguard to the assessment and maintenance of OAS' internal control environment. The Board monitored the performance of the internal audit function during the year and were pleased to conclude that the function was performed effectively and with due professional care. The OIG has, for the most part, completed the workload planned for the 2014. The Board notes that several projects in the OIG 2013 work plan were not completed until 2014, and one additional audit planned for 2014 has been carried forward to the 2015 work plan. The Board has also noted that the OIG has experienced capacity challenges this year, but is encouraged with the strategy in place to recruit and retain the skills and knowledge needed for the audit and investigation functions. Nevertheless, the Board is aware that retention of internal auditors remains an ongoing challenge and will continue to monitor the capacity of the function. Although audit work continues to identify areas where existing management practices need to be strengthened, the Board is encouraged that management is embracing the OIG’s recommendations as a tool to help achieve objectives in an environment of shrinking resources.
Training

During the first three quarters of 2015, the OIG participated in a follow-up training for the implementation of the Audit Management Software, TeamMate. The implementation of this software will facilitate, improve the efficiency of the OIG functions, contribute to the modernization of the office and keep the OIG in compliance with the Institute of Internal Auditors (IIA) recommendations for the appropriate use of technology. Furthermore, the OIG Investigator joined the Association for Certified Fraud Examiners (ACFE) and attended the three-day ACFE 2015 Global Fraud Conference.

In an effort to provide training to the OIG personnel to maintain their skill levels and to ensure they are adequately prepared to meet the required minimum annual Continuing Professional Education (CPE) credits, during the second semester of 2015, the OIG will continue to make training an important part of staff development, including assisting OIG personnel interested to become Certified Fraud Examiners. The OIG will encourage its staff to participate in training activities that are in compliance with auditing and investigation standards as well as the CPE requirements, as specified by the IIA.

IV. Audit Activities

During the first quarter of 2015, the OIG worked on finalizing four audit reports that began in previous years. From March – September 2015, the OIG completed three of the seven audits included in 2015 work plan and issued the reports. As of September 30, 2015, three other audits were in various stages of completion and one was in planning phase. Our audits are risk-based and also focus on increasing accountability and higher adherence with GS/OAS rules and regulations, identifying operational processes that may lack internal controls, and promoting organizational efficiency and effectiveness.

Audit SG/OIG/AUD-15/01 – Department of General Services – GS/OAS Fixed Assets System

A consulting firm contracted by the OIG is providing this internal audit service on behalf and under the supervision of the OIG. The main objectives of this audit were to: (1) Assess the Department of General Services’ (DGS) compliance with GS/OAS policies and procedures as related to Chapter XIV of the OAS Budgetary and Financial Rules within the following areas (a) verifying the use of the fixed asset accounts, (b) accounting for fixed assets, (c) valuation of fixed assets, (d) accuracy and completeness of fixed assets inventory, (e) tracking and disposal of fixed assets; (2) Evaluate the accuracy of fixed assets inventory maintained by the Inter-American Defense Board (IADB); (3) Assess DGS’ compliance with GS/OAS procurement rules during the acquisition of fixed assets; (4) Verify that the recommendations issued in the prior OIG report on the Organization’s fixed assets (SG/OIG/AUDIT-05/07) have been appropriately addressed. This audit is currently in the reporting phase and is scheduled to be finalized during the fourth quarter of 2015.

Audit SG/OIG/AUD-15/02 – Secretariat for Multidimensional Security – Inter-American Committee against Terrorism (CICTE)

The main objectives of this audit were to: (1) verify whether the activities of the Inter-American Committee against Terrorism (CICTE) for the audit scope period were carried out in compliance with established GS/OAS rules and regulations, including Executive Order No. 08-01 Rev. 7, Donors’ agreements as well as other GS/OAS directives, if applicable; and (2) Evaluate internal controls surrounding CICTE’s operations for the period including: (a) Financial transactions: how they were
initiated, authorized, processed and recorded in the system; (b) Procedures for recruiting projects’ personnel; (c) Projects’ disbursements; and (d) Procedures for safeguarding and transferring fixed assets, if applicable. Furthermore, the objectives also include following up on prior audit recommendations related to CICTE, if applicable. The audit scope covered transactions related to CICTE for the period from January 2013 to December 2014. The audit report has been issued.

Based on the results of the work performed, areas that need improvement were identified. The following lists the observations that support our conclusion: (1) Lack of AMS personnel to support CICTE’s operations, (2) Unspent Specific Fund balances related to CICTE’s operations from 2006 and 2007 remained inactive in OASES, (3) Lack of consistent procedures to review Non-OAS staff members’ per-diems, (4) Inaccurate recording of per-diem disbursements noted related to Non-OAS staff members.

Audit SG/OIG/AUD-15/03 – Department of Financial and Administrative Services – Disbursement Process for Specific Funds

The main objectives of this audit were to (1) Verify whether disbursements made through Specific Funds for the audit scope period were in compliance with the established GS/OAS rules and regulations, including the Financial Handbook for Specific Fund Agreements, and other applicable guidelines and directives; (2) Evaluate internal controls surrounding the disbursement process for Specific Funds including how transactions were initiated, authorized, processed, recorded and reported during the scope period; and (3) Verify that the OIG recommendations related to the disbursement process for Specific Funds issued in previous OIG reports have been appropriately addressed. The scope will cover transactions related to the disbursement process for Specific Funds for the period from January 1, 2014 to June 30, 2015. This audit is scheduled to be finalized during the fourth quarter of 2015.

Audit SG/OIG/AUD-15/04 – Department of Information and Technology Services – Business Continuity/Disaster Recovery Plan

A consulting firm contracted by the OIG has provided this internal audit service on behalf and under the supervision of the OIG. The main objectives of this audit were to: (1) Assess compliance with Executive Order 08-01, Rev 7 relating to the responsibility of the Information Security Section of the Department of Information and Technology Services (DOITS) to “keep an up-to-date disaster contingency plan for the operational continuity and recovery of the Organization’s systems, in case of disaster;” and (2) Evaluate the effectiveness of the GS/OAS Business Continuity Plan (BCP)-Disaster Recovery Plan (DRP). The audit report has been issued.

Based on the results of the work performed, areas that need improvement were identified. The following lists the observations that support our conclusion:

- While the IT DRP meets the Executive Order 08-01, Rev. 7 requirement to, “keep an up-to-date disaster contingency plan for the operational continuity and recovery of the Organization’s systems, in case of disaster,” the IT DRP does not align with an organization BCP, as a BCP does not exist.
- There is not a documented mapping or description of how the risks listed in the IT Risk Analysis align to the risk scenarios documented in the DRP.
- The Business Impact Analysis (BIA) was completed without input from the business areas.
- The current recovery objectives are achievable during a short time event that only affects the GSB data center and not the ADM data center.
- Business areas may procure IT services from third –party vendors. An IT service procured by a business area may not meet the recovery requirements for that business area and in some
cases the recovery requirements may not be defined. The IT service also may not meet the established recovery objectives by the current BIA and DRP. DOITS leadership lacks authority to require business areas to use DOITS approved service providers for IT services or compatible providers that meet disaster recovery requirements.

- The only two data centers (GSB and ADM buildings) are located within a half mile of each other and are on the same power grid.
- An Uninterrupted Power Supply (UPS) and a generator are not installed to support the ADM data center.
- Any Recovery Time Objective (RTO) or Maximum Tolerable Disruption (MTD) shorter than 48 hours may not be met should OAS need the contracted disaster recovery provider (Agility) to recover systems and data.
- The current tape library is not able to meet the required RTOs and Recovery Point Objectives (RPOs).
- There is a lack of understanding of the roles and responsibilities assigned to the various non-DOITs IT Disaster Recovery Coordinators and their supporting team members and there is limited training for these non-DOITS team members.
- While aspects of the IT DRP have been tested as a part of planned and unplanned activities, not all of the aspects of the plan have been tested.
- The records management manual is outdated to address data retention requirements and needs.
- Certain business areas have developed their own recovery plans that were not coordinated in conjunction with the BIA and DRP that DOITS developed.
- A cybersecurity/ data breach response plan does not exist to document the process for notification, response, handling, and communication, as well as roles and responsibilities, in the event of a cybersecurity/ data breach.

Audit SG/OIG/AUD-15/05 – GS/OAS Office in Trinidad and Tobago

The main objective of this audit was to: (1) Verify whether the internal disbursement process in local currency and U.S. dollar for the operational functions of the office and for projects (if applicable) in Trinidad and Tobago is appropriately designed and operating effectively and efficiently to ensure the orderly and efficient conduct of activities; and (2) Validate whether the GS/OAS Office in Trinidad and Tobago is carrying out its responsibilities in accordance with the General Standards, policies and procedures of the General Secretariat, including the Staff Rules, Executive Orders, Administrative Memoranda, Budgetary and Financial Rules, and Field Financial Manual. The period covered in the review was January 1 to December 31, 2014. This audit is scheduled to be finalized during the fourth quarter of 2015.

Audit SG/OIG/AUD-15/06 – GS/OAS Office in Venezuela

The main objective of this audit is to review whether the GS/OAS Office in Venezuela is carrying out its responsibilities in accordance with the General Standards, policies and procedures of the General Secretariat, including the Staff Rules, Executive Orders, Administrative Memoranda, Budgetary and Financial Rules, and Field Financial Manual. This also includes verifying whether the internal disbursement process in local currency and U.S. dollar for the operational functions of the office and for projects are appropriately designed and operating effectively and efficiently to ensure the orderly and efficient conduct of activities. The period covered during the review was January 1 to December 31, 2014. The audit report has been issued.
Based on the results of the work performed, areas that need improvement were identified. The following lists the observations that support our conclusion: (1) Unspent Specific Fund balance related to the office’s operations from 2007 remained inactive in OASES; (2) Outdated archives related to the office’s operations; (3) Obsolete fixed assets; (4) Telephones and computer equipment need upgrades; (5) Need for more frequent inspection of the office’s fire extinguishers; (6) Need to regularize the office’s Technical Administrative Assistant position; (7) Need to regularize the payment method related to the contract of the office’s Messenger/Chauffeur; (8) Need to regularize the payment method related to the contract of the office’s Cleaning services personnel; (9) Need to regularize the payment method related to the contract for the office’s rent; (10) Some payments for services lack appropriate supporting documentation; (11) Inadequate segregation of duties related to the office’s disbursement process; (12) The official vehicle is insured with an international policy, in violation of local laws; (13) Some personal calls made from the office’s phone were not reimbursed at the time of our field visit; and (14) Need to regularize the issue of deductions made from wages of the office’s Technical Administrative Assistant.

Audit SG/OIG/AUD-15/07 – Department of Human Resources – Performance Contracts (CPR) Mechanism

The main objective of this audit was to review the Performance Contracts (CPR) mechanism according to the GS/OAS rules and regulations, including Executive Order No. 05-04, Corr. 1: Performance Contracts Rules, Executive Order No. 08-01 Rev. 7 and other applicable GS/OAS directives, as well as to follow up on prior audit recommendations related to the CPR mechanism. The audit scope covers transactions related to Natural CPRs for the period from January 2013 to December 2014. As of September 30, 2015, this audit was in fieldwork phase and is scheduled to be finalized during the fourth quarter of 2015.

V. Investigation Activities

From January – September 2015, the OIG received five matters for investigation and carried over two Preliminary Reviews and two Investigations from the previous year. Of these cases, in the first semester of 2015, the OIG closed two Preliminary Reviews without opening an investigation, finding both allegations unsubstantiated. In addition, the OIG closed one matter following a full investigation, for which it issued a total of ten recommendations. The OIG also found sufficient indication of wrongdoing in two of the matters received and opened these into full investigations. As of September 30, 2015, three matters remained in the Preliminary Review phase and three were under investigation.

It is important to note that in July 2015 the OIG investigator requested and was granted a 5-month leave without pay in August 2015 to participate in an internship program in Europe. The investigator is scheduled to be back in office in January 2016.

Investigation SG/OIG/INV-13/14

This investigation was ongoing as of September 30, 2015.

Investigation SG/OIG/INV-14/03

In March 2014, OIG/INV received information indicating that the Department of Conference and Meetings Management (DCMM) may have had several consultants under contractual arrangements that may be in violation of the Organization’s rules, specifically Staff Rule 104.18 and Administrative Memorandum No. 82. Following a full investigation, the OIG concluded that the allegations were substantiated. Specifically, the investigation concluded that some consultants under CPR contracts were receiving overtime remuneration and others counted on simultaneous contracts with the Organization for
the same or similar services in violation of the Organization’s rules. The OIG issued ten recommendations to address these violations and ensure that risks identified in the investigation were mitigated.

Investigation SG/OIG/INV-14/10

In November 2014, the OIG received information anonymously indicating a potential conflict of interest between a member of the Organization’s External Auditors’ team and a CPR in the Organization. The OIG conducted interviews, reviewed contracts and supporting documentation and conducted independent research into the matter. From the activities conducted and the information received, the OIG was unable to substantiate that a conflict of interest existed and closed the matter as unsubstantiated prior to opening an investigation.

Investigation SG/OIG/INV-14/11

This matter was still in the Preliminary Review stage as of September 30, 2015.

Investigation SG/OIG/INV-15/01

In January 2015, the OIG received information indicating a concern for the security procedures of the Organization and an allegation of negligence on the part of the Security Section of the Department of General Services (DGS). Specifically the allegation noted a specific security breach as an indication of negligence on the part of the Security Section. The OIG reviewed the allegation and interviewed the complainant, as well as the Head of the Security Section with respect to the security measures put in place after the breach and followed up on the execution of these measures. The OIG also reviewed previous OIG audits and recommendations to the Security Section, and followed up on the execution of these recommendations. In light of the activities conducted the OIG concluded that the breach noted was a one-time incident rather than evidence of continued negligence and that there was insufficient information to conclude that the Security Section had a practice of acting negligently with regards to security breaches in the Organization’s buildings. The OIG concluded the allegation was unsubstantiated and closed the matter prior to opening an investigation.

Investigation SG/OIG/INV-15/02

In April 2015, the Investigations Unit of the Office of the Inspector General (“OIG/INV”) received information indicating that fraudulent invoices may have been presented for reimbursement to Carefirst Bluecross Blusheild (“Carefirst BCBS”) by a retired OAS staff member (“the subject”) based in Argentina. The allegation indicated that the OAS Insurance Office found indications of fraud in a reimbursement claim presented by the subject. Specifically, the OAS Insurance Office indicated that they had received a check from Carefirst BCBS for the subject for reimbursement of medical expenses, which corresponded to services rendered by a physician provider in Argentina during the months from June to September 2014.

Upon receiving the check, the OAS Insurance Office (“the Office”) red flagged the payment due to the amount of the check as well as the quantity and nature of the services. The Office requested an investigation from the Carefirst BCBS Special Investigation Unit. The OIG/INV reviewed the Carefirst BCBS Investigation summaries and the supporting documentation, reviewed the receipts presented by the subject and documentation of reimbursements from the OAS Insurance Office, and conducted independent research on the physician providers. As a result of these activities, the OIG/INV concluded that there is reasonably sufficient evidence to support that the subject has presented fraudulent receipts for reimbursement to Carefirst BCBS, in violation of the Organization’s rules and obligation to protect the
Medical Benefits Trust Fund for which it is ultimately liable. Therefore, the OIG/INV recommends the matter be opened to a full investigation.

The subject was informed by representatives of OIG/INV and DLS that given these facts, the OIG report would conclude that all invoices presented by her for services allegedly provided by the physicians were fraudulent and would recommend the Organization seek restitution and prohibit her from participating in the Organization’s health plan. The subject informed representatives of OIG/INV and DLS that she understood the consequences of her actions and that on advice of her lawyer she would reimburse the Organization whatever funds they deemed fit.

Review of the reports obtained from Carefirst BCBS indicated that from 2008-2014 the total value of substantiated fraudulent claims submitted by the subject for reimbursement amounted to USD109,800. On September 18, 2015, the subject informed the OIG/INV that she had sent her first restitution check in the amount USD500 to the OAS Insurance Office. The check was received on October 14, 2015.

The OIG/INV will issue a formal investigation report during the fourth quarter and will also recommend that the Organization seek restitution from Carefirst BCBS for gross negligence in reimbursing invoices that should have raised obvious red flags. It should also be noted that the Mission of Argentina has been informed of this investigation.

Investigation SG/OIG/INV-15/03

In May 2015, the Investigations Unit of the Office of the Inspector General (OIG/INV) received information indicating that fraudulent emails may have been sent from the Inter-American Commission on Human Rights (IACHR) official email.

Specifically, the allegation indicated that a petitioner from Argentina who filed a complaint with the IACHR in August 2014, had received several emails and faxes between August 2014 and January 2015, which appeared to have emanated from the same email account used to communicate with all IACHR petitioners. These emails appear to have instructed the petitioner to deposit money into an alleged IACHR Citibank account to further the review of his petition. Specifically in October 2014, the petitioner received an email from cidhdenuncias@oas.org with instructions to make 10 separate payments of 5,000 Argentinian pesos using Citibank headed invoices provided by the emails. The records show that the petitioner allegedly paid a total of USD24,620 to the sender of these emails and faxes.

The OIG/INV reviewed the allegations and the emails as well as documentation presented by the petitioner. The OIG/INV was able to confirm that the account in which the petitioner deposited the 10 separate payments was not a Citibank account but rather a “Dinero Mail” account. Furthermore, the IACHR informed the OIG/INV that the matter had been reported to them after the petitioner contacted an IACHR Administrative Assistant and informed them of the payments made.

The OIG/INV also contacted DOITS personnel who analyzed the long distance call logs from the IACHR fax numbers and the emails received by the petitioner. DOITS personnel produced incident reports in which they found that there were no logs of outgoing calls to the petitioner’s number or any long distance number on the dates the petitioner allegedly received faxes from the IACHR. In addition, DOITS personnel also concluded that there was no evidence that the email address cidhdenuncias@oas.org was used to send emails to the petitioner, or that outgoing calls were placed from the IACHR fax numbers to Argentina or the petitioner, for which they suspect this to be a case of email spoofing where a third party outside the Organization sent the forged emails and faxes.
The OIG/INV will issue a formal investigation report during the fourth quarter.

**Investigation SG/OIG/INV-15/04**

This matter was still in the Preliminary Review stage as of September 30, 2015.

**Investigation SG/OIG/INV-15/05**

This matter was still in the Preliminary Review stage as of September 30, 2015.

### VI. Status of Recommendations

Thus far, the OIG has continued to work with the areas of the GS/OAS to follow-up on outstanding recommendations. The OIG is establishing procedures to follow-up on recommendations so that the responses from the areas are recorded in an efficient and consistent manner. This initiative will be facilitated through the use of the audit software TeamMate where we currently have an automated database of over 100 pending recommendations. It is important to note that the areas have made efforts to implement the recommendations in a timely manner and the OIG continues to follow-up on the issued recommendations to verify their status.

### VII. Risk Assessment

According to Standard 2120-A1 (Risk Management) of the International Professional Practice Framework (IPPF) for internal auditing, “the internal audit activity must evaluate risk exposures relating to the organization’s governance, operations, and information systems regarding: (1) Reliability and integrity of financial and operational information; (2) Effectiveness and efficiency of operations and programs; (3) Safeguard of assets and (4) Compliance with laws, regulations, policies, procedures and contracts.”

In compliance with this standard, during the third quarter of 2015, the OIG has been working with the various areas of the GS/OAS to initiate the Risk Assessment process. The responses the OIG has received from these areas which have identified the risk exposures, will not only assist the OIG in formulating risk-based audit plans for 2016-2017, but will also add to our database of actual risks that could negatively affect the Organization’s ability to achieve its objectives.

Additionally, the information collected could help facilitate the dialogue on Risks and Controls and the implementation of an Enterprise/Organization-Wide Risk Management framework (ERM) to manage both internal and external risk factors effectively.

### VIII. OIG Participation at Meetings

During the first three quarters of 2015, the OIG has participated as an observer during meetings of the PC and the CAAP, as well as an observer in various committee meetings and working groups of the General Secretariat that may impact internal controls; which include the Selective Bid and Contract Awards Committee. OIG staff has also participated in meetings as a member of a task-force on sexual harassment within the GS/OAS. In addition, the OIG encourages department managers to consult with the office regarding operational matters that may present a potential risk to the Organization, the
implementation of recommendations, or other operational issues related to the internal control environment, including proposals for changes in business processes and reviews of draft operational procedures. This process will contribute to improving internal communication and a satisfactory internal control environment within the General Secretariat.

Garry LaGuerre  
Interim Inspector General