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

OIG-IG-19-24

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 July 31, 2019.

I remit this Annual Report to you, for subsequent forwarding to the Permanent Council, in accordance with the provisions of Article 122 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.

Hugo Eduardo Ascencio
Inspector General

Encl.



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2019

Activity Report of the Office of the Inspector General for the Period of January 1 to July 31, 2019

This report is presented in compliance with Article 122 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

August 23, 2019
Original: English

Contents

I. Summary.....	- 3 -
II. Mandate	- 4 -
III. External Quality Assessment.....	- 5 -
IV. Internal Audits	- 6 -
V. Investigations.....	- 9 -
VI. Status of Audit Recommendations	- 16 -
VII. OIG Participation at Meetings and Coordination with Other Oversight Bodies.....	- 16 -

I. Summary

This report is submitted in conformity with Article 122 of the General Standards. It covers the activities of the Office of the Inspector General (OIG) from January 1 to July 31, 2019.

The Inspector General enjoys the functional independence needed to initiate, perform, and report to the Permanent Council and to the Secretary General on the audits, investigations, and inspections required to ensure the correct use and administration of the Organization's resources and to safeguard its assets, as well as on the overall efficacy of the functions of the OIG.

During the period from January 1 to July 31, 2019, the OIG staff:

1. Initiated seven audits of which three were completed.
2. Addressed 15 investigative matters of which 11 were completed.
3. Completed its risk-based bi-annual internal audit plan for the General Secretariat of the Organization.
4. Coordinated the External Quality Assessment of its Internal Audit Activity.
5. Worked closely with the CAAP Working Group on the Review of OAS Programs in the monitoring of the implementation by the General Secretariat of the OIG recommendations.
6. Continued acting as observer at a number of GS committees; as well as met and presented reports to the OAS governing bodies.

II. Mandate

Article 117 of the General Standards to Govern the Operations of the General Secretariat (General Standards) - Internal audit: *“The Office of the Inspector General is 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, economy and transparency 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, in accordance with these General Standards, with the Permanent Council duly apprised”.*

Article 119 of the General Standards - Independence of the Inspector General: *“The Inspector General shall enjoy the functional independence needed to initiate, perform, and report to the Permanent Council and to the Secretary General on the audits, investigations, and inspections required to ensure the correct use and administration of the Organization's resources and to safeguard its assets, as well as on the overall efficacy of the functions of the Office of the Inspector General and on the qualifications and performance of the staff and independent contractors providing services in said office”.*

Article 122 of the General Standards - Reports of the Inspector General and the General Secretariat's Obligation to act: *“The Inspector General shall present the Secretary General with reports on the audits, investigations, and inspections he conducts, with copies to the Permanent Council and the Board of External Auditors. In submitting his reports, the Inspector General shall recommend such measures as he deems necessary to safeguard their confidentiality.”* Moreover this article adds that: *“The report of the Inspector General will be made available to the member states at Office of the Inspector General with clearly defined procedures and appropriate protection for sensitive information that could compromise pending legal action, expose sensitive organizational data of designated operators, endanger the safety and security of any entity, unit, or individual, or infringe on the privacy rights of any individual”.*

Executive Order No. 14-03, Procedures for Whistleblowers and Protections against Retaliation, issued on November 21, 2014, outlines the General Secretariat's general policies for encouraging the reporting of financial and administrative misconduct, as well as procedures to accept reports by prospective whistleblowers seeking protection from reprisals for their actions. Specifically, this policy provides the basis for the protection of whistleblowers, informants and witnesses from retaliation in the reporting of financial and administrative misconduct and is essential in the fight against fraud. The OIG Hotline is available to the public as an additional mechanism for reporting allegations of misconduct involving the human resources of the GS/OAS, as well as allegations of fraudulent, corrupt, coercive and collusive practices involving the GS/OAS, whether committed by staff members or other personnel, parties or entities, and deemed to be detrimental to the Organization.

Executive Order No. 15-02, Policy and Conflict Resolution System for Prevention and Elimination of All Forms of Workplace Harassment, adopted on October 15, 2015, emphasizes that the GS/OAS is committed to provide a workplace that is free of all forms of harassment. The OIG is the competent and chosen authority by the General Secretariat to address formal workplace harassment complaints.

III. External Quality Assessment

In compliance with Article 127 of the General Standards, the Inspector General's Office announced on November 6, 2018, that the Office would undergo an External Quality Assessment by the firm IIA Quality Services, LLC, a branch of the Institute of Internal Auditors (IIA), the authority that defines and regulates the internal auditing activity worldwide.

The principal objectives of the External Quality Assessment (EQA) were to:

1. Assess the OIG Internal Audit’s conformance with the Standards and the IIA Code of Ethics.
2. Assess the effectiveness of Internal Audit in providing assurance and advisory services to the Member States of the OAS, senior stakeholders within the OAS, and other interested parties.
3. Identify opportunities, offer recommendations for improvement, and provide counsel to Internal Audit for improving their performance and services and promoting their image and credibility.

The onsite portion of the EQA took place during the week of February 25, 2019 and the final conclusions made by the independent assessment team were submitted on March 1, 2019 – the last date of the onsite portion of the EQA. The qualified assessment team that performed this EQA demonstrated competence in both the professional practice of internal auditing and the EQA process as required by the Standards.

As per Standards criteria, an opinion is provided by the independent assessors for each element evaluated in the EQA, as well as their overall opinion. That opinion can be any of the followings:

- GC –“Generally Conforms”
- PC –“Partially Conforms”
- DNC –“Does Not Conform”

The results of the OAS / Internal Audit Activity External Assessment for each element evaluated are summarized below:

Governance		Staff		Management		Process	
Standard	Rating	Standard	Rating	Standard	Rating	Standard	Rating
1000	PC	1200	GC	2000	GC	2200	GC
1100	PC			2100	GC	2300	GC
1300	PC			2450	GC	2400	GC
Code of Ethics	GC			2600	GC	2500	GC

Triggered by the gaps to conformance with the Standards noted by the independent assessors under Governance, their overall opinion was that the OAS Internal Audit partially conforms to the Standards and generally conforms with the IIA Code of Ethics.

The results of the External Quality Assessment were fully presented to the Secretary General and the Permanent Council for review and action as needed.

IV. Internal Audits

In the January 1 - July 31, 2019 period, the OIG’s Internal Audit Section initiated seven audits, three of which were completed in the period as further detailed in the table below:

Code	Title	Origin	Status at year end
AUD-18/04	Contract Management – Major Contracts of the GS/OAS	Audit Plan	Completed
AUD-18/05	401 (m) Plan Contracts Review	Audit Plan	Completed
AUD-19/01	Inspections of Personnel Transfers, Internal and External Competitions, and Reclassifications Included in the Program-Budget 2018 - 2 nd Semester 2018	General Assembly Request	Completed
AUD-19/02	The Inter-American Commission of Human Rights (IACHR) - Audit of Disbursements & Hiring Personnel	Audit Plan	In process
AUD-20/06	CICTE's Cybersecurity Program Disbursements	Audit Plan	In process
AUD-19/04	GS/OAS Medical Benefits Plan/Program	Audit Plan	In process
AUD-19/05	Audit of National Offices	Audit Plan	In process
AUD-19/03	External Funding Strategy and Regulations Framework	Audit Plan	Not started
AUD-19-06	Inspections of Personnel Transfers, Internal and External Competitions, and Reclassifications Included in the Program-Budget 2019 – 1 st Semester 2018	General Assembly Request	Not started

The results of the completed audits were as follows:

AUD-18/04 – Contract Management - Major Contracts of the GS/OAS

This audit of the Contract Management – Major contracts of the General Secretariat of the Organization of American States (GS/OAS) reviewed the relevant contract’s transactions from January 1, 2017 to June 30, 2018.

After initial analysis of the disbursements for the scope period, the OIG chose the two vendors with the major spend in the audit period:

- 1) The vendor for the contract of Travel Management Services; and
- 2) The vendor for the contracts of Security Guard Services, Janitorial Services and Maintenance, Messenger and other General Services.

In our review of the performance of the Travel Management Services Contract we did not observe any non-compliance instances. However, the OIG noted that in February 2017, the GS/OAS initiated the bidding process for the selection of the Travel Management Company (TMC).

For this, the GS/OAS received four proposals (including the incumbent). The process was almost completed and the Contracts Award Committee selected one of the participants as a recommendation to be awarded the contract, which was not the incumbent company. The process was cancelled by the Secretary General in hopes to have more participants in a new process. As a result, the incumbent company was renewed until a new process is complete and a company is awarded with the contract.

On May 3 2019, the Department of Procurement Services made a presentation to the Committee on Administrative and Budgetary affairs (CAAP) about the “Selection of the Official Travel Agency for the GS/OAS” in which they stated that the final recommendation process for the selection of the company that will provide the service for the next term was initiated and they anticipated that the contract would

start sometime in the second half of 2019. The OIG will be monitoring the conclusion of this process as part of its follow-up activities.

In our review of the performance of the contracts of the second major vendor, we noted non-compliance instances, as well as lapses of control as detailed below.

Security Guard Services Contract:

- Non-compliance with the amount of hours of service established in the Security Services Contract.
- Insufficient staff to cover absences or special events.
- Derived from the above, there have been instances in which the contractor's personnel worked long and extra hours to cover shifts.
- Training requirements for security guard personnel were not met as established in the contract.

Janitorial Services Contract:

- There are no formal control procedures to verify neither the actual hours of work performed nor the quantity of personnel attending the work site covering the positions agreed to in the Janitorial Services Contract.
- The Terms of Reference (TOR) of the bid document in section 7 "Quality Control Plan" indicates that the contractor shall develop and implement a complete Quality Assurance/Control Plan to ensure the janitorial Services provided to GS/OAS attains a consistently high level of performance. Also, it is stated in the TOR that the contractor shall provide the GS/OAS representative "On monthly basis regular reports on the performance of the services. The type of each report shall be mutually agreed between the GS/OAS and the Contractor". Through inquiries, we learned that there are no formal reports that the vendor provides to the OAS on a monthly basis.

AUD-18-05 – 401 (m) Plan Contracts Review

The 401(m) Plan (hereinafter the Plan) – created in 1999 and established as a U.S. tax-deferred qualified retirement contributions plan in 2001 – operates as an alternative to the OAS Retirement and Pension Plan (RPP) for short-term contract holders and those in trust positions.

At the GS/OAS, the "401 (m) Plan Document" governs the operations of the Plan. Article 9 of this document assigns the Plan Administrator the responsibility for the general administration of the Plan and for carrying out its provisions.

The Plan Administrator's role and the Plan's named fiduciary for purposes of the Plan Administration was assigned to the Plan Administration Committee (PAC) on December 19, 2005 by the Secretary of Administration and Finance by means of a Memorandum of Decision. Moreover, Administrative Memorandum No. 134, issued on February 15, 2017 by the Secretary for Administration and Finance provided further details on the decision and guidelines for the PAC.

This audit scope covered the period from January 1, 2017 to December 31, 2018 and its objectives were as follows:

- Provide an independent opinion about the Governance of the Plan.
- Evaluate compliance with the internal regulations and the most relevant provisions/terms of those contracts/agreements, including a validation of the administrative expenses and fees charged to the Plan and participants.
- Assess the effectiveness and efficiency of the Plan's operations relating to the safeguard of the Plan's assets and achievement of the Plan's goals.

- Evaluate the timeliness of the recording of employee and employer contributions to the Plan.

Of the four audit objectives stated above, our assessment of the timeliness of the recording of employee and employer contributions to the Plan did not notice any issue. For the remaining three objectives findings were noted as summarized below:

- **Plan Governance:** No chairman for the PAC has been appointed since the former Chairman's resignation in 2017.
- **Compliance with internal regulations, contracts and agreements:**
 - Charges to the Plan are not being overseen by the GS/OAS.
 - Inconsistencies noted in the number of Plan Participants and Value of Plan Assets used for the calculation of the amount billed by vendor serving the Plan.
 - Discrepancies noted with regards to Trustee's fees and Actuary/Record-keeper Fees/Expenses.
 - Overbilling of Distribution Processing Fees by vendor.
 - Considering the inconsistencies and discrepancies noted above, we estimated that in total the plan was overbilled USD 4,707.94 in year 2018.
- **Effectiveness and efficiency of the Plan's Operations:** In our opinion, Plan fees and oversight efforts might be optimized by reducing the number of third-parties providing services to the Plan.

AUD-19-01 – Inspections of Personnel Transfers, Internal and External Competitions, and Reclassifications Included in the Program-Budget 2018 -2nd Semester 2018

The General Assembly through Resolution AG/RES. 1 (LII-E/17) rev. 2 - Program Budget of the Organization for 2018 requested the following under Human Resources section:

“12 c. To instruct the Office of the Inspector General in its semiannual reports to ascertain that personnel transfers, internal and external competitions, and reclassifications included in this program-budget are done in strict accordance with the applicable standards.”

As per the General Assembly instructions stated above, the OIG performed a review of the related personnel actions for the period from July 1, 2018 to December 31, 2018.

Our review, based on representative samples randomly selected by us, noted full adherence with the Organization's relevant regulations for the personnel transfers, internal and external competitions performed during the audit period. No personnel reclassifications were completed for the period under review.

V. Investigations

In the January 1 to July 31, 2019 period, the OIG’s Investigation Section (hereinafter OIG/INV) processed a total of 15 investigative matters, 11 of which were completed, four are in process and one has not been started. Of those received in this period one was a Special Request (REV-19/04, requested by the Secretary General).Details are reflected in the following table:

Code	Technical Area/Subject	Status at year end
INV-17/12	MACCIH - Whistleblower Complaint	Completed
INV-17/13	MACCIH - Alleged Irregularities in Hiring of Consultants	Completed
INV-17/14	MACCIH - Unauthorized Access to Information	Completed
INV-18/03	MACCIH - Alleged Lack of Protection of Personal Communications	Completed
INV-18/04	MACCIH - Alleged Discriminatory and Racist Comments Made by MACCIH Officials	Completed
INV-18/06	MACCIH - Internal Communications Leak	Completed
INV-18/07	Alleged Irregularities in Grant’s Fund Management	Completed
INV-18/09	IACHR - Leak of Internal Information	Completed
INV-18/13	Alleged Workplace Harassment in the Department of General Services	Completed
INV-19/01	Alleged Workplace Harassment in the Summits Secretariat	Completed
INV-19/02	OAS Belize-Guatemala Mission-Improper Hiring of Domestic Partner as Consultant	Completed
INV-18/11	Alleged Misconduct of OAS Staff Member	In Process
INV-18/12	Alleged Irregularities in U.S Tax Reimbursement by Staff Member	In Process
INV-19-03	Alleged Defamation and Racist Comments by Staff Member	In Process
REV-19-04	Alleged Leak of Misinformation to External Parties	In Process
INV-18/10	Alleged Irregularities in Program Administration	Not Started

Note: From June 2017 to February 2018, the OIG received 11 complaints about allegations of misconduct and other irregularities at the Mission to Support the Fight Against Corruption and Impunity in Honduras (MACCIH). Due to their volume and complexity, as well as the routine demands on the OIG’s investigative resources, the OIG sought extra support in the form of a co-sourcing investigative and audit support engagement with an external firm. Consequently, investigations of four complaints were jointly undertaken by the OIG with Baker Tilly Virchow Krause, LLP (Baker Tilly).

In accordance with the Uniform Guidelines for Investigations, all investigations conducted by the OIG/INV are administrative in nature and are intended to assist the Secretary General in fulfilling his internal oversight responsibilities with respect to the resources and staff of the Organization as well as to assist the OAS Permanent Council, the Board of External Auditors and the CAAP in their fiscal supervision duties (OAS General Standards, Article 114).

If, as an outcome of the investigative work, a staff member is found to have engaged in misconduct, OIG/INV includes specific recommendations to the Secretary General for disciplinary measures or employment-related sanctions in accordance with the facts, findings and supporting documentation of each case. Staff Rule 111.1 - Disciplinary Measures, establishes that disciplinary measures shall be imposed by the Secretary General: at the recommendation of the corresponding Office or Department Director, including the Inspector General.

Specific OIG/INV recommendations for staff members are omitted from this report in order to protect the privacy and confidentiality of the respective personnel and any related administrative internal processes.

The results of the completed investigations were the following:

INV-17/12 – MACCIH - Whistleblower Complaint

On June 26, 2017, the OIG/INV received a whistleblower complaint from a MACCIH employee denouncing “*irregular acts that contravene internal rules of the Organization, the Charter Agreement of the MACCIH with the Government of Honduras, basic ethical norms of any professional and more so of international public services employees, as well as standards and principles embodied in the Inter-American Human Rights Protection System.*”

The complainant directed multiple accusations at two fellow MACCIH employees; all parties are no longer employed by the GS/OAS after having either resigned or their contracts were not renewed by the Secretary General in early 2018.

According to the whistleblower, the first MACCIH officer participated in “*serious misconduct*” owing to several acts of alleged wrongdoing, insubordination, and abuse of the OAS Special Observer Contract status conferred upon the staff member.

The allegation that the first accused MACCIH officer violated GS/OAS norms and standards through his involvement in a Honduran law reform process with local congressional authorities was uncorroborated. Notwithstanding, infractions by this same person while serving at the MACCIH and at GS/OAS headquarters were substantiated, such as documented cases of outbursts against co-workers, abuse of assigned driver benefits and improper use of work hours to obtain unrelated training and/or certification, as well as untruthfulness and lack of collaboration with OIG inquiries.

In addition, the whistleblower asserted that a second MACCIH officer had, among other things, allegedly made repeated derogatory and/or denigrating comments about the national origin, race, gender and/or physical appearance of fellow MACCIH employees. Furthermore, the complainant stated that he/she feared this individual acted with abuse of authority while making threats and/or pursuing retaliation through high-level contacts within the Organization.

As to the second MACCIH officer’s alleged derogatory comments, the OIG found ample evidence that this person engaged in repeated and aggressive forms of speech at times.

As proof of the derogatory statements allegedly made by these MACCIH officials, the whistleblower shared with the OIG/INV a surreptitiously obtained audio recording. This same audio recording was thereafter leaked and widely disseminated through both social media and news reports in Honduras; the audio later became the subject of a separate investigation (**OIG-INV-18-04**).

Contrary to the accounts given by the whistleblower and others, a witness told the OIG/INV that the source of the recording was a high-ranking MACCIH official known to the whistleblower. Moreover, it was determined that the audio was made in an office space shared at one time by the second MACCIH official and two other co-workers.

The delivery by the whistleblower of a recorded dialogue obtained surreptitiously and reproduced without the consent of any of the parties, as well as potentially misleading the OIG/INV when consulted about the audio’s origin, constitutes serious misconduct by the complainant that is not protected activity under the whistleblower policy.

Lastly, the OIG/INV found no corroboration for the claims of perceived threats and potential reprisals against the accuser, including a supposed plot to have the whistleblower fired through efforts by the second MACCIH official.

Due to an inordinate backlog of incomplete investigative engagements and the nature of this case's relationship to several other MACCIH complaints under review at the time, this investigation was concluded in late 2018, while the corresponding final report was issued on March 18, 2019, alongside other related cases: **OIG-INV-17-13**, **OIG-INV-18-03** and **OIG-INV-18-04**.

INV-17/13 – MACCIH - Alleged Irregularities in Hiring of Consultants

On October 19, 2017, a MACCIH-based whistleblower and a fellow MACCIH official jointly filed a complaint alleging irregularities in the hiring of a former consultant (CPR) who was employed by the GS/OAS to produce evaluations and assessments of the Mission's progress.

The initial scope of this investigation was expanded to assess and determine whether CPR contracts given to two individuals with MACCIH funds were in accordance with or contravene established policies and procedures as related to the prevailing GS/OAS rules and regulations, as well as the MACCIH mandate.

Some of the deliverables and the performance of both consultants were highly questioned by the MACCIH's former leadership ranks, as well as other MACCIH employees.

The joint OIG-Baker Tilly investigation found that there was conflicting testimony about the quality of work for both consultants. Each consultant had detractors and supporters. For Consultant No. 1, three individuals stated that his work was satisfactory, good or met expectations. Conversely, three other witnesses were critical of his work; one of these characterized it as "mediocre."

For Consultant No. 2, two individuals stated that his work met expectations, while at least two legal professionals questioned the caliber of his products, while another qualified his performance as "less than mediocre".

GS/OAS rules do not mandate competitive processes for natural CPR (i.e. an individual, not a legal entity) contracts below USD 80,000/year and exceptions to the competitive process can be granted by the Secretary General or the Chief of Staff of the Secretary General for natural CPR contracts above that annual threshold.

Consultant 1 and Consultant 2 were hired without a competitive process, but that fact did not violate the internal regulations mentioned above. Moreover, the credentials presented by both consultants appeared to be aligned with the qualifications needed for the work that they performed.

The OIG-Baker Tilly review found a serious internal-control deficiency. In general, the performance evaluation forms for MACCIH CPR contracts had many blanks or were incomplete. The respective CPR performance evaluations for both consultants under investigation were not the exception to that general deficiency, which further limited the ability to assess the quality of their services.

Hence, the OIG recommended that due to the MACCIH's nature and for increased transparency, all future CPR contracts should be awarded through a competitive selection process regardless of the USD 80,000 annual cap. Additionally, the OIG recommended that all future CPR evaluation questions at the GS/OAS be answered fully to properly assess the quality of services rendered by consultants and to guide future hiring decisions. This investigation was part of a four-case report issued concurrently on March 18, 2019.

INV-17/14 – MACCIH - Unauthorized Access to Information

Throughout 2017, MACCIH employees suspected and complained about multiple IT incidents including unauthorized, unprompted and concealed remote access to workstations during office hours; they also reported an irregular connection to the Mission's IT infrastructure

Since its inception, MACCIH's IT platforms have been implemented and operated independently of the GS/OAS Dept. of Information and Technological Services (DOITS) with little or no oversight and with one employee formerly performing all IT functions.

A separate but parallel Baker Tilly Internal Audit Report confirmed an earlier OIG recommendation to hire both an Information Security Officer and an Information Technology Assistant, in order to properly segregate duties and redistribute the responsibilities and workload of the single IT MACCIH employee. The information security position was filled in early 2019, while a selection process for the IT assistant is ongoing. This investigation was part of a four-case report issued concurrently on March 18, 2019.

INV-18/03 – MACCIH - Alleged Lack of Protection of Personal Communications

A whistleblower complaint was filed on February 20, 2018, by an outgoing MACCIH employee. This investigation focused on the actions of a GS/OAS Staff Member who was accused of improperly accessing the GS/OAS-issued cell phones of two MACCIH officials.

Investigative inquiries by OIG/INV and Baker Tilly determined that the Staff Member acted solely out of his/her own volition and professional judgment, without instructions from GS/OAS leadership. In fact, the Staff Member was only instructed to suspend the lines associated with the mobile units of the two MACCIH employees, not to capture or intercept their communications.

The investigation established that the Staff Member and an assistant contacted the local telecommunications company to request duplicate cell phone SIM cards that were later used to access the contents of the cell phones. As a result of the SIM cards' insertions, the social-media accounts linked to the two former MACCIH employees on their phones were accessed.

The Staff Member admitted the chain of events in separate interviews and briefings in 2018, and stated that the events herein described were his/her initiative and that he/she acted alone. The investigation's findings corroborated the Staff Member's account.

Based on those facts and findings OIG/INV provided specific recommendations to the Secretary General. This investigation was part of a four-case report issued concurrently on March 18, 2019.

INV-18/04 – MACCIH-Alleged Discriminatory and Racist Comments Made by MACCIH Officials

On February 20, 2018, the OIG was tasked with investigating the source and manner of distribution of a controversial audio recording involving multiple MACCIH employees and with establishing whether the dialogue or the related acts, including its leak and subsequent widespread dissemination, violated GS/OAS norms and standards.

The joint OIG/INV-Baker Tilly investigative team could not determine how and when the various versions of the audio recording were captured or by whom. However, a key witness who is a news director at a Honduras news outlet stated that the recording was leaked by the former MACCIH leadership via WhatsApp.

Two of the participants in the audio stated that the recording was made without their consent on or about December 6, 2016, a full 14 months before its contents were widely publicized by the local news media. At the time of the recording in 2016, two of the audio participants shared office space with a third MACCIH subordinate employee. Witnesses stated that this person had boasted about having multiple recordings of his/her superiors. However, in an OIG/INV interview this individual denied any involvement in the specific recording subject of this investigation.

As established in OIG/INV-17-12, the recording did not originate outside the MACCIH premises, as the OIG was originally led to believe by a whistleblower, and various versions of the audio were apparently manipulated to conceal its origins.

A forensic examination of metadata in three different audio files of the same recording determined that the earliest and cleanest version was created on an Apple device on May 23, 2017. Two other files analyzed contained poorer quality versions of the original audio which further masked the source of the recording.

In interviews with the OIG/INV, the recording participants - whose voices were overheard making derogatory and racial slurs - attempted to distance themselves from the controversial content of the audio file. They appealed to their status as victims of premeditated and calculated unethical and potentially criminal acts by their adversaries within the MACCIH. Notably, however, they did not take responsibility for the denigrating comments.

Both the racist and xenophobic comments made by former MACCIH employees and the subsequent leak of the surreptitious recording were acts involving serious misconduct that severely jeopardized the Mission's standing.

As established by the joint OIG/INV-Baker Tilly investigation, the former MACCIH leadership also played a key role in the chain of events that led to the wide dissemination and publication of the clandestine audio.

Additionally, the three former MACCIH officials - including the whistleblower - breached the Code of Ethics and several rules and standards of the Organization by making unauthorized affirmations and disclosures to the media. They also used social media to disseminate other communications and/or internal documentation of the GS/OAS, violating multiple norms and standards, including the Standards of Conduct of International Civil Service.

Based on those facts and findings, OIG/INV provided specific recommendations to the Secretary General.

This investigation was part of a four-case report issued concurrently on March 18, 2019.

INV-18/06 – MACCIH - Internal Communications Leak

On March 23, 2018, the acting MACCIH chief alerted the OIG to a leak of internal Organization communications due to the publication of an institutional email addressed to MACCIH employees. A screenshot of the printed message appeared on social media the same day, and then news media in Honduras, the following day.

Internal MACCIH inquiries established that an email from the Secretary General on March 14, 2018 appeared on social media only hours after its reception at MACCIH headquarters in Tegucigalpa.

Due to the volume of investigative assignments undertaken by the OIG in 2018 and the priorities assigned to ongoing MACCIH-related work and the OIG's limited resources, preliminary inquiries commenced in October 2018; while interviews and subsequent analysis of the findings occurred in March and April 2019.

Technical constraints were also encountered as the email systems only back up six months' worth of email archives, per policy, both at the MACCIH and at GS/OAS Headquarters.

The OIG/INV interviewed at least five current or former MACCIH employees who were present in meetings or briefings with individuals who publicized the leaked email on their social media pages.

All interviewees denied having forwarded or printed the email in question. It should be noted that the same content as that found in the March 14, 2018 email, was made public by the Mission the following day at a meeting before civil society organizations.

Given the time demands and limited resources of the OIG, it was deemed counterproductive to try to interview every email recipient. Considering the findings, the documentary information compiled and the witness testimony, the OIG closed the case as uncorroborated due to a lack of evidentiary proof on April 12, 2019.

INV-18/07 – Alleged Irregularities in Grant’s Fund Management

On April 20, 2018 the OIG received information from several GS/OAS officials alleging potential irregularities in the management of three donor-funded cooperative agreements or awards by a Staff Member. The GS/OAS officials reported that they suspected possible non-existent OAS contractors, fictitious terms of reference and/or questionable or duplicate deliverables.

Approximately a month later, the donor issued a letter to a GS/OAS department requesting the immediate removal of the Staff Member as program manager due to various shortcomings.

In addition to the budget line items, balances and uncoordinated travel plans and associated costs questioned by the donor, the OIG/INV analyzed several transactions that demonstrated potential irregularities in the execution of specific funds by the Staff Member between 2016 and 2018.

The OIG/INV investigation concluded that while there was no evidence of misappropriation of funds by the Staff Member, he/she engaged in:

- Actions that caused multiple financial transactions to be entered into the GS/OAS reporting systems that do not conform to GS/OAS norms and standards, violating donor agreements for the use and purpose of specific funds.
- Submission of false evidence and misleading documentation to attempt to justify the use of funds not directly connected with the award.
- Duplication of efforts and spending of resources, resulting in redundancies and waste.
- Recurring budget deficits that affected the payroll of a Staff Member and a CPR consultant.
- Use of fictitious terms of reference to effectuate retroactive payments to consultants and contractors.

Based on those facts and findings, OIG/INV provided specific recommendations to the Secretary General. This report was issued on February 5, 2019.

INV-18/09 – IACHR - Leak of Internal Information

On September 5, 2018, an Inter-American Commission of Human Rights (IACHR) employee submitted to the OIG a request for investigation regarding an alleged improper disclosure of confidential information. The petitioner stated that an unidentified IACHR worker had improperly leaked confidential information in real time from within a Sept. 2, 2018 IACHR working meeting to an external party who subsequently used the information to post it on social media..

To establish whether or not any of the attendants at the meeting, or those who had access to the document or to the internal agenda of the session, distributed the document and/or divulged information, the OIG/INV contacted the Department of Information and Technology Services (DOITS), to trace the information allegedly disclosed through searches of both institutional cell phones and email accounts.

DOITS' report did not yield any results through its searches of institutional email accounts; neither did DOITS' tracking queries show that the document had been shared with third parties through the OAS network.

Consequently on January 23, 2019, OIG/INV closed the case in its preliminary stage due to the lack of evidentiary support to identify the person responsible for the information leak, issuing a recommendation to reinforce the IACHR's current procedures to ensure the protection of its information.

INV-18/13 - Alleged Workplace Harassment in the Department of General Services

On November 1, 2018, a Department of General Services (DGS) employee submitted a workplace harassment complaint against a DGS colleague.

The complainant enumerated several incidents related to abusive behavior on an array of interpersonal dynamics in 2016 and 2017. The complaint was accompanied by seven letters signed by former and current DGS employees, many of them referring to the temperament of the DGS colleague; others mentioned some altercations that allegedly took place between the DGS colleague and the letters' signatories.

At first glance, the OIG/INV confirmed that only one of the alleged incidents of workplace harassment had occurred within the one-year time limit on reporting allegations in accordance with the GS/OAS Policy and Conflict Resolution System for Prevention and Elimination of All Forms of Workplace Harassment.

After analyzing documentary evidence, OIG/INV concluded that the only incident within the timeframe allowed by the GS/OAS policy neither contained the necessary elements nor presented sufficient grounds to initiate a formal investigation. Accordingly, on February 25, 2019, OIG/INV proceeded to close the preliminary investigation dismissing the complaint.

INV-19/01 - Alleged Workplace Harassment in the Summits Secretariat

On January 9, 2019 a former consultant of the Summits of the Americas Secretariat, filed a workplace harassment complaint through the OIG Hotline. The complainant indicated that during a recruitment competition process, for which she applied, she was selected as a short-listed candidate and was interviewed. But at the end of the process the area head allegedly abused of his/her authority by improperly influencing the decision to hire another candidate. The OIG/INV preliminary investigation focused on establishing whether the recruitment and competition processes were transparent and whether or not an incident of workplace harassment occurred.

A detailed examination of the DHR file of the competition process indicates that the procedure followed the steps and was carried out in accordance with the provisions established in the GS/OAS regulations, including the participation of the different bodies of the Organization engaged in the recruiting processes.

That being the case, the fact that one candidate had not been finally selected does not constitute per se an incident of workplace harassment. Consequently, the case was closed at the preliminary phase on February 8, 2019.

INV-19/02 - OAS Belize-Guatemala Mission-Improper Hiring of Domestic Partner as Consultant

On March 21, 2019 OIG/INV carried out a formal investigation in response to a complaint filed by a GS/OAS Staff Member who was informed about potential irregularities regarding an improper hiring of a domestic partner as a consultant in the adjacency zone between Belize and Guatemala.

Apparently, a P-4 GS/OAS officer had recommended and coordinated the hiring of his “common-law wife” as a consultant, of whom he was a direct supervisor. As such, he would have reviewed and evaluated her products and requested payments and renewals of her contract.

During the preliminary investigation, OIG/INV examined the available documentation, which prima facie suggested the occurrence of irregular actions. On April 12, 2019, the OIG/INV opened a formal investigation to corroborate or dismiss the allegations. The research undertaken by the OIG/INV confirmed that the P-4 officer: (i) Did maintain an intimate relationship with the consultant (as his life partner or “common-law wife”), (ii) Not only hired but promoted and awarded four CPR contracts to his domestic partner from June 19, 2017 to November 15, 2018. Sufficient evidence demonstrated that the former consultant carrying out the same duties earned USD 1,617.13 per month while the P-4 officer’s domestic partner, with identical terms of reference, received USD 2,440 per month.

Through his disclaimer, the P-4 officer attempted to distort the allegations based mainly on the fact that his relationship was a matter of fact rather than of law; however, this technicality does not comport with that established in the Code of Ethics of the GS/OAS, which regulates employees’ intimate relations.

OIG/INV concluded that both parties failed the Code of Ethics of the GS/OAS by not disclosing their sentimental affairs to the administration and that their failure to report such situation clearly constituted a flagrant violation of GS/OAS rules and regulations. Based on those facts and findings OIG/INV provided specific recommendations to the Secretary General in a report issued on June 21, 2019.

VI. Status of Audit Recommendations

The OIG monitors quarterly with the General Secretariat the status of the OIG audit recommendations. Subsequently, the results of that monitoring is reported to the CAAP

In the period from January 1 to July 31, 2019 a total of 22 high/medium priority audit recommendations were monitored, of which a total of three audit recommendations were deemed as fully implemented by the OIG. For the remaining 19 still open recommendations, in most of the cases the General Secretariat has already initiated the actions needed to address them.

VII. OIG Participation at Meetings and Coordination with Other Oversight Bodies

The OIG staff participated as observers during meetings of the CAAP, as well as in various committee meetings and working groups of the General Secretariat that may impact internal controls, such as the Contract Awards Committee.

The OIG also remained in communication with the External Auditors of the Organization, as well as with other oversight bodies of the GS/OAS in order to ensure proper coordination, coverage and minimize duplication of efforts.

Hugo Eduardo Ascencio
Inspector General