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Review of the Effects of the COVID-19 Pandemic on the International Exchange Programs of the Bureau of Educational and Cultural Affairs

INFORMATION REPORT

Summary of Review

The Department of State's (Department) Bureau of Educational and Cultural Affairs (ECA) designs and implements international educational, professional, and cultural exchange programs for both Americans and foreigners. In early 2020, as the COVID-19 pandemic became widespread, ECA was managing more than 100 active exchange programs involving approximately 4,500 Americans overseas and more than 7,500 foreign nationals in the United States.

OIG conducted this review to assess how ECA responded from March 2020 through January 2021 to the risk management challenges associated with the COVID-19 pandemic's impact on its exchange programs. Specifically, OIG reviewed ECA's immediate crisis response, including the repatriation of thousands of exchange program participants; the effects of the crisis on ECA's budget and grants administration; and the effects of the crisis on exchange program operations.

OIG found that ECA's extensive experience in responding to previous country-specific emergencies, including the need to evacuate and repatriate exchange program participants, helped prepare it to respond to the COVID-19 pandemic. The bureau responded early to the pandemic's escalating spread, sharing information broadly with U.S. embassies, partners, and participants. ECA effectively used the experiences of the first program terminations and participant repatriations that began in late January 2020 in China to inform its crisis preparation posture globally. Although some initial ECA guidance to U.S. embassies on the status of overseas U.S. academic exchange program participants created confusion, the bureau addressed this issue in subsequent messaging.

ECA successfully repatriated thousands of exchange participants, both to and from the United States, in a timely manner. By March 20, 2020—just a week after ECA suspended all exchange programs globally—the bureau had assisted more than 2,500 Americans in returning to the United States. By summer 2020, final repatriation numbers included approximately 4,000 Americans returned to the United States and 5,000 foreign nationals returned to their home countries. ECA's early decision to coordinate its pandemic response through a bureau-wide task force, established on January 27, 2020, was key to its success. ECA's effort to repatriate American citizen exchange participants benefited from whole-of-government clarity about the existing authorities and available means for meeting this core Department consular function. However, OIG found that ECA's responsibility to assist the thousands of foreign national exchange participants in the United States under its auspices was more challenging because it lacked that same clarity of authorities and means.

ECA canceled, postponed, or altered all FY 2020 in-person exchange programs not already completed by March 2020. As a result, ECA ended FY 2020 with an unprecedented \$93.4 million in carryover and recovered funds. At a virtual offsite in December 2020, the bureau decided to repurpose these funds for evaluation, technology development, virtual programming, and alumni engagement. In addition, OIG found that ECA used the flexibility provided by the Office of Management and Budget's March 2020 COVID-19 guidance on

grants administration to help mitigate the pandemic's effect on its grantees and partner organizations. ECA issued 89 pandemic-related amendments to awards from March 18 to December 29, 2020, mostly no-cost extensions to the period of performance or no-cost changes in scope as programs moved from in-person programming to virtual formats.

The move to virtual platforms allowed many programs to continue either fully or partially. OIG found that the bureau's increased use of virtual technologies since 2013 left it well prepared to meet the soaring demand for virtual exchange programs during the pandemic. Ninety-five percent of respondents to an OIG survey sent to public diplomacy staff in U.S. embassies said the bureau assisted them in moving to virtual programs, including through training, while also assisting program participants who lacked viable internet access or had connectivity problems. The consensus of both ECA and embassy staff was that virtual programs cannot replace in-person programs, but the pandemic experience yielded lessons learned that will strengthen future programming.

This report does not contain any recommendations.¹

BACKGROUND

As mandated by the Fulbright-Hays Act of 1961, ECA designs and implements educational, professional, and cultural people-to-people exchange programs that seek to deepen mutual understanding between the United States and foreign populations as a long-term investment in the promotion of American leadership, values, and foreign policy goals.² With an annual budget of more than \$700 million and a staff of 547 positions worldwide, ECA administers more than 100 different exchange programs annually that engage youth, students, educators, artists, athletes, and rising leaders in the United States as well as in more than 160 countries. ECA-funded exchange programs annually send approximately 15,000 Americans abroad and bring approximately 50,000 foreign exchange participants to the United States.

The Centers for Disease Control and Prevention (CDC) issued guidance on March 1, 2020, recommending U.S. institutions of higher education consider postponing or canceling international travel and study abroad programs. On March 11, 2020, the Department issued a Level 3 Global Health Advisory urging U.S. citizens to reconsider all travel abroad due to

¹ Although this report does not contain any recommendations, OIG provided a draft of this report to Department stakeholders for their review and comment on the findings. The Department provided technical comments that were incorporated into the report, as appropriate.

² The Mutual Educational and Cultural Exchange Act of 1961, widely known as the Fulbright-Hays Act, states as its purpose "to enable the Government of the United States to increase mutual understanding between the people of the United States and the people of other countries by means of educational and cultural exchange; to strengthen the ties which unite us with other nations by demonstrating the educational and cultural interests, developments, and achievements of the people of the United States and other nations, and the contributions being made toward a peaceful and more fruitful life for people throughout the world; to promote international cooperation for educational and cultural advancement; and thus to assist in the development of friendly, sympathetic, and peaceful relations between the United States and the other countries of the world." (22 USC Ch. 33: Section 2451; Pub. L. 87–256, §101, Sept. 21, 1961, 75 Stat. 527.)

the global impact of the COVID-19 pandemic.³ In response to this emerging guidance, ECA suspended all international exchange programs on March 12. On March 19, the Department raised the advisory to Level 4, advising U.S. citizens to avoid all international travel. For the remainder of 2020 through the time of this review in early 2021, the ongoing pandemic forced ECA to cancel, postpone, or alter all its exchange programs.

At the time of the bureau's decision to suspend programs, ECA program participants included approximately 4,500 Americans overseas and more than 7,500 foreign nationals in the United States. As discussed later in this report, ECA successfully helped repatriate most of those who needed to depart within the space of a few weeks. Approximately 2,000 Fulbright foreign participants remained in the United States at their host universities to finish the spring semester and many then remained for the second year (academic year 2020 to 2021) of their degree programs.

In addition to exchange programs directly funded by ECA, the bureau also oversaw a wide array of "J" visa exchange programs⁴ administered by nongovernmental entities. In this broader oversight role, ECA coordinated with American high schools and universities, health care professionals, airlines, partner program implementing agencies, designated sponsors, and more than 30 foreign embassies to support the safe return home of approximately 25,000 foreign nationals studying in the United States between March and June 2020, including 17,000 foreign high school students on private exchange programs.

OIG reviewed ECA's immediate crisis response as it focused on repatriating program participants; the pandemic's impact on ECA's budget and grants administration; and the bureau's efforts during the pandemic to transition many of its suspended in-person exchanges to interactive virtual platforms, consistent with Section 209 of the Foreign Service Act.⁵

³ The CDC guidance identified levels of risk assessment, with Level 2 considered moderate, Level 3 as high, and Level 4 as very high. The Department's travel advisory for other countries (travel.state.gov) used the same levels of risk assessment. At the time of the Department's March 11 advisory, the Department and CDC rated all countries worldwide at Level 2 or above.

⁴ ECA has administrative oversight responsibility for 14 categories of U.S. Government-supported exchange programs governed by the non-immigrant "J" visa. These exchanges are defined by section 102 of the Fulbright-Hayes Act, 22 U.S.C. 2452, and section 101(a)(15)(J) of the Immigration and Nationality Act, as amended, 8 U.S.C. 1101(a)(15)(J). This report covers only the "J" visa programs of official academic, professional, and cultural exchange directly funded by ECA. Other "J" visa programs are administered by private sector and nongovernmental sponsoring organizations which, under ECA oversight, bring foreigners to the United States under certain conditions and requirements. These include categories such as trainees, teachers, high school exchange students, physicians, camp counselors, au pairs, interns, and Summer-Work-Travel student participants. While the COVID-19 pandemic significantly affected these private programs, they were outside the scope of OIG's review.

⁵ See Appendix A.

IMMEDIATE CRISIS RESPONSE: REPATRIATING PROGRAM PARTICIPANTS

Existing Country-Specific Crisis Procedures Helped Prepare the Bureau's Global Pandemic Response

ECA personnel told OIG that the bureau's extensive experience responding to countryspecific emergencies, including the need to evacuate and repatriate program participants, helped prepare it to respond to the COVID-19 pandemic. ECA's FY 2018 to FY 2022 Bureau Strategy included as one of its objectives to "safeguard the health, safety and welfare of exchange participants" including "timely response to emergency incidents." While the global scale of the crisis was unlike anything they faced before, OIG found that ECA staff were able to draw on well-established procedures and checklists for country-specific emergency situations. The bureau codified and periodically shared these procedures with all U.S. embassies, most recently in a highly detailed 2015 cable.⁶ The cable charged embassy public diplomacy sections with ensuring that American citizens who were in the country on ECA-administered exchange programs be factored into embassy emergency planning, including consular section lists of potential evacuees. In the OIG survey sent to all public diplomacy sections for this review,⁷ 85 percent of those that responded confirmed they had such plans in place prior to the pandemic.



Figure 1: COVID-19 Crisis Timeline

Source: OIG generated from information provided by the Bureau of Educational and Cultural Affairs.

⁶ Department cable 15 STATE 73956, "Guidance on Procedures for Fulbright and Related Academic Exchange Programs in Crisis Situations Overseas," June 22, 2015. This information is also included in the ECA-issued handbook, "Fulbright Program Resources for Public and Cultural Affairs Officers," updated annually.

⁷ In December 2020, OIG sent questionnaires about COVID-19 pandemic's impact on ECA-administered exchange programs to the public diplomacy sections of all overseas U.S. diplomatic missions. OIG received responses from 76 of the 172 public diplomacy sections.

Bureau Provided Timely Program Updates as COVID-19 Spread

OIG found that ECA responded early to the pandemic's escalating spread, sharing information broadly with embassies, partners, and exchange program participants. As shown in Figure 1 above, ECA responded quickly to escalating advisories from the Department and the CDC to protect the safety and welfare of participants in its international exchange programs. Among the public diplomacy sections that responded to OIG's survey, 92 percent rated ECA guidance as either "very helpful" (49 percent) or "somewhat helpful" (43 percent). Most narrative comments received through the survey were positive about ECA's early communication and coordination and acknowledged the uncertain and fast-changing environment as conditions and guidance quickly changed.

Bureau Shared Best Practices and Early Lessons Learned

ECA used the experiences of the first program terminations and program participant repatriations that began in late January 2020 in China, soon followed by Korea and Italy, to inform its crisis preparation posture globally. On February 28, 2020, ECA reached out to public diplomacy sections worldwide to share best practices and lessons learned from the public diplomacy staff at Embassy Beijing and its constituent posts.⁸ The message encouraged embassies to work with ECA if they wished to postpone or cancel programs based on local health conditions and embassy staff departures. It stressed the importance of frequent communication with participants in their countries to contain rumors and manage expectations. On March 5, the ECA Policy Office issued a letter template with links to Department travel advisories and the latest CDC guidance for program officers to share with ECA's program partners. The letter stressed the importance of exchange participants' health and safety and warned that all travelers should be prepared for travel restrictions with little or no advance notice, including in the countries that participants must transit through to return home. At the same time, ECA and its partner organizations provided foreign national participants in the United States with information on how to protect themselves while in the United States and how to monitor international travel restrictions to plan their return home.

Following ECA's March 12, 2020, decision to suspend all international exchange programs for at least 60 days, ECA officials conducted virtual briefings on March 12 and 13 with the Department's six regional bureaus and public diplomacy sections in those regions on the steps ECA was taking in response to the Department's heightened Global Level 3 travel advisory. The briefings included information on the status of all ECA programs and how ECA would provide information to U.S. participants overseas and assist with their return to the United States.

⁸ On February 28, 2020, ECA's Policy Office sent an email titled "Internal Message from ECA to Mission Public Affairs Sections on COVID-19 Response" to Public Diplomacy Office directors in the Department's regional bureaus to distribute to public diplomacy sections in their regions. The email included eight attachments: A letter from ECA's Principal Deputy Assistant Secretary; COVID-19 Best Practices and Lessons Learned; ECA's Virtual Exchange Toolkit; ECA's Podcasting Toolkit; cable 19 STATE 118806, "Office of the U.S. Speaker Program FY-20 Guidance and Call for Requests" (November 12, 2019); American Spaces Guidance Related to COVID-19; Professional Development Opportunities for Teachers; and Programs and Resources for Students.

Some Early Messages on Status of Academic Exchange Participants Caused Confusion

OIG found that as ECA scaled up its response to the quickly evolving situation in Asia, Europe, and then globally, some early ECA guidance on the status of academic exchange program participants created confusion. As the Department's country-specific travel advisories rapidly escalated from Level 3 "Reconsider International Travel" to Level 4 "Avoid International Travel" (in China, for example, changing over just 4 days), ECA initially tried to provide flexibility on setting deadlines for when participants needed to depart their host countries to reflect varying local conditions and personal choice. For example, after the Department issued its Level 4 global travel advisory on March 19, an ECA message the next day stated that embassy chiefs of mission could determine departure dates for Fulbright program participants. ECA intended the guidance to give embassies flexibility to manage program participant departures based on local conditions and travel options. However, some participants and embassies misunderstood it to mean that U.S. academic exchange grantees were under chief of mission authority,⁹ or that the programs could continue. Upon learning of the confusion, ECA was quick to clarify its guidance and ECA program officers followed up individually with country program administrators to help them work through specific questions and challenges.

Bureau Successfully Facilitated Repatriation of Thousands of Program Participants

OIG found that ECA successfully repatriated thousands of exchange participants, both to and from the United States, in a timely manner. At the time of the bureau's March 12 decision to suspend programs, approximately 4,500 Americans were overseas on ECA programs, of which 3,728 were on academic exchange programs. At the same time, more than 7,500 foreign nationals were in the United States on ECA programs, approximately 4,600 of whom were Fulbright academic program grantees hosted by U.S. universities across the country. By March 20—just a week after the global suspension decision—ECA had successfully assisted more than 2,500 Americans in returning to the United States. By the end of April, ECA had repatriated 3,542 Americans to the United States; by summer, final repatriation numbers settled at about 4,000 Americans returned to the U.S. and 5,000 foreign nationals returned to their home countries.¹⁰ Of the 76 public diplomacy sections that responded to OIG's survey, 92 percent stated that ECA was either very (60 percent) or somewhat (32 percent) supportive in helping them manage their initial emergency response to the COVID-19 pandemic and its impact on their ECA program participants.

⁹ While ECA maintains administrative oversight responsibility for its American citizen exchange program participants overseas, they remain private citizens and are not under chief of mission authority. (See 2 Foreign Affairs Handbook (FAH)-2 H-116.8a and 2 FAH-2 H-112.1c(2)).

¹⁰ Approximately half of the foreign Fulbright grantees were able to safely remain in the United States as their host institutions switched to online or hybrid programs, while about 600 of the Fulbright Americans chose to remain overseas following the termination of their programs.



Figures 2 and 3: Repatriated high school exchange students from ECA's Future Leaders Exchange Program (FLEX) program celebrating their successful return journeys home. Top: FLEX students returning to Turkmenistan. Below: FLEX students returning to Moldova. **Source:** Bureau of Educational and Cultural Affairs.

Bureau Mobilization of Staff Was Key to Task Force Success

OIG found that ECA's early decision to coordinate its pandemic response through a bureauwide task force, established on January 27, 2020, was key to its success. The task force initially focused on repatriating American citizens from Wuhan, China; South Korea; and northern Italy. On February 25, ECA invited the public diplomacy officers who had been evacuated from Mission China to brief the task force on best practices and lessons learned from that mission's experience. By mid-March, the task force had evolved into an effort to repatriate U.S. citizen exchange participants throughout the world and foreign exchange participants in the United States to their home countries. The task force coordinated with the Department's pandemic

task force, implementing partners, the Department's Bureau of Medical Affairs and other bureaus, U.S. embassies, and foreign embassies in Washington, D.C. For example, ECA in April worked with the Bureau of European and Eurasian Affairs, the embassies in Washington for Georgia and Armenia, and the U.S. embassies in Tbilisi and Yerevan to arrange the repatriation of 69 Georgians and 35 Armenians, mostly high school students. Due to the unavailability of flights, the Armenian students had to fly from the United States to Georgia and continue by bus to Armenia. This required close diplomatic coordination with both countries and support by the U.S. embassies.

ECA staff cited the "all-hands-on-deck" approach to the repatriation task force as key to their success. This included staff on all levels and across teams, from implementing partners to the Assistant Secretary, who stepped in to assist with repatriations when diplomatic negotiations were needed. The task force, despite the constraint of operating virtually, adapted rapidly to changing health guidance and travel advisories and a variety of changing conditions in more than 160 countries. These issues included foreign governments that closed borders without prior notice, airlines that canceled flights at the last minute, and changing foreign government requirements for COVID-19 testing. The U.S. embassies with which the task force coordinated faced their own difficulties, including ordered and authorized departure of American personnel and locally employed staff who suddenly had to work at home with limited access to virtual platforms.

Foreign Repatriations Hindered by Lack of Clarity on Authorities and Responsibilities

ECA's responsibility to assist the thousands of foreign exchange participants in the United States under its auspices lacked the clarity of existing authorities and available means that supported ECA's effort to repatriate American citizen exchange participants. Under the individual grant agreements for each program participant, ECA generally was responsible for return airfare costs at the conclusion of each program. But responsibilities for the unpredictable array of emergency expenses related to the pandemic were less clear, and not all foreign embassies in Washington stepped forward to assist their own citizens. ECA program officers and task force members told OIG that although the terms of the grant agreements might have permitted ECA to take a more limited approach to covering these expenses, they believed they had a clear professional and ethical responsibility to fully assist foreign participants who chose to return to their home countries. ECA leadership told OIG it understood the U.S. Government's responsibility for the safety and welfare for its own citizens would always appropriately be the Department's top priority, but they planned to explore ways to clarify and strengthen procedures and policies for assisting foreign exchange participants in future crises.

Spotlight on Success: Bureau Conducted a Thorough Review of its Pandemic Response for Lessons Learned

In August 2020, after the most urgent crisis response work had subsided, ECA leadership tasked the bureau's Evaluation Division to conduct an in-depth review of its crisis management performance to draw lessons learned for use in future crises. The Evaluation Division surveyed ECA staff as well as dozens of U.S. embassies, other Department bureaus, and program implementing partners. It also convened five focus group discussions with staff from ECA program units, U.S. embassies, regional bureaus, and the ECA task force. In December 2020, the bureau published its findings, including a six-page analysis of what worked well, key challenges and obstacles, and recommendations for the future. Among the many recommendations that could have relevance for future task force efforts were ensuring sufficient overlap and detailed notes during turnover of task force staff; defining task force roles clearly, including organizational charts with job descriptions; and standardizing daily briefings to clarify what information needs to be collected. The findings from this evaluation will enable ECA to further improve its crisis management response for future emergencies.

RESOURCE MANAGEMENT: IMPACT ON BUDGET AND GRANTS

Early Decision on Financial Terms for Terminated American Fulbright Grants Set a Uniform Bureau Standard

As the crisis spread globally in March 2020, ECA's Academic Programs Division gained speedy approval from the Fulbright program's governing board¹¹ for a package of financial support aimed at easing the costs for its 2,745 American program participants overseas transitioning back home following the sudden termination of their programs. The central elements included an extension of all participant stipends through June 30 (or through October 31 for participants who arrived overseas after January 1, 2020), authorization to incur "extraordinary costs" for the return journey, and an additional transfer allowance of \$1,000 to support additional travel and transition expenses. ECA designed these packages of financial support centrally to set a uniform worldwide standard, thereby ensuring equitable treatment of all Fulbright program participants. The financial support packages also served as a template that ECA staff administering other non-Fulbright exchange programs could choose to adapt and apply to their own American program participants.

¹¹ The J. William Fulbright Foreign Scholarship Board is a 12-person, presidentially appointed board with statutory responsibility for supervision of the ECA-administered international exchange programs under sections 102(a)(1), 102(b)(4) and (6) of the Mutual Educational and Cultural Exchange Act of 1961, as amended (PL 87-256, also known as the Fulbright-Hays Act). Fulbright programs are administered overseas by binational Fulbright commissions or, in countries without commissions, directly by the U.S. embassy.

COVID-19 Restrictions Led to Unprecedented Bureau Budget Carryover for FY 2020

With almost all new program travel and in-person events curtailed by the pandemic, ECA ended FY 2020 with an unprecedented \$93.4 million in carryover and recovered funds.¹² While it was not unusual for ECA to have carryover funds in any given year, FY 2020 carryover funds totaled \$79.1 million, compared with \$26.7 million in FY 2019. In addition, ECA recovered \$14 million in unused funds from grants that were completed and closed out in FY 2020 (FY 2019 recoveries totaled \$9.8 million). In previous years, bureau leadership restored carryover funds to their original program office for use the following year and reprogrammed recovery funds for new proposals. However, because of the unprecedented FY 2020 balance, the bureau executive office organized a virtual offsite on December 1, 2020, that brought together ECA leadership, program office leaders, and input from the regional bureaus to strategize how best to repurpose the additional funds. The group evaluated proposals on three criteria—Department and bureau strategic goals, impact, and feasibility—and forwarded its recommendations for FY 2021 spending to ECA's assistant secretary for approval. ECA's FY 2021 Education and Cultural Exchange operating plan reflected the uncertain COVID-19 environment in 2021 with a shift in some funding from in-person programs to more evaluation, technology development, virtual programing, and alumni engagement. At the time of OIG's review, the Department had yet to approve the bureau's FY 2021 Education and Cultural Exchange operating plan, after which it must be forwarded to Congress for final approval.

Bureau Used CARES Act Money to Reimburse Unexpected COVID-19 Repatriation Expenses

In May 2020, the Department notified Congress of its intent to use \$12 million from the Department's \$122.6 million CARES Act¹³ allotment to fund unexpected exchange participant program termination and repatriation expenses related to COVID-19. At the time, ECA had not yet conclusively canceled all in-person international exchanges for the remainder of the year and did not anticipate what turned out to be the unusually large FY 2020 carryover balance discussed above. The bureau used \$5 million of the CARES Act funding for an initial tranche of reimbursements to bi-national Fulbright Commissions for the unexpected costs they incurred in helping repatriate American exchange participants. Following the December 2020 budget offsite discussed above, ECA determined that it could use carryover funds to cover the balance of those costs. Thus, in January 2021, the Department notified Congress that the remaining \$7 million in CARES Act funding initially reserved for ECA would be redirected to other pandemic-related Department needs.

¹² Unlike other Department bureaus, ECA's separate congressional budget appropriation provides "no-year" money. In most cases, ECA does not need to return to the U.S. Treasury any funds unobligated during the fiscal year in which they were appropriated but instead can reprogram the funds for use in the following fiscal year.

¹³ Congress on March 27, 2020, passed the Coronavirus Aid, Relief, and Economic Security Act (The CARES Act) in response to the COVID-19 outbreak and its impact on the economy, public health, state and local governments, individuals, and businesses.

Bureau, Office of Management and Budget Guidance Provided Key Flexibility for Adjusting Grants

One week after ECA's March 12, 2020, suspension of international exchange programs, the Office of Management and Budget (OMB) issued COVID-19 guidance¹⁴ that gave ECA flexibility to assist grantees and partner organizations. Among its provisions, the OMB guidance authorized no-cost extensions on expiring Federal assistance awards and authorized other costs necessary to sustain activities during the pandemic period. Additionally, the ECA Grants Office issued a blanket waiver on March 12 to the Fly America Act requirements¹⁵ for ECA awards— critically important for the facilitation of the participant repatriations discussed above—and developed new templates to expedite the approval process for no-cost extensions and no-cost changes in scope, as described below.

Most ECA exchange programs are conducted through multi-year awards that provide flexibility to reprogram funds within the award's period of performance. ECA issued 89 pandemic-related amendments to these multi-year awards from March 18 to December 20, 2020. Most of these were no-cost extensions to the period of performance or no-cost changes in scope as programs moved from in-person to virtual programming. In addition, ECA worked with the Department's Office of the Procurement Executive to develop guidance for program partners on allowable costs to support increased virtual programing, including for staff training and equipment purchases. These efforts helped mitigate the financial impact on ECA's implementing partners of curtailed or re-oriented program activity. For example, ECA gave \$6.5 million to Global Ties U.S., the umbrella organization for the 84 community-based groups across the United States that organize and host local programs for ECA's International Visitor Leadership Program.¹⁶ This aid allowed them to sustain operations through 2020.

PROGRAM MANAGEMENT: TRANSITIONING TO VIRTUAL PROGRAMS

Most In-Person Exchanges Remained Suspended; Some Programs Continued Virtually

ECA canceled or postponed nearly all ongoing FY 2020 ECA exchange programs by March 2020, with the exception of approximately 2,000 Fulbright foreign graduate students and other ECA

¹⁴ On March 19, 2020, OMB issued M-20-17, *Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations*. M-20-17 contained time-limited provisions that were schedule to be reassessed by OMB within 90 days. On June 18, 2020, OMB issued M-20-26, *Extension of Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations*, which rescinded M-20-17 and provided an extension of allowability of salaries and other project activities through September 30, 2020.

¹⁵ The Fly America Act, Title 49 U.S. Code, Subtitle VII, Part A, subpart I, Chapter 401, 40118, requires that airline tickets bought with U.S. Government funds must be on a U.S. flag carrier. Exceptions include when no U.S. flag carrier provides service on a particular leg of the route and use of a foreign carrier is required to avoid unreasonable risk to a traveler's safety.

¹⁶ The Global Ties U.S. network organizes and hosts local programs that provide an essential component of ECA's International Visitor Leadership Program. Many network members are volunteer organizations, but others have paid staff that rely on ECA visitor-generated revenue.

academic participants placed at U.S. colleges and universities, who were able to continue their exchange programs, as noted above. In many cases, especially for programs involving large groups of grantees, ECA decided to defer programs entirely until the latter half of FY 2021 or later, as conditions permit. In some cases, programs proceeded fully or partially using virtual platforms; this option was most widely used for short-term focused programs involving a single participant, such as the U.S. Speaker Program, as well as the International Visitor Leadership Program. At the time of OIG's review, most new in-person exchange programs remained suspended.

Bureau Was Well Prepared to Transition to Virtual Programs

The bureau's increasing use of virtual technologies in recent years left it well prepared to meet the soaring demand for virtual exchange programs during the pandemic. In 2013, ECA established the Collaboratory Team to explore new technologies and innovative ways of delivering programs. Since then, all ECA solicitations for in-person exchange programs have included language encouraging the development of virtual components to maintain engagement among exchange participants, encourage collaboration, and broaden project participation. In 2019, the Collaboratory Team developed a Virtual Exchange Toolkit that it shared with all embassy public diplomacy sections. The toolkit helped boost the number of ECA virtual exchange programs six-fold in 2019, from 13 to 84 programs, and doubled the number of participants from 57,752 to 111,662. The pandemic prompted an even greater surge in requests for virtual programs, with ECA conducting more than 400 virtual programs in 2020. In response to OIG's survey, 95 percent of those that responded said ECA aided them with the move to virtual programs during the pandemic, including assisting some program participants who lacked viable internet access or had connectivity problems. ECA also adapted its virtual offerings by taking into account different time zones and improving language interpretation services.

Bureau Provided Training and Tools to Assist with Transition to Virtual Programs

When the pandemic began, the Collaboratory Team started delivering targeted training to different ECA program units to support the transition to virtual exchange programs. In addition, a March 26, 2020, cable to all embassies provided guidance to public diplomacy sections on virtual alternatives to canceled or postponed activities.¹⁷ ECA also provided virtual training and equipment to its partner program agencies and the community-based organizations that assist with scheduling and transporting visitors and locating host families. ECA officials told OIG the bureau's existing culture of telework also aided the transition to virtual programming, because bureau staff already were equipped to work from home and support new virtual programs.

Exchange Practitioners See Virtual Elements Enhancing, Not Replacing, In-Person Experiences

OIG found the consensus of both ECA and embassy staff was that virtual programs cannot replace in-person programs, but the pandemic experience yielded lessons learned that will strengthen future programming. ECA staff told OIG they intended to continue applying several

¹⁷ Cable 20 STATE 33456, "Virtual ECA Programming in the Face of COVID-19," March 26, 2020.

virtual programming best practices once in-person exchanges resumed. They anticipated more hybrid programs, including making more routine use of virtual pre-travel and orientation components. They told OIG they also envisioned enhanced virtual engagements with program alumni and more virtual speaker programs. Of the 76 embassy public diplomacy sections that responded to OIG's survey, 65 percent indicated they drew lessons from using virtual programming, including the ability to reach more remote audiences and conduct orientation sessions and post-visit debriefings virtually.

However, ECA staff and some embassy public diplomacy survey respondents told OIG that virtual programs were often more time-consuming to organize and execute than in-person programs. For example, virtual programs required staff to conduct practice sessions to work through technical issues. In addition, virtual programs took longer because time zone differences and competing commitments of the participants meant sessions usually had to be spread over many weeks as opposed to the compressed and fully immersive schedule of an in-person program. Both ECA staff and embassy respondents cited inadequate, unreliable internet connectivity as a major obstacle in many countries, as was the challenge of working across multiple time zones. Virtual programs also lacked the cultural component that comes from in-person travel and the informal interactions with Americans that foreign exchange visitors often cite as highlights of their experience. Finally, ECA staff told OIG that virtual programs cannot match the bonding and networking benefits that accrue to participants through an in-person group travel and program experience.

Pandemic Prompted the Bureau to Streamline Some Processes

ECA staff told OIG that the COVID-19 pandemic helped streamline some bureau processes. For example, it prompted the ECA Program Management Division, which manages the pre-award process, to develop online procedures to replace paper processes that included hand-carrying grant proposals to the bureau's Assistant Secretary for approval. ECA also piloted a program to automate some of the DS-2019 ("Certificate of Eligibility for Exchange Visitor (J-1) Status") forms used for "J" visa exchange programs to avoid the costs and security risks of delivering the documents by mail or courier. As an example of the potential cost savings of this new approach, ECA's International Visitor Leadership Program alone spent approximately \$50,000 in mail and courier fees during FY 2019 to deliver these forms.

Bureau Continued Forward Planning on Future Programs to Ensure Continuity

Even while COVID-19 forced ECA to suspend most FY 2020 programs, the bureau continued to move forward on future program planning to ensure continuity. Most exchange programs require long lead times to identify, interview, vet, and obtain necessary travel documentation for participants. During the pandemic, ECA continued to solicit program proposals for multi-year awards that would begin in FY 2021, while developing clear guidance to cover scenarios ranging from program deferral, to online or hybrid formats, to the traditional in-person model. For example, ECA's Office of Citizen Exchanges sought proposals for a 3-year TechWomen award to provide mentorship programs between women from leading science and technology

companies and institutions in the United States and emerging women leaders in science and technology in Africa.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This review was conducted from January 4 to March 5, 2021, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspections Handbook, as issued by the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM).

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and Congress with systematic and independent evaluations of the operations of the Department and USAGM. Consistent with Section 209 of the Foreign Service Act of 1980, this review focused on the impact of COVID-19 on exchange programs administered by the Bureau of Education and Cultural Affairs (ECA). OIG's specific objectives were to review:

- ECA's Emergency Crisis Response to assess the quality and timeliness of the bureau's communications and guidance to program partners, program participants, and U.S. embassies, and to determine the effectiveness of its management of program participant repatriations, including the ECA task force created to organize this effort.
- The pandemic's impact on ECA's budget, including funds needing to be reprogrammed or returned, grants needing to be terminated or amended, emergency costs, and cost implications of the transition to virtual programming.
- The impact of exchange program cancelations and deferrals and the transition of many programs to virtual platforms and to assess the effectiveness of the virtual program formats in meeting program goals and objectives.

Due to the COVID-19 pandemic and taking into consideration relevant guidance, OIG largely conducted this review remotely and relied on audio- and video-conferencing tools in lieu of inperson interviews with Department and other appropriate personnel. For this review, OIG conducted interviews with ECA staff, surveyed public diplomacy staff in U.S. embassies, and reviewed documentation associated with how the pandemic affected ECA operations and staff, communication and repatriation efforts, budgets, and exchange programs. OIG used professional judgment, along with documentary, testimonial, and analytical evidence collected or generated, to reach the conclusions included in this report. OIG shared the substance of this report with offices, individuals, and organizations affected by the review.

Jefferson Brown (Team Leader), Thomas Mesa (Team Manager), Brent Byers, Spry Baltz, and Thomas Furey conducted this review. Other report contributors included Caroline Mangelsdorf and Diana McCormick.

APPENDIX B: FY 2020 AND FY 2021 PROGRAM BUDGET AS ENACTED

	FY 2020	FY 2021
Programs	(in thousands)	(in thousands)
Academic Programs:	-	-
Fulbright Program		
Students, Scholars, Teachers, Humphrey, Undergraduates	272,000	274,000
American Spaces	15,000	15,000
Global Academic Exchanges		
Educational Advising and Student Services	13,377	13,377
English Language Programs	45,200	45,200
American Overseas Research Centers	4,383	4,383
Special Academic Exchanges		
South Pacific Exchanges	375	375
Timor Leste Scholarship Program	375	375
Disability Exchange Clearinghouse	475	450
Benjamin A. Gilman International Scholarship Program	16,000	16,000
Tibet Fund	650	675
Professional and Cultural Exchanges:		
International Visitor Leadership Program	104,000	104,000
Citizen Exchanges Program	111,860	115,860
Other	5,728	5,750
Program and Performance:		
Evaluation	3,450	3,400
Alumni	5,230	5,230
Virtual Exchange - Collaboratory	370	100
U.S. Speaker Program	-	4,000
Cultural Heritage Program	-	120
Young Leaders Initiatives	34,400	34,400
Countering State Disinformation and Pressure	12,000	12,000
Civil Society Exchange Program	5,000	5,000
Exchanges Support	78,827	80,605
Total	730,700	740,300

Source: Generated by OIG from data provided by the Bureau of Educational and Cultural Affairs.



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