Office of Inspector General

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To: Carrie Hessler-Radelet, Director
Anne Hughes, Chief Compliance Officer

From: Kathy A. Buller, Inspector General

Date: August 24, 2016

Subject: Management Advisory Report: Site History Files

The purpose of this memorandum is to bring to your attention systemic deficiencies in the maintenance, organization, and use of site history files that OIG has found at multiple posts, potentially increasing safety and security risks to Volunteers. Incomplete, disorganized, and unused site history files are a longstanding issue resulting from weaknesses in agency oversight, guidance, and systems. Poor site history documentation increases the risk that Volunteers may be placed in unsafe sites. Throughout the period in question, OIG has continued to receive complaints from Volunteers alleging that posts placed them in unsafe sites despite previously having been notified that sites were dangerous. Management attention is required to mitigate the safety and security hazard that poorly maintained and insufficiently used site history files pose to Volunteers.

Background

Between 2012 and 2016, OIG made numerous findings in multiple posts and regions concluding that site history files were incomplete, insufficiently organized, and/or not being used to inform site selection (see the list of nine posts in Appendix A). OIG evaluated 19 posts, eight of which (42 percent) had deficient site history files. OIG found issues with site history files at an additional, ninth post during a special review conducted at the request of the U.S. House Committee on Foreign Affairs. In a 2012 report, OIG outlined recurring issues with site development, including site history file maintenance, indicating that this is a longstanding issue.[1]

The Peace Corps Strategic Plan for FY 2014-2018 highlights Volunteer safety and security as one of the agency's top priorities.[2] At present, the agency requires that posts maintain site history files that capture relevant safety and security issues and that post staff reviews site history files when selecting sites for Volunteer placement. The purpose of site history files is to ensure that relevant, site-specific safety and security information is collected, stored, and made readily available to programming staff with an active role in the site development and selection process in order to reduce potential safety and security risks to Volunteers. Agency-wide guidance, policies, and procedures on site history files can be found in numerous locations (see Appendix B).
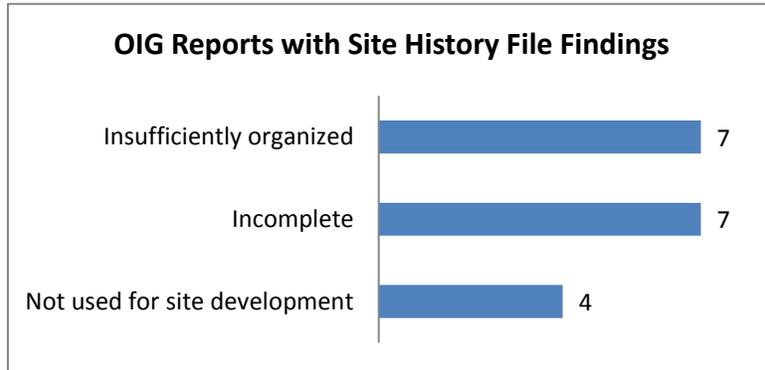
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[1] Recurring Issues: OIG Post Audits and Evaluations Fiscal Years 2009-2011
[2] The Peace Corps Strategic Plan, FY 2014-2018

Findings

Site history files were deficient at nine different posts dating back to 2012. Weak oversight mechanisms, guidance, and systems contributed to this condition. As a result, Volunteers faced increased safety and security risks and may have been placed in sites that did not meet Peace Corps standards. The primary finding areas were related to organization, completeness, and use.

OIG Reports with Site History File Findings

Insufficiently organized	7
Incomplete	7
Not used for site development	4

Oversight Was Insufficient

Agency guidance clearly states that at post, the Safety and Security Manager is responsible for maintaining site history files and the Country Director is responsible for oversight of these operations. Peace Corps Safety and Security Officers provide technical oversight for Safety and Security Managers, and Regional Directors provide oversight to ensure Country Directors have established and are effectively managing their posts' safety and security programs. Given the frequency of findings on this topic, oversight for this process at post and headquarters has not ensured consistent maintenance and use of site history files at post. Multiple post staff are involved in the maintenance and use of site history files. In addition, multiple entities at headquarters and post are involved in oversight. As such, responsibilities for both file maintenance and oversight may not be clear.

In 2009, the agency issued a memo streamlining certification of post compliance with MS 270, "Volunteer/Trainee Safety and Security." As a result, post staff now reports to headquarters on safety and security compliance using the Administrative Management Control Survey. The AMCS includes a question about site history file use, but it does not address file completeness and organization. Furthermore, because the AMCS relies on self-assessment, it may not be a sufficient oversight mechanism. In addition, the 2009 memo required that the Office of Safety and Security conduct a review of posts' safety and security activities every third year. However, the list of topics reviewed does not explicitly include site history files.

Furthermore, while it is laudable that the agency has incorporated Volunteer well-being and improved site development into its strategic plan, the related performance goals are based on Volunteer satisfaction. These indicators do not promote accountability for staff responsibilities

PEACE CORPS OFFICE OF INSPECTOR GENERAL

which Volunteers may know very little about, such as the maintenance and use of site history files.

The recurring deficiency in site history files across multiple posts indicates a systematic issue and suggests that current oversight mechanisms are insufficient. In order to adequately implement the agency's site history file policies, stronger oversight mechanisms at post and headquarters are required.

Guidance Was Unclear and Inaccessible

Agency policy requires staff to collect and use site history information for site development and selection (MS 270 6.7 "Site History Documentation"). However, the procedural guidance on what types of information should be included in site history files is not entirely clear and accessible to post staff.

The guidance on the systems and procedures for site history files is located across multiple documents and platforms (see Appendix B). For example, the Peace Corps recently transitioned to a new intranet platform. The intranet is the primary mechanism by which staff accesses internal documentation and guidance, including the Peace Corps Manual. The previous intranet platform is being maintained as an archive or "legacy intranet" while the new intranet is being populated. A legacy intranet page on site history files is the only place outlining what information is required for the files and how it should be organized. Staff may not be aware of this historically archived guidance or be able to readily access it. Likewise, the Office of Safety and Security produces standard operating procedures that appear on the intranet. However, they do not appear as official procedures in the Peace Corps Manual, nor does the Peace Corps Manual reference them.

Additionally, the site development procedural guidance is inconsistent; it includes the requirement that staff consults site history files during site development, but does not include this step in the timeline of activities. Furthermore, these standard operating procedures do not provide explicit instructions on how to organize and maintain site history files. Each post is expected to develop its own site selection processes, with guidance from its region. However, regional site development guidance is not easily accessible. These references are too informal, difficult to locate, and vague to adequately guide Safety and Security Managers at post in the organization and maintenance of site history files.

Systems Were Lacking

In addition to oversight and guidance, data management systems are potentially useful tools that could improve the organization of site history file documentation. Agency-wide electronic platforms such as the Volunteer Information Database Application (VIDA) or SharePoint could be used to organize and store site history information. During our fieldwork, staff noted that existing systems are not being used effectively for knowledge management:[3]

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[3] IG-14-06-E: Final Report on the Program Evaluation of Peace Corps Philippines

"We have some of this information in VIDA. A lot of the information is in people's memories."

"All we have is in the VIDA. The name of the agency, the address and the name of the person…But not harassment issues—it's not in VIDA. That is with SSM. When we are looking for sites for transfer PCVs, there are some that we know we can't place a PCV there but it's not in the database."

VIDA is not currently set up to store the type of information required for site history files. An electronic solution may require additional development to fully accommodate site history file needs. In April 2016, the Field Advisory Board noted the inefficiencies associated with multiple electronic platforms and recommended that post staff be involved in the VIDA redesign process. In order to maximize functionality, an electronic data management system for site history files ought to be integrated with other systems and be developed with input from post staff. More importantly, in order for an electronic data management system to be effective, the agency requires clear guidance, processes, and oversight. In the absence of an electronic data management system, OIG maintains that significant progress can be made to improve the organization, completeness, and use of site history files.

The agency should provide post staff with clear and accessible guidance and systems that support site history file maintenance.

Conclusion

Insufficient oversight and a lack of agency-wide guidance and systems for organizing and maintaining site history files contributed to recurrent deficiencies in the organization, completeness, and use of site history files across numerous posts over an extended period of time. OIG notes that inadvertently placing a Volunteer in an unsafe site could have serious consequences. In order to mitigate the risk of safety and security incidents and improve Volunteer wellbeing, OIG recommends that the agency develop and implement a comprehensive information management system that addresses oversight, guidance, and systems in order to improve the maintenance and use of site history files.

We recommend:

1. That the Associate Director for Safety and Security, the Associate Director of Global Operations, and Regional Directors collaborate to strengthen oversight mechanisms to improve the completeness, organization, and use of site history files for site development and selection.

2. That the Associate Director for Safety and Security collaborate with the Associate Director of Global Operations and Regional Directors to provide clear, easily accessible and explicit agency-wide guidance to posts on the processes and procedures for maintaining site history files.

3. That the Associate Director for Safety and Security, the Associate Director for Global Operations, Regional Directors, and the Chief Information Officer collaborate as needed to provide systems for post for maintaining site history files.

cc: Laura Chambers, Chief of Staff
        Carlos Torres, Deputy Director
        Shawn Bardwell, Associate Director Office of Safety and Security
        Ken Yamashita, Associate Director Office of Global Operations
        Francisco Reinoso, Chief Information Officer
        Dee Hertzberg, Acting Regional Director of Africa Operations
        Kristin Besch, Acting Regional Director of Europe, Mediterranean and Asia Operations
        Emily Untermeyer, Acting Regional Director of Inter-America and the Pacific Operations
        Angela Kissel, Compliance Officer
        IGChron
        IG

Appendix A: List of OIG Reports that Contain Site History File Findings
Appendix B: Summary of Agency-wide Guidance on Site History Files

Appendix A: OIG Reports that Contain Site History File Findings

OIG Reports that Contain Site History File Findings	Year of Publication
Rwanda Preliminary Report, Post Evaluation	2016
Lesotho, Post Evaluation	2015
Benin, Post Evaluation	2015
Sierra Leone, Post Evaluation	2015
Philippines, Post Evaluation	2014
Moldova, Post Evaluation	2013
Namibia, Post Evaluation	2013
Indonesia, Post Evaluation	2013
Safety and Security Weaknesses in PC/Cameroon, Memo	2012

Appendix B: Agency-wide Guidance on Site History Files

Source	Requirement
MS 270 6.7 Site History Documentation	• Each post must maintain a system for recording the history of a site. • Site history files must capture security issues. • Files should include Volunteer concerns about a location, safety or security incidents, and other conditions that could affect placement.
MS 270 6.2 Site Selection Criteria	• Each post must review the site history, if there is any.
MS 270 6.8.2(b) Volunteer Initiated Action	• Volunteer who feels at risk may request to be removed from his or her site… The post must conduct an assessment of the safety of the site… All assessments must be documented in the site history files.
Site History Files (legacy intranet)	*Required documentation for site history files:* • Site Survey forms for the community, partner agency, and housing • Copies of all agreements • Copies of crime incident reports (non-confidential information only) • Copies of site locator form and/or map • Volunteer COS Site Report • Site visit documentation that is not confidential *Optional documentation for site history files:* • PCV Replacement Request form from partner agency • Original Volunteer Request form • Any historical information • Photographs of the site and agency activities • Newspaper clippings about the community and/or Peace Corps activities there • Information on other development organizations working at site or in the area • Site history files should be organized by geographical area rather than by sector to facilitate use during the site development process
MS 270 3.2.4 Country Director	• The CD has overall responsibility for the day-to-day management and execution of safety and security programs at post. The CD is responsible for establishing, overseeing, and managing the post Volunteer Safety and Security Support System. The CD is in charge of developing post-specific policies and procedures that implement this manual section and all other safety and security guidelines established by Peace Corps.
MS 270 3.2.5 Safety and Security Coordinator	• The Safety and Security Coordinator reports to the CD and is responsible for the overall coordination of the post's Volunteer safety and security system and must collaborate closely with other staff to ensure that all required components of the Volunteer safety and security support system are operational and being executed. The Office of Safety and Security, through Overseas Operations and the

	relevant PCSSO, provides technical oversight over the work performed by the SSC.
MS 270 3.2.2 Regional Director	• The RD is responsible for ensuring that CDs in the Region have established and are effectively managing their Volunteer safety and security support systems in accordance with the guidelines established by Peace Corps.
MS270 Compliance Reporting Memo (2009)	• Eliminated MS270 self-certification and incorporated AMCS self-report on safety and security. • Established that the Office of Safety and Security review each post's "safety and security plan" at least once every three years.
AMCS C12.5.2	• Are Site History Files used to document the history of a site from the start of the evaluation process and to capture important information and security issues that could affect future Volunteer placements?
Site Development Procedural Guidelines	• Site history files must be consulted when evaluating a potential site. • Volunteers in nearby sites should be consulted about the viability of the site.
Programming, Training and Evaluation Guidance	• Each post establishes its own site selection criteria and processes with guidance from its region. • Site-history information that is critical for future site-development consideration should be kept in site-history files.
SOP Site Development and Selection	• The Safety and Security Coordinator (SSC) will work with programming staff to ensure that potential sites have been cross referenced and checked with information contained in the site history files.
Safety and Security Manager SOP Site History Files	• The SSC will work with programming staff to identify the types of information and/or documents that must be stored in an electronic, centralized site history file. • The SSC will conduct periodic reviews of the site history files to ensure that the responsible parties are collecting and maintaining appropriate information. • The SSC will work with the DPT or equivalent to ensure that site history files on all potential sites has been reviewed for security or programming issues. • Site history file contents should include site preparation reports, notations about safety or security concerns, Volunteer reports, and relevant media reports or from government or other organizations.

Appendix C: Agency Response

MEMORANDUM

To: Kathy Buller, Inspector General

Through: Anne Hughes, Chief Compliance Officer

From: Ken Yamashita, Associate Director for Global Operations
              Shawn Bardwell, Associate Director for Safety and Security
              Francisco Reinoso, Chief Information Officer

Date: October 10, 2016

CC: Carrie Hessler-Radelet, Director
              Laura Chambers, Chief of Staff
              Carlos Torres, Deputy Director
              Joaquin Ferrao, Deputy Inspector General
              Angela Kissel, Compliance Officer

Subject: Agency Response to the Management Advisory Report: Site History Files

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Enclosed please find the agency's response to the recommendations made by the Inspector General as outlined in the Management Advisory Report: Site History Files, sent to the Agency on August 24, 2016.

The agency concurs with all four recommendations and will work to address them by the set target dates.

Recommendation 1

That the Associate Director for Safety and Security, the Associate Director of Global Operations, and Regional Directors collaborate to strengthen oversight mechanisms to improve the completeness, organization, and use of site history files for site development and selection.

Concur:

Response: The Associate Director for Safety and Security, the Associate Director of Global Operations and the Regional Directors will be working to issue baseline interim guidance on site history files during the first quarter of fiscal year (FY) 2017. Each post will be expected to ensure compliance with the interim guidance by the end of the second quarter of FY 2017.

Once the interim guidance is developed and issued, the Safety and Security, Global Operations and the Regional Directors will work to develop clear, easily accessible and explicit agency-wide guidance to posts on the processes and procedures for maintaining site history files. This guidance will include oversight mechanisms that improve the completeness, organization and use of site history files for site development and selection.

Documents to be Submitted:
- Interim Guidance on Site History Files
- Final Guidance on Site History Files

Status and Timeline for Completion: September 2017

Recommendation 2

That the Associate Director for Safety and Security collaborate with the Associate Director of Global Operations and Regional Directors to provide clear, easily accessible and explicit agency-wide guidance to posts on the processes and procedures for maintaining site history files.

Concur:

Response: The Associate Director for Safety and Security, the Associate Director of Global Operations and the Regional Directors will be working to issue baseline interim guidance on site history files during the first quarter of fiscal year (FY) 2017. Each post will be expected to ensure compliance with the interim guidance by the end of the second quarter of FY 2017.

Once the interim guidance is developed and issued, the Safety and Security, Global Operations and the Regional Directors will work to develop clear, easily accessible and explicit agency-wide guidance to posts on the processes and procedures for maintaining site history files. This guidance will include oversight mechanisms that improve the completeness, organization and use of site history files for site development and selection.

Documents to be Submitted:
- Interim Guidance on Site History Files
- Final Guidance on Site History Files

Status and Timeline for Completion: September 2017

Recommendation 3

That the Associate Director for Safety and Security, the Associate Director for Global Operations, Regional Directors, and the Chief Information Officer collaborate as needed to provide systems for post maintaining site history files.

Concur:

Response: As the agency works to develop the final guidance on Site History Files, it will use the established guidance to determine which systems are most appropriate for maintaining site history files, and to what degree technology might enable those systems. An initial iteration of these systems will be in place for the final guidance to be implemented next year, while the technological approach will continue to evolve based on necessity, experience and capacity.

Documents to be Submitted:
- Final Guidance on Site History Files
- Memo on System(s) Employed for Site History Files

Status and Timeline for Completion: September 2017