PEACE CORPS
Office of
INSPECTOR GENERAL

Management and Performance Challenges

Fiscal Year 2017

These challenges illustrate the most significant areas the Office of Inspector General (OIG) believes need improvement for the Peace Corps to effectively manage its resources and minimize the potential for fraud, waste, and abuse occurring in its operations. Addressing the issues related to these challenge areas will enable the agency to increase operational efficiencies and improve mission effectiveness.

In accordance with the Reports Consolidation Act of 2000, the Office of Inspector General (OIG) is submitting what it has determined to be the most significant management and performance challenges facing the Peace Corps. The challenges discussed in the attachment to this memo are to be included in the Agency Financial Report for Fiscal Year 2017. The IG's management challenges are observations of the IG based on the work performed by the OIG as well as information uncovered during the performance of our oversight responsibilities.

Significant management challenges facing the Peace Corps:

- **Information Technology Security Management**

- **Planning and Implementation**

- **Human Capital Management**

- **Compliance**

- **Volunteer Health and Safety**

Challenge: Information Technology Security Management

Why This Is a Challenge

Effective information technology (IT) security programs help protect agency data from being misused by both internal and external sources, and minimize the risk of having sensitive data compromised. Federal laws and regulations governing IT security are designed to strengthen an agency's management of its operations. They also provide significant guidance to help prevent serious information security incidents. The Federal Information Security Management Act of 2002 (FISMA), as amended, is central to the Federal IT security program.[1] The objective of FISMA is to develop a comprehensive framework to protect government information, operations, and assets.

OIG is concerned about the quality of the agency's IT security program, especially considering the sensitive data that the Peace Corps maintains about Volunteers, such as health records and sexual assault incident information. Since FY 2009, we have reported in our management and performance challenges that the Peace Corps has not achieved full compliance with FISMA or fully implemented an effective IT security program.[2] Some of the identified issues have been outstanding for over 7 years, and the agency has struggled to implement corrective actions. Year after year, our results demonstrate that the Peace Corps lacks an effective information security program because of problems related to people, processes, technology, and culture.

One of the main drivers of the agency's immature IT security program is that the Peace Corps has not fully implemented a comprehensive agency-wide risk management program that is effective in monitoring, identifying, and assessing security weaknesses and resolving related problems at the entity, business process, and information system levels. While the agency has taken steps to strengthen its risk program at the information system level, it lacks full agency commitment and alignment with the National Institute of Standards and Technology Risk Management Framework. Without a robust risk management process, the Peace Corps is exposed to attacks, environmental disruptions, and business failures due to human error.

Since the Peace Corps does not foster a risk-based culture, it allows offices to disregard the agency's responsibility to protect its most sensitive data by introducing many information systems to the network without having the proper security assessments and approvals. Further, the agency lacks a comprehensive continuous monitoring program that documents all agency systems and their associated risks. The Peace Corps process is ad-hoc, reactive, and does not allow the agency to effectively monitor and protect its dynamic IT environment.

Progress in Addressing the Challenge

Peace Corps management has made some progress in strengthening IT security management programs and FISMA compliance. For example, the agency's chief information security officer has remained with the agency for more than a year. This is important because the agency has struggled to hire and maintain qualified staff in this role over the last 4 years. Additionally, the agency has developed and implemented user security awareness training and has begun implementing

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1   FISMA was amended in December 2014 by the Federal Information Security Modernization Act of 2014 (Pub. L. No. 113-283).

2   Review of Peace Corps' Information Security Program (2016)

multi-factor authentication for network logins. However, a number of FISMA issue areas discussed in prior years' challenge statements have not been fully resolved and require full agency involvement to complete.

What Needs to Be Done

In order to ensure the agency's information, operations, and assets are protected, it is critical that the Peace Corps achieve full compliance with FISMA and other federal laws and regulations that apply to managing its IT security infrastructure.

The Peace Corps needs to embrace a risk-based culture and place greater emphasis on improving its information security program, including accomplishing greater FISMA compliance and timely remediation of IT security weaknesses that have been identified internally and through the annual FISMA audit and other reviews. Further, emphasizing a risk-based culture can help the agency better ensure that all decisions the agency makes are aligned with its priorities. The agency has made a committment to implement an Enterprise Risk Management framework in its 2018-2022 Strategic Plan. However, the agency will need to dedicate resources and develop comprehensive policies to fully achieve this objective.

The Peace Corps will need to focus on improving its IT security program by involving senior leadership, ensuring agency policies are comprehensive, and prioritizing the time and resources necessary to become fully FISMA compliant and eliminate weaknesses. Focusing on the implementation of the Risk Management Framework will facilitate tailoring an information security program that meets the Peace Corps' mission and business needs across a decentralized organization.

Key OIG Resources

Review of Peace Corps' Information Security Program (2016)

Peace Corps' FY 2016 Performance and Accountability Report

Report on Protecting Sensitive Information in Peace Corps Computer Systems (2016)

Management Advisory Report: The Peace Corps' Cloud Computing Pilot Program (2015)

Challenge:

Planning and Implementation

Why This Is a Challenge

Although the Peace Corps continues to improve key business processes and critical Volunteer support functions, as well as streamline its operations, it is constrained by decentralized processes and a lack of modern systems. Often, the agency does not apply sufficient time and resources to its planning and implementation processes.

The Peace Corps has difficulties planning and coordinating the implementation of new initiatives. For example, the Peace Corps made significant commitments to a version of cloud technology without first appropriately researching new platforms and including the Office of the Chief Information Officer (OCIO) in those decisions. In 2014, the agency entered into an agreement to provide a cloud-supported network that did not meet Federal computer security requirements and placed sensitive agency information in that environment.[3] Before making such a move, the agency should have consulted with multiple offices to ensure that needs requirements were fully assessed and that all federal requirements were addressed. In another example from our country program evaluation of Peace Corps/Kosovo[4], we found that the post did not have an adequate amount of time to onboard and train new staff and prepare for Volunteers. According to OIG's 2014 report on new country entries, New Country Entries: Lessons Learned[5], an inadequate time frame for opening a post can result in a number of problems, including inadequate Volunteer training, poorly developed sites, and an uneven quality in staff hiring or training—all of which OIG observed in Peace Corps/Kosovo. Retroactively

addressing poor implementation can cost the agency undue time, money, and effort.

Effective implementation of initiatives requires fully developed policies, procedures, and guidance to support critical changes, especially for new systems. While the agency has a dedicated committee and process to develop policy, including procedures and other internal controls, it struggles to effectively coordinate, implement, and manage these rules. For example, the Peace Corps implemented a new property management system (Sunflower) in 2015, but did not document important controls residing in the system and how they should be applied until 2017. For 2 years the property control procedures on record related only to the defunct system. In addition, the agency did not change relevant policies or procedures governing employee time and attendance in anticipation of implementing a new timekeeping system. Instead the agency switched its time and attendance system first and is still working to change its relevant guidance. This change impacted all staff because the system is tied to payroll. While training was provided to staff and supervisors at rollout, such trainings cannot supplant well considered policies, procedures, and guidance. Additional planning should occur during the initial phases of the project to ensure that users are prepared and that related reference materials are sufficient and readily available after roll-out. Planning and implementation is further hampered by the lack of a centralized system whereby a headquarters office can ensure that other offices update previous guidance according to new agency-wide policies or initiatives.

Moreover, although the Peace Corps is working to modernize its businesses processes, OIG audits and evaluations

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3   Management Advisory Report: The Peace Corps' Cloud Computing Pilot Program (2015)
4   Evaluation of Peace Corps/Kosovo (2017)
5   New Country Entries: Lessons Learned

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have found that several essential business functions remain largely paper-based, including processes for travel, medical supply management, payment vouchers, purchase card logs, contract files, and several human resource functions including performance appraisals, employee off-boarding, and training records. Recently, when the agency switched its human resources system, it actually replaced certain automated HR functions with paper processes. Lack of automation makes planning and implementation more challenging and impacts data reliability, as manual data processes are more prone to error.

Progress in Addressing the Challenge

The Peace Corps established initiatives to better manage certain programs and changes in the agency. The Office of the Chief Information Officer launched the Business Advocacy Manager Program in early FY 2017. The program pairs an IT liaison with each agency office to facilitate collaboration, fulfill requests, and advocate during IT project planning. To manage workforce reduction requirements, the agency established a task force that develops processes, guidance, and communications on all hiring actions, reassignments, and reorganizations. The processes established by the task force will "standardize personnel actions and allow for strategic decision-making by supervisors, managers, and senior leadership."

The agency continues to utilize the recommendations of a field advisory board, which is comprised of post leadership from across regions. The agency established the board to determine the most prominent issues among posts and recommend policies and actions for the agency to address these concerns. Office heads work with the board to communicate updates on new policies and initiatives as well as progress on prior recommendations.

The senior policy committee continues to work to improve communication and coordination in this area. The agency has updated internal guidance for a number of policies related to new systems or programs, such as those for the website and direct hire duty hours. These policies are scheduled to be issued pending approval of their implementing procedures.

What Needs to Be Done

The agency needs to assign overall responsibility for planning, coordinating, and implementing agency-wide policies or initiatives. The agency should ensure that responsible program offices regularly review agency policy under their purview and assist the senior policy committee in making and communicating appropriate changes. It should continue to assess its operations and modernize its business processes, including ensuring that new processes and initiatives related to essential business functions are automated. The agency also needs to ensure that these modernization efforts are appropriately planned and that their implementation into agency policies and procedures is timely and fully integrated. Furthermore, agency business processes must support effective internal controls by ensuring continuity and accountability. As automated systems are introduced in the Peace Corps environment, the agency must be diligent in ensuring that proper IT security controls are in place, as IT security has been a reported challenge area since 2009. See the Management Challenge section titled Information Technology Security Management.

Key OIG Resources

Evaluation of Peace Corps/Kosovo (2017)

OIG's FY 2017 Annual Plan

Management Advisory Report: The Peace Corps' Cloud Computing Pilot Program (2015)

Recurring Issues Report: Common Challenges Facing Peace Corps Posts, FYs 2012-2015

Final Audit Report: Peace Corps Applicant Screening Process (2014)

New Country Entries: Lessons Learned (2014)

Management Advisory Report: Certification of Volunteer Payments (2013)

Final Audit Report: Peace Corps Overseas Staffing (2013)

Final Program Evaluation Report: Follow-up Evaluation of the Volunteer Delivery System (2010)

Challenge: Human Capital Management

Why This is a Challenge

Key pillars of human capital management include hiring, recruitment, training, and knowledge management. In performing oversight over agency operations, OIG has highlighted areas of concern in all four sectors. Most importantly, we have noted how excessive personnel turnover has substantially exacerbated these challenges.

Hiring and Recruitment

Nearly all Peace Corps U.S. direct hire staff are subject to a 5 year term limit called the "five-year rule" (FYR). Congress enacted the FYR in 1965 to create a constant flow of new employees including returned Peace Corps Volunteers, avoid the inflexibility associated with the civil service system, and prevent employees from working their entire career at the Peace Corps. However, when OIG analyzed the impact of the FYR in June 2012, we found that between 2005 and 2009 the annual pace of employee turnover was between 25 percent and 38 percent, quadruple the average turnover rate in the Federal government. OIG estimated that excessive turnover driven by the FYR accounted for approximately 60 percent of $20.7 million in total turnover management costs.

In July 2017, OIG issued "Management Implication Report – Challenges Associated with Staff Turnover" to the acting Director. This report outlined the negative effects of staff turnover on the agency's ability to maintain high quality Volunteer support and improve core business functions, illustrating that high staff turnover is a persistent challenge for the agency that spans multiple levels and areas of operation.

Almost all leadership positions at the Peace Corps, both at headquarters and overseas, are subject to the FYR. Since these positions directly impact the agency's operations, recruiting and hiring skilled personnel to fill these vacancies is critical. In 2013, OIG reported on these challenges in our audit of Peace Corps overseas staffing. We found that the agency struggled to maintain a robust pool of qualified applicants and ensure positions were filled in a timely manner. It had difficulty managing hiring and administrative timelines for open positions, maintaining consistency in the interview and hiring process, planning for transfers, and dealing with unexpected vacancies. These challenges were aggravated by the agency's accelerated rate of overseas staff turnover.

Headquarters personnel recruitment is similarly difficult because many of the positions require specialized knowledge and the ability to perform governmental budgeting, payment, and contracting. We found that the FYR exacerbated the agency's challenges in attracting and retaining qualified personnel and contributed to an abbreviated average tenure of about 3 years. Specifically, the agency has struggled to recruit qualified staff in acquisition and contract management, and short tenures have compromised the agency's ability to conduct adequate acquisition planning. In our 2016 audit of Peace Corps' healthcare benefits administration contract, we identified that inexperienced staff and insufficient planning contributed to instances of the agency's non-compliance with the Federal Acquisition Regulations and other complex rules associated with soliciting, awarding, and administering contracts or procurements. This is particularly concerning due to the large sums of money processed in contracting and acquisitions.

Training and Knowledge Management

Training and knowledge management are also important aspects of human capital management. Effective staff training is essential in core volunteer support functions to help ensure the health, safety, and security of volunteers. Knowledge management, the systematic documentation and maintenance of information, is necessary for the agency to operate efficiently and achieve goals. Further, it is important that training and knowledge databases are accessible by the right people at the right times and are consistently updated.

In FY 2014, OIG evaluated the Peace Corps' training of overseas staff and uncovered a number of challenges.[6] The agency's primary training and orientation program for overseas staff members was not available to all of them, and the agency lacked an alternate mechanism for orienting new overseas staff members. In the absence of a comprehensive, standardized orientation and training program for all overseas staff, each post decided what information would be provided to new staff. This created variability in the quality of staff training, and there was no assurance that new staff was properly trained on important policies and procedures. Further, in both the 2013[7] and 2016[8] evaluation reports on the Peace Corps Sexual Assault Risk Reduction and Response (SARRR) program, OIG again found that there was inconsistent onboarding and continuing education processes for critical staff positions which deliver safety, security and medical support to volunteers. The Peace Corps' high turnover rate exacerbates training challenges by simultaneously creating a larger burden for staff charged with employee training responsibilities and a larger need to effectively train incoming staff.

The agency's lack of centralized training records and a robust learning management system, further complicate its ability to effectively and efficiently train staff. In the aforementioned FY 2013, 2014, and 2016 evaluation reports, OIG found that the agency could not identify everyone who needed to take certain trainings, nor track training completion. During fieldwork in 2016, OIG could not verify that all overseas staff had received the mandatory SARRR training required by the Kate Puzey Peace Corps Volunteer Protection Act of 2011; nor could we identify the population of overseas staff required to take these trainings. Constant turnover and insufficient training records challenge the agency's ability to ensure that employees receive training on mandatory and job-essential topics.

The importance of knowledge management has been highlighted in several internal and external evaluations of the FYR. Our 2012 FYR report and 2017 management implication report illustrate the importance of knowledge management and highlight how excessive turnover makes this process simultaneously more difficult, and more critical to ensure continuity of operations. Shortened tenures contribute to insufficient institutional memory. With high turnover, the Peace Corps must rely on its policies, reports, and other office-level operating procedures to act as its centralized source of knowledge and agency history. However, as identified in the "Planning and Implementation" section of this report, Peace Corps has struggled with systematically recording, maintaining, and propagating such guidance. For example, during fieldwork for the 2016 SARRR program report, OIG found that the Office of Victim Advocacy had very few written operating procedures to orient the new director. In addition, the Peace Corps' online manual and intranet

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6   Final Report on the Program Evaluation if the Peace Corps' Training of Overseas Staff (2014)

7   Evaluation of the Peace Corps Volunteer Sexual Assault Policy (2013)

8   Final Evaluation Report on the Peace Corps Sexual Assault Risk Reduction and Response Program (2016)

has been incomplete for an extended period of time due to site upgrades.

Progress in Addressing the Challenge

Hiring and Recruitment

The agency has made improvements to hiring and recruiting in an attempt to limit the turnover of critical Peace Corps positions. Accomplishments include recruiting intermittent experts and rovers to ensure adequate coverage of unexpected senior post staff vacancies; developing a master calendar of all known upcoming vacancies; and holding monthly coordination meetings through which key offices can give feedback on the qualifications needed to fill upcoming vacancies.

Furthermore, the Peace Corps has revised its acquisition and contracting policies and procedures with the goal of assuring timely contract awards and improving its process for selecting and designating contracting officer representatives.

On May 1, 2017, Congressman Ted Poe introduced H.R. 2259, the "Sam Farr Peace Corps Enhancement Act." That bill would allow the Director to exempt certain positions from the FYR if they require specialized technical or professional skills and knowledge of Peace Corps operations, such as those relating to Volunteer health services, financial management, information technology, procurement, personnel, legal services, or safety and security. That provision is supported by agency management.

Training and Knowledge Management

Since the agency established an Office of Staff Learning and Development (OSLD) in 2015, this office has worked to define learning and development needs at specific phases in each employee's tenure, including

trainings needed to comply with federal laws and communicated the importance of SARRR training to staff. OSLD has also worked to purchase a new learning management tool to help manage training requirements and completions; however, this system is still in development.

What Needs To Be Done

Hiring and Recruitment

The agency still needs to address two open recommendations (recommendations 2 and 3) from our 2012 FYR report relating to better management of turnover and acquisition and retention of qualified personnel in core business functions. In addition, the agency should take action to improve how it hires certain overseas staff, such as by developing (1) policies and procedures for hiring overseas staff management positions, and (2) a set schedule for maintaining rosters of eligible candidates for these positions.

Training and Knowledge Management

The agency needs to act on many recommendations related to training and knowledge management. Specifically, the agency needs to address the systemic issues uncovered during our 2014 evaluation, including creating a training needs assessment process, a standardized training program for new overseas staff, and an improved learning management system. In addition, the agency still needs to develop, communicate, and track expectations and results for how headquarters and overseas staff comply with training-related laws and policies.

The agency must devote resources to formalize knowledge management practices related to recording institutional memory, transferring knowledge to new hires, and ensuring accessibility. The agency

must also establish a process to monitor and evaluate the success of the newly acquired learning management system.

Key OIG Resources

Management Implication Report: Challenges Associated with Staff Turnover (2017)

Final Evaluation Report on the Peace Corps Sexual Assault Risk Reduction and Response Program (2016)

Final Audit Report: Peace Corps' Volunteer Healthcare Benefits Administration Contract (2016)

Final Report on the Program Evaluation if the Peace Corps' Training of Overseas Staff (2014)

Final Audit Report: Peace Corps Overseas Staffing (2013)

Evaluation of the Peace Corps Volunteer Sexual Assault Policy (2013)

Final Evaluation Report: Impacts of the Five-Year Rule on Operations of the Peace Corps (2012)

Recurring Issues: OIG Post Audits and Evaluations FY 2009-2011 (2012)

Challenge: Compliance

Why This Is a Challenge

The Peace Corps is a small agency that finds itself challenged to meet its global mission while at the same time complying with all of the requirements of a Federal agency. While the Peace Corps has shaped its core values around Volunteer wellbeing, commitment to national service, and other areas related to quality programming, diversity, and innovation, the agency has not made complying with Federal laws, regulations, and other requirements a priority. Compliance is a significant objective in the government sector, and management should comprehensively consider the controls needed to effectively comply with relevant requirements.[9] There is no centralized responsibility for identifying and understanding which Federal laws and regulations apply to the Peace Corps or for ensuring that the agency works towards compliance. The agency lacks an effective coordinating mechanism that supports implementation. Currently, individual offices and staff members are responsible for knowing what has been passed and working with their respective offices to meet requirements. OIG reports have noted challenges in compliance in numerous operational areas. Non-compliance with IT security requirements has been covered in the Information Technology Security Management, as that is a particularly sensitive and far-reaching problem.

Drug Free Workplace

In September 1986, Executive Order 12564 mandated a drug-free federal workplace and required formal agency programs and employee drug testing for those serving in sensitive positions. While the agency initially issued a plan in 1991, it did not update, maintain, or develop procedures in this plan. OIG issued a report in 2012 informing the agency of its noncompliance and need to review and follow a formal drug-free workplace plan.[10] It then took four more years for the agency to issue an updated comprehensive drug-free workplace plan, policy, and implementing procedures; list testing-designated positions; and begin random drug testing for headquarters designated positions.

Accessibility of Electronic and Information Technology

The Rehabilitation Act of 1973 was amended in 1998 to require Federal agencies to make their electronic and information technology accessible to people with disabilities. The law requires that technologies such as websites, phone systems, hardware, and software be available for both members of the public and Federal employees with physical, sensory, or cognitive disabilities. However, the Peace Corps has not ensured its public-facing website is in full compliance. A subpage states that users can request a reasonable accommodation to access a portion of the website and provides an email address and phone number to make this request.

Records Management Requirements

In August 2012, the Office of Management and Budget and the National Archives and Records Administration issued a directive providing a robust records management framework and requiring agencies to eliminate paper and use electronic recordkeeping to the fullest

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9   See GAO Green Book Section OV2.16-OV2.25 for agency management guidance for establishing objectives.

10   Management Advisory Report: Peace Corps Drug-Free Workplace Plan (2012)

extent possible by December 2016. Despite initially budgeting and allocating funds to implement such a system, the agency has not fully complied. In February 2017, the Peace Corps reported that it had defunded the records management program and had no plans to fund it moving forward. It is relying on individual users to save their electronic records appropriately. In this report, the agency also stated that the cause of non-compliance was that "almost 50 years of records mismanagement cannot be reversed quickly...."[11]

Whistleblower Protection Act

A 2014 memorandum issued by the White House Chief Technology Officer required agencies to participate in the U.S. Office of Special Counsel's Whistleblower Protection Act certification program. Under Title 5 of U.S. Code, Section 2302(c), agencies must inform employees of their rights under the Civil Service Reform Act, the Whistleblower Protection Act, the Whistleblower Protection Enhancement Act, and related laws. The agency began to implement a program in August 2016 and submitted an application to begin the process of obtaining certification for their Whistleblower program on July 16, 2017. However, the agency has not yet received its compliance certification for this important program.

Federal Requirements for Access

Homeland Security Presidential Directive 12 (signed August 27, 2004) was a strategic initiative requiring a government-wide standard for secure and reliable forms of identification for Federal employees and contractors. This directive led to a requirement issued by Office of Management and Budget instructing agencies to upgrade their physical and logical access systems by FY 2012 to require the use of Personal Identity Verification cards. Through our review work of Peace Corps' information security program, we have been reporting the agency's non-compliance with this requirement since 2013.[12] After years of refusing to implement the requirement, new leadership in the OCIO made the decision to begin efforts to comply in FY 2016. The agency is beginning to implement logical access controls at headquarters, but is still struggling with full agency implementation.

Federal Acquisition Regulations

During our audit work on the Peace Corps' largest contract, we noted significant non-compliance with Federal Acquisition Regulation (FAR) requirements.[13] This included failing to incorporate proper contract clauses, misclassifying the type of contract issued, and extending the existing contract non-competitively over a long period of time. By incorrectly applying the FAR, the Peace Corps failed to best protect the government's interests and appropriately emphasize oversight of the contract.

Progress in Addressing the Challenge

The agency has taken steps to develop formalized drug-free workplace and whistleblower programs. However, neither of these programs are in full compliance yet. Specifically, the drug-free workplace program does not include any sensitive senior agency managers who are located overseas and the whistleblower program is still pending approval and certification. Based on the recommendations in our review of the agency's largest contract, the Peace Corps appropriately planned for, competed, and awarded a replacement contract vehicle with the correct clauses and sufficient oversight mechanisms included.

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11   Peace Corps Senior Agency Official for Records Management 2016 Annual Report (2017)

12   Review of Peace Corps' Information Security Program (2016)
13   Final Audit Report: Peace Corps' Volunteer Healthcare Benefits Administration Contract (2016)

The agency's Office of Civil Rights and Diversity has started a task force to alert certain senior managers to accessibility requirements and recently assigned an accessibility coordinator to help with these efforts.

What Needs to Be Done

While the Peace Corps has taken recent steps to address specific Federal requirements, the agency lacks an overall program to ensure Federal compliance. The agency should establish this role and give it the appropriate authority to ensure identification, coordination, and implementation of federal requirements. This mechanism will help the agency prioritize compliance. Through OIG work and informal discussions with the agency, we have stressed the importance of complying with Federal laws; however the agency has defunded or assigned resources to other areas and has not taken responsibility or accountability seriously. As the Federal government continues to face spending cutbacks and the agency streamlines operations to focus on Volunteer support, the Peace Corps must adopt a deliberate and comprehensive approach to ensure compliance with Federal rules and regulations.

Key OIG Resources

Review of Peace Corps' Information Security Program (2016)

Agency Financial Report FY 2016

Final Audit Report: Peace Corps' Volunteer Healthcare Benefits Administration Contract (2016)

Management Advisory Report: Peace Corps' Volunteer Health Care Administration Contract (2015)

Management Advisory Report: Peace Corps Drug-Free Workplace Plan (2012)

Peace Corps Senior Agency Official for Records Management 2016 Annual Report (2017)

Challenge: Volunteer Health and Safety

Why This Is a Challenge

While the Peace Corps works to prioritize the safety, security, and physical and mental health of its Volunteers, OIG country program evaluations and audits have identified aspects of the agency's safety and security and Volunteer medical care programs that present management challenges. Specifically, these challenges relate to the Volunteer health care program, processes for selecting and approving sites for Volunteers, procedures and documents that prepare the agency to respond to emergencies, and sexual assault risk reduction and response.

Volunteer Health Care

In 2010, OIG reviewed the medical care provided to Volunteers following the death of a Volunteer in Morocco.[14] The review found that the methods used to measure and monitor the quality of Volunteer health care were insufficient. A follow-up review released in March 2016 found that the agency enhanced the Volunteer health program with regard to our 2010 findings, but further improvements were still needed.[15] Specifically, overseas health units had experienced turnover and staffing gaps that resulted in poor transfer of patient information and documentation which can put Volunteers' health and safety at risk.

We also found that while the agency had established a policy to identify root causes of sentinel events, defined as unfortunate or unexpected events, the reviews had not resulted in any systemic change. The process was ineffective because the agency categorized too many events as sentinel to review them effectively, sentinel event committee members often had conflicts of interest with the cases, and root cause analyses were not comprehensive.

In OIG's recent country program evaluation of Peace Corps/South Africa, we found that the process for placing Volunteers with medical accommodations in South Africa was insufficient.[16] We recommended that the agency take into account the nature of service as well as the availability of support services in the country when making decisions about placing Volunteers with medical accommodations, especially those with mental health accommodations. Beyond considering the availability of health services in the country, the agency did not have a process to determine what types of medical accommodations might be reasonable in South Africa, which was an exceptionally challenging post for Volunteers to serve in. The agency stated that it lacked sufficient and defensible data to make these considerations. OIG had previously recommended in a 2010 report on the Volunteer delivery system that the agency collect and analyze data to determine to what extent Volunteer medical accommodations pose an undue hardship on the operations of Peace Corps, and that recommendation remains open.

Volunteer Site Selection and Approval

OIG found issues with site development at a number of posts. The agency requires that posts maintain site history files with relevant safety and security information, and that post staff review these files when considering Volunteer site placement. However, between 2012 and 2016, OIG

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14   Death Inquiry and Assessment of Medical Care in Peace Corps Morocco (2010)

15   Final Program Evaluation: Follow-Up Evaluation of Issues Identified in the 2010 Peace Corps/Morocco Assessment of Medical Care (2016)

16   Final Country Program Evaluation: Peace Corps/South Africa (2017)

found site history files were incomplete, insufficiently organized, or not being used to inform site selection in multiple posts and regions. OIG also found that several posts did not comply with their self-identified housing criteria, and appropriate staff (including the safety and security manager) were not always sufficiently included in the site development process. Without housing checks and proper site development, the agency may inadvertently place Volunteers in houses and sites that impose increased safety and security risks.

Emergency Preparedness

During emergencies, posts' ability to locate Volunteers, maintain detailed emergency plans, and communicate those plans to Volunteers is critical. However, more than half the posts evaluated between 2012 and 2015 did not maintain complete and accurate site locator forms, which contain contact information and site location details needed to locate Volunteers in an emergency.

In addition, OIG evaluations identified five posts with emergency action plans that were not up to date and accessible to Volunteers. At approximately half of the posts that were evaluated from 2012 to 2015, Volunteers were unaware of their emergency consolidation points. Outdated emergency action plans and a lack of communication to Volunteers about the plans and consolidation points increased the risk that Volunteers would be unable to respond quickly and appropriately in an emergency.

We further found gaps in medical emergency preparedness at posts. Medical action plans were often incomplete and missing important information that could be necessary in an emergency. This was partly due to a lack of awareness by country directors concerning their health unit oversight responsibilities. In turn, the agency did not complete all required activities, such as carrying out medical

emergency preparedness drills, ensuring that Peace Corps medical officers have assessed local health facilities, and conducting site visits to Volunteers.

Sexual Assault Risk Reduction and Response

In November 2016, OIG issued a report on the Peace Corps' Sexual Assault Risk Reduction and Response (SARRR) program as required by the Kate Puzey Peace Corps Volunteer Protection Act of 2011.[17] We found that SARRR policies and procedures focused on responding to victims of assault, but risk reduction strategies were less prevalent. We also identified problems with the Peace Corps' SARRR training program for both Volunteers and staff. These issues reduced the agency's effectiveness in teaching Volunteers important program information and providing all resources intended by the program.

Progress in Addressing the Challenge

In response to our 2016 evaluation of Volunteer health care the agency has clarified guidance to medical staff, including the role of regional medical officers; how frequently posts should review in-country medical facilities and providers; its expectations for the training and use of back-up medical providers; and how to conduct an annual medical emergency drill. The agency also updated its guidance and procedures on patient safety events to focus on systemic causes. In 2016, the Office of Health Services delivered a training to all medical officers to encourage the reporting of mistakes so that the agency can better understand errors and fix systemic issues. In addition, the agency has taken steps to update its guidance on Volunteer site development procedures and requirements for medical action plans.

17   Evaluation of the Peace Corps' Sexual Assault Risk Reduction and Response Program (2016)

In response to our SARRR program evaluation, the agency has worked to strengthen their program. Specifically, it filled a new position for a permanent SARRR program director to provide oversight, coordination, and better communication for the program. The agency has also worked to improve both Volunteer and staff related trainings. It has created a new safety and security assessment to help posts better understand Volunteer comprehension of SARRR training, and issued guidance to posts clarifying expectations regarding SARRR training both for permanent staff and temporary staff serving in senior leadership positions.

What Needs to Be Done

Volunteer Health Care

The agency should strive to improve their sentinel review process, since this process will better ensure that the Peace Corps continuously learns how to better support Volunteer health and safety. Specifically, the agency should ensure reviews include key components like root cause identification and a focus on addressing systemic issues. The agency also needs to provide sufficient and appropriate staffing for case reviews.

In addition, the Peace Corps should put in place more systematic data collection and analysis in order to determine to what extent Volunteer medical accommodations pose an undue hardship on its operations.

Site Selection and Approval

In order to reduce safety and security risks to Volunteers, the agency should develop stronger oversight, clearer guidance, and an electronic system to manage site history files. Additionally, it is critical that proper housing checks with the involvement of appropriate staff occur during the site selection process.

Furthermore, posts need to conduct housing checks in a way that is consistent with their specified housing criteria.

Sexual Assault Risk Reduction and Response

The agency needs to continue to focus on improving the SARRR program. It must ensure Volunteer trainings are specific to the countries of service and address risks to male and LGBTQ Volunteers. These trainings should continue throughout a Volunteer's service, not only at the beginning of service. The agency also needs to clarify roles and responsibilities of all post and headquarters offices involved with the program. The agency should focus efforts on better including risk reduction aspects such as implementing guidance to help staff talk sensitively and candidly about risk reduction, and developing a plan to improve collection of feedback on the effectiveness of the sexual assault risk reduction and response program.

Key OIG Resources:

Final Country Program Evaluation: Peace Corps/South Africa (2017)

Management Advisory Report: Site History Files (2016)

Recurring Issues Report: Common Challenges Facing Peace Corps Posts, FYs 2012-2015 (2016)

Final Program Evaluation: Follow-Up Evaluation of Issues Identified in the 2010 Peace Corps/Morocco Assessment of Medical Care (2016)

Evaluation of the Peace Corps' Sexual Assault Risk Reduction and Response Program (2016)

Death Inquiry and Assessment of Medical Care in Peace Corps Morocco (2010)