

OFFICE OF THE INSPECTOR GENERAL

MEMORANDUM

To: Ron A. Tschetter, Director
David Liner, Chief of Staff/Chief of Operations
Richard Parker, Director of Communications
Amy Horton, Director, Center for Field Assistance and Applied Research
Ed Anderson, Chief Information Officer

Copy: Jay Katzen, Regional Director, EMA
Henry McKoy, Regional Director, Africa
Allene Zanger, Regional Director, IAP
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From: H. David Kotz, Inspector General

Date: September 28, 2007

Subject: OIG Concerns about Lack of Internal Controls in Agency On-Line
Collaboration Tools

INTRODUCTION AND SUMMARY

This Memorandum is issued to call your attention to significant vulnerabilities that we have determined exist with respect to the lack of internal controls in connection with two online collaboration tools that the Peace Corps intends to deploy shortly.¹

After this office became aware of the Agency's interest in deploying the online collaboration tools of Guru and PeaceWiki, senior auditor Steven Kaffen interviewed selected Peace Corps personnel leading these projects to learn more about the projects and whether internal controls have been established to limit the Agency's vulnerabilities.

¹ This memorandum only examines two of four online collaboration tools currently being considered as part of an online collaboration portfolio for the Agency. The others are Webex and Share Point, and they are in varying stages of development and deployment. Internal controls and the avoidance of duplication should be considered for these tools, as well.

Following these interviews and his review, we provided a draft of this Memorandum to the Directors of Communication and the Center for Field Assistance and Applied Research to solicit their feedback and comments on our conclusions.

Based upon this review, we are advising you with this Memorandum of concerns we have about the Agency's intent to deploy these tools and make recommendations with respect to ensuring that appropriate and necessary internal controls are established prior to deployment.

We understand that the Guru project actually predated the PeaceWiki project and has been deployed in beta testing and pilot phases since March and July, respectively. An anticipated date for full deployment of Guru for Peace Corps staff was mid-September, 2007. That date, however, we are told, has been postponed pending a decision by the Agency whether it will replace Guru with a different software tool offering similar functionality. We have also been informed that the PeaceWiki project may be deployed as a test at several posts as early as mid-October 2007.

We have concerns about the Agency going forward with deployment of these tools before ensuring that appropriate controls are put into place. We also have concerns about the possible duplication of efforts with respect to these tools with very similar objectives and users.²

THE GURU TOOL

² Although the Director of Communications has indicated to the OIG that Guru will be primarily for staff and PeaceWiki primarily for Volunteers, other information obtained by the OIG indicates that the first phase of PeaceWiki may be intended for staff as well and there remains the possibility that Guru will be also deployed for Volunteers.

We have been advised that the purpose of Guru is “to share information that can be used at many posts around the world.” Guru is to have interactive capabilities as well as forums and a Frequently Asked Questions (“FAQs”) section and it is both password protected and protected by user name authentication. We understand that feedback from a survey and Guru’s beta test and pilot indicate that staff at different posts have similar questions, and that the hope is that Guru will permit wider communication among the posts in answering common questions and sharing common practices. Guru is an off-the-shelf product customized for the Agency and, in this regard, Peace Corps has purchased a license from an outside vendor for its use. We have been advised that the Agency has already committed substantial resources for the Guru license as well as considerable project hours in creating, organizing, announcing, and providing training on the tool. Additionally, we have been advised that staff from across the Agency have been involved with steering this project from the needs assessment phase through beta testing and the pilot.

We also understand that during the beta and pilot phases, Guru content and data entry is immediate, i.e., without any pre-screening. Content control is by “self-policing,” peer-to-peer review, Center-based sector specialist review, and standard supervisory review of employee work. Four Center-based sector specialists are tasked with reviewing content, and responding to unanswered questions and content-related questions. These sector specialists are also tasked with reporting questionable postings to the system administrator. Abusive or profane language is monitored by automated search and by reviews by the system administrator.

The Center Director recommends that Guru remain a tool offered only to Peace Corps staff because of concerns about content and management control, although others in the Agency have sought Volunteer integration into the tool. While the decision on whether to include Volunteers in the system has been postponed for now, it is presently envisioned that Volunteers would eventually have input and viewing access. However, initially, we have been advised that Guru would be for staff use only.

THE PEACEWIKI TOOL

We have been advised that PeaceWiki's purpose is also "to share project information." PeaceWiki is intended for use by both staff and Volunteers, although the formal discussions on this tool have been Volunteer-centric. Staff and Volunteers will be able to input and edit pages; however, staff will be able to lock pages so that they cannot be edited, or block edits by Volunteers. In developing PeaceWiki, the Agency used the source code of Wikipedia (which was provided to Peace Corps) with some modifications. PeaceWiki is protected by user name authentication.

It is to be principally self-policing with review capabilities by staff. Some content review will be performed by an Administrator. Content and data entry would be immediate without any pre-screening and unlike Guru, the information would be posted anonymously. Deployment for staff on a test basis is intended very shortly, with full deployment, including to Volunteers, envisioned to occur within three-to-six months. While we understand that the acquisition costs for PeaceWiki have been minimal, numerous staff time and project hours have been expended in connection with this project as well.

Concerns have been expressed within the Agency itself about the lack of or insufficient documentation on various aspects of the PeaceWiki tool, and the lack of controls in the area of content management and possible misuse of the tool by Volunteers.

OIG CONCERNS ABOUT THESE TOOLS

Based upon our understanding of these two systems, we express the following concerns:

1. Duplication

It appears that both Guru and PeaceWiki have as their objective the sharing of project information and operate in a somewhat similar manner. At present, they are intended to serve staff and Volunteers; although we understand that at one point early-on in the process, it appeared that Guru was intended to be for staff and PeaceWiki, for Volunteers. The Agency has already expended significant funds and substantial man-hours for both projects. Deploying similar tools for staff and Volunteers could result in unnecessary duplication of efforts and costs, as well as user confusion.

2. Content control

Both tools rely upon “self-policing,” although in its current phase, Guru does have sector specialist reviews in-place for inaccurate content. We were informed that regional management has raised questions about how content will be monitored in both tools, for, in particular, non-project-focused entries, blogs, and inaccuracies. Further, while content may be accurate, its applicability may be limited to a particular region or topography. The issue of internal content control is made more complex by the nature of the two types of users, staff and Volunteers, and the differences in their levels of professionalism, supervisory controls, and long-term vested interest in the Peace Corps as an institution.

We wish to express serious concerns about the lack of internal content controls currently in place for each system, particularly as they relate to potential Volunteer use. There have been several recent OIG investigations relating to Volunteer blog behavior that have revealed situations in which inappropriate comments made by Volunteers have created legal and cross-cultural risks for the Agency even to the point of jeopardizing the Peace Corps' reputation overseas. Accordingly, we believe that meaningful, reliable and substantive mechanisms of content control and review must be established prior to deployment of these systems. Content posted on these tools must be accurate, appropriate, and befitting of Peace Corps Volunteers, staff, and the Agency as a whole. The numerous examples relating to inappropriate comments by Volunteers on blogs demonstrate that self-policing measures alone are simply not successful or sufficient, particularly, in a perceived "anonymous" environment. In addition to potential inappropriate content that may be posted and accessed worldwide, there is the significant concern that Volunteers, in relying upon inaccurate information that may contradict formal guidance, may actually engage in improper or even illegal conduct.

Accordingly, it is critical that pre-screening rather than post-screening measures be put into place to provide content control.

RECOMENDATIONS

In light of the foregoing, we offer the following recommendations:

Recommendation no. 1:

That the Agency establish a committee to review the organizational needs, functions, objectives, and user base of Guru, PeaceWiki, and other on-line collaboration tools in various stages of development and deployment; identify duplications; and determine the actions required to minimize such duplications and ensure their implementation. That such committee issue a report or otherwise document its conclusions describing what actions the Agency should take as a result of its review.

Recommendation no. 2:

That the Agency not release Guru and PeaceWiki until an appropriate system for content management and control is developed for each, reviewed by interested parties, and adequately tested; and that such systems recognize the serious potential vulnerabilities of content management through “self-policing” given the potential of inappropriate comments and the dangers of inaccurate or improper information on Agency and post programs and projects.

Recommendation no. 3:

That the Agency review its financial commitments to all on-line collaboration tools, both in terms of cash investment and person-hours and that this review take into account all required financial outlays and commitments for technical, managerial, and content management support that have already been incurred and will be incurred in the future. That the Agency issue a report or otherwise document its conclusions as to whether such on-line collaboration tools are cost-effective.

Please respond to these recommendations by October 19, 2007, indicating whether you concur or do not concur. If you concur, describe the actions taken or planned and the dates for their completion. If you do not concur, provide reasons for any disagreements with issues and recommendations presented.