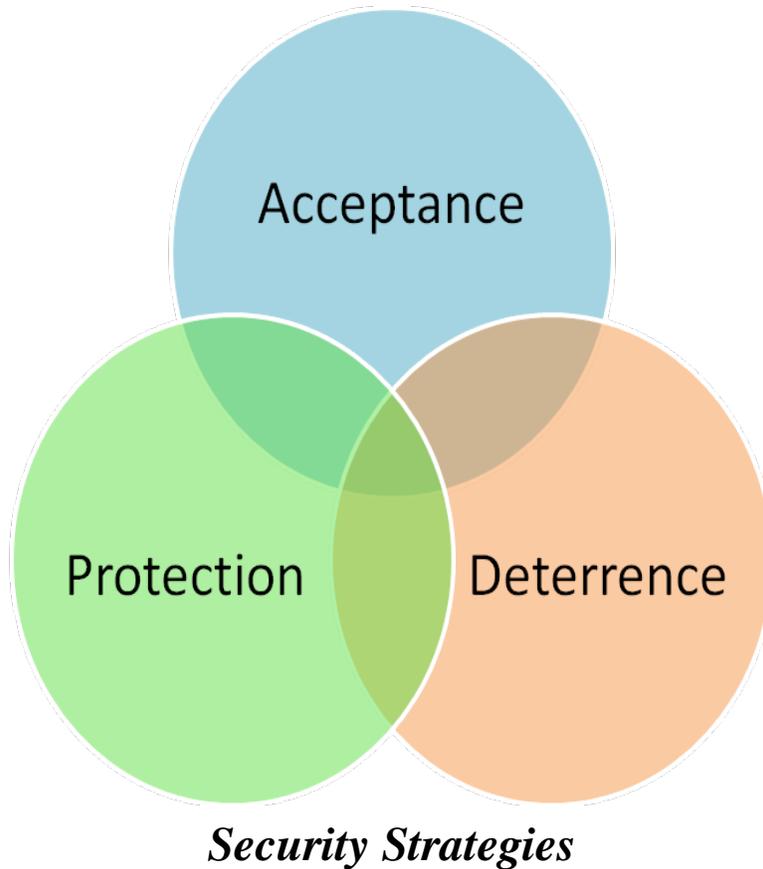




Peace Corps Office of Inspector General



Final Audit Report: Peace Corps Volunteer Safety and Security Program

April 2010



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Peace Corps Volunteer Safety and Security
Program
IG-10-08-A**

A handwritten signature in blue ink that reads "Gerald P. Montoya". The signature is fluid and cursive, with a long horizontal stroke at the end.

Gerald P. Montoya
Assistant Inspector General for Audit

April 2010

EXECUTIVE SUMMARY

Since 2002, the Peace Corps' safety and security program has evolved significantly and substantial progress has been made in addressing the agency's safety and security needs. For example, Peace Corps established the Office of Safety and Security, revised Peace Corps Manual section 270 that outlined the components of the agency's safety and security support system, established a self-certification compliance check, and assigned safety and security coordinators to each overseas post. In addition, Peace Corps maintained a much larger safety and security workforce than comparable international non-governmental organizations. Overall, Volunteers overwhelmingly reported that they were satisfied with their level of safety and security and staff support.

Despite these achievements, we identified multiple areas where Peace Corps needs to improve in order to ensure that the agency's safety and security program is complete, implemented consistently, and positioned to meet the unique safety and security challenges it faces. Although Peace Corps established the Office of Safety and Security to provide oversight and management of all agency safety and security, it served as a consultative office, not an oversight office, and relied on the Peace Corps' overseas posts to request its assistance and implement its suggestions. The posts independently managed their safety and security budgets and personnel without oversight from the Office of Safety and Security. In addition, regions provided general oversight to posts, but had not clarified their safety and security roles and responsibilities.

Our review found that without a clear management structure, no office accepted complete ownership of the safety and security program, and the agency's security program lacked essential elements. As a result, Volunteers were placed at greater risk because the agency did not ensure that posts fully implemented required safety and security policies. Specifically, Peace Corps had not:

- Developed a comprehensive security strategy and plan that articulated how the agency's security policies related to the acceptance model
- Aligned safety and security personnel's roles and responsibilities with the agency's stated priority of safety and security
- Defined the skills and experience needed for all security positions
- Consistently hired people with adequate skills and experience to fill its safety and security positions
- Clearly defined the roles of headquarters safety and security staff and field safety and security staff to avoid unclear expectations and duplicate responsibilities
- Standardized training for safety and security personnel

In addition to the lack of defined roles and responsibilities within Peace Corps, the agency had not formalized its relationship regarding safety and security responsibilities with the Department of State.

Therefore, Peace Corps did not ensure a consistent and complete safety and security program. This increased the risk that posts had not fully implemented essential security policies and practices that protect Volunteers. Our report contains 28 recommendations, which, if implemented, should strengthen internal controls and correct the deficiencies in the Peace Corps overseas safety and security program.

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SAFETY AND SECURITY BACKGROUND

INHERENT RISK IN SAFETY AND SECURITY OVERSEAS

Serving overseas as a Peace Corps Volunteer involves inherent risks. Peace Corps' "Safety and Security In Depth" webpage states, "Living and traveling in an unfamiliar environment, having a limited understanding of local language and culture, and being perceived as well-off are some of the factors that can put a Volunteer at risk. Many Volunteers experience varying degrees of unwanted attention and harassment. Petty thefts and burglaries are not uncommon, and incidents of physical and sexual assaults do occur." Various factors beyond the control of the Peace Corps also affect safety and security, including natural disasters, poor infrastructure, political conflict, and economic downturn.

The security risks inherent in international service are evident when comparing typical crime incident rates to those of the Peace Corps. For example, we compared the Department of Education's 2008 crime statistics for 988 public colleges and universities to Peace Corps crime incident rates.¹ Peace Corps has approximately 8,000 Volunteers overseas. If compared to public colleges and universities, Peace Corps would rank first for the most robberies; second for most burglaries, and seventh for most aggravated assaults. Further, in comparison to crime statistics reported by countries around the world, Peace Corps Volunteers experience higher rates of rape and burglary than any of the 86 countries that responded to the United Nations crime statistics analysis.²

We recognize the differences in the information, sample size, and source between Peace Corps Volunteer service and statistics that focus on educational institutions or national crime data; however, we cite this information only to emphasize the risks associated with Peace Corps' service and the need for strategies and policies to mitigate those risks.

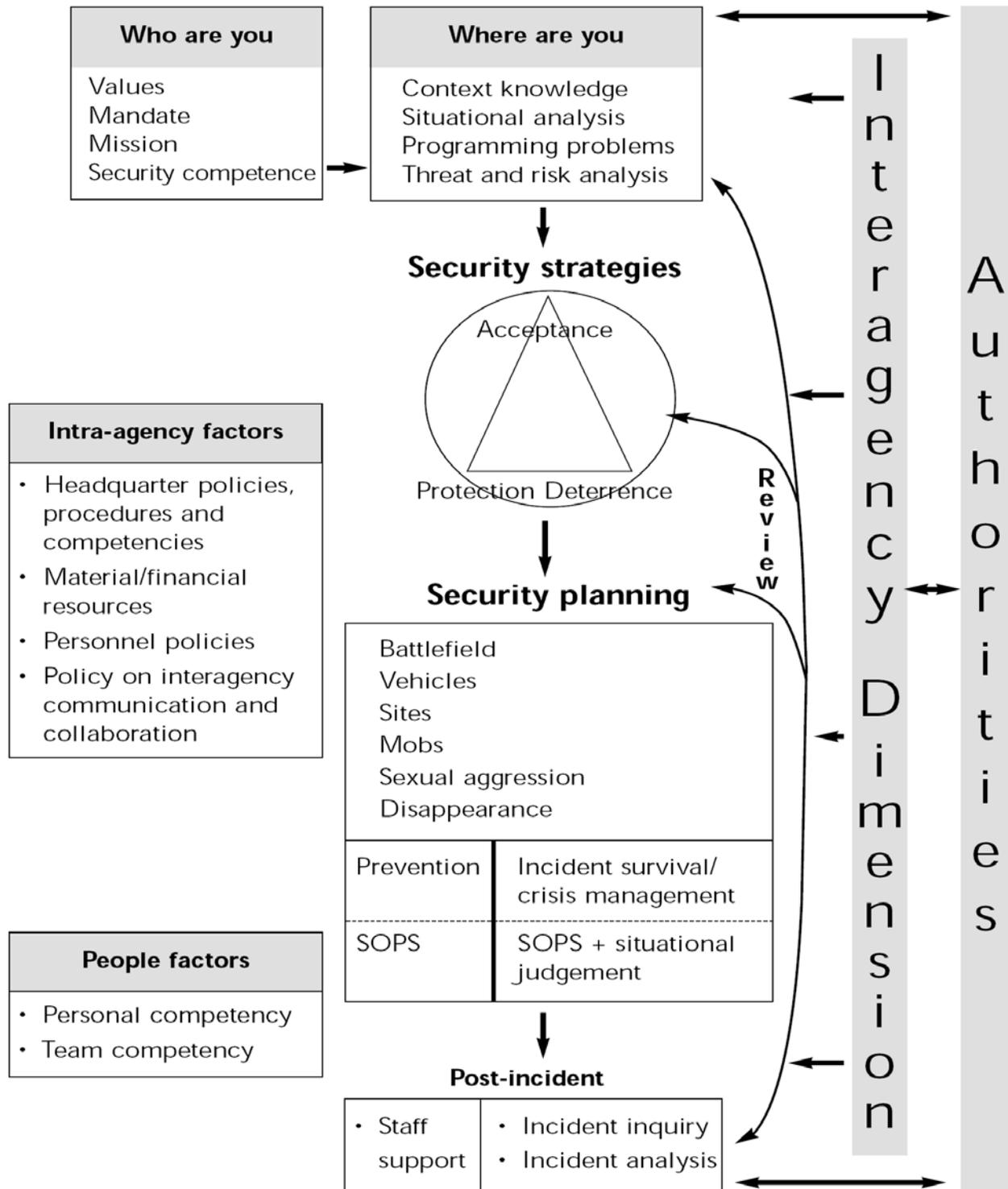
SAFETY AND SECURITY FRAMEWORK

Assessing Peace Corps' overseas safety and security program requires consideration of all security management components. The Humanitarian Policy Group (HPG) is a team of independent researchers and professionals working on humanitarian issues who have created an overall framework for safety and security programs in humanitarian organizations (see diagram 1). Although developed for humanitarian organizations that provide assistance and reconstruction support in unstable or violent areas, the general principles of good practice in security management are applicable to the Peace Corps.

¹ The U.S. Department of Education compiles statistics of alleged criminal offenses reported to campus security authorities or local police agencies and presents the information on its [Office of Post Secondary Information website](#).

² Every two years the United Nations compiles crime statistics on incidents of victimization that have been reported to the authorities in any given country. The statistics are published in the United Nations Surveys on Crime Trends and the Operations of Criminal Justice Systems and can be viewed at the [United Nations Office on Drugs and Crime website](#).

Diagram 1. The Security Management Framework



Van Brabant, Koenraad, "Good Practice Review 8: Operational Security Management in Violent Environments," June 2000, used with permission from HGP.

As the security management framework illustrates, an organization must define its mission and risks, determine the desired security strategy, establish planning documents to implement that strategy, and incorporate a post-incident process. The framework presents the three primary security strategies used by organizations – acceptance, protection, and deterrence. Peace Corps primarily used the acceptance security strategy, which is common for humanitarian organizations. According to the HPG, “An acceptance strategy tries to reduce or remove threats by increasing the acceptance (the political and social ‘consent’) for your presence and your work in a particular context...” For this reason, Peace Corps requires Volunteers to integrate into their communities and staff to liaise with local officials.

However, having a well defined program aligned to the security management framework does not ensure an effective safety and security program. HPG states, “there are a substantial number of ‘soft’ skills involved that have to do with building relationships, managing agency image, managing people and self-management.” Competent staff and properly aligned security positions are necessary to implement the policies and oversee the security program.

The Peace Corps asserts that safety and security of Volunteers is the agency’s highest priority. The agency’s strategic plan states:

The agency has dedicated safety and security personnel at post and headquarters who are part of an extensive safety and security support network. The agency will endeavor to enhance the safety and security of Volunteers by identifying risks, developing mitigation strategies, educating personnel, evaluating effectiveness, and incorporating feedback and appropriate policy revisions. Adequate training of staff and Volunteers and continual assessment are key factors in ensuring Volunteers are well-supported to carry out their work in a safe manner.

Peace Corps revised its safety and security program in response to reviews from the Government Accountability Office (GAO), interest from Congress and the public, and the change in the international security environment. In July 2002, GAO Report No. [GAO-02-818](#), “Initiatives for Addressing Safety and Security Challenges Hold Promise, but Progress Should Be Assessed,” identified the following weaknesses.

- Peace Corps provides broad guidance and support to posts, relying on them to develop and implement effective practices.
- Peace Corps’ safety and security framework is unevenly implemented.

- Reported crime incidents have increased, but the full extent of crime against Volunteers is unknown due to underreporting.

As a result of the GAO report, Director Vasquez testified before Congress in 2004.³ According to Director Vasquez’s testimony, he “approved a reorganization that created a new Office of Safety and Security and increased by 80 people the number of full-time safety and security staff, ninety-five percent of which are deployed overseas. This staff, which includes a new associate director for safety and security, a chief compliance officer, a research psychologist, nine regionally-based safety and security officers, and a safety and security desk officer for each Peace Corps region, was restructured to better communicate, supervise, monitor and help set safety and security policy.”

In addition, Peace Corps revised its Manual section (MS) 270, “Volunteer / Trainee Safety and Security,” which requires posts to implement the following six safety and security practices.

- Monitor, assess, and disseminate safety and security information to Volunteers and trainees.
- Continually train Volunteer and trainees on culturally appropriate lifestyles and appropriate judgment that reduces risks.
- Inspect Volunteer and trainee sites before their arrival to ensure housing and work sites are appropriate, safe, and secure.
- Establish procedures for reporting safety and security incidents.
- Develop and test emergency action plans.
- Establish a system to collect contact and whereabouts information from Volunteers when they are away from their communities.

Since its inception, the Office of Safety and Security has increased its number of staff with additional regionally-based positions and assumed additional responsibilities. For example, the responsibility for responding to violent crimes against Volunteers shifted from the Office of the Inspector General (OIG) to the Office of Safety and Security in September 2008.

*IMPROVEMENTS ENHANCED
SAFETY AND SECURITY*

Peace Corps Volunteers generally rate their safety and security and staff support satisfactory in the biennial Volunteer survey.⁴ In the 2008 Biennial Volunteer Survey, 95% of Volunteers reported that they felt adequately safe where they lived. The survey also asked Volunteers how satisfied they were with staff support related to safety and security. On a scale of 1 to 5 (5 being the highest), 91% of Volunteers reported a 3, 4, or 5.

³ Gaddi Vasquez served as Peace Corps Director from January 23, 2002 to September 7, 2006.

⁴ In 2009, Peace Corps began conducting annual Volunteer surveys.

A comparison of incident rates indicates that Peace Corps has improved the safety and security of Volunteers in several key areas. Table 1 shows a comparison of several types of incidents using fiscal year (FY) 2009 third quarter rates and the Peace Corps “Assaults Against Peace Corps Volunteers 1990-1999” epidemiological analysis. These rates present the number of incidents per 100 Volunteer and trainees years, except the rape incidents shown per 1,000 Volunteer and trainee years. Volunteer and trainee years are the amount of time trainees and Volunteers are in the country and at risk.

Table 1. Comparison of Peace Corps Incident Rates

| Incident Type | 1990's Rate | FY 2009 Rate as of July 15, 2009 | Direction of Change |
|---|------------------|----------------------------------|---------------------|
| Rape | 3.6 ^A | 1.7 | ↓ |
| Major Sexual Assault | 0.9 ^B | 0.3 | ↓ |
| Aggravated Assault | 1.0 ^A | 0.5 | ↓ |
| Major Physical Assault | 1.7 ^B | 0.4 | ↓ |
| Other Sexual Assault | 1.0 ^B | 2.6 | ↑ |
| Other Physical Assault | 1.4 ^B | 1.6 | ↑ |
| ^A Average Incident rate from 1990-1999 ^B Average Incident rate from 1997-1999. The study excluded earlier years because of changes to the classification of incidents. | | | |

MORE IMPROVEMENT NEEDED TO ENSURE CONSISTENCY AND EFFECTIVENESS

Despite creating an Office of Safety and Security and adding security staff, Peace Corps continued to rely on posts to implement the safety and security policies without providing the oversight and management necessary to ensure a consistent and effective program. The elements of the security management framework previously discussed helps to ensure effective security programs.

Our report identified several areas where Peace Corps could strengthen its safety and security framework in order to provide Volunteers with the most effective and competent support. Specifically, we discuss weaknesses in the intra-agency and personnel competencies in findings A and B. We also discuss Peace Corps’ security strategy and policies in finding C and the interagency relationship in finding D.

FINDING A. SAFETY AND SECURITY ORGANIZATIONAL STRUCTURE

The Peace Corps divided responsibility for overseeing posts' safety and security programs between offices without establishing clear lines of authority and reporting relationships to ensure the Office of Safety and Security could properly oversee the agency's safety and security program. According to the GAO, clearly defined areas of authority, responsibilities, and reporting relationships are necessary to ensure a positive organizational environment and to provide the responsible office with the authority necessary to ensure proper implementation of policies and procedures.

Without clear lines of authority and communication to the posts and regions, Peace Corps limited the Office of Safety and Security's ability to fulfill its mission in overseeing and managing Volunteer safety and security, including personnel and budgetary resources. In addition, the Office of Safety and Security could not properly manage the agency's safety and security program because Peace Corps had not established an effective process to monitor compliance with Peace Corps policies. The following are weaknesses in the monitoring process.

- Although the Peace Corps safety and security officers (PCSSOs) assessed post compliance with MS 270, the Office of Safety and Security viewed the PCSSO role as advisory and did not assume control of tracking and monitoring implementation of their recommendations.
- The agency did not establish clear oversight for PCSSO recommendations and did not follow through on its statement to GAO that the chief compliance officer would track the recommendations.
- Peace Corps lacked a clearly defined process to monitor the timeliness of posts' incident reporting.
- Post self-assessments were not designed to determine the adequacy of the monitoring processes established at posts.

Therefore, the agency did not ensure that management was fully informed of how well its security program was being implemented and posts implemented inconsistent safety and security procedures that did not always comply with the agency's safety and security policies established in MS 270.

Safety and Security Roles

Since the 2002 GAO audit, Peace Corps headquarters offices and post safety and security roles have continued to change. The agency's immediate response to the GAO report was the revision of MS 270 to incorporate additional security procedures; the establishment of the Office of the Safety and Security to oversee the agency's safety and security program; and the increase in the number of regional safety and security officers to provide training

and support to posts.⁵ In addition, in 2003 Peace Corps assigned safety and security desk officers (SSDOs) that reported to regional directors to monitor posts' compliance with safety and security policies contained in MS 270.

Although headquarters increased safety and security requirements, some overseas posts did not initially hire dedicated safety and security staff to implement MS 270 and gather the documentation needed to obtain quarterly confirmation of compliance. As a result, posts began tasking administrative, programming, and training personnel with the responsibility of ensuring MS 270 compliance by gathering site locator forms, coordinating emergency action plans, tracking crime incidents, and monitoring Volunteer locations. By 2004, all posts had a safety and security coordinator (SSC) to fulfill this role, which decreased the burden on other staff. Some posts transitioned administrative, programming, and training personnel into the SSC position that may or may not have had safety and security backgrounds.

The SSCs reported to the country directors, who were ultimately responsible for the safety and security of their assigned post. Country directors hired SSCs, implemented MS 270, and managed the post's safety and security funds. The country directors reported to one of the three regions. These regions were responsible for overall management and implementation of Peace Corps programs. In regards to safety and security, the regions communicated safety and security issues to the posts, oversaw posts' budgets (including safety and security funds), and monitored MS 270 compliance.

The Office of Safety and Security assumed a consultative relationship with posts. For example, the Office of Safety and Security PCSSOs served as the security advisors by reviewing posts' compliance with MS 270, training SSCs, and sharing best practices. In "Mainstreaming the Organisational Management of Safety and Security," HPG describes this type of relationship as a "security advisor model." According to HPG,

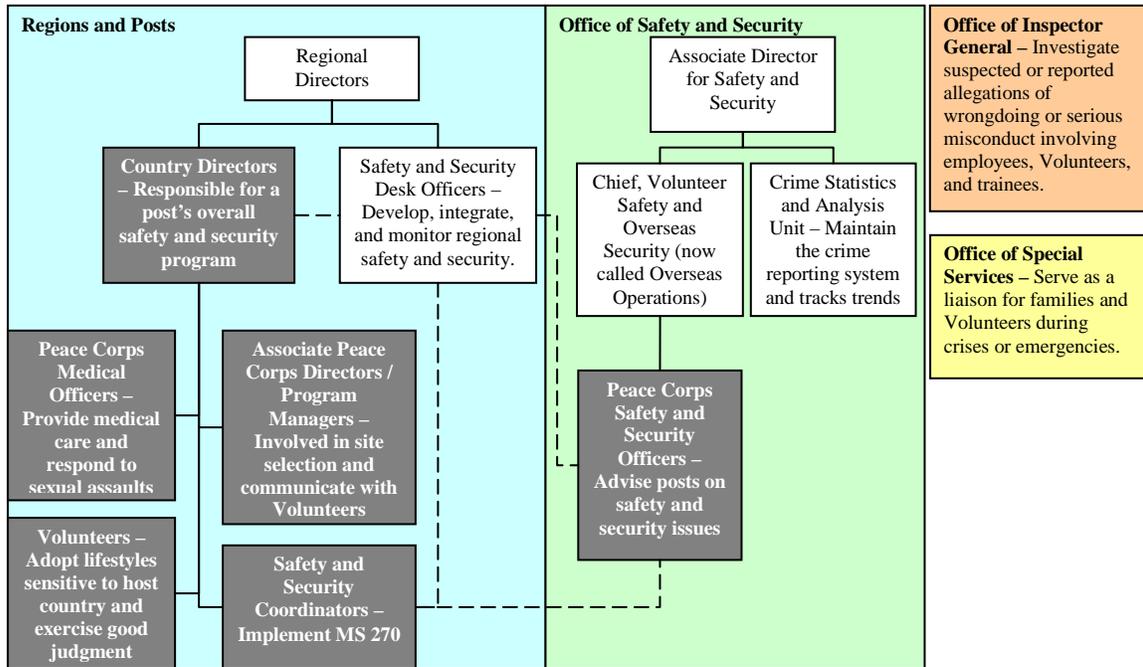
Responsibility for security is clearly vested in the operational management line, but the security focal point provides specialist back-up. This back-up can encompass taking forward policy articulation and security training, participation in interagency initiatives on security, quality control of field-level security plans, security management audits in the field, specialist support around certain crises, security-related equipment assessments, and the provision of advice upon request from the line manager."

HPG states that in the security advisor model "security advisers find that their advice carries weight, because senior management and the organization as a whole accord much importance to security, and because of the demonstrated competence of the postholder(s)." It further states, "General organizational good practice demands that authority and responsibility are clearly delineated, so that there is no doubt who is accountable for what."

Diagram 2 shows the Peace Corps offices and positions involved in safety and security and their relationships.

⁵ The title of the regional safety and security officer position was later changed to the Peace Corps safety and security officer.

Diagram 2. Safety and Security Organizational Structure and Responsibilities



*Gray boxes represent overseas positions.

**Solid line indicates reporting relationships and dotted lines indicate informal lines of communication.

LINES OF AUTHORITY

Peace Corps did not establish clear lines of authority and reporting to ensure the Office of Safety and Security could properly oversee the agency's safety and security program.

OFFICE OF SAFETY AND SECURITY'S MISSION

The Office of Safety and Security's mission is to provide management and oversight of all Peace Corps safety and security in accordance with MS 130, "Office of Safety and Security: Organization, Mission, and Functions." GAO Standard for Internal Control in the Federal Government (Report No. GAO/AIMD-00-21.3.1) states,

A good internal control environment requires that the agency's organizational structure clearly define key areas of authority and responsibility and establish appropriate lines of reporting. The environment is also affected by the manner in which the agency delegates authority and responsibility throughout the organization. This delegation covers authority and responsibility for operating activities, reporting relationships, and authorization protocols.

In response to weaknesses identified in GAO-02-818, Peace Corps stated, "the Office of Safety and Security will facilitate headquarters' ability to effectively supervise and oversee posts' compliance with MS 270..."

Peace Corps defined the authority and management responsibility of the Office of Safety and Security in MS 130, which assigns the associate director for safety and security responsibility to:

- Make proactive recommendations to the Director on safety and security matters;
- Advise the Director and senior staff on the agency's domestic and overseas safety and security activities;
- Develop and implement agency security policies, procedures, goals and objectives formulated to maximize safe, secure, and effective implementation of the Peace Corps' programs and operations; and,
- Manage the agency's information, personnel, physical, and overseas security; emergency preparedness; and analysis functions.

MS 130 also assigns the Volunteer Safety and Overseas Security Division within the Office of Safety and Security the responsibility of ensuring that staff and Volunteers are adequately trained in their safety and security responsibilities and are able to implement programs and operations safely and effectively.

However, Peace Corps limited the Office of Safety and Security's ability to fulfill its responsibilities because it did not formally define line of communication to the regions' SSDOs and establish adequate oversight of posts' safety and security personnel and budgetary resources.

*OFFICE OF SAFETY AND
SECURITY'S RELATIONSHIP
WITH REGIONS' SSDOS*

In the agency's response to the 2002 GAO report on safety and security, Director Vasquez stated that the agency was creating an SSDO position within each region whose primary responsibilities were to facilitate and track compliance with MS 270 and assist in tracking and implementing PCSSO recommendations. The agency employed three SSDOs to perform these tasks and additional safety and security responsibilities. However, the SSDOs provided services similar to the Office of Safety and Security. Because Peace Corps management had not adequately defined the lines of authority and communication between the Office of Safety and Security and the regions' SSDOs, some posts were unclear on the different roles and the need for SSDOs.

Headquarters and field staff stated that there is duplication in the SSDO role and other positions within the Office of Safety and Security, particularly the PCSSO. The Office of Safety and Security is responsible for all agency safety and security in accordance with MS 130. Further, the Office of Safety and Security intranet website states that "The Office of Safety and Security was established in March, 2003, to foster improved communication, coordination, oversight, and accountability for all Peace Corps safety and security efforts." However, regions have assigned several functions related to the Office of Safety and Security responsibilities to the

SSDOs, including tracking MS 270 compliance, tracking and assisting with emergency action plan testing, helping posts implement safety and security policies and assisting with crises. In addition, the SSDOs served as communication liaisons even though the Office of Safety and Security was responsible for improving communication and coordination. For example, the SSDOs were liaisons between posts and the Office of Safety and Security. SSDOs also informed the regions of safety and security information that impacted them; however, the Office of Safety and Security is located at headquarters along with the regions and could share information directly.

Feedback received from country directors and SSCs about the value of the SSDO varied. Many found the position helpful to understand headquarters operations, share best practices among posts in the region, and provide security warnings and information about neighboring countries and other posts in the region. However, some country directors and SSCs were confused about the role of the SSDO and felt that some of its job responsibilities overlapped with or should be performed by other headquarters staff members. When comparing the PCSSO and SSDO position descriptions we identified potential overlap in the following areas.⁶

- Analyzing trends
- Developing recommendations to safety and security issues
- Providing expert knowledge
- Providing support for post MS 270 compliance
- Assisting in crisis management
- Providing support for post development of emergency plans
- Sharing and communicating information
- Providing training
- Assisting in new country assessments

In October 2007, the Director approved a pilot project to examine the benefit of converting SSDO positions to the Office of Safety and Security. After the pilot, the associate director for safety and security recommended that the SSDO position be assigned to the Office of Safety and Security. Although satisfied with the result, the regional directors advised against it and the SSDO remained in the regions to better coordinate with regional and post staff. However, the agency did not clarify how the SSDO would maintain the necessary relationship with the Office of Safety and Security without duplicating roles and responsibilities. In addition, one region assigned a SSDO as a temporary country director to one of its posts, requiring her to fulfill the SSDO responsibilities while overseas and

⁶ Appendix B provides a full comparison of the primary PCSSO and SSDO responsibilities.

managing a post.

A review of the SSDO position description revealed that some of the responsibilities that are valued by country directors and SSCs were not reflected in the SSDO position description. Instead, the position description includes several functions that overlap with the PCSSO role or gives the SSDO responsibility for activities that the Office of Safety and Security should be performing. Although overlap may be necessary in some areas, a careful analysis of the SSDO position responsibilities should be conducted. Because the Office of Safety and Security is responsible for oversight and management of all agency safety and security, it should have a formal line of communication to the SSDOs and delineate safety and security responsibilities to avoid unnecessary duplication. This will help the agency develop a more integrated safety and security program, determine the appropriate number of safety and security staff, and avoid spending funds on unnecessary duplication.

*POST SAFETY AND SECURITY
BUDGETARY RESOURCES*

In FY 2008, Peace Corps obligated \$11.4 million for safety and security. PCSSOs sometimes reviewed funds during post assessments, but the Office of Safety and Security was not formally involved in the posts' budget planning process. Posts developed their separate budgets using the integrated planning and budget system. First, each post developed a 3-year strategic plan and submitted the plan to their region for review. Next, regional directors presented strategic plan summaries and requests for budget enhancements or reductions to the Director. In addition, the Office of Budget and Analysis assisted the regions in putting together any enhancement and reduction requests. Based on these presentations, with senior staff input, the Director made the internal plan and budget decisions for the next FY. Last, regional directors sent the decisions to posts.

In contrast, the Department of State involves posts and headquarters offices within the Bureau of Diplomatic Security during budget formulation. For example, the posts' regional security officers (RSOs) work with the posts' financial managers to identify security requirements. The Department of State posts then send their budget plans to the chief financial officer and the Office of Overseas Protective Operations. This office directs the development of standards, policies, and procedures associated with overseas guards, residential security, and high-threat protection programs. It also determines and recommends funding priorities for its security programs and works with the chief financial officer to coordinate resource requirements and budget requests. This process ensures that the office with authority and expertise over security functions has visibility when posts formulate budgets and can make recommendations to ensure the agency has a complete and consistent security program.

Because the Office of Safety and Security did not have adequate oversight

and input in posts' safety and security funding, it could not properly manage all of the agency's safety and security resources in accordance with MS 130.

WE RECOMMEND:

1. That the Director reevaluate the organizational structure related to the safety and security functions and establish clear lines of authority to ensure the Office of Safety and Security can manage the agency's safety and security program.
2. That the associate director for safety and security work with the associate director of global operations to review the roles and responsibilities of the safety and security desk officers and clarify the differences between the safety and security desk officers and Peace Corps safety and security officers to eliminate unnecessary duplication and ensure the Office of Safety and Security has oversight over all safety and security functions in accordance with the Peace Corps manual section 130.
3. That the associate director of global operations develop standard operating procedures for the safety and security desk officer position based on the revised roles and responsibilities.
4. That the associate director for safety and security work with the associate director of global operations and the chief financial officer to develop a process to involve the Office of Safety and Security in posts' budget planning for safety and security expenses and in formulating the recommendation to the Director for posts safety and security needs.

**TRACKING INTERNAL
SAFETY AND SECURITY
REVIEWS**

Peace Corps lacked a reliable process to track and ensure implementation of PCSSO recommendations.

*OFFICE OF SAFETY AND
SECURITY MONITORING*

As part of the agency's efforts to ensure MS 270 compliance, the PCSSOs visited posts and made recommendations to improve safety and security. Although some recommendations are suggestions, PCSSOs also identified critical recommendations typically required by law or policy or necessary to safeguard against an immediate threat. However, the Office of Safety and Security viewed its role as consultative and did not want authority to ensure the recommendations were implemented. Instead, SSDOs tracked PCSSO recommendations. The Office of Safety and Security did not receive regular feedback on the status of their recommendations and were not consulted to determine if the posts' actions adequately addressed the problem. Instead, the Office of Safety and Security relied on its positive relationships with regions and its confidence that the agency would address important safety and security concerns.

CHIEF COMPLIANCE

MS 123 states, "It is the mission of the Office of the Chief Compliance

Officer to develop and coordinate the Peace Corps' compliance system with Inspector General reports, Congressional mandates, and other regulations and laws.” In addition, MS 123 states that the chief compliance officer “reviews submissions from the Regions to ensure compliance with the MS 270 Volunteer Safety and Support System Compliance Checklist that all posts submit annually.” Because MS 270 is the agency regulation for safety and security, the chief compliance officer should have a clearly defined role in post compliance and resolution of PCSSO recommendations.

In the agency’s response to the 2002 GAO report on safety and security, Director Vasquez stated that the agency’s newly appointed chief compliance officer would “track safety and security recommendations generated from Inspector General reports, Regional Safety and Security Officer [PCSSO] evaluations, and other sources....” However, the chief compliance officer did not oversee PCSSO recommendations as Director Vasquez stated the position would. Instead, the SSDOs track MS 270 compliance and the PCSSO recommendations. Without involvement by the chief compliance officer or anyone else, Peace Corps lacked a defined process to resolve disagreements between the Office of Safety and Security and regional management.

GAO Internal Control Management and Evaluation Tool (GAO-01-1008G) supports the monitoring of these recommendations and states that “Internal control monitoring should assess the quality of performance over time and ensure that the findings of audits and other reviews are promptly resolved.” The section on “monitoring and audit resolution” provides more specific guidance on the elements of an effective monitoring system.⁷ Specifically, GAO recommends that:

- The agency has a mechanism to ensure the prompt resolution of findings from audits and other reviews.
- Agency management is responsive to the findings and recommendations of audits and other reviews aimed at strengthening internal control.
- The agency takes appropriate follow-up actions with regard to findings and recommendations of audits and other reviews.

We compared Peace Corps practices to the GAO guidance and discovered that Peace Corps had not implemented some steps necessary to ensure PCSSO reviews are effective. See Table 2 for a comparison of typical Peace Corps practices for PCSSO reviews compared to GAO’s suggested review steps.

⁷ Audit Resolution includes the resolution of findings and recommendations not just from formal audits, but also resulting from informal reviews, internal separate evaluations, management studies, and federally mandated assessments.

Table 2. Peace Corps Monitoring Controls

| GAO Guidance ⁸ | Peace Corps' Level of Compliance |
|--|---|
| Corrective action is taken or improvements made within established timeframes to resolve the matters brought to management's attention. | The recommendations did not always include timeframes, and the date the recommendation is closed was not always documented in the SSDO's tracking spreadsheets. |
| In cases where there is disagreement with the findings or recommendations, management demonstrates that those findings or recommendations are either invalid or do not warrant action. | Regions made the final decision about whether a recommendation is implemented. If there was a disagreement between the Office of Safety and Security and the regions, the Office of Safety and Security stated that it could seek help from the Chief of Staff. |
| Executives with the proper authority evaluate the findings and recommendations and decide upon the appropriate actions to take to correct or improve control. | Because regions had budget authority, they determined what action, if any, would be taken. The Office of Safety and Security did not have the authority to make these decisions. |
| Desired internal control actions are followed up on to verify implementation. | The SSDO tracking spreadsheet did not facilitate easy tracking of implementation activities. |
| Management and auditors follow up on audit and review findings, recommendations, and the actions decided upon to ensure that those actions are taken. | The SSDOs determined whether a recommendation could be closed; PCSSOs were not involved in closing out recommendations and did not follow-up to determine if recommendations had been closed. |
| Top management is kept informed through periodic reports on the status of audit and review resolution so that it can ensure the quality and timeliness of individual resolution decisions. | The SSDOs did not provide periodic reports to The Office of Safety and Security on the status of PCSSO recommendations. |
| | |

ADEQUACY OF REGIONAL TRACKING

The tracking and implementation of PCSSO recommendations has been an ongoing concern for the OIG. The August 2008 OIG program evaluation report on Volunteer safety and security included the finding “Senior regional management has not adequately monitored the implementation of PCSSO recommendations.” The report stated that neither “the Office of Safety and Security nor the regional management could verify the extent to which country directors implemented PCSSO recommendations.” Peace Corps continued to lack an adequate monitoring process because no one was tracking and following up on open recommendations in a systematic way to ensure they were addressed. Our analysis of each region’s SSDO tracking spreadsheets and a comparison to actual PCSSO reports revealed the following problems:

- Tracking spreadsheets did not include all critical recommendations.
- Critical recommendations in 2007, based on MS 270 and Department of State security regulations, had not been fully addressed as of November 2009.

⁸ The table does not contain the full text; instead, it contains excerpts from GAO’s Internal Control Management and Evaluation Tool (GAO-01-1008G) that are most relevant to tracking and monitoring PCSSO recommendations.

- Some of the tracking spreadsheets were incomplete and did not indicate the status of the recommendations.
- The SSDOs did not consistently use dates to indicate when the recommendation was closed, how long it took to close the recommendation, and/or follow-up dates.
- The tracking spreadsheets did not list who closed the recommendation.
- The tracking spreadsheets did not document the post or agency corrective actions or how implementation was verified.

CONCLUSION

The agency did not adequately monitor and implement PCSSO recommendations and did not follow through on its statement that the chief compliance officer would track the recommendations. Because the Office of Safety and Security did not want to jeopardize their consultant relationship with the posts by having PCSSOs serve as compliance officers or internal auditors, it did not want to take control over tracking and enforcing their recommendations. Further, the regions assumed responsibilities for overseeing implementation of safety and security policies and PCSSO recommendations because they controlled the budget and resources needed to ensure compliance. However, the regions were hesitant to make PCSSO recommendations mandatory because they did not believe that all of the PCSSOs have a sufficient level of safety and security knowledge to make meaningful recommendations.⁹ Without a formalized process to track and enforce critical PCSSO recommendations, the agency could not effectively ensure that safety and security shortcomings were addressed. As a result, management permitted posts to perpetuate security weaknesses and fail to comply with MS 270 and Department of State security regulations.

WE RECOMMEND:

5. That the Director ensures that Peace Corps develop and implement a process that adequately tracks Peace Corps safety and security officer recommendations and ensures that corrective actions are taken in a timely manner. The process should define roles and responsibilities of responsible personnel and hold them accountable for implementation.

| | |
|--|---|
| MONITORING TIMELINESS OF INCIDENT REPORTING | <i>Peace Corps lacked a clearly defined process to monitor the timeliness of posts' incident reporting.</i> |
|--|---|

One of the SSDO responsibilities was to monitor the timeliness of posts' incident reporting. Posts must report incidents timely to ensure

⁹ Information obtained during this audit was supplemented by information in the August 2008 OIG report entitled "Final Program Evaluation Report: Volunteer Safety and Security."

management is fully informed of current situations and can provide the necessary support and oversight. It is also important that the RSO in country is aware of incidents. MS 270 states, “The country director is responsible for establishing protocols for responding to all safety and security incidents reported by V/Ts.... Post is responsible for relaying information regarding any incidents affecting [Volunteer/Trainee] safety and security to the appropriate office(s) at [Peace Corps/Washington].” For serious crimes, posts are instructed to immediately contact headquarters. Although the MS 270 does not define timely reporting, the Crime Incident Reporting System user manual requires posts to report incidents within three business days.

Posts continued to submit incident reports more than three days beyond the required reporting period, even though the SSDO monitors the timely reporting of incidents and will contact posts if they repeatedly submit late information. We reviewed all 2,441 incidents reported through the Crime Incident Reporting System since its implementation in April 2008. Posts may have up to seven days to report an incident after considering the three business days plus weekends and holidays. We identified 241 records (10%) not submitted to headquarters within seven days after the incident was reported. Therefore, SSDOs and the Office of Safety and Security need to formally require that posts submit reports within a specific timeframe and hold posts accountable to those standards.

WE RECOMMEND:

6. That the associate director of global operations develop a clearly defined process that identifies and establishes corrective actions for posts that repeatedly submit incident reports late.
7. That the associate director of global operations reiterate to the regions and all posts the importance of timely reports and formalize the abovementioned process through a policy memorandum or Peace Corps Manual section

POST COMPLIANCE WITH SAFETY POLICIES

The Office of Safety and Security and the regions did not establish an effective assessment process to ensure posts fully complied with safety and security regulations.

MS 270 COMPLIANCE PROCESS

The MS 270 compliance self-certification process began in 2003 as an effort to track posts’ progress developing and implementing their Volunteer safety support system. In 2008, most posts had reported full compliance with MS 270. The process primarily required posts to respond whether they had implemented specific policy requirements, such as post safety and security policies, site locator forms, annual risk assessments, Volunteer safety and security training, incident report protocols, and current emergency action plan.

*REPEAT OFFICE OF
INSPECTOR GENERAL
FINDINGS*

Although the checklists indicated whether posts had pertinent documentation and policies, it was not effective in determining the adequacy of those policies and procedures. Reoccurring safety and security findings identified by the OIG and the PCSOs demonstrate that posts were not fully compliant with MS 270 because the processes posts implemented were insufficient.

OIG reports found that some posts continue to not fully implement safety and security policies and procedures. Based on a review of OIG evaluations from FYs 2004 through 2009, we identified numerous reoccurring evaluation findings regarding post safety and security. Table 3 shows the number of evaluation reports that identified safety and security issues.

Table 3. Number of Evaluation Reports that Identified Safety and Security Issues

| Safety and Security Issue | Reports |
|--|---------|
| Contact information/site locator forms that were inaccurate or incomplete | 9 |
| Posts were not thoroughly completing housing/sites inspections | 8 |
| Inadequate emergency action plans or evacuation plans | 7 |
| Various cities where Volunteers were located were considered unsafe (particularly urban areas, including Peace Corps office locations) | 7 |
| Posts had inadequate or non-existent emergency action plan testing | 6 |
| Volunteers engaged in unsafe behaviors or were not prepared for emergencies | 6 |
| Travel or transportation methods placed Volunteers at risk | 6 |
| Volunteers were underreporting crime incidences | 5 |
| Volunteers were not following the out-of-site policy or the policy was unclear | 5 |

OIG audits also contain reoccurring findings related to safety and security. For example, Peace Corps did not consistently ensure contractors obtained security clearances and signed intelligence background information certification as required by MS 743. Our review of 69 post audits from the last five years identified 26 that contained findings regarding untimely security clearances and updates and 34 that contained findings regarding contractors not signing intelligence background information certificates. These two forms are necessary to show that posts conduct adequate review of personnel to determine whether they are trustworthy and suitable to work for the Peace Corps.

Although Peace Corps recently updated its MS 743, it did not include responsibilities for a management office to ensure country directors request and obtain the required personal services contractors' information. To oversee posts' compliance, Peace Corps management must assign

responsibilities for reviewing and tracking background investigations and intelligence background information certifications to a headquarters office to ensure that posts comply with the Peace Corps Manual.

REPEAT PCSSO FINDINGS

As previously discussed in the “Tracking Internal Safety and Security Reviews” section of this report, the PCSSOs conduct reviews of posts’ safety and security programs and identify weaknesses. Based on a selection of 10 PCSSO reports, we identified reoccurring safety and security findings regarding MS 270 compliance. The reports identified deficiencies in emergency action plan tests; safety and security training; housing criteria and site development; and crime response. The review of reports demonstrates that PCSSOs continue to identify weaknesses in posts’ compliance with MS 270.

*ADMINISTRATIVE
MANAGEMENT CONTROL
SURVEY*

In May 2009, the Office of Safety and Security and regions decided to incorporate MS 270 content into the Administrative Management Control Survey (AMCS). AMCS is a self-assessment tool that originated in the mid-1980s in response to the Office of Management and Budget Circular A-123, “Management Accountability and Control.” This circular required federal agencies to have formal methods for evaluating internal control processes and provided “guidance to Federal managers on improving the accountability and effectiveness of Federal programs and operations by establishing, assessing, correcting, and reporting on management controls.” However, Peace Corps did not require all posts to use AMCS.

The decision to incorporate MS 270 requirements into AMCS was logical to reduce redundancy and better assess all posts strengths and weaknesses collectively. However, the information provided to management through AMCS must flow to each responsible office to ensure that authorized personnel can make informed decisions on agency policies and practices. Further, Circular A-123 states, “Agency managers should continuously monitor and improve the effectiveness of management controls associated with their programs.” Therefore, as managers of the safety and security program, the Office of Safety and Security must be involved in the AMCS process and receive the safety and security assessments to determine whether posts are successfully implementing safety and security policies.

CONCLUSION

The MS 270 compliance process served as a self-assessment tool for posts to determine whether they had implemented all elements of MS 270. The self-assessment did not provide sufficient detail to determine whether those elements were adequate. As a result, OIG and PCSSO reviews repeatedly reported weaknesses in posts’ policies, documentation, and practices.

With the inclusion of MS 270 requirements in AMCS, the Office of Safety and Security must ensure the self-assessment questions adequately address the weaknesses identified by the safety and security audits and reviews. To

be an effective control mechanism for ensuring compliance with agency policies, the AMCS questions must require posts to assess the adequacy instead of the existence of policies and documentation. Further, AMCS should be reviewed and revised periodically to incorporate questions that address the safety and security issues identified by the OIG and PCSSOs. This will help posts ensure compliance with agency policies and provide management with more relevant information.

WE RECOMMEND:

8. That the chief compliance officer, in conjunction with the associate director for safety and security, establish a process to identify reoccurring safety and security issues and to take necessary steps to address these issues through additional guidance, clarification, or other action.
9. That the associate director for safety and security, in conjunction with the associate director of global operations, develop a process to track post compliance with the Peace Corps policies requiring post staff to have background investigations and signed intelligence background information certifications.
10. That the associate director of global operations require posts to use the Administrative Management Control Survey, or at a minimum the safety and security section, to ensure that posts continue to review and assess compliance with Peace Corps Manual section 270.
11. That the Director provide the Office of Safety and Security with the mandate, authority, and resources to review post responses to the safety and security sections of the Administrative Management Control Survey and use them to provide guidance on areas of weakness and provide assistance, as appropriate, when posts report non-compliance.

FINDING B. COMPETENCY OF SAFETY AND SECURITY POSITIONS

The Peace Corps did not adequately align safety and security personnel's roles and responsibilities with the agency's stated priority of safety and security, the Office of Safety and Security's mission, and the field's needs and expectations. Furthermore, the agency did not consistently hire people with the necessary skills and experience and delineate their roles and responsibilities. Specifically, Peace Corps did not:

- reassess the role of the SSC since its inception;
- clearly define the necessary skills and abilities of the PCSSOs and ensure they fulfilled the needs of the posts; and
- standardize training and development for safety and security positions.

As a result, the usefulness of the safety and security positions varied depending on the skills of individuals and needs of the posts. In addition, Peace Corps could not ensure that personnel were qualified to handle all safety and security issues that might arise. This contributed to confusion within the agency and with other federal agencies during security situations, which sometimes hindered crime incident response.

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| SAFETY AND SECURITY COORDINATOR ROLES | <i>SSC job responsibilities, related skills, staffing levels, and pay grade were inconsistent because PC/headquarters had not reassessed the SSC roles to ensure they were consistent with the change in posts' needs.</i> |
|--|--|

SSC skills, experience, and pay grade varied from post to post. At many posts, the position has evolved from an administrative position and now requires skilled individuals that have law enforcement, military, or other related safety and security background. In addition to training, communication, and documentation responsibilities, many country directors rely on SSCs to interface with local law enforcement officials and guide Volunteers through the investigative and judicial processes if a crime occurs. Despite this, headquarters personnel still refer to the position as a clerical one, which is reflected in their pay grade and staffing levels.

GAO's Internal Control Management and Evaluation Tool (GAO-01-1008G) section on Commitment to Competence provides the following guidance:

The agency [performs] analyses of the knowledge, skills, and abilities needed to perform jobs appropriately. Consider the following:

- The knowledge, skills, and abilities needed for various jobs have been identified and made known to employees.

*JOB RESPONSIBILITIES AND
RELATED SKILLS*

- Evidence exists that the agency attempts to assure that employees selected for various positions have the requisite knowledge, skills, and abilities.

The SSC position was created around 2002, and its initial responsibilities were primarily clerical. In the agency's response to the 2002 GAO report on safety and security, Director Vasquez stated that the SSC position would be responsible for maintaining MS 270 compliance documentation and following up with other post staff to ensure timely submission of required documentation. This is reflected in the statement of work template for the SSC position, which states, "the role of the incumbent is to augment and support, not assume responsibility for, senior staff security-related functions." It further states that the SSC's primary responsibility is to monitor and maintain appropriate documentation regarding the post's compliance with MS 270. The statement of work, which can be customized by each post, lists the SSCs' key responsibilities in the areas of MS 270 compliance, information sharing, training staff and Volunteers, site selection and monitoring, incident reporting and response, and emergency action plan development and testing (see appendix C for the complete SSC statement of work). The statement of work does not list any specific skills, background, or experience needed except to say that the person "must have sufficient English and local language skills."

Some region staff, country directors, and SSCs stated that the position has evolved; many posts have expanded the SSC's responsibilities to include more non-clerical duties, and the country directors view the SSC as a member of the senior staff at the post. Country directors and SSCs we interviewed expressed concerns that if the SSC is an administrative role, critical Volunteer safety and security functions will not receive sufficient attention.

Over half (13 of 25) of the country directors and SSCs we interviewed said that SSCs need to have a law enforcement background. Although local law enforcement, not SSCs, are responsible for conducting criminal investigations, they stated that SSCs need to have an understanding of the investigative and judicial processes to ensure Volunteers receive the necessary support. In countries where police investigative functions lack sufficient resources, SSCs with a law enforcement background and an established relationship with local authorities are important.

Accordingly, the four posts in our sample of 12, that added a skills, background, or experience section to the statement of work; all listed law enforcement or security experience and/or knowledge of local laws as requirements. Eight of the 13 SSCs we interviewed had a military, law enforcement, or safety and security background. However, other SSCs did not have this background because some posts, along with regions, have

focused on hiring someone who can fulfill the SSC's administrative duties. The Office of Safety and Security, regions, and posts do not have a common understanding of the SSC role and the skills and backgrounds necessary to fulfill the position's responsibilities. As a result, the SSC responsibilities were not standardized and Peace Corps could not ensure consistent support of Volunteers.

In addition, the inconsistency in SSC responsibilities contributed to misunderstandings with the RSOs who oversee the safety and security of U.S. embassies and often work with the SSC or other Peace Corps staff members if a Volunteer is the victim of a crime. Many RSOs rely on SSCs to interact with both police and Volunteers if a crime incident occurs. RSOs were concerned that without security backgrounds SSCs could not adequately train Volunteers, properly respond to crimes, and clearly document crime incidents. On two separate occasions in FY 2009, an RSO reported that the response by the SSC after a violent crime incident was inadequate because they lacked local contacts or knowledge of the criminal investigation and judicial processes. Therefore, it is essential that Peace Corps clearly define SSC responsibilities and communicate the roles to all individuals involved in Volunteer safety and security.

PAY GRADES

Similar to an SSC's skills and responsibilities, SSC pay grades varied from post to post. The OIG compared SSC pay grades among posts and analyzed the SSC pay grades in relationship to programming staff, but did not conduct a work analysis of the position. The OIG recognizes that SSCs and programming staff members have different responsibilities. However, some country directors, SSCs, and PCSSOs stated that SSC pay is a problem because they have assumed increased responsibilities but their pay grade had not increased. Accordingly, 7 of the 12 country directors interviewed stated that the SSC pay grades need to reflect the increased importance and responsibilities of the job.

A review of SSC grades revealed that they range from a 6 to a 10 worldwide.¹⁰ Over 40% of the SSCs are at a pay grade 8 level. Some variance is reasonable as experience and time on the job affects the pay grades. However, the SSCs pay grade level typically fell below that of program managers and associate Peace Corps directors (APCDs), and at 13 posts SSCs were graded lower than some or all of the people in programming support roles. Although the OIG recognizes that a direct comparison of staff pay grades may be misleading because of differences in job responsibilities, the data analysis and feedback from some country

¹⁰ SSCs and most programming staff are personal services contractors and therefore are not part of the foreign service or general schedule pay scales. However, we used foreign service national equivalent grade levels for this comparison because MS 743, "Procurement of Personal Services of Host Country Residents by Contract" states, "The range of compensation in the applicable State Department Local Compensation Plan may be used as well for determining fair and reasonable base compensation" for personal services contractors.

directors indicated that the grading structure created by headquarters is not in line with the SSCs elevated responsibilities at multiple posts. Their expanded roles sometimes require the SSC to liaise with government and local law enforcement officials, develop and deliver post security trainings, and participate in Volunteer site development. According to PCSSOs, country directors and SSCs, the SSC pay grade affects the post's ability to retain qualified SSCs and may hinder the SSCs from gaining full cooperation from other staff.

STAFFING LEVELS

When the position was initially created, each post was provided funding for one SSC position regardless of the number of Volunteers. Headquarters staff confirmed that there is still no SSC to Volunteer ratio. With the exception of two posts, each post continues to have one SSC.¹¹ Although this may have been adequate when the position was primarily clerical, many SSCs now interact with Volunteers, respond to incidents, and visit Volunteer sites. As the position's responsibilities have increased and the number of Volunteers has grown, the SSC's workload has also increased. According to the data provided in Peace Corps' Congressional Budget Justification for FY 2010, the number of Volunteers at each post ranged from 11 to 294, and there were 7,298 total Volunteers as of September 30, 2009.¹² This is an average of approximately 108 Volunteers per SSCs (and safety and security assistants at post). In contrast, posts usually have numerous programming staff members. Although field staff recognized that safety and security responsibilities are not the sole responsibility of the SSC and should be shared among the staff, they also stated that the SSC position is a demanding job with a heavy workload. As a result, several country directors and SSCs stated that some posts may need additional safety and security staff, especially considering the anticipated growth in the number of Volunteers.

CONCLUSION

Peace Corps had not standardized the SSC roles and responsibilities to ensure consistent support to Volunteers, which created discrepancies in the SSC pay grades and staffing numbers. Although some headquarters personnel considered the SSC position as a clerical role, many posts have augmented the SSC's roles and responsibilities to provide more security expertise. Additionally, RSOs have expectations that some SSCs did not have the skills or training to meet.

The OIG acknowledges that the agency views safety and security as a shared responsibility among all post staff, and the OIG is not in the position to determine which staff members should assume responsibility for various safety and security elements. However, some posts require more safety and security experience from field staff than the current structure provides. To

¹¹ PC/Morocco has an SSC and an assistant SSC. PC/Honduras has an SSC and a part-time staff member that provides administrative safety and security support.

¹² This number does not include Peace Corps Response Volunteers and United Nations Volunteers. Including those Volunteers, there were 7,340 Volunteers as of September 30, 2009.

address this problem, the agency must reassess what is required for field staff to deliver the essential safety and security elements and ensure that the agency's structure, including position descriptions of all post staff members, pay grades, and staffing levels, support field staff.

WE RECOMMEND:

12. That the associate director of global operations work with the associate director for safety and security and post personnel to review the safety and security coordinator position and determine the needed safety and security coordinator roles and responsibilities.
13. That the associate director of global operations, in coordination with the general counsel, update the safety and security coordinator position's statement of work and define minimum skills and education, as well as the position descriptions for all personnel at post with safety and security responsibilities, based on the review of safety and security coordinator roles and responsibilities.
14. That the associate director for safety and security work with the associate director of global operations and post personnel to determine an appropriate pay grades for safety and security coordinators based on the updated review of the safety and security coordinator role and responsibilities.
15. That the associate director for safety and security work with the associate director of global operations and post personnel to assess the need for additional safety and security personnel at posts and develop a standard evaluation process for determining the required number of staff.

PEACE CORPS SAFETY AND SECURITY OFFICERS

PCSSO skills and abilities varied, which created different expectations and caused some people to question the value of the position.

NEED FOR THE PCSSO POSITION

In the agency's response to the 2002 GAO report on safety and security, Director Vasquez stated that the agency would hire additional regional safety and security officers (subsequently titled PCSSOs) who would conduct safety and security assessments at posts, provide recommendations for improvement, and be a resource to posts in fulfilling MS 270 requirements. PCSSOs provide support to country directors in their security program, assess the post's security environment and risk management strategy, provide support to local law enforcement officers investigating violent crimes committed against PCVs, and assist with crisis management. Currently, the agency employs seven PCSSOs, six of whom are located in the field and one is currently working at headquarters. Three additional PCSSO positions are vacant. These PCSSOs have varying backgrounds and different approaches to the job.

The Office of Safety and Security views the PCSSO role as a consultative one, and they rely on invitations from country directors to visit and assess posts (see finding A). The Office of Safety and Security intranet website

refers to the PCSSOs as safety and security consultants, and MS 130 states that they “provide support to Country Directors in all areas of safety and security.” They also participate in new country entry assessments, assist posts with crisis management, and review the physical security of facilities and staff residences.

Feedback from country directors, SSCs, and RSOs concerning the usefulness of the PCSSO role varied. Nineteen of 25 country directors and SSCs reported that they appreciated the support they received from the PCSSOs. However, other country directors and SSCs do not believe the PCSSO position is necessary. Some commented that they had to create work for the PCSSO even when the post did not need additional support. This view of the PCSSOs occurred most often at posts that have SSCs with a strong security background or in countries where the post can rely on local law enforcement. Some regions stated that the usefulness of the PCSSO varies and depends on who is serving in the role.

Our review of PCSSO reports from 2008 and 2009 shows that PCSSOs continue to identify safety and security gaps and provide useful advice to some posts. However, the number of reports produced by each PCSSO varied. In the two-year period, one PCSSO produced 15 post assessment reports while another PCSSO produced only one report.¹³ Although post assessments are not the sole focus of the PCSSO’s job, the variance raises questions about the frequency with which country directors are requesting PCSSO support and the consistency with which PCSSOs document the identified security gaps.

As discussed in Finding A, headquarters and post staff also noted that there is an overlap in roles and responsibilities of PCSSOs and SSDOs. Although some country directors and SSCs understand the distinction between the PCSSO and SSDO roles, others reported that they believed the positions are duplicative and would prefer that the funds for some of those staff roles be made available for SSC training or pay grade increases.

JOB RESPONSIBILITIES AND RELATED SKILLS

The Office of Safety and Security did not ensure that all PCSSOs had responsibilities and skills that enabled them to support posts’ safety and security needs. Because PCSSOs provide training and consultative services to their posts, the Office of Safety and Security highlighted their need for a strong training background. They also emphasized the need for PCSSOs to understand the Peace Corps approach to safety and security, but they did not believe that a security or law enforcement background was always necessary because it could hinder the PCSSO’s ability to understand Peace Corps’ security strategy, the acceptance model. Contrary to this opinion, the job description stated that PCSSOs need knowledge of security administration

¹³ This analysis did not include newly hired PCSSOs or people who were not in the field the majority of the two-year timeframe. One PCSSO included in this analysis started the position in May 2008.

and criminal investigative techniques and must have enough security knowledge to function as a technical authority.

Further, country directors and SSCs relied on the PCSSO to help train local staff, particularly when a new SSC was hired, and they expected the PCSSO to be a subject matter expert in safety and security. Especially for posts with an experienced SSC, a PCSSO with a strong security background was necessary to provide useful training and expert advice. RSOs who were familiar with the PCSSO role also agreed that PCSSOs should have technical expertise in security or law enforcement similar to the RSOs.

The PCSSOs' ability to meet these varied expectations was mixed because they had different professional backgrounds. While some PCSSOs had military, law enforcement, or other security-related backgrounds, others had skills in training and consulting. These training skills are useful for part of the PCSSO role, but do not ensure they can "function as a technical authority" as stated in their job description. The OIG identified times when a crime occurred and the RSO who worked with Peace Corps staff to respond to an incident expected the PCSSO to assume a greater role in the crime response process. However, the PCSSO lacked the professional contacts and knowledge of the criminal investigation and judicial processes needed to provide effective support.

In comparison, Latter-day Saints Volunteer Services sends missionaries and humanitarian workers to over 100 countries and has an office within the U.S. with 15 security professionals. All of these individuals have extensive law enforcement, military, or intelligence backgrounds, and have been trained in response techniques and security functions.

The different expectations that field staff have of the PCSSO role coupled with variability in PCSSO skills and background creates a situation where it is hard to fulfill the numerous, varying expectations people have of the position. As a result, some people questioned the value of the role or expect the PCSSOs to perform work that does not align with their position description and skills.

GEOGRAPHIC PLACEMENT

PCSSOs live and work overseas and are assigned to a sub-region. Some country directors stated that having the PCSSOs live in the field helped them better understand the cultural context and learn or maintain local language skills. While this arrangement is preferable for some posts, others believe the PCSSOs should be located at headquarters in Washington, D.C. or in other U.S. cities such as Miami, Florida. We analyzed the costs of placing the PCSSOs overseas and compared this to the cost if they were located in Washington, D.C. When living abroad, the agency incurs costs for housing, shipping of goods, dependent care, and other miscellaneous expenses. The agency would not incur these costs if the PCSSOs were located in

Washington, D.C. or another U.S. location, although their salaries would rise because of the higher locality pay. Based on data from the 2008 operations plan, we determined that having all of the PCSSOs live abroad costs the agency approximately \$185,000 more per year than if they worked at headquarters. It should be noted that additional travel costs may be incurred if PCSSOs are located in Washington, D.C.; those costs are unknown and were not included in the analysis. However, this analysis, along with feedback from regions and posts, indicates that the Office of Safety and Security should reevaluate its PCSSO placements to ensure the most cost effective alternative that meets Peace Corps requirements and supports the overarching safety and security policy.

CONCLUSION

Because of the variability in headquarters and posts' expectations of the PCSSO role and the PCSSOs' ability to meet these expectations based on their experience and skill sets, some posts and regional staff question the agency's need for PCSSOs. Further, the OIG determined that there is still a need for someone to provide technical expertise in areas related to safety and security, because PCSSOs continue to identify safety and security weaknesses when they visit posts,. However, some PCSSOs may not be equipped to provide the support needed by posts and may not have the technical expertise to train SSCs that already have a background in security or law enforcement. As the agency considers increasing the number of PCSSOs, the Office of Safety and Security should reconsider the role and the placement of its PCSSOs to ensure that all PCSSOs have the basic skills needed for the position, increase standardization, clarify expectations, and make sure agency funds are not being wasted.

WE RECOMMEND:

16. That the associate director for safety and security work with the associate director of global operations to reassess the Peace Corps safety and security officer roles and responsibilities and revise the job description accordingly.
17. That the associate director for safety and security work with the associate director of global operations to analyze whether the posting of each Peace Corps safety and security officer enhances safety and security and is the most efficient, effective, and cost effective placement. If needed, relocate Peace Corps safety and security officers accordingly.

TRAINING

Peace Corps did not standardize training for SSCs and PCSSOs to ensure that they had the skills to carry out their responsibilities.

STANDARD TRAINING AND DEVELOPMENT PROGRAMS

GAO Internal Control Management and Evaluation Tool (GAO-01-1008G) section on Commitment to Competence provides the following guidance:

The agency provides training and counseling in order to help employees maintain and improve their competence for their jobs. Consider the following:

- There is an appropriate training program to meet the needs of all employees.
- The agency emphasizes the need for continuing training and has a control mechanism to help ensure that all employees actually received appropriate training.

The 2002 GAO report on safety and security stated that the agency had “unclear guidance and weaknesses in safety and security training for staff.” The agency responded by stating that newly developed MS 270 Implementation Procedures had been developed and would be included in the training for safety and security staff. However, SSCs do not participate in those trainings. Furthermore, the agency’s response to the GAO report stated that the agency would establish routine safety and security staff training on a two-year cycle. However, we determined that the training deficiencies identified in the 2002 GAO report continued to exist. Twenty-eight out of 37 (76%) PCSSOs, country directors, SSCs, and SSDOs we interviewed identified training for safety and security staff as an area in need of improvement. The Office of Safety and Security’s FY 2010-2012 Integrated Planning and Budgeting System submission stated that the office is currently developing training programs for its staff as well as a certification program for SSCs; however, as of December 2009, this had not been fully developed. We compared training records to job responsibilities and identified areas for improvement related to PCSSO and SSC training.

PEACE CORPS SAFETY AND SECURITY OFFICER TRAINING

The Office of Safety and Security provided PCSSOs training on an ad-hoc basis depending on their needs and training requests. Our review of training records revealed that most PCSSOs received training in victim advocacy (8 of 9 PCSSOs), criminal investigations (8 of 9), terrorism (5 of 9), and other basic security functions (3 of 9). However, no PCSSO received training in the areas of policy development, program coordination, and training delivery even though those responsibilities are in the PCSSO job description.

*SAFETY AND SECURITY
COORDINATOR TRAINING*

Further, in 2003 the Department of State provided PCSSOs with 2-week training for overseas security. However, since that time Peace Corps has not worked with the Department of State to continue such training.¹⁴

The current PCSSOs have a variety of backgrounds and skills, and the agency needs a uniformed training and development plan to ensure PCSSOs have the skills needed to be effective consultants and technical advisors to posts. During our audit, the Office of Safety and Security developed a training plan of required PCSSO courses with expected implementation in January 2010.

Because the agency lacked a standardized training program for SSCs, the posts determined what kind of training the SSC received. Most posts provide training based on the position's responsibilities; however, SSC job responsibilities varied from post to post (as previously discussed in the Safety and Security Coordinator Roles section). As a result, SSC training varied and SSCs did not always receive training that matched essential job responsibilities such as developing and delivering training and advising on selection of safe Volunteer sites.

Our analysis of training records revealed that the most widely received training was the crime incident response system's online tutorial (54 of 68 SSCs participating) and the online presentation on the death of a Volunteer (29 of 68 SSCs participating). Participation in all other trainings was inconsistent, though some SSCs had training in other relevant topics such as victim assistance, risk assessments, physical security, first aid, and criminal investigations.

SSCs also received training from PCSSOs, although the topics covered by the PCSSOs varied, and the PCSSOs did not visit every post on a routine basis. Based on a review of PCSSO reports, PCSSOs did not visit 11 posts within 2008 and 2009.

Some SSCs shadowed safety and security staff located in another country. This was considered beneficial by SSCs who participated in such a program but not all SSCs received this opportunity.

Another valuable SSC training opportunity is the biennial conference facilitated by PCSSOs and funded by the Office of Safety and Security. Some country directors and SSCs suggested holding the conference every year, similar to the annual conferences for Peace Corps medical officers and administrative officers. The Office of Safety and Security funded the SSC conferences in prior years. Although the Office of Safety and Security had planned to conduct SSC workshops in FY 2009, the office's FY 2010-2012 budget submission stated that budget constraints forced them to abandon this

¹⁴ Based on comments from the Department of State, this sentence was added after the preliminary report was issued.

plan. In September 2009, the Office of Safety and Security submitted a request for agency resources to fund a reoccurring SSC conference. If approved, this will help address some of the posts' concerns.

CONCLUSION

Clearly defined training programs help to ensure that staff has the necessary skills and abilities to perform their functions. Peace Corps provided standardized training and provided annual conferences for some field-based positions, but did not do this for SSCs even though Peace Corps described safety and security as the agency's "highest priority."

Implementing clearly defined training programs will help ensure Peace Corps staff is competent and can provide adequate safety and security overseas through both preventative measures, such as providing Volunteer training in safety and security and ensuring that Volunteer sites meet minimum safety standards, as well as response mechanisms that ensure timely and appropriate actions when situations arise.

WE RECOMMEND:

18. That the associate director for safety and security develop and implement a training program for Peace Corps safety and security officers based on updated descriptions of their roles, responsibilities, and needed skills.
19. That the associate director for safety and security work with the associate director of global operations to develop and implement a training program for safety and security coordinators based on updated descriptions of their roles, responsibilities, and needed skills.
20. That the Director allocate sufficient resources to implement safety and security coordinator and Peace Corps safety and security officer training programs.

FINDING C. MAINTAINING AND COMMUNICATING SAFETY AND SECURITY POLICIES

As the safety and security program changed, the Peace Corps did not communicate how the new policies related to the overall security strategy and ensure the information was complete and current. Specifically, the agency:

- Lacked a comprehensive security policy that connected the agency’s overall security strategy to specific processes;
- Did not adequately communicate security strategy, risks, and responsibilities to Volunteer applicants; and
- Did not maintain current Peace Corps Manual sections that clearly identified the key offices and positions involved in safety and security.

Frequent staff turnover and changes to the security program contributed to the lack of an organized and complete agency security policy. As a result, Peace Corps could not ensure Volunteers and staff were fully informed of the security program and the need for its rules and procedures.

SECURITY POLICY

Peace Corps did not fully document its safety and security program in a clear and coherent policy.

*OVERARCHING SECURITY
POLICY*

The Humanitarian Aid department of the European Commission is responsible for the European Union’s humanitarian aid and conducts studies of humanitarian operations. Their “Generic Security Guide for Humanitarian Organisations” states:

Guidance on the organisation’s overall attitude to security should be written in a security policy. The hierarchy of security documents is thus:

- Security policy – giving overall policy and principles for the organisation
- Security manual – giving generic procedures for the organisation
- Security plan – giving detailed procedures for a specific location.

Peace Corps provides generic and detailed security procedures without clearly articulating how these procedures relate to the overall policy and principles for the organization. The Peace Corps Manual sections defined the minimum post security procedures while individual posts develop more specific security plans in the welcome books, Volunteer and staff

handbooks, and sometimes separate safety and security handbooks. However, Peace Corps lacked an overarching security document that explained the agency’s strategy for addressing and mitigating security risks. Table 4 lists the primary documents used for Peace Corps safety and security.

Table 4. List of Peace Corps Safety and Security Guides

| Document | Last Update | Description |
|--|--------------------------------------|---|
| Peace Corps Internet website “What About Safety” and “Safety and Security In Depth” pages | September 25, 2008 and March 9, 2009 | Explains fundamentals about risks and mitigating factors. |
| MS 270, “Volunteer/Trainee Safety and Security” and compliance checklist | December 3, 2007 | Requires posts to establish programs that include informing Volunteers of safety and security issues, providing safety training, selecting safe Volunteer sites, developing and testing emergency action plans, and establishing protocols for reporting and responding to safety and security incidents. |
| Volunteer Handbook | September 2005 | Emphasizes taking responsibility for personal safety and defines emergency action plans. |
| MS 340, “Opening a Post” and attachments Peace Corps' New Country Assessment Guide and New Country Entry Guide | March 29, 2007 | Outlines the process for opening or reopening a Peace Corps post. |
| MS 130, “Office of Safety and Security: Organization, Mission, and Functions | May 23, 2005 | Defines the roles and responsibilities of the Office of Safety and Security |
| Evacuation Support Guide | September 2004 | Provides a roadmap in the event of an evacuation. |
| Personal Safety Paradigm: Acceptance Model | April 2001 | Explains the Peace Corps’ application of the acceptance model. |
| Personal Safety Overseas | April 2000 | Useful lessons learned from pre-departure through incident occurrences. |
| Country Welcome Book | Varied depending on the post | Provides post specific risks, statistics, and security policies. |
| Country Volunteer Handbook | Varied depending on the post | Provides post specific risks and security policies for Volunteers. |
| | | |

An overarching security document is necessary to logically connect these policies and procedures to the agency’s mission and strategy. According to HPG, a safety and security policy is “a key statement acknowledging risk, the responsibility of individual staff members and of the organisation to reduce risk, and the fundamentals of how the organisation intends to do so.... It is a signal to all stakeholders, staff, trustees, management, partners and donors that the organisation takes the safety and security of its staff serious.” Overarching security policies are a standard best practice identified by leading non-governmental organizations. For example:

- The International Federation of Red Cross and Red Crescent Societies, “Stay Safe: The International Federation’s Guide for Security Managers,” states, “A security plan is an essential tool for

developing and maintaining adequate security procedures and responses. The first phase of security planning is to identify and determine how the three security strategies (acceptance, protection and deterrence) can be utilized and implemented. The plan must relate to the specific operational situation and will comprise a number of components including: security regulations and guidelines; briefing and debriefing procedures; contingency planning; critical incident management.”

- People In Aid, a not-for-profit organization, seeks to improve organizational effectiveness within the humanitarian and development sector worldwide by advocating, supporting and recognizing good practice in management. In their document, “Policy Guide and Template Safety and Security,” People In Aid states, “The creation of an overarching security policy must remain the responsibility of headquarters.... Organisations should determine the key factors that make up a comprehensive security policy and design a series of standard operating procedures for posts....” It also recommends that security policies state who is responsible for the policy, the process of evaluating the policy, and the choice of the security strategy. See appendix D for the list of policy components.
- The Voluntary Service Overseas (VSO), an international development organization similar to Peace Corps, provides its staff and volunteers with the “VSO Security Policy.” It states, “This policy aims to inform staff and other parties connected with VSO about VSO’s approach to managing security so that they can take an active role in reducing risk in their work and daily lives. This policy will be accompanied by an Organisational Safety and Security Plan, which shows how VSO makes the policy work. Separate Security Plans must be developed for each country in which VSO works.”

The lack of an overarching policy at Peace Corps was partially caused by the transition of responsibilities to the newly created Office of Safety and Security and was perpetuated by the frequent staff turnover and lack of knowledge management. As a result, Peace Corps did not articulate how the security practices described in the Peace Corps Manual supported its security strategy. Peace Corps could improve its security program by clearly defining its overall strategy and explaining how the current processes ensure its success. A comprehensive security document can provide the link to how the various rules and processes provide increased Volunteer safety and also help clarify the safety and security authorities and relationships discussed in finding A.

Without a comprehensive security policy, Peace Corps could not ensure it provided appropriate guidance for the most common security issues and in a

readily available form and location for posts to easily access in times of need. A comprehensive security policy should include standard operating procedures that are well organized and readily available. HPG's "Mainstreaming the Organisational Management of Safety and Security" emphasizes the need for safety and security documentation to be user-friendly. It states:

This is an area of often major weakness. A pile of paper is unlikely to be actively and productively used by people with already little time to stand back and reflect, and burdened with too much paper. Safety- and security-related documentation has to be centralised in one reference pack. But that by itself is not enough. Operational agencies are not experts in information management, and tend to underestimate the vital importance of editing documents for internal consistency and reduction of repetition, and of good formatting and attractive presentation. Documents have to be made user-friendly.

Peace Corps established operating procedures for evacuations, emergency action plans, site development and housing standards, and crime incidents. However, the documents were not centralized and country directors and SSCs were not always aware of where the documents were located. Although posts face different security risks based on the location and environment, there are similarities and common practices that the Office of Safety and Security could consolidate in standard operating procedures. This would help to address various security risks, establish basic rules for mitigating those risks, and set the tone for the agency.

WE RECOMMEND:

21. That the associate director for safety and security coordinate an agency-wide effort to develop, document and disseminate a comprehensive safety and security plan that includes the agency's safety and security strategy, security risks, and policies to mitigate those risks.
22. That the associate director for safety and security work with the associate director of global operations to consolidate the standard operating procedures for safety and security coordinators and ensure the agency has a procedure for all major security issues.

VOLUNTEER AWARENESS

Peace Corps did not have an adequate process to ensure potential Volunteers were fully informed of the security risks before being sent overseas.

Peace Corps primarily adheres to an acceptance strategy that requires Volunteers to integrate into their community and relies on the local population and host family to support and protect the Volunteer. This approach requires the Volunteer to adopt a culturally appropriate lifestyle and to minimize situations that put them at risk. It is essential that Peace Corps communicates its safety and security strategy and policies to the Volunteers from the application process through the close of service conference to help ensure Volunteers accept personal responsibility for their safety and security.

APPLICATION PROCESS

The recruitment and application process involved several Peace Corps offices that have responsibilities for providing safety and security information. Diagram 3 shows the safety and security information provided to Volunteers throughout the selection process.

Diagram 3. Peace Corps Timeline from Application to Service

| Recruitment -applied to Peace Corps | Placement -approved and matched to country | Staging -pre-departure orientation | Pre-service Training -held in country |
|--|---|--|--|
| <p>Applicant searches for information online and can view the Safety of the Volunteer report listing crime statistics.</p> <p>Recruiter provides the Volunteer Handbook and discusses general challenges of Volunteering overseas.</p> | <p>Country Desk Units from the regions send country-specific information to the placement officer.</p> <p>Placement officer sends the invitee the Volunteer Assignment Descriptions and an internet link to the country welcome book.</p> | <p>Trainee receives email containing the two-page document "Approach to Safety and Security" with the staging itinerary.</p> <p>Trainee works through workbook exercises about managing risks.</p> | <p>SSC and sometimes the RSO brief the trainees. Throughout training the exercises focus on cultural expectations, security concerns, and the post's safety and security policies.</p> |

RECRUITMENT AND PLACEMENT

Although Peace Corps presents the security information in various documents and formats, Peace Corps had no assurance that potential Volunteers were fully informed of the risks and accepted the necessary responsibilities to mitigate those risks. An applicant is expected to have read:

- the two pages in the Volunteer Handbook concerning accepting responsibility for security and the need for an emergency action plan;
- the country welcome book that addresses country specific security issues, "staying safe," "how to not be a target for crime," and how to prepare for the unexpected; and

- “The Approach to Safety and Security” that provides more detailed information on the risks and realities of Peace Corps service.

However, the agency had no assurance that the potential Volunteers have read these pertinent documents, understand the risks, and accept personal responsibilities before leaving the country.

Similar organizations have developed comprehensive material on common security issues and the need to accept responsibility for personal security. These documents clearly identify the risks of international service and the organization’s expectations of volunteers. For example:

- The Latter-day Saints Church Security Department provides all volunteers with a 22-page booklet on physical security; traveling safety; incident reporting; and policies on issues of transportation, robbery, injuries, kidnapping, and threats. The booklet also includes basic rules of good personal security for Volunteers to practice at all times.
- The VSO provides potential volunteers with a 20-page document entitled, “Know Before You Go.” This document contains information about the number and types of crimes that previous volunteers have experienced; defines volunteer’s and the organization’s responsibilities; provides advice, tips, and useful resources; and concludes with the section entitled, “Are You Ready to Accept the Risks?” The document focuses on making sure that potential volunteers are fully informed of the situation they will be placed in and the risks they will be expected to help mitigate.

This document begins by stating, “VSO and our partner organisations want you to become a VSO volunteer. But before you accept your placement, you need to think carefully about whether you’re prepared to accept the risks it will involve. We would rather you looked at the risks and decided not to volunteer than went into a situation where you felt unsafe.” Before serving, the volunteer must sign a confirmation that they accept the risks.

Providing Volunteers with a consolidated handbook on the basic principles of Volunteer safety early on in the process would help Volunteers understand their roles and responsibilities better. This would also provide more opportunity for those unwilling to accept responsibility to withdraw earlier and save Peace Corps time and costs.

GAO-02-818 reported that Peace Corps began adding a day-long safety and security training to Volunteer staging in July 2002. Director Vasquez

*PRE-DEPARTURE
ORIENTATION (STAGING)*

discussed the role of staging in the overall safety and security process in his March 24, 2004 testimony before the House International Relations Committee. He said,

Safety and security issues are fully integrated in all aspects of Volunteer recruitment, training, and service, with an emphasis on Volunteers taking personal responsibility at all times and assimilating into communities. Information provided throughout the recruitment and application process -- to recruiters, on the recruitment website, in printed application materials, informational booklets and educational videos, during the two days of staging, and the 10 to 12 weeks of in country pre-service training -- all includes the key messages that being a Volunteer involves risk, that Volunteers can and are expected to adopt safe lifestyles, and that the Peace Corps has an effective safety support system in place.

Further, Director Vasquez included “the addition of the equivalent of one full day of safety and security training during a two-day pre-departure orientation (staging) for new trainees...” when discussing new initiatives in his testimony.

By FY 2008, Peace Corps had reduced staging from two days to five hours to reduce costs due to budget cuts and to allow posts to provide country-specific training. Not only did the shortened staging timeframe decrease the amount of information that was provided, but some headquarters staff expressed concern that it provided less time for potential Volunteers to adjust and fully understand the important information they received before going overseas. Further, safety and security is not specifically discussed at staging, but is incorporated into some of the material and discussions. The amount of security information varies based on the staging coordinator’s knowledge and the post-specific material. Although the shift to in-country training is reasonable, providing basic Peace Corps safety and security information to Volunteers before leaving the U.S. will increase security awareness, provide a background for the practices they will learn at posts, and help ensure the safety and security message they receive is consistent.

During our interviews with country directors and SSCs, several expressed the need for Volunteers to adapt their behavior to the local culture and to accept responsibility. Because Volunteer personal responsibility is vital to the success of the acceptance model strategy, increasing the security information at staging could reinforce Volunteers’ understanding of responsibilities and acceptance of security risks.

Although Volunteers certify that they have read and understand the information in the Peace Corps Volunteer Handbook before departing from

staging, the handbook did not discuss safety and security in depth. In contrast, VSO provides potential volunteers with weekend long training that informs the volunteer of security risks and ensures they are willing to accept responsibility. Peace Corps needs to provide Volunteers with more information about Peace Corps' approach to safety and security and ensure that Volunteers have a basic understanding of security principles. Requiring that Volunteers attest to a statement accepting responsibility for their safety and security and acknowledging receipt and understanding of Peace Corps' basic security principles would help ensure Volunteers are aware of agency security policies and accept the risks involved and the consequences of not following policy.

OFFICE COORDINATION

The Office of Safety and Security was not involved in the recruiting, placing, and staging processes. Although the Office of Safety and Security reviewed the "Approach to Safety and Security" document, information had not been updated since June 2003. Much of the information remained the same, but key safety and security positions, including the SSC, were not mentioned. Before departing the U.S., the Office of Safety and Security must ensure that Peace Corps informs Volunteers of what to expect, teaches the basic roles and responsibilities, and identifies key points of contact regarding safety and security.

CONCLUSION

In accordance with MS 130, the Office of Safety and Security is responsible for developing and implementing agency security policies and procedures and is tasked with ensuring Volunteers are adequately trained in their safety and security responsibilities. Therefore, the Office of Safety and Security must be involved in the entire process including recruiting, placing, and staging to ensure Volunteers are fully informed of the agencies' security policies and procedures.

WE RECOMMEND:

23. That the associate director for safety and security work with the associate director for volunteer recruitment and selection to provide Volunteers with a consolidated handbook on the basic principles of Volunteer safety during the recruitment and staging processes.
24. That the associate director of global operations, in conjunction with the associate director for safety and security and the associate director for volunteer recruitment and selection, develop a code of conduct or list of basic security principles that Volunteers must sign before departure to ensure Volunteers know their responsibilities and accept the risks involved with serving overseas.
25. That associate director for volunteer recruitment and selection work with the associate director for safety and security to ensure the information presented to Volunteers at staging adequately addresses security risks, teaches steps to mitigate those risks, and identifies key Peace Corps personnel involved in the security process.

**REGULARLY UPDATED
MANUALS**

Peace Corps did not update Peace Corps Manual sections to identify the change in safety and security roles and responsibilities.

STAFF RESPONSIBILITIES

Because of the changes in the safety and security programs it is important to maintain current guidance to keep the posts and other agencies informed. However, our review identified several areas where the Peace Corps Manual sections were not current. Specifically, Peace Corps Manual sections did not include all offices, key positions, and responsibilities of Peace Corps safety and security personnel.

- MS 270 governs the post safety and security, but did not define the roles and responsibilities of the SSC, PCSSO, or SSDO. The policy discusses the necessary elements of a post's safety and security program and assigns overall responsibility to the country director.
- MS 270 cites outdated policies and procedures as support and resource materials to assist posts in establishing an effective Volunteer and trainee safety support system. It also states, "Staff responsibilities under the EAP [emergency action plan] are outlined in MS 350." However, Peace Corps rescinded MS 350.
- MS 340 provides guidance on opening a post, but did not mention the Office of Safety and Security or the Office of Medical Services although the accompanying procedure guides described their essential roles in determining the safety of a country and potential Volunteer locations.
- MS 130 mentions the Volunteer Safety Council which no longer exists.

WE RECOMMEND:

26. That the associate director for safety and security update Peace Corps Manual sections 130 and 270 to include the roles and responsibilities of the current safety and security offices and key positions.
27. That the chief of staff direct the update to Peace Corps Manual section 340 to include the roles and responsibilities of the Office of Safety and Security and the Office of Medical Services.

FINDING D. INTERAGENCY RELATIONSHIP

Peace Corps had not formalized its inter-agency relationship regarding safety and security responsibilities with the Department of State. This occurred because Peace Corps headquarters was concerned about how a formal agreement would affect the level of support received. Instead, they relied on individuals at posts to manage their relationships with Department of State safety and security personnel.

As a result, Peace Corps posts' communication with RSOs varied, embassy security staff did not clearly understand Peace Corps roles and responsibilities, and the level of support differed between countries. Unclear responsibilities could compromise Volunteers' safety and hinder response to crimes against Volunteers.

AUTHORITY OVERSEAS

Although Peace Corps maintains independence from foreign policy, it relied on the Department of State for several security functions. The Department of State is statutorily responsible for the development and implementation of policies and programs to provide protection of all U.S. Government personnel on official duty abroad and the establishment and operation of security functions at all U.S. Government missions abroad.¹⁵

MEMORANDUMS OF UNDERSTANDING

Department of State, Bureau of Diplomatic Security (DS) maintained overseas safety and security memorandums of understanding (MOUs) in the Foreign Affairs Manual title 12, "Diplomatic Security," section 400. According to the Foreign Affairs Manual title 12, section 050, MOUs "are a means to coordinate diplomatic security programs between DS and other federal agencies domestically and at posts abroad....MOUs are not legal documents, per se, but rather management tools which assist in program administration." The Foreign Affairs Manual included MOUs with the U.S. Agency for International Development, Broadcasting Board of Governors, Department of Defense, Department of Commerce, and the Department of Navy. These agreements included the points of contacts and discussed the responsibilities for physical security, personnel security investigations, and training services.

PEACE CORPS SECURITY AGREEMENTS

The Department of State RSOs routinely provided Peace Corps support by assessing U.S. government facilities, conducting staff background checks, and providing support in response to serious crimes. However, Peace Corps had not clearly defined these services in a formal document. Instead, Peace Corps maintained informal agreements with the Department of State that did not provide specifics concerning the services and expectations between the agencies.

¹⁵ Department of State authority for security overseas is derived from various statutes, including the Omnibus Diplomatic Security and Antiterrorism Act of 1986 (Public Law 99-399).

In February 2009, the Department of State issued two cables (STATE 12291 and STATE 12309) to its overseas posts regarding the interaction with the Peace Corps.¹⁶ The first cable reaffirmed the basic principles that guide the Department of State's dealings with the Peace Corps and the need to maintain separation. The second cable established the responsibilities of the Peace Corps staff and the RSOs regarding crimes against Volunteers overseas. These cables clearly identified many of the safety and security roles and responsibilities. However, Peace Corps and the Department of State employees may not be familiar with the relationship and their respective responsibilities because Peace Corps did not formalize the agreements in an MOU similar to those in the Foreign Affairs Manual title 12, section 450.

Survey responses from 60 RSOs revealed that they were unclear about the roles of the SSC and PCSSO. The majority of RSOs (47 out of 60) did not answer the question concerning PCSSO roles and two of the responses confused the SSC with the PCSSO roles. When asked whether Peace Corps adequately explained and communicated its safety and security roles and responsibilities, 14 out of 60 stated they did not understand the roles and another 14 received clarification of roles only by talking with the country director and SSC.

Without clearly defining the relationship with Department of State, Peace Corps increased the risk that response to Volunteer security issues would not be provided timely. In security situations, such as violent crimes, kidnappings, and acts of terrorism, every second is vital and everyone must know their responsibilities to ensure lives are safe. One RSO surveyed said, "When an incident occurs and the SSC or PCSSO requests RSO assistance (crime or investigation involving a PCV or PC employee), PC headquarters needs to quickly coordinate with DS headquarters. . . so they may officially task [an] RSO prior to any investigative steps are taken. This has proven a bit difficult in the past and the lack of DS headquarters coordination can place the RSO in a very difficult position." The RSO could respond quicker to Peace Corps safety and security needs and with less apprehension if the RSO's responsibilities regarding Volunteers were explicitly stated in an MOU.

RELATIONSHIP WITH VOLUNTEERS

Unlike most federal agencies, both U.S. government employees and Volunteers that are U.S. citizens work for Peace Corps. The Peace Corps Act states, "except as provided in this chapter, volunteers shall not be deemed officers or employees or otherwise in the service or employment of, or holding office under, the United States for any purpose." The Department of State's message instructed its overseas posts to "treat [Volunteers] in the same manner as you do all other private American citizens resident in your

¹⁶ The cables were previously discussed as messages in the preliminary report. The wording was changed to cables and the numbers were added after receiving comments from the Department of State.

area.” A clear understanding of the safety and security expectations between posts and DS is furthered necessary because of this unique combination of government employees and Volunteers.

Volunteers must maintain separation from the Department of State to avoid the appearance of connections to intelligence communities that may compromise the Peace Corps’ ability to promote world peace and friendship. In accordance with the Peace Corps Act, “Peace Corps shall be an independent agency within the executive branch.” Nonetheless, the Department of State maintains responsibilities regarding the security of all Americans overseas. For example, Foreign Affairs Manual Title 12, chapter 420, “Post Security Management,” assigns RSOs the responsibility of “Providing unclassified security threat countermeasure briefings and other professional security advice to U.S. business executives and other U.S. private citizens at a level of frequency commensurate with host-country threat conditions.” Therefore, a formal MOU is necessary to explain the unique situation and how security services differ between the U.S. government employees and the Volunteers.

A formal MOU with the Department of State must take into consideration other agencies and offices that have roles regarding Volunteer safety and security. For example, the Department of State Bureau of Consular Affairs maintains authority to provide protection and services for U.S. citizens and nationals, including crisis management, victim assistance, death procedures, and arrest of U.S. citizens abroad. Peace Corps OIG and Office of Special Services also have roles regarding victim assistance, death procedures, and arrest of U.S. citizens abroad.

WE RECOMMEND:

28. That the Director, in conjunction with the associate director for safety and security, develop formal documentation with the Department of State Bureau of Diplomatic Security to clarify the roles and responsibilities for overseas safety and security regarding Peace Corps staff and Peace Corps Volunteers.

OBJECTIVES, SCOPE, AND METHODOLOGY

OBJECTIVE

The primary objective of our program audit was to determine whether the Peace Corps' safety and security function is providing competent and effective support for Volunteer safety and security throughout the world. We also examined applicable internal controls over safety and security operations as it related to our audit objective.

SCOPE AND METHODOLOGY

The OIG conducted an audit of the Peace Corps overseas safety and security program July 17 – December 7, 2009. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We based our audit conclusions on information from documents, data analysis, and interviews. We interviewed headquarters staff in the Office of Safety and Security, regions, the Office of Special Services, and the Office of Volunteer Recruitment and Selection. We judgmentally selected 12 out of approximately 74 posts and interviewed the country directors and SSCs.

We interviewed representatives at other federal agencies including Department of State and the U.S. Agency for International Development. We coordinated with the Department of State DS to survey RSOs. Sixty out of approximately 150 RSOs and staff responded to our questions concerning Peace Corps safety and security roles, responsibilities, expectations, and communication. We also interviewed 10 overseas RSOs to gain their understanding of the Peace Corps' roles and responsibilities.

We identified best practices from international non-governmental organizations through interviews with safety and security management at Voluntary Service Overseas, Save the Children, the Church of Latter-day Saints and the United Methodist Church Mission Volunteers and reviewed guidance from the European Commission's Humanitarian Aid office, People In Aid, and the Overseas Development Institute HPG. We obtained crime statistics from the U.S. Department of Education and the United Nations Office on Drugs and Crime websites to compare with Peace Corps crime statistics.

We reviewed Peace Corps policies, organizational charts, personnel files, training records, and standard operating procedures. We obtained vacancy announcements and resumes from Office of Human Resource Management to analyze job responsibilities and the skills needed for safety and security

personnel in the following positions: associate director for safety and security; chief, overseas operations; SSDOs, and PCSSOs. The original vacancy announcements, including the knowledge, skills, and abilities and minimum requirements needed for the position, were not available for some positions. Instead, we relied on the most recent version of the vacancy announcement to determine the job responsibilities, position requirements, and skills needed. We were also unable to obtain the most recent resumes for all safety and security personnel and at times used resumes that had been submitted for previous Peace Corps positions.

We also conducted an analysis of SSC pay grades. We compared the pay grades of SSCs at posts across the world. The pay grade level of each SSC was also compared to the pay grades of programming staff members at the same post, including program managers/APCDs, program assistants, program specialists, and program secretaries; to determine if the SSC was paid more, the same, or less than the programming staff members. Because SSCs and many programming staff members are personal services contractors, they do not have an actual pay grade. However, Peace Corps has identified the equivalent foreign service national pay grades for these staff members. Regions provided the pay grade data for SSCs and programming staff. Data discrepancies were noted, which we attempted to clarify.

To determine the number of Volunteers per SSC and safety and security assistant, we obtained a list of all field-based safety and security staff members from the regions. Any discrepancies between this data and other staff data (such as staff listings on the intranet) were clarified. The number of Volunteers worldwide was obtained from Peace Corps' Congressional Budget Justification for FY 2010. This analysis used the Volunteer numbers as of September 30, 2009.

We reviewed Office of Safety and Security budgetary documents for FYs 2008 and 2009, including budgeted funds used and requests for agency resources. We also obtained budgets for posts hosting PCSSOs to summarize the associated costs. We extracted safety and security budget information for all posts from the accounting system and analyzed the expenditures to identify inappropriate charges to the safety and security account. In addition, we reviewed the FYs 2008 and 2009 unfunded and funded requests for agency resources to identify any safety and security needs not adequately covered by posts' budgets.

We relied on computer-processed data from Peace Corps' financial management system Odyssey and the Crime Incident Reporting System. While we did not test the financial management system controls, we compared supporting documentation with the records contained in the systems to determine whether the information generated by the system was

sufficiently reliable for the audit objectives. We conducted data integrity tests on the entire population of Crime Incident Reporting System for FY 2008 information. We judgmentally sampled the Crime Incident Reporting System for FY 2008 to obtain a selection of 25 violent and 25 non-violent incidents and verified Crime Incident Reporting System data with documentation from safety and security personnel.

INTERNAL CONTROLS

GAO established guidance for implementing internal controls in federal agencies in report GAO/AIMD-00-21.3.1, “Standards for Internal Control in the Federal Government.” Internal controls provide reasonable assurance that the following objectives are being achieved:

- effectiveness and efficiency of operations,
- reliability of financial reporting, and
- compliance with applicable laws and regulations.

The five internal control standards are control environment, risk assessment, control activities, information and communication, and monitoring. During our audit, we reviewed whether Peace Corps had adequate internal controls related to overseas safety and security. In our report, we identified internal control weaknesses related to control environment, control activates, information and communication, and monitoring. We did not specifically address risk assessment.

CONTROL ENVIRONMENT

Peace Corps did not establish a positive control environment because it lacked clear lines of authority and lines communication (finding A) and failed to provide a commitment to competence (finding B). The Office of Safety and Security did not exercise authority over the agency-wide safety and security program. As a result, posts and regions implemented safety and security practices that were inconsistent and did not always comply with agency policies. In addition, the Peace Corps did not:

- clearly define the required skills for safety and security positions,
- standardize the SSC role, and
- establish appropriate training programs to ensure safety and security personnel could fulfill their responsibilities.

CONTROL ACTIVITIES

Peace Corps did not have an adequate process to ensure posts complied with safety and security policies contained in MS 270. The agency did not take sufficient steps to mitigate reoccurring safety and security weaknesses because of the lack of management oversight (finding A). Further, Peace Corps did not effectively manage its human workforce to ensure the appropriate personnel filled the security positions and were provided the necessary training, tools, structure, incentives, and responsibilities to ensure operational success (finding B).

INFORMATION AND COMMUNICATION

Peace Corps improved its communication of crime incidents through the implementation of the Crime Incident Reporting System. However, headquarters did not ensure the posts provided the information timely. Further, headquarters did not streamline the information flowing to the posts because of overlap in headquarters responsibilities (finding B).

MONITORING

Peace Corps did not establish an effective process to correct deficiencies identified in findings from Office of Safety and Security reviews (finding A). In addition, management did not take sufficient actions to mitigate reoccurring safety and security weaknesses identified in OIG evaluations and audits (finding A).

QUESTIONED COSTS AND FUNDS PUT TO BETTER USE

We did not identify any questioned costs during the course of the audit. We identified funds to be put to better use during the course of the audit. They are discussed in the accompanying audit report and enumerated below along with the recommendation number in the report.

Questioned Costs

| Recommendation number | Description | Amount |
|--------------------------|-------------|--------|
| N/A | | |

Funds Put to Better Use

| Recommendation number | Description | Amount |
|--------------------------|------------------------------|--------------------|
| 17 | Placement of PCSSOs overseas | \$185,000 per year |

LIST OF RECOMMENDATIONS

WE RECOMMEND:

1. That the Director reevaluate the organizational structure related to the safety and security functions and establish clear lines of authority to ensure the Office of Safety and Security can manage the agency's safety and security program.
2. That the associate director for safety and security work with the associate director of global operations to review the roles and responsibilities of the safety and security desk officers and clarify the differences between the safety and security desk officers and Peace Corps safety and security officers to eliminate unnecessary duplication and ensure the Office of Safety and Security has oversight over all safety and security functions in accordance with the Peace Corps manual section 130.
3. That the associate director of global operations develop standard operating procedures for the safety and security desk officer position based on the revised roles and responsibilities.
4. That the associate director for safety and security work with the associate director of global operations and the chief financial officer to develop a process to involve the Office of Safety and Security in posts' budget planning for safety and security expenses and in formulating the recommendation to the Director for posts safety and security needs.
5. That the Director ensures that Peace Corps develop and implement a process that adequately tracks Peace Corps safety and security officer recommendations and ensures that corrective actions are taken in a timely manner. The process should define roles and responsibilities of responsible personnel and hold them accountable for implementation.
6. That the associate director of global operations develop a clearly defined process that identifies and establishes corrective actions for posts that repeatedly submit incident reports late.
7. That the associate director of global operations reiterate to the regions and all posts the importance of timely reports and formalize the abovementioned process through a policy memorandum or Peace Corps Manual section.
8. That the chief compliance officer, in conjunction with the associate director for safety and security, establish a process to identify reoccurring safety and security issues and to take necessary steps to address these issues through additional guidance, clarification, or other action.
9. That the associate director for safety and security, in conjunction with the associate director of global operations, develop a process to track post compliance with the Peace Corps policies requiring post staff to have background investigations and signed intelligence background information certifications.
10. That the associate director of global operations require posts to use the Administrative Management Control Survey, or at a minimum the safety and security section, to ensure that posts continue to review and assess compliance with Peace Corps Manual section 270.

11. That the Director provide the Office of Safety and Security with the mandate, authority, and resources to review post responses to the safety and security sections of the Administrative Management Control Survey and use them to provide guidance on areas of weakness and provide assistance, as appropriate, when posts report non-compliance.
12. That the associate director of global operations work with the associate director for safety and security and post personnel to review the safety and security coordinator position and determine the needed safety and security coordinator roles and responsibilities.
13. That the associate director of global operations, in coordination with the general counsel, update the safety and security coordinator position's statement of work and define minimum skills and education, as well as the position descriptions for all personnel at post with safety and security responsibilities, based on the review of safety and security coordinator roles and responsibilities.
14. That the associate director for safety and security work with the associate director of global operations and post personnel to determine an appropriate pay grades for safety and security coordinators based on the updated review of the safety and security coordinator role and responsibilities.
15. That the associate director for safety and security work with the associate director of global operations and post personnel to assess the need for additional safety and security personnel at posts and develop a standard evaluation process for determining the required number of staff.
16. That the associate director for safety and security work with the associate director of global operations to reassess the Peace Corps safety and security officer roles and responsibilities and revise the job description accordingly.
17. That the associate director for safety and security work with the associate director of global operations to analyze whether the posting of each Peace Corps safety and security officer enhances safety and security and is the most efficient, effective, and cost effective placement. If needed, relocate Peace Corps safety and security officers accordingly.
18. That the associate director for safety and security develop and implement a training program for Peace Corps safety and security officers based on updated descriptions of their roles, responsibilities, and needed skills.
19. That the associate director for safety and security work with the associate director of global operations to develop and implement a training program for safety and security coordinators based on updated descriptions of their roles, responsibilities, and needed skills.
20. That the Director allocate sufficient resources to implement safety and security coordinator and Peace Corps safety and security officer trainings.
21. That the associate director for safety and security coordinate an agency-wide effort to develop, document and disseminate a comprehensive safety and security plan that includes the agency's safety and security strategy, security risks, and policies to mitigate those risks.

22. That the associate director for safety and security work with the associate director of global operations to consolidate the standard operating procedures for safety and security coordinators and ensure the agency has a procedure for all major security issues.
23. That the associate director for safety and security work with the associate director for volunteer recruitment and selection to provide Volunteers with a consolidated handbook on the basic principles of Volunteer safety during the recruitment and staging processes.
24. That the associate director of global operations, in conjunction with the associate director for safety and security and the associate director for volunteer recruitment and selection, develop a code of conduct or list of basic security principles that Volunteers must sign before departure to ensure Volunteers know their responsibilities and accept the risks involved with serving overseas.
25. That associate director for volunteer recruitment and selection work with the associate director for safety and security to ensure the information presented to Volunteers at staging adequately addresses security risks, teaches steps to mitigate those risks, and identifies key Peace Corps personnel involved in the security process.
26. That the associate director for safety and security update Peace Corps Manual sections 130 and 270 to include the roles and responsibilities of the current safety and security offices and key positions.
27. That the chief of staff direct the update to Peace Corps Manual section 340 to include the roles and responsibilities of the Office of Safety and Security and the Office of Medical Services.
28. That the Director, in conjunction with the associate director for safety and security, develop formal documentation with the Department of State Bureau of Diplomatic Security to clarify the roles and responsibilities for overseas safety and security regarding Peace Corps staff and Peace Corps Volunteers.

ACRONYMS AND GLOSSARY

ACRONYMS

| | |
|-------|--|
| AMCS | Administrative Management Control Survey |
| APCD | Associate Peace Corps Director |
| DS | Diplomatic Security |
| FY | Fiscal Year |
| GAO | Government Accountability Office |
| HPG | Humanitarian Policy Group |
| MOU | Memorandum of Understanding |
| MS | Peace Corps Manual Section |
| OIG | Office of Inspector General |
| PCSSO | Peace Corps Safety and Security Officer |
| RSO | Regional Security Officer |
| SSC | Safety and Security Coordinator |
| SSDO | Safety and Security Desk Officer |
| VSO | Voluntary Service Overseas |

GLOSSARY

Acceptance Strategy. A method of mitigating safety and security threats or having the local communities control the threats on your behalf by gaining their consent and acceptance for your presence and your work.

Peace Corps Safety and Security Officer. Peace Corps U.S. direct hire personnel assigned to the field to serve as safety and security consultants to the posts in the sub-regions under their responsibility. They provide overseas posts with guidance and training to implement a Volunteer safety and security system that is most appropriate for the environment for the post and in accordance with agency policies and priorities.

Regional Security Officer. Department of State DS special agents, assigned to U.S. diplomatic missions overseas. They serve as the personal advisor to the ambassador or chief of mission on all security issues. Their responsibilities include, but are not limited to: coordinating all aspects of a mission's security program; developing and implementing effective security programs to protect U.S. government employees; providing unclassified security briefings and advice to U.S. business executives overseas; and serving as the primary liaison with foreign police and security services overseas in an effort to obtain support for U.S. law enforcement initiatives and investigations.

Safety and Security Coordinator. Peace Corps position located at a post and assigned to augment and support senior staff security-related functions. The position reports to the country director and is typically a host country national. See appendix C for an example of this position's statement of work.

Safety and Security Desk Officer. Peace Corps position assigned to the regions that reports to the region's chief of operations. The position provides support to regional senior management in developing, integrating, and monitoring regional safety and security activities, training, data compilation, analysis, and

APPENDIX A

other relevant initiatives.

Staging. A brief, intense orientation to the Peace Corps and the general demands of being a healthy, safe, and effective Volunteer prior to departure overseas. The purpose of staging is to register trainees, give a general orientation to Peace Corps, and allow some time for reflection on commitment to service and personal responsibility in maintaining one's health and safety.

Standard Operating Procedures. Formally established procedures for carrying out particular operations or dealing with particular situations, written specifically to prevent an incident happening, to survive an incident, or to follow as part of the agency's incident and crisis management.

PCSSO AND SSDO RESPONSIBILITIES

The following table is a comparison of PCSSO and SSDO responsibilities based on the FY 2009 position descriptions.

| Comparison of PCSSO and SSDO Roles and Responsibilities | | |
|--|---|---|
| Area of Responsibility | PCSSO | SSDO |
| Safety and Security Policy | Develops new policies, procedures, and guidelines. Assesses the impacts of changes on operations. | No roles or responsibilities listed. |
| Safety and Security Trend Analysis | Collects and analyzes post and sub-regional information and communicates information to stakeholders. | Analyzes post, regional, and sub-regional information and provides to posts and regional management. Assesses trends in regional safety and security concerns and issues and drafts strategies and responses. |
| Recommending Improvements | Provides guidance to address problems and concerns and develops recommendations and alternative solutions to minimize and mitigate risks. | Compiles and prepares reports on safety and security activities for the purpose of recommending optimum procedures and program management guidance to region. |
| Expert Knowledge | Serves as an agency technical authority with respect to policy impacts on the agency's security programs and operations. | Maintains an expert knowledge of the regions' safety and security strategies and trends. |
| Post MS 270 Compliance | Provides managers and employees with information on interpretation of agency security guides. | Provides MS 270 compliance technical support, clarifies agency safety policy, responds to direct inquiries, answers questions, and analyzes files from posts. Monitors MS 270 compliance. |
| Crisis Management | Facilitates crisis management and emergency preparedness processes, including the development and testing of emergency action plans and training of Volunteers and staff. | Under specific direction of the regional director and region's chief of operations, assists in management of regional safety and security crisis situations as they arise. |
| Emergency Planning | Collaborates with the post in developing crisis management and emergency action plans and response strategies. | Provides technical support to posts regarding post-specific emergency planning process. Reviews emergency action plans with staff from the Office of Safety and Security. |
| Information Sharing | Collects and disseminates resources and best practices to posts through participation and facilitation at workshops, conferences, and joint training events. | Develops specific implementation strategies to promote information dissemination and exchange among security and safety oriented organizations and among assigned program offices. |

APPENDIX B

| Comparison of PCSSO and SSDO Roles and Responsibilities (cont'd) | | |
|---|--|--|
| Area of Responsibility | PCSSO | SSDO |
| Training | <p>Evaluates existing training programs and assists and facilitates development of guidelines and modules for regions.</p> <p>Identifies training needs and develops and delivers non-standard security courses covering advanced subject matter areas.</p> <p>Assists in the training of new SSCs at posts. Participates in pre-service and in-service trainings. Plans and conducts workshops, conferences, and joint training events for multiple sub-regional posts.</p> | <p>Evaluates existing training programs and procedures and develops guidelines and modules for the regions.</p> <p>Occasionally delivers non-standard security courses covering advanced technical systems or subject matter areas.</p> |
| Regional Support | No roles or responsibilities listed. | Assesses and updates region's emergency action plan. Performs record-keeping and compiles reports for the region. Acts as a liaison with PCSSOs. Recommends safety and security priorities for allocation of budget and staff resources. |
| New Country Assessment | Visits posts to assess the socio-economic, political, and criminal climate and its impact on Volunteer safety and security. Conducts risk assessments and recommends a series of strategies to improve post's posture in reducing security risks and minimizing crimes against Volunteers. | Assists in the new country entry or re-entry assessments. |
| Interagency Relationship | Acts as liaison with RSO. Serves as technical expert by using policies and procedures to assist in development and maintenance of relationships with stakeholders. | No roles or responsibilities listed. |
| Criminal Investigative Liaison | Establishes and maintains relationship with state, local entities, and industries affected by the agency's programs. Creates processes to enable the agency to pursue collaborative arrangements and relationships with federal, state, and local government agencies. | No roles or responsibilities listed. |

SSC STATEMENT OF WORK TEMPLATE

Regions provide the following statement of work as an example to posts when filling a vacant SSC position.

SAFETY AND SECURITY COORDINATOR

The Safety and Security Coordinator reports to the Country Director (CD) and provides safety and security support to post. The role of the incumbent is to augment and support, not assume responsibility for, senior staff security-related functions (i.e., site inspection and selection, Peace Corps Volunteer (PCV) site visits, revising the Emergency Action Plan). Overall the SSC has primary responsibility to monitor and maintain appropriate documentation regarding post compliance with MS 270. Also, under the direct supervision of the Country Director, the incumbent may be the contact point with the Peace Corps Safety and Security Officers (PCSSO), Safety and Security Desk Officers, Embassy security officials, and local law enforcement agencies in carrying out the responsibilities designated below or as directed by the Country Director. The incumbent must have sufficient English and local language skills to carry out these duties.

RESPONSIBILITIES

MS 270 Compliance:

1. Develops and maintains a legible and orderly system of compiling, reporting, and filing safety and security incident reports, local media reports with safety implications, safety and security directives from Peace Corps Headquarters, the US Embassy and post. This information must be made accessible to appropriate post staff as required.

2. Provides administrative support for MS 270 verification, ensuring that adequate systems are functioning to support Volunteer safety and security. This can include, but is not limited to:
 - Ensuring that all site locator forms are recorded in the office, current, and PCV communication access is accurate. Updates as required.
 - Ensuring that all site history forms are available, integrated and computerized, filed geographically, and up-to-date.
 - Works with the training manager to ensure that all safety and security training competencies are integrated into Pre-Service Training/In-Service Training (PST/IST) and verified with a written report.
 - Ensuring that all Volunteer site selection criteria and visits are documented and filed appropriately.
 - Maintains PCV travel/out of site log.

APPENDIX C

- Regularly updates and monitors safety and security data in the VIDA database (i.e. Volunteers, Consolidation Points, EAP events, sites, reports, etc.)
3. Participates in staff meetings (both general staff meetings and senior staff meetings at the discretion of the CD), discussions and activities and makes recommendations for changes in program policy and procedures as they relate to Volunteer safety and security.
 4. Establishes and maintains open communication with both the regional PCSSO and the Safety and Security Desk Officer, informing them of both problems and progress in the country, such as major incidents, changes in crime data and other information on new policies or programs affecting safety and security.
 5. Develops and maintains contact with Embassy security staff and local law enforcement to obtain crime updates and information needed for assessing the security of existing and potential Volunteer sites.
 6. Under guidance from the CD, serves as post's primary safety and security contact/intermediary with other non-governmental organizations, volunteer sending organizations (i.e. VSO, JICA/JOCV, SNV, UNV, etc.) and other development agencies.

Information Sharing:

7. Develops and organizes safety and security resources such as manuals, books, leaflets, pamphlets, slides, videos, and memos and makes their contents and Peace Corps policies known to staff and Volunteers.
8. Maintains post crime statistics and reviews (analyzes) trends.

Training:

9. Participates in the design, development and delivery of PST and IST sessions in the areas of personal safety and security. Participates in staff and guard safety and security training, as appropriate.
10. With the training manager, participates in the selection and orientation of home-stay families for PST, as appropriate.

Site Selection and Monitoring:

11. Works with the Peace Corps Medical Officer (PCMO) and Associate Peace Corps Directors (APCDs) to develop and maintain Volunteer site and housing selection criteria and procedures. Participates in site visits as appropriate.

APPENDIX C

12. Updates village and home-stay safety and security checklist, guidelines and policies.
13. Provides advice to APCDs regarding site placements and/or Volunteer site changes.

Incident Reporting and Response:

14. Works closely with the CD to develop reporting and follow-up procedures for incidents reported by Volunteers (housing inspection, police follow-up, property damage, etc.).
15. Ensures that reportable incidents are communicated to the CD for coordination with the Office of Inspector General (OIG). Coordinates follow-up activities as appropriate.
16. Helps coordinate PCV and local Police contacts/communication in the incident reporting process as needed.

EAP Planning and testing:

17. Under the direction of the CD, coordinates the testing of the EAP with staff at least once per year. In collaboration with other staff, prepares a written report of the results of the EAP test and distributes it to all interested parties. Assists with EAP revisions as needed.

Other Duties:

18. In collaboration with the CD, follows-up on recommendations from PCSSO visits.
19. In collaboration with the CD/PCSSO/General Services Officer (GSO), follows up on Regional Security Officer (RSO) security recommendations for the Peace Corps office and staff residences.
20. Performs other safety and security duties as assigned by the Country Director.

PEOPLE IN AID SECURITY POLICY

People in Aid provides the following example of a safety and security policy in its “Promoting Good Practice in the Management and Support of Aid Personnel,” 2008 revision.

Organizational Pre-requisites/commitment

- A value statement relating to the safety and security of personnel
- A statement defining safety and security
- An organizational location for security preparedness and coordination. E.g. A Security Officer
- A Crisis Management strategy
- Incident analysis and evaluation component
- A budget allocated to security training and implementation
- A statement defining organizational relationship with local and international legal provisions
- A statement regarding relationship with armed guards or military units
- A statement clearly outlining the organizations policy on kidnapping for ransom
- Provision of health and other insurance cover for personnel

Key components of a security policy

- Statement as to who is responsible for designing and modifying the policy
- Process of evaluation of policy. Who reviews it and how often?
- A process of risk assessment incorporated at all levels
- Choice of a Security Strategy. Who chooses and may the strategy be changed?
 - Acceptance
 - Protection
 - Deterrence
- Crisis Management Team
- Stress and Trauma Management
- Coverage by the policy. Does this include all staff as well as dependents?
- Statement on individual responsibility for staff to reduce exposure to risk
- Media relations
- Training processes for all personnel covered by the policy
- Evacuation plan for staff from high-risk environments
- Contingency plans for other emergencies
 - Medical emergencies
 - Kidnapping
 - Natural disasters
- Standard operating procedures
 - Money
 - Communications
 - Vehicles
 - Mines
 - Organizational assets
 - Data and document storage
 - Incident reporting
 - Site selection
 - Visitor security

AGENCY COMMENTS TO THE PRELIMINARY REPORT

We received comments to our preliminary report from Peace Corps management addressing all 28 recommendations. Additional comments were received from the Department of State, Bureau of Diplomatic Security. Both agency and Department of State comments received are included in the following pages.



MEMORANDUM TO THE INSPECTOR GENERAL

To: Kathy Buller, Inspector General

From: The Office of the Director

CC: Stacy Rhodes, Chief of Staff *WR Rhodes*
Edward C. Hobson, Associate Director for Safety and Security
Esther Benjamin, Associate Director of Global Operations
Roger Conrad, Acting RD Inter-America and Pacific Region
Lynn Foden, Acting RD Africa Region
David Burgess, Acting RD Europe, Mediterranean and Asia Region
Carl Sosebee, General Counsel
Bill Rubin, Deputy General Counsel
Rosie Mauk, AD Volunteer Recruitment and Selection
Thomas Bellamy, Acting Chief Financial Officer
Carey Fountain, Chief Acquisition Officer
Nicola Cullen, Policy & Program Analyst

Date: April 12, 2010

Subject: Response to Preliminary Audit Report: Peace Corps Volunteer Safety and Security Program

This is a joint response to the recommendations made by the Office of the Inspector General regarding Volunteer Safety and Security as outlined in the Preliminary Audit Report: Peace Corps Volunteer Safety and Security Program, dated February 2010.

The Office of Inspector General (OIG) recommendations are numbered 1 through 28. Appearing immediately after each recommendation and labeled as Disposition is the Peace Corps response.

The agency concurs with 27 and partially concurs with 1 of 28 recommendations.

1. That the Director reevaluate the organizational structure related to the safety and security functions and establish clear lines of authority to ensure the Office of Safety and Security can manage the agency's safety and security program.

Disposition: *CONCUR*

2. That the associate director for safety and security work with the associate director of global operations to review the roles and responsibilities of the safety and security desk officers and clarify the differences between the safety and security desk officers and Peace Corps safety and security officers to eliminate unnecessary duplication and ensure the Office of Safety and Security has oversight over all safety and security functions in accordance with the Peace Corps manual section 130.

Disposition: *CONCUR*

3. That the associate director for global operations develop standard operating procedures for the safety and security desk officer position based on the revised roles and responsibilities.

Disposition: *CONCUR*

4. That the associate director for safety and security work with the associate director of global operations and the chief financial officer to develop a process to involve the Office of Safety and Security in posts' budget planning for safety and security expenses and in formulating the recommendation to the Director for posts safety and security needs.

Disposition: *CONCUR*. The process of budgeting Safety and Security expenditures at posts will be included in the agency review of Volunteer safety and security.

5. That the Director ensures that Peace Corps develop and implement a process that adequately tracks Peace Corps safety and security officer recommendations and ensures that corrective actions are taken in a timely manner. The process should define roles and responsibilities of responsible personnel and hold them accountable for implementation.

Disposition: *CONCUR*

6. That the associate director of global operations develop a clearly defined process that identifies and establishes corrective actions for posts that repeatedly submit incident reports late.

Disposition: *CONCUR*. The Associate Director of Global Operations will review the existing process that identifies late submissions.

7. That the associate director of global operations reiterate to the regions and all posts the importance of timely reports and formalize the abovementioned process through a policy memorandum or Peace Corps Manual section.

Disposition: *CONCUR*. Based on the outcomes of recommendation six, corrective actions will be developed and communicated to all posts, as appropriate.

8. That the chief compliance officer, in conjunction with the associate director for safety and security, establish a process to identify reoccurring safety and security issues and to take

necessary steps to address these issues through additional guidance, clarification, or other action.

Disposition: *CONCUR*

9. That the associate director for safety and security, in conjunction with the associate director of global operations, develop a process to track post compliance with the Peace Corps policies requiring post staff to have background investigations and signed intelligence background information certifications.

Disposition: *CONCUR*

10. That the associate director of global operations require posts to use the Administrative Management Control Survey, or at a minimum the safety and security section, to ensure that posts continue to review and assess compliance with Peace Corps Manual section 270.

Disposition: *CONCUR*. The FY 2011-2013 IPBS guidance indicates that all posts are expected to complete the AMCS. The Associate Director of Global Operations will require posts to use AMCS through a policy memo.

11. That the Director provide the Office of Safety and Security with the mandate, authority, and resources to review post responses to the safety and security sections of the Administrative Management Control Survey and use them to provide guidance on areas of weakness and provide assistance, as appropriate, when posts report non-compliance.

Disposition: *CONCUR*. The Director will ensure that guidance is provided to the field that will authorize the Office of Safety and Security to review the AMCS and to use post responses as a basis for providing guidance and technical assistance.

12. That the associate director of global operations work with the associate director for safety and security and post personnel to review the safety and security coordinator position and determine the needed safety and security coordinator roles and responsibilities.

Disposition: *CONCUR*

13. That the associate director of global operations, in coordination with the general counsel, update the safety and security coordinator position's statement of work and define minimum skills and education, as well as the position descriptions for all personnel at post with safety and security responsibilities, based on the review of safety and security coordinator roles and responsibilities.

Disposition: *CONCUR*. The Associate Director of Global Operations, in coordination with the Associate Director for Safety and Security and the Chief Acquisition Officer, will review the SSC SOWs and update the roles and responsibilities, as appropriate.

14. That the associate director for safety and security work with the associate director of global operations and post personnel to determine an appropriate pay grades for safety and security coordinators based on the updated review of the safety and security coordinator role and responsibilities.

Disposition: *CONCUR*

15. That the associate director for safety and security work with the associate director of global operations and post personnel to assess the need for additional safety and security personnel at posts and develop a standard evaluation process for determining the required number of staff.

Disposition: *CONCUR*

16. That the associate director for safety and security work with the associate director of global operations to reassess the Peace Corps safety and security officer roles and responsibilities and revise the job description accordingly.

Disposition: *CONCUR*

17. That the associate director for safety and security work with the associate director of global operations to analyze whether the posting of each Peace Corps safety and security officer enhances safety and security and is the most efficient, effective, and cost effective placement. If needed, relocate Peace Corps safety and security officers accordingly.

Disposition: *CONCUR*. The Associate Director of Global Operations will work with the Associate Director for Safety and Security to review the posting of PCSSOs. This analysis will be based on findings from the analysis undertaken as a result of several of the recommendations in this report.

18. That the associate director for safety and security develop and implement a training program for Peace Corps safety and security officers based on updated descriptions of their roles, responsibilities, and needed skills.

Disposition: *CONCUR*

19. That the associate director for safety and security work with the associate director of global operations to develop and implement a training program for safety and security coordinators based on updated descriptions of their roles, responsibilities, and needed skills.

Disposition: *CONCUR*

20. That the Director allocate sufficient resources to implement safety and security coordinator and Peace Corps safety and security officer trainings.

Disposition: *CONCUR*

21. That the associate director for safety and security coordinate an agency-wide effort to develop, document and disseminate a comprehensive safety and security plan that includes the agency's safety and security strategy, security risks, and policies to mitigate those risks.

Disposition: *CONCUR*

22. That the associate director for safety and security work with the associate director of global operations to consolidate the standard operating procedures for safety and security coordinators and ensure the agency has a procedure for all security issues.

Disposition: *CONCUR*. At the conclusion of the agency's study of safety and security, the Associate Director for Safety and Security will develop SSIs for all major security issues.

23. **That the associate director for safety and security work with the associate director for volunteer recruitment and selection to provide Volunteers with a consolidated handbook on the basic principles of Volunteer safety during the recruitment and staging processes.**

Disposition: *CONCUR*. However, we would like to note that until a Volunteer swears in, he or she is a trainee not a Volunteer.

24. **24. That the associate director of global operations, in conjunction with the associate director for safety and security and the associate director for volunteer recruitment and selection, develop a code of conduct or list of basic security principles that Volunteers must sign before departure to ensure Volunteers know their responsibilities and accept the risks involved with serving overseas.**

Disposition: *CONCUR*. However, we would like to note that until a Volunteer swears in, he or she is a trainee not a Volunteer.

25. **That associate director for volunteer recruitment and selection work with the associate director for safety and security to ensure the information presented to Volunteers at staging adequately addresses security risks, teaches steps to mitigate those risks, and identifies key Peace Corps personnel involved in the security process.**

Disposition: *PARTIALLY CONCUR*. The Associate Director for Safety and Security has and will continue to collaborate with the Associate Director for Volunteer Recruitment and Selection regarding the content of the training provided at staging. However, it has been determined that Staging is not the most appropriate venue for attempting to teach mitigation strategies, particularly since much of this information is post-specific. The Office of Safety and Security continues to work with the Global Operations and OPATS to improve the quality of safety and security training that is provided during PST. The Office of Safety and Security will work with Volunteer Recruitment and Selection to review the safety and security content that is presented at Staging.

26. **That the associate director for safety and security update Peace Corps Manual sections 130 and 270 to include the roles and responsibilities of the current safety and security offices and key positions.**

Disposition: *CONCUR*. The Associate Director for Safety and Security will update MS 270 and 130.

27. **That the chief of staff direct the update to Peace Corps Manual section 340 to include the roles and responsibilities of the Office of Safety and Security and the Office of Medical Services.**

Disposition: *CONCUR*. The Chief of Staff will direct that MS 340 be updated to include the roles and responsibilities of the Office of Safety and Security and the Office of Medical Services.

28. **That the Director, in conjunction with the associate director for safety and security, develop formal documentation with the Department of State Bureau of Diplomatic Security to clarify the roles and responsibilities for overseas safety and security regarding Peace Corps staff and Peace Corps Volunteers.**

Disposition: *CONCUR*



COMMENTS ON OIG DRAFT REPORT ON PEACE CORPS VOLUNTEER
SAFETY AND SECURITY PROGRAM

Observations

1. DS Comment 1 on entire Report:

Comment: A new MOU with Peace Corps outlining the responsibilities of the RSO, the Bureau of Diplomatic Security, and the Department of State related to the Safety and Security of Peace Corps personnel, including both direct hire and volunteers, is an absolute necessity. DS transmitted two cables in 2009 related to DS support to Peace Corps in the area of safety and security. The cable numbers were not noted in the report – IP recommends the cable numbers be included, STATE 12291 and STATE 12309. The continuing confusion among RSOs over their role related to support to Peace Corps even after the release of these two cables in 2009, points out the need for a MOU.

2. DS Comment 2 on entire Report:

Comment - In the area of training – Peace Corps made no mention of the two-week course that DS developed / delivered for Peace Corps (specifically for the PCSSOs) in 2003. DS provided the record of this training to the members of the audit team. DS does have a relationship with Peace Corps (they brief in the BRSO program), but has not provided formal training to them since 2003, other than briefings provided by our external briefing team.

3. **Recommendation 18:** *That the associate director for safety and security develop and implement a training program for Peace Corps safety and security officers based on updated descriptions of their roles, responsibilities and needed skills. (page 50)*

Comment - DS is offering assistance to Peace Corps in responding to this recommendation.



Recommendation 19: *That the associate director for safety and security work with the associate director of global operations to develop and implement a training program for safety and security coordinators based on updated descriptions of their roles, responsibilities, and needed skills. (page 50)*

Comment: DS is offering assistance to Peace Corps in responding to this recommendation.

4. **Recommendation 21:** *That the associate director for safety and security coordinate an agency-wide effort to develop, document and disseminate a comprehensive safety and security plan that includes the agency's safety and security strategy, security risks, and policies to mitigate those risks. (page 50)*

Comment: DS is offering assistance to Peace Corps in responding to this recommendation.

5. **Recommendation 22:** *That the associate director for safety and security work with the associate director of global operations to consolidate the standard operating procedures for safety and security coordinators and ensure the agency has a procedure for all major security issues. (page 51)*

Comment: DS is offering assistance to Peace Corps in responding to this recommendation.

OIG COMMENTS

When comments on OIG reports are received, they are evaluated to ensure (1) all findings and recommendations raised in the preliminary report are addressed, (2) estimated completion dates of action are reasonable, and (3) comments are responsive.

Of the 28 recommendations made in our audit report, management fully concurred with 27 recommendations, partially concurred with one recommendation. However, management's comments were incomplete and not fully responsive to the audit report and recommendations. Management's comments did not provide specific actions or timeframes to address our audit findings and recommendation. As a result, we were unable to close any the recommendations.

We request that the Chief Compliance Officer work with management officials to develop a concrete strategy to address the findings and recommendations in our report including planned corrective actions and timeframes for completion of each corrective action.

AUDIT COMPLETION AND OIG CONTACT

AUDIT COMPLETION

This audit was a combined effort by auditors and evaluators conducted by the following:

- Mr. Gerry Montoya, Assistant Inspector General for Audit
- Ms. Susan Gasper, Senior Evaluation
- Mr. Brad Grubb, Senior auditor
- Ms. Heather Robinson, evaluator

OIG CONTACT

If you wish to comment on the quality or usefulness of this report to help us strengthen our product, please email Gerald P. Montoya, Assistant Inspector General for Audit, at gmontoya@peacecorps.gov, telephone 202.692.2907 or Jim O'Keefe, Assistant Inspector General for Evaluations, at jokeefe@peacecorps.gov, telephone 202.692.2904.

REPORT FRAUD, WASTE, ABUSE, AND MISMANAGEMENT

Fraud, waste, abuse, and mismanagement in government affect everyone from Peace Corps Volunteers to agency employees to the general public. We actively solicit allegations of inefficient and wasteful practices, fraud, abuse, and mismanagement related to Peace Corps operations domestically or abroad. You can report allegations to us in several ways, and you may remain anonymous.

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**Peace Corps
Office of Inspector General
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