

## **Final Report**

Evaluation of Human Resources Management for Overseas Contract Staff

IG-23-08-E September 2023

## **EXECUTIVE SUMMARY**

#### **OVERVIEW**

The Peace Corps employs more than 3,400 staff who help execute the agency mission and serve on the front lines of the Volunteer experience. Approximately 92 percent of staff at overseas posts are personal services contractors (PSCs), who also make up 70 percent of all Peace Corps staff. A significant part of the agency's success depends on how well it manages its human resources operations to hire, train, and retain quality PSC staff. Our evaluation assesses the agency's human resources management for overseas PSCs, focusing on the posts' operations and the support they receive from agency offices and staff. We did not measure PSC satisfaction with human resources services or address the human resources management of the agency's direct hire staff.<sup>1</sup>

#### WHAT WE FOUND

OIG determined that the agency's management of human resources for PSCs was adequate. We identified some strengths and highlighted other areas where the agency provided sufficient support. However, we also identified areas for the agency's attention to improve effectiveness and efficiency. We found that no single office or individual was responsible for managing human resources for PSCs, making it difficult for the agency to coordinate its resources and expertise to identify and support the needs of PSC human resources management. We also found that key human resources managers at posts were not sufficiently trained and that the complex overseas human resources management functions that fall outside of PSC contract administration and management were not adequately supported. In addition, the agency was not conducting effective oversight for the collection and analysis of human resources management data and feedback.

Our review revealed the need for improved management policy and guidance. The agency recently completed The Overseas Contracting Handbook, which compiles all agency human resources policies into one document; however, human resources managers still required additional guidance for their work in hiring, managing grievances, reviewing and updating staff handbooks, and implementing awards for PSC staff.

#### **RECOMMENDATIONS IN BRIEF**

Our report contains nine recommendations, which, if implemented, should strengthen post operations and correct the deficiencies detailed in the accompanying report.

<sup>&</sup>lt;sup>1</sup> Direct hire staff are United States citizens or foreign service nationals (FSNs) who are employees of the U.S. government.

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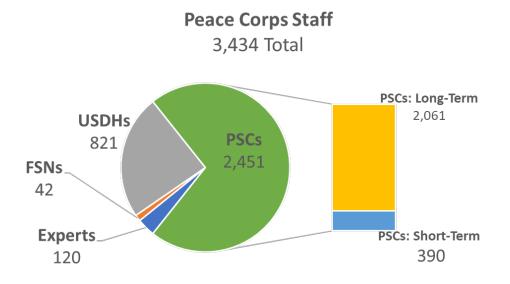
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## BACKGROUND

Personal services contractors (PSCs) are individuals who sign contracts with the Peace Corps to fill staffing needs at overseas posts.<sup>2</sup> A personal services contract is characterized by the employer-employee relationship it creates between the Government and the contractor<sup>3</sup>. Peace Corps Manual Section (MS) 732 states that Peace Corps awards personal services contracts to "permanent host-country residents and nationals" and "permanent residents of countries other than the host country who are not host country nationals."

Per MS 732, Peace Corps considers PSCs to be employees of the U.S. Government, with the conditions of their service outlined in their contracts.<sup>4</sup> The manual section states that Peace Corps "manages, supervises, and directs all aspects of the contracted work being performed by the PSC, as it would the work performed by a direct hire employee." PSCs are critical to agency operations with responsibilities that include, but are not limited to, administration, finance, programming, training, and Volunteer support duties, with many PSCs serving in leadership positions at the posts and directly supervising staff. PSCs also play a significant role in supporting Peace Corps Volunteers' effective management of their work, health, and safety.

PSCs constitute the largest segment of the agency's staff. As of 2022, 71% of the agency's 3,434 total staff were PSCs.



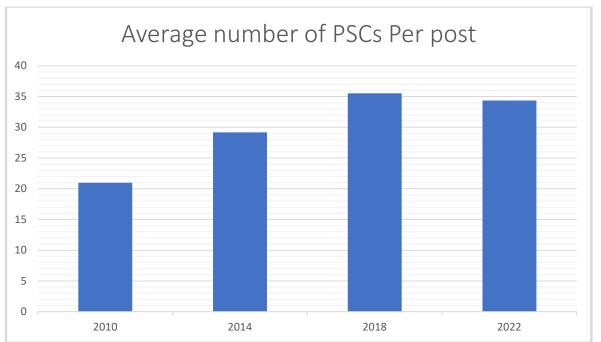
Source: 2022 data from OCFO and Office of Human Resources.

<sup>3</sup> 48 C.F.R. § 37.104

<sup>&</sup>lt;sup>2</sup> Federal law prohibits agencies from awarding personal services contracts unless specifically authorized by statute to do so. The Peace Corps Act authorizes Peace Corps to employ contractors. *See* 22 U.S.C. § 2509(a)(5).

<sup>&</sup>lt;sup>4</sup> See also 22 U.S.C. § 2509(a)(5).

As of 2022, PSCs made up approximately 92% of all post staff. The average number of long-term PSCs per post has increased by approximately 64 percent since 2010, from 1,615 PSCs in 2010 to more than 2,000 in 2022, though this growth has leveled off since 2018.<sup>5</sup>



Source: 2010 data from the 2010 Report entitled "The Peace Corps: A Comprehensive Agency Assessment Report" and 2014, 2018, and 2022 data provided by the OCFO

Managing human resources functions and tasks for such a large and critically important cohort of staff requires effective execution and coordination at the posts and across the agency. Each post, regardless of its size, must successfully hire, train, manage, and retain its staff or risk failure in achieving the agency's mission to support host country communities and its Volunteers. The Peace Corps Office of Inspector General (OIG) began this project based on feedback from post and headquarters staff who reported that Peace Corps' posts need more support managing human resources for PSCs. This evaluation provides the Peace Corps with information that should help the agency leverage resources and expertise that will help posts to better manage these human resources responsibilities.

<sup>&</sup>lt;sup>5</sup> The average number of PSCs per post increased from 20.97 in 2010 to 34.35 in 2022.

## **OBJECTIVE, SCOPE, AND METHODOLOGY**

#### **OBJECTIVE**

To assess the adequacy of Peace Corps' management of human resources for its overseas contract staff, or PSCs, we reviewed the following researchable questions:

- How is the agency's management of human resources for PSCs organized?
- Is agency oversight of the management of human resources for PSCs sufficient?
- Are policies and guidance for human resources management for PSCs clear and effective?
- Are Peace Corps staff trained sufficiently for their PSC human resources management duties?
- Is human resources management for PSCs adequately resourced?
- Does the agency strategically plan for the management of human resources for PSCs?
- How do other Federal agencies manage human resources for their overseas contract staff?

#### **SCOPE**

On May 21, 2021, OIG announced its review of the Peace Corps' management of human resources for its overseas contract staff. The OIG developed the evaluation objective and researchable questions after conducting staff interviews and document reviews prior to announcing the project to the agency. During this development phase of the project, we encouraged staff with whom we spoke to provide any significant information regarding the management of human resources for PSCs, ranging from hiring post personnel to the conclusion of PSC staff tenure. Our review included human resources management for both long- and short-term PSCs during the period between 2018 to 2022.<sup>6</sup>

Unless stated otherwise, the terms "human resources management" and "management of human resources" used in this report refer to human resources management specific to overseas PSCs, not for United States Direct Hires (USDH) or Foreign Service National (FSN) overseas staff. Currently, there are approximately 3 USDHs assigned to each overseas post and 42 FSN staff located worldwide, who receive human resources services primarily from U.S. embassies. "Human resources management," as used in this report, does not refer to any office of human resources.

<sup>&</sup>lt;sup>6</sup> Long-term contracts have contractual terms of service of more than 260 workdays, short-term contracts have contractual terms of service of less than 260 workdays.

#### Methodology

This evaluation was conducted in accordance with Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation* (2020).

#### Human Resources Managers

To help us address the adequacy of human resources operations for PSCs, we focused on the work performed by post staff who had the most significant responsibilities for human resources operations. This report refers to "human resources managers" as post staff who are responsible for managing human resources for PSCs. OIG coordinated with each regional chief administrative officer to identify the human resources managers at each post. The types of human resources managers identified include overseas contract officers (OCO),<sup>7</sup> human resources specialists and assistants, PSC supervisors, country directors (CD), directors of management operations (DMO), and directors of programming and training (DPT).

#### Staff Interviews<sup>8</sup>

We randomly selected and interviewed one human resource manager from one large post and one small post in the three Peace Corps regions: Africa region (AF); Europe, Mediterranean, and Asia region (EMA); and Inter-America and the Pacific region (IAP). In addition, OIG interviewed various headquarters staff who had human resources management support responsibilities for overseas posts. We also interviewed staff who approached us to share information or their perspective on the subject, along with staff we sought out based on evidence and feedback that came up over the course of the evaluation.

#### Staff Survey

We conducted a virtual survey of 622 human resources managers across all posts, with a response rate of 71%.

#### **Documentation Review**

We reviewed documentation collected from Peace Corps, including the same set of documents from two large and two small posts from each region.<sup>9</sup>

#### Information External to Peace Corps

We reviewed information, legislation, and websites from other Federal agencies.

<sup>&</sup>lt;sup>7</sup> Most posts have two OCOs, which typically consist of the director of management operations and a local staff member, usually a financial specialist or deputy director of management of operations, who could be a PSC or a Foreign Service National.

<sup>&</sup>lt;sup>8</sup> See Appendix A for list of interviewees.

<sup>&</sup>lt;sup>9</sup> See Appendix B for the evaluation document request sent to the Agency on May 21, 2021.

### **EVALUATION RESULTS**

OIG determined that Peace Corps' management of human resources for PSCs was adequate in some areas, however, we identified multiple areas for improvement which we describe in this section.

#### **ORGANIZATION OF HUMAN RESOURCES MANAGEMENT**

We asked the following researchable question to help us achieve our project objective:

How is the agency's management of human resources for PSCs organized?

Human resources for PSCs are managed at the posts and supported by headquarters offices. There is some consistency in how human resources management is organized across posts – the CD oversees administrative and human resources functions; the DMO administers post's human resources management system; two OCOs, usually the DMO and a financial specialist or assistant or the deputy director of management operations (DDMO) administer PSC contracts; and other staff who directly supervise PSCs.<sup>10</sup> Posts differ in how transactional human resources management tasks, such as timekeeping, processing insurance claims, or coordinating staff training, are assigned to staff. We found that PSC human resources management was supported by human resources specialists or assistants at some posts, regardless of size, while other posts did not have any dedicated human resources staff members.

Policy, guidance, and support for human resources management for PSCs is provided by several headquarters' offices:

The three regional offices (AF, EMA, IAP) "direct the management and support for countrylevel operations" for PSCs.

Office of General Counsel (OGC) provides legal advice and services regarding the management of PSCs.

Office of the Chief Financial Officer (OCFO), particularly the Office of Acquisition and Contract Management (OACM) and the Office of Global Accounts Payable/Volunteer and PSC Financial Services (VPS), provides administrative support and guidance for the management of human resources for PSCs.

Additionally, the Office of Global Operations (OGO) coordinates the management of overseas operations promoting efficiencies and "disseminating best practices among the regions." The overseas contracting council, which provides recommendations and approves procedures regarding PSC management, consists of representatives from the Office of the Director, OGO, the Office of Health Services, the Office of Global Health and HIV, OGC, OCFO, the Office of the Chief Information Officer (OCIO), the Office of Safety and Security, the Office of

<sup>&</sup>lt;sup>10</sup> Examples of staff who supervise PSCs at posts from which we requested documents include the director of programming and training along with program managers, training managers, general service managers, DDMO, and language or cross-culture coordinators.

#### PEACE CORPS OFFICE OF INSPECTOR GENERAL

Management, the Office of Human Resources, the Office of Overseas Programming and Training Support (OPATS), and the three regions. A separate benefits committee comprised of regional chief administrative officers (CAO), OACM staff, and OGC addresses PSC benefits and administration.

Some agency offices support human resources management for specific PSC positions, such as the Office of Safety and Security, which is involved in training post safety and security managers and assistants, and the Office of Medical Services, which is involved in hiring and training Peace Corps medical officers. In addition, the Office of Staff Learning and Development and OCIO provide resources and expertise that assist post staff with their human resources management responsibilities.

While the headquarters Office of Human Resources supports overseas and domestic direct hire employees, it does not have a significant role in the management of human resources for overseas PSCs.

Based on our observations, we identified some strengths in the agency's organization of human resources management. Many posts have staff with the necessary skills to effectively manage PSC human resources. Headquarters offices support human resources management by providing the posts with resources, such as the Overseas Contracting Handbook (OCH), and training, such as Foundations of Supervision – A Course for New PSCs Supervisors. We also found that human resources managers at the posts collaborated effectively with relevant headquarters offices to address specific human resources management situations as they arise.

#### AREA OF ORGANIZATION THAT REQUIRES MANAGEMENT ATTENTION

## The agency does not have a position that is responsible for the management of human resources for overseas PSCs.

Responsibilities for human resources management for PSCs were spread among multiple offices at headquarters and did not have a lead or "owner;" someone who has the overarching responsibility for managing human resources for PSCs and can coordinate support from key offices. We found that, since there is no lead coordinator, the agency has struggled to effectively organize overseas staff training, provide sufficient assistance to human resources managers in position classification and compensation, ensure that the posts have the required staff performance awards program,<sup>11</sup> and oversee the agency's overall human resources management. Numerous staff have also reported that no one is sufficiently representing post IT needs for human resources management to the agency or OCIO. One staff member described how different offices were "pointing at each other" when asked about IT solutions for the management of human resources for PSCs.

<sup>&</sup>lt;sup>11</sup> More detail regarding performance awards is found in the Policy and Guidance section of this report.

PEACE CORPS OFFICE OF INSPECTOR GENERAL

We found that the responsibilities for human resources management for PSCs was spread among multiple offices at headquarters and did not have a lead or "owner," someone who has the overarching responsibility for managing human resources for PSCs and can coordinate support from key offices. The Government Accountability Office's (GAO) Standards for Internal Control in the Federal Government (Green Book) states that management should establish a "position in the organizational structure that is assigned an overall responsibility of the entity." This is consistent with the Government Performance and Results Modernization Act of 2010 (GPRA), which requires agency leadership to develop strategies, manage the program's execution, review performance, and

coordinate across the agency to achieve a goal. OIG determined that though some agency offices supported selected segments of human resources management, the overall complexity of PSC human resources management, which requires resources and expertise from multiple offices, needs substantial and sustained coordination.

#### We recommend:

1. The agency assigns a key role in the organizational structure that has the overall responsibility to manage human resources for overseas PSCs.

#### **OVERSIGHT OF HUMAN RESOURCES MANAGEMENT**

We answered the following researchable question to help us achieve our project objective:

Is agency oversight of the management of human resources for PSCs sufficient?

OIG determined a need for a more comprehensive and focused oversight of human resources management for PSCs, however, we also determined that some critical human resources functions received adequate attention or supervision. For example, the agency has effective

controls that ensure critical human resources management actions for PSCs are completed, such as contract renewals, salary payments, and mandatory trainings. Staff also reported effective communication between relevant offices and individuals regarding human resources management for PSCs. For example, the regions, OACM, and OGC met regularly to discuss situations that arise at the

The agency has effective controls that ensure critical human resources management actions for PSCs are completed, such as contract renewals, salary payments, and mandatory trainings.

posts, which included some human resources issues. OCOs and OACM communicated effectively about contracting challenges and post staff continually assess the performance of their

operations, which can include collaboration or emphasis on improving human resources management. In addition, at the time of our review, OACM was reviewing all local compensation plans (LCP) and posts' benefit attachments to ensure they aligned with PSC contracts.

#### AREA OF OVERSIGHT THAT REQUIRES MANAGEMENT ATTENTION

#### The agency has not conducted data-driven reviews for human resources management for PSCs.

The GPRA Modernization Act of 2010 requires that Federal agencies conduct "frequent datadriven reviews that guide decisions and actions to improve performance outcomes, manage risk, and reduce costs." OIG determined that the agency has not conducted data-driven reviews focused on human resources management for PSCs.

Without data-driven reviews, the agency does not have a complete, or "big-picture," understanding of the agency's management of human resources for PSCs. Key challenges remain insufficiently addressed, such as finding the right balance between human resources management and contract administration, determining how much time and effort staff spend managing human resources, or developing a management approach that improves agency standardization while supporting each post's unique needs. The agency has not sufficiently assessed how to support posts in managing the tasks that human resources managers have reported they need help with, such as hiring staff, classifying positions, creating and modifying statements of work (SOWs), supervising and managing employee performance, conducting labor relations, and managing staff grievances.

One reason for the agency's insufficient review of its management of human resources for PSCs is based on the agency's ineffective use of tools to collect relevant and timely data on the subject. For example, the Administrative Management Control Survey (AMCS) is one of the primary tools the agency uses to collect data about operations from the posts, even though it has not been required by the agency or used by posts in the few years preceding FY22, and the data was not rolled up to reflect a broad view of the results and feedback across multiple posts. In addition, the AMCS does not address the many human resources management challenges that we identified in this evaluation. Another key data collection tool, the Host-Country Staff Survey, collects information from PSCs about job training and staff development, but does not include human resources management issues. Proper data collection tools would help the agency conduct the necessary data-driven reviews that could improve performance outcomes, manage risk, and reduce costs related to human resources management for PSCs.

Additionally, the agency has not been conducting data-driven reviews because agency management's focus on human resources was not sufficiently comprehensive or proactive. For example, staff described an "ad hoc" approach by which leadership took a reactive approach to specific situations or problems as they arose, or would address smaller human resources components, such as contract administration, rather than a more wholistic solution to overarching human resources management challenges.

#### We recommend:

- 2. The agency creates or modifies data collection tools to gather the data necessary to conduct comprehensive reviews of human resources management for overseas PSCs that could improve performance outcomes and operational effectiveness.
- 3. The agency conducts a comprehensive review of human resources management for overseas PSCs to improve performance outcomes and operational effectiveness.
- 4. The agency develops a plan to implement improvements identified in the comprehensive review of human resources management for overseas PSCs.

#### **POLICY AND GUIDANCE**

We answered the following researchable question to help us achieve our project objective:

Are policies and guidance for human resources management for PSCs clear and effective?

OIG determined that policy and guidance improvements would benefit human resources management for PSCs in the areas of hiring, grievances, updating post staff handbooks, and presenting staff awards. However, the agency has clearly laid out many policies, guidance, and requirements for overseas PSCs in the Peace Corps Manual, the OCH, PSC contracts and benefits attachments, and the posts' staff handbooks.<sup>12</sup> In December 2021, OACM consolidated PSC guidance, which had been published in numerous OACM newsletters, into a central OCH chapter that provides procedures for implementing MS 732, the agency's policy for acquiring and administering PSC contracts. Staff reported that this chapter was clear, useful, and easy to find and understand. Additionally, OGO developed a global staff handbook template, which includes base information on agency policies and guidance that the posts can tailor to their local environment, creating an "easy to understand" handbook specific to each post.

#### AREAS OF POLICY AND GUIDANCE THAT REQUIRE MANAGEMENT ATTENTION

#### HIRING

#### The posts lack adequate processes in the recruitment and selection of PSC staff.

There is no agency requirement for the posts to establish hiring processes. And while the OCH provides some guidance for advertising positions, evaluating applications, interviewing applicants, and selecting candidates for PSC positions; OIG determined that guidance for hiring PSC staff required management attention.

<sup>&</sup>lt;sup>12</sup> Some Peace Corps guidance can also be found in the Overseas Financial Management Handbook.

We found that some posts lacked adequate processes for recruiting and selecting PSC staff. For example, staff reported that their posts' processes did not include steps for establishing timelines or identifying staff roles and responsibilities in the hiring process. Staff also stated that their hiring process was not supported by the necessary resources, such as procedural checklists, applicant interview questions, or skills tests.

Without adequate processes and resources in place for PSC recruitment and selection, staff have had to recreate the procedures each time they hire new PSCs. Staff reported that this inconsistent approach to hiring resulted in poor hiring decisions and poor applicant pools. Staff across different positions at multiple posts acknowledged that the hiring process at their respective posts took too long, that mistakes were identified late in the process, and that their posts' hiring activities were inconsistent and difficult to implement.

#### We recommend:

5. The agency ensures that each post establishes a hiring process that includes a standard timeline for hiring and clarifies the responsibilities of staff that have a role in the process.

#### GRIEVANCES

The agency lacks sufficient guidance for the management of PSC grievances.

Peace Corps MS 645 and 654 provide policies and procedures for PSC allegations of discrimination and harassment.<sup>13</sup> However, we determined that agency guidance for PSC grievances was an area that required management attention.

There are no grievance policies or procedures in the OCH that apply to PSCs and our survey revealed that 35% of CDs, 40% of DMOs, and 43% of DPTs did not have sufficient guidance to manage staff grievances. Some posts did not have grievance procedures or any policies at all, while other posts created ad-hoc processes with varying degrees of success. Several CDs said that they address grievances with "open-door" policies, which could be problematic if the CD is the cause of the grievance or staff do not trust post leadership. One post created an anonymous submission box for staff to place concerns for the CD to address, which were difficult to resolve since anonymous submissions could not be attributed to or directly resolved with an individual. One senior staff at a post revealed that staff use performance reviews to air grievances because there is no clear alternative mechanism. Multiple staff reported that management responded to grievances by referring them to the OIG.

<sup>&</sup>lt;sup>13</sup> Peace Corps MS 654 provides policies and procedures for PSCs to make and consider allegations of discrimination and MS 645 does the same for harassment.

OIG found that staff were dissatisfied with post leadership's management of internal grievances. Several senior staff at headquarters also reported that some of the posts were not prepared to properly manage grievances. One locally hired human resources manager stated that the posts "muddle through" grievances. Multiple DMOs reported that without a grievance policy, PSC concerns for problems such as staff conflicts or bullying go unresolved or unreported. Several

There are no grievance policies or procedures in the OCH that apply to PSCs and our survey revealed that 35% of CDs, 40% of DMOs, and 43% of DPTs did not have sufficient guidance to manage staff grievances.

staff pointed out that the USDHs were often the cause of the grievance or conflict, which kept local staff from voicing their concerns for fear of reprisal or retaliation from USDH staff. One post staff member stated that if there were concerns over trust with post leadership, staff would wait out that individual's employment term instead of raising their concerns.

Standardizing grievance policies and procedures is challenging. Many reported that lodging grievances is uncommon or not accepted in some host countries and local cultures. OIG determined the agency should develop grievance policies and procedures to provide assurance that local staff concerns are heard and that problems, such as bullying and staff conflicts, do not go unaddressed.

#### We recommend:

6. The agency establishes grievance policies and procedures for overseas PSCs that includes guidance about how grievances are raised and resolved.

#### POST STAFF HANDBOOKS

#### Some staff handbooks included information that was inaccurate.

Each post issues staff handbooks that are intended to help local staff understand their rights and responsibilities, and contain policies, procedures, notices, and forms specific to PSCs. Handbooks help the posts implement key policies consistently, despite frequent leadership turnover, and can also encourage staff made up of multiple employment classifications and nationalities to feel like they are part of the same team. The OCH documents some requirements about what should and should not be in the handbooks and includes suggested content about issues such as time and attendance or staff travel. OIG determined that agency guidance for staff handbooks required management attention.

The OCH states "it is important that all information in the Peace Corps Post Staff Handbook is carefully reviewed for direct applicability to Peace Corps PSCs." The relevant handbook information should be clearly written and accurately applicable to PSCs, however, staff reported that many handbooks included information that was conflicting, incorrect, or outdated. For example, both post and headquarters staff told us that some information included in the handbook's leave policies did not match what

was written in a PSC contract. Handbook information that contradicted the LCP was concerning since it governs the pay and benefits for PSCs at posts.

Some handbooks still contain outdated policies that need to be changed or revised after the handbooks had been updated, leading staff to unwittingly violate agency policies. Our review of 14 post handbooks revealed that 2 had not been updated since 2017, 2 had not been updated since 2018, and 3 had not been updated since 2019. Incorrect or missing information resulting from outdated policies could result in complex problems that escalate and require significant time and engagement from the regional offices, ACM, and OGC.

Staff from both headquarters and posts reported that the posts did not have sufficient guidance, templates, or support to timely and accurately develop and update the handbooks. DMOs reported needing guidance about incorporating agency and embassy policies and U.S. Federal laws with the local labor policies in the handbooks. Other staff pointed out that it was not clear who should update the handbooks and when. We found that the OCH does not provide guidance on how, how often, and by whom handbooks should be reviewed. Moreover, it explicitly states that staff handbooks do not require review or approval from headquarters or the region.

#### We recommend:

7. The agency establishes a standard operating procedure that ensures staff handbooks are updated timely and effectively.

#### **STAFF AWARDS**

#### Most posts did not have a clear and objective awards policy.

Peace Corps policy states that the agency uses incentive awards to encourage all employees to help improve operations. The agency's awards program recognizes and awards employees for exceptional performance, personal efforts that improve operational efficiency, and special acts or services. OIG determined that agency guidance for PSC incentive awards required management attention.

The OCH requires that all posts "must have an established awards program of cash and/or time off awards [...] that outlines eligibility criteria and process for the awards program." Our review found that only 2 out of 14 staff handbooks included an established awards program with the required eligibility criteria and process. Some interviewees also reported that their posts did not have a documented or established awards program.

As a result of not having an established awards program, we found that awards were inconsistently managed by the posts. One headquarters staff member described the quality of awards management from post to post as "hit or miss." Staff reported that award decisions have been based on whether funding was available, made without established criteria, and inconsistently implemented when CDs turned over. Awards programs should be developed by the posts to accommodate the differing cultural attitudes regarding awards, while oversight is needed to ensure awards program requirements are met.

#### We recommend:

8. The agency ensures that posts develop and document an awards program that outlines eligibility criteria and process.

#### STAFF TRAINING

We answered the following researchable question to help us achieve our project objective:

Are Peace Corps staff trained sufficiently for their PSC human resources management duties?

OIG determined that overall training for human resources management was insufficient, however, we identified some agency-provided training on certain human resources functions. For example, several mandatory agency training courses were related to human resources management for PSCs. The Foundations of Supervision – A Course for New PSCs Supervisors course has generated positive feedback, and the PATH course addresses long-standing interests in improved onboarding for all new staff, including PSCs. Additionally, the multi-week overseas staff training (OST) program is an agency required training that is provided to CDs, DMOs, DPTs, and local staff. OST includes training on human resources management topics, such as PSC supervision, supervision ethics, legal issues, host-country staff skill building and professional development, and diversity and inclusion. OST includes contracting and procurement training for CDs and DMOs; with a human resources management training session added to the DMO track; and a one-week contracting and procurement training for OCOs. OACM and OGC provide trainings at DMO and CD conferences that address some human resources issues, and each region has organized a human resources manager working group at the posts to discuss human resources issues and share best practices.

#### AREA OF STAFF TRAINING THAT REQUIRES MANAGEMENT ATTENTION

Staff training for human resources managers at the post was insufficient.

The GAO Green Book states that management should "tailor training based on the needs of the role." Peace Corps MS 664 states that staff complete "task-specific training" to "acquire or enhance skills and competencies necessary to perform the tasks of a position."

We found that training for human resources managers at the posts was not sufficiently tailored to focus on key human resources management tasks. For example, contract management and administration are significant components of overall human resources management, however, staff reported that human resources specialists, CDs, and DPTs were not sufficiently trained in contract management. One staff member pointed out that DPTs manage approximately one-third of a post's PSCs yet get no training from OACM. Staff also reported that OCO training was

insufficient for human resources management because it was exclusive to contracting and did not cover other critical components to managing human resources for PSCs.

Although OST includes some human resources training, it is considered to be too general and ineffective at helping human resources managers acquire the range of skills and competencies necessary to perform their tasks. Moreover, not all PSCs, including many who manage human

Overall, most overseas human resources managers were selftrained and taught, instead of receiving training that was tailored to their human resources management responsibilities. resources, attend OST. In the absence of targeted training, most of the training responsibility for a post's human resources specialists and managers fall to post leadership, who often lack the time or the skills to effectively oversee training requirements. Moreover, USDH leadership experiences frequent turnovers, which could disrupt the posts' capacity to train staff. Lastly, the agency did not organize refresher training opportunities for human resources managers to acquire or enhance skills and competencies.

We found that insufficient training programs resulted in human resources managers, who were often self-trained or learned on the job, not having the adequate skills and competencies to timely and efficiently manage tasks such as hiring and recruiting, administering time, attendance, and leave, and using human resources systems. They consistently stated that they needed to improve their skills in handling staff grievances and USDH staff in particular reported the same for their staff development, performance management, and coaching responsibilities. OCOs and others reported that they have struggled with developing and updating SOWs and conducting the necessary market research on the value of local position duties and responsibilities, which are two critical pieces needed for setting overseas staff compensation. Overall, most managers were self-trained and taught, instead of receiving training that was tailored to their human resources management responsibilities.

#### We recommend:

9. The agency develops and implements a plan to train USDH and local staff for their human resources management responsibilities.

#### **Resources**

We answered the following researchable question to help us achieve our project objective:

#### Is human resources management for PSCs adequately resourced?

OIG determined that human resources management for PSCs was not adequately resourced. However, without effective oversight and management coordination, the Peace Corps will continue to struggle in determining the resources needed to manage human resources efficiently, as this report has demonstrated. When asked if human resources management for PSCs had sufficient resources to adequately complete their work requirements, staff responses focused on IT and staffing needs. Many also emphasized the disparity in human resources support for USDHs and PSCs. Agency staff managing human resources for USDHs are supported by an entire agency office – the Office of Human Resources – while human resources managers at the posts are supported by a comparatively small cohort consisting of staff from the region, OGC, and OACM. Moreover, human resources management for PSCs cannot draw from the same shared resources provided to USDHs by the Federal Government, such as the timekeeping and personnel management systems serviced by the National Finance Center; the policy, guidance, and oversight functions provided by the Office of Personnel Management; and retirement planning administered by the Federal Retirement Thrift Investment Board.

#### INFORMATION TECHNOLOGY

IT solutions that support human resources management for PSCs include a payroll processing system, a learning management system to assist with staff training and development, and a personnel tracking system to track staff data and support administrative functions, such as setting up e-mail accounts. At the time of our review, the agency was in the process of acquiring a human capital management platform which interviewees said will include a time and attendance system for overseas staff.

Fourteen of the sixteen post staff who answered OIG's questions about resources for human resources management reported a need for new or improved IT solutions. Staff told us they lacked IT systems that manage time and attendance, track performance management, and oversee hiring and recruitment. In addition, post staff reported that they needed improved tracking mechanisms or a comprehensive system to organize their human resources management tasks and responsibilities. Headquarters staff also stated that the agency needed to replace or upgrade the current personnel tracking system.

In the absence of adequate IT systems supporting some of their work functions, post staff have been performing critical tasks manually with basic program tools, such as MS Excel. Staff claimed that these manual processes take too much time and result in many errors. One staff member called time and attendance and leave calculations a "nightmare." Several DMOs stated that the lack of automated support for reviewing and organizing employment applications increased the time it took to fill positions.

OCIO manages *Ignition*, an intranet portal that staff can use to explore IT support options, request IT assistance, and submit ideas for IT solutions and support. OCIO tracks these submissions, which often come from overseas staff. However, large-scale IT solutions are difficult to develop and implement without a program office or a representative tasked to work with OCIO and OCFO. The agency does not have a position or "owner" with the overall responsibility to manage human resources for PSCs. Addressing our recommendation in the organization section of this report – to assign a key role or "owner" with this responsibility – should benefit the identification, development, and implementation of IT solutions for human resources management.

#### STAFFING

Staff opinions about the post staffing levels for human resources management were mixed. Some human resources managers reported their posts were appropriately staffed, while others wanted to add a dedicated human resources staff member to their respective posts. OIG determined that because post human resources staffing needs must compete with other pressing needs, the posts should base staffing levels on what works best for them. Key headquarters support offices, in particular OACM, OGC, and the regions, were described by post staff as highly competent and dedicated, but small and busy. As with the posts, staffing levels for human resources management at headquarters should be determined in the context of overall agency management priorities. The oversight section of this report includes a recommendation for the agency to gather data and conduct data-driven reviews that can guide decisions and actions to improve human resources management for PSCs. Addressing this recommendation should help the agency assess and adjust staffing levels at posts and headquarters as necessary to improve the efficiency of PSC human resources management.

#### STRATEGIC PLANNING

We answered the following researchable question to help us achieve our project objective:

#### Does the agency strategically plan for the management of human resources for PSCs?

OIG determined that the agency's strategic planning for human resources management for PSCs was adequate. We examined strategic planning for human resources management at the posts and the agency at large. Evaluating how well the agency met performance goals fell outside the scope for this evaluation.

#### Posts

The Integrated Planning and Budget System (IPBS) is a strategic planning tool used by the posts annually, which is the agency's "primary program and resource management planning process." OGO and the regions collaborate with OCFO to manage the IPBS process and work with the posts to plan for budgeting and other resource needs. Staff reported that the process was effective in helping the posts strategically align resources, and it is through the IPBS that posts can, and have, successfully request staff and resources to support human resources management.

#### AGENCY

GPRA mandates that Federal agencies develop and circulate a strategic plan that covers a period of at least 4 years. An agency meets the GPRA requirement by establishing and publishing a strategic plan that includes multi-year goals with strategies to achieve those goals.<sup>14</sup> In both the 2018 and 2022 issued multi-year strategic plans, the agency gave some consideration to staff issues that impact human resources management for PSCs, including optimizing staff

<sup>&</sup>lt;sup>14</sup> The two documents are combined into one, each including the overarching year strategic plan and the specific performance plan for any given year.

performance,<sup>15</sup> advancing equitable and inclusive management of staff; aligning resources with agency priorities and risk; and standardizing business practices to reduce redundancies across posts.

#### **OTHER FEDERAL AGENCIES**

We considered the following researchable question to help us achieve our project objective:

#### How do other Federal agencies manage human resources for their overseas contract staff?

We planned this inquiry expecting that the management of human resources at other international organizations with overseas contractors could provide valuable comparative analyses for Peace Corps. After researching other organizations, we determined that the singularity of Peace Corps operations made any comparative analyses impractical for the purposes of this review. While OIG did not pursue this analysis, we encourage the agency to engage with other Federal agencies as it moves forward with improving human resources management for PSCs.

<sup>&</sup>lt;sup>15</sup> Peace Corps Strategic Plan: Fiscal Years 2018-2022, Performance Goal 2.1.

### LIST OF RECOMMENDATIONS

#### WE RECOMMEND:

- 1. The agency assigns a key role in the organizational structure that has the overall responsibility to manage human resources for overseas PSCs.
- 2. The agency creates or modifies data collection tools to gather the data necessary to conduct comprehensive reviews of human resources management for overseas PSCs that could improve performance outcomes and operational effectiveness.
- 3. The agency conducts a comprehensive review of human resources management for overseas PSCs to improve performance outcomes and operational effectiveness.
- 4. The agency develops a plan to implement improvements identified in the comprehensive review of human resources management for overseas PSCs.
- 5. The agency ensures that each post establishes a hiring process that includes a standard timeline for hiring and clarifies the responsibilities of staff that have a role in the process.
- 6. The agency establishes grievance policies and procedures for overseas PSCs that includes guidance about how grievances are raised and resolved.
- 7. The agency establishes a standard operating procedure that ensures staff handbooks are updated timely and effectively.
- 8. The agency ensures that posts develop and document an awards program that outlines eligibility criteria and process.
- 9. The agency develops and implements a plan to train USDH and local staff for their human resources management responsibilities.

### **APPENDIX A: INTERVIEWS CONDUCTED**

The following table lists staff interviewed by OIG during this project.

#### Table 1: Interviews Conducted with Post and Headquarters Staff

Position	Location	Number Interviewed
Overseas Contract Officer <sup>16</sup>	Post	6
Administrative Staff <sup>17</sup>	Post	6
Country Director	Post	8
Director of Management Operations	Post	11
Director of Programming and Training	Post	3
Other Post Staff	Post	1
Headquarters Staff <sup>18</sup>	HQ	36

<sup>&</sup>lt;sup>16</sup> This included financial specialists and assistants or deputy director of management operations.

<sup>&</sup>lt;sup>17</sup> This included human resources specialists and assistants, or other administrative staff, not to include the OCOs or DMOs listed in this table.

<sup>&</sup>lt;sup>18</sup> We interviewed headquarters (HQ) staff from AF, EMA, IAP, OCFO, OGO, OGC, Office of Staff Learning and Development, OPATS, OCIO, the Office of Strategic Information, Research, and Planning, and Office of Human Resources. Included in this HQ cohort were former post staff. Thirteen of the HQ staff interviews were conducted during the evaluation development phase before the project was announced to the agency.

## **APPENDIX B: DOCUMENT REQUEST**



**Request for Documentation** Peace Corps Office of Inspector General

May 21, 2021

The Peace Corps Office of Inspector General Evaluation Unit has launched the *Evaluation of Human Resources Management for Overseas Contract Staff, 21-EVAL-02*. Senior Evaluator Paul Romeo will lead the evaluation. The scope of this evaluation is 2018 through the present. Please coordinate with appropriate offices to provide Paul the most recent versions of the documents requested, unless otherwise stated in the list below. Paul will send a link to a secure file-sharing tool where the documents can be uploaded. Please complete the document request by June 11, 2021. If a requested document is unavailable, or you need clarification about the request, please contact Paul at promeo@peacecorpsoig.gov.

#### Requested Documentation

Position Descriptions/Statements of Work templates for Country Director, Director of Management Operations, Director of Programming and Training, Overseas Contracting Officer, and Office of Acquisitions and Contract Management (ACM) staff

Administrative Management Control Survey template

Agency staffing plans and organizational charts for the Office of the Chief Financial Officer, ACM, the Office of Global Operations (OGO), Africa Operations (AF), Europe Mediterranean and Asia Operations (EMA), Inter-America and the Pacific Operations (IAP), Office of Staff Learning and Development, and the Office of Human Resources.

Integrated Planning and Budgeting System (IPBS) Guidance and instructions (2018 - present)

Operation Plan guidance and instructions for HQ and Overseas posts (2018 - present)

Global template for post staff handbooks

Enterprise Risk Management Council documentation that pertains to the management of overseas contract staff (e.g., personnel tracking or IT systems, pay/benefits, turnover issues, etc.)

USDH Benefits Committee (OGO) documentation (meeting minutes, agendas, FAQs, etc.)

Any agency reports, assessments, and studies related to human resources for overseas contract staff from 2018, or older if they contain open recommendations

#### PEACE CORPS OFFICE OF INSPECTOR GENERAL

Documentation (meeting minutes, agendas, etc.) from any region working groups, communities of practice, discussion forums, or other group efforts that address human resources management for overseas contract staff.

For these 12 posts – Zambia, Sierra Leone, Senegal, Guinea, Ukraine, Timor Leste, Morocco, Nepal, Panama, Belize, Columbia, Peru – provide the following:

IPBS submissions, 2018 to present. To include -

IPBS submission form and/or strategic plan narrative

organizational chart or staffing plan

Technical Activity Descriptions that pertain to human resources issues for overseas contract staff, such as staff training or development.

Operation Plan, including Operation Plan Memo

Position descriptions/statements of work for overseas contract staff with human resources duties and responsibilities, and overseas contract staff who supervise PSCs at these posts.

Staff handbooks

Any reports, assessments, or studies that relate to the post's human resources or staffing management, such as HQ staff trip reports, internal management assessments, internal management consultations, etc. from 2018 to the present.

## **APPENDIX C: LIST OF ACRONYMS**

AF	Africa Operations
AMCS	Administrative Management Control Survey
CD	Country Director
DDMO	Deputy Director of Management Operations
DMO	Director of Management Operations
DPT	Director of Programming and Training
EMA	Europe, Mediterranean, and Asia Operations
FSN	Foreign Service National
GPRA	Government Performance and Results Modernization Act of 2010
HQ	headquarters
IAP	Inter-America and Pacific Operations
IPBS	Integrated Planning and Budget System
LCP	local compensation plan
MS	Manual Section
OACM	Office of Acquisitions and Contract Management
OCFO	Office of the Chief Financial Officer
ОСН	Overseas Contracting Handbook
OCIO	Office of the Chief Information Officer
OCO	Overseas Contract Officer
OGC	Office of General Counsel
OGO	Office of Global Operations
OIG	Office of Inspector General
OSLD	Office of Staff Learning and Development
OST	Overseas Staff Training
РСМО	Peace Corps Medical Officer
PSC	Personal Services Contractor
SSM	Safety and Security Manager
SOW	statement of work
USDH	United States Direct Hire
VPS	Office of Volunteer and PSC Financial Services

### **APPENDIX D: AGENCY RESPONSE**



#### MEMORANDUM

To:	Joaquin Ferrao, Inspector General	
		EMILY Digitally signed by EMILY HAIMOWITZ
Through: Signature	Emily Haimowitz, Chief Complianc	e & Risk Officer OWITZ 20:13:43 -04'00'
From:	Carol Spahn, Director	<u> </u>
	Signature U	ALLISON Digitally signed by ALLISON BLOTZER
Allison Blot	zer, Acting Chief Financial Officer	BLOTZER Date: 2023.09.22 11:19:50 -04'00'
	Signature	Digitally signed by
Scott Beale,	Associate Director, Office of Global Op	Deale. Scoll pate 2023 00 22
		Signature

Date: September 25, 2023

CC: Thomas Peng, Chief of Operations and Administration Lauren Stephens, Chief of Staff Joshua Romero, White House Liaison Ruchi Jain, General Counsel Michelle Godette, Regional Director, Africa Region Rebecca Sharp, Regional Director, EMA Region Mike McCabe, Regional Director, IAP Region Michael Terry, Acting Chief Information Officer Sonja Truehart-McKinney, Director of Acquisition and Contract Management Eva Piszczek, Director of Global Accounts Payable, Office of the Chief Financial Officer Akoua Enow, Acting Chief Human Capital Officer, Office of Human Resources Karla Wesley, Director of the Office of Staff Learning and Development Meredith Giordano, Deputy Director, Office of Global Operations Adam Stalczynski, Chief Administrative Officer, Africa Region Paul Negley, Chief Administrative Officer, EMA Region Gonzalo Molina, Chief Administrative Officer, IAP Region Kathryn Wallace, Associate General Counsel, Office of the General Counsel Lien Galloway, Associate General Counsel, Office of the General Counsel Yefat Levy, Associate General Counsel, Office of the General Counsel Chai Shenoy, Associate General Counsel, Office of the General Counsel Molly Mimier, Supervisory Contract Specialist, Acquisition and Contract

#### PEACE CORPS OFFICE OF INSPECTOR GENERAL

	Management
	Kari Abood, Expert, Acquisition and Contract Management
	Kris Besch, Expert, Office of Global Operations
	Paul Shea, Expert, Office of the Chief Financial Officer
	Colin Jones, Expert, Office of the Chief Compliance Officer
	Greg Yeich, Compliance Officer, Office of the Chief Compliance Officer
Subject:	Agency Response to the Preliminary Report on the Program Evaluation of Human Resources Management for Overseas Contract Staff (Project
	No. 21-EVAL-02)

Thank you for the opportunity to respond to this preliminary report from the Office of Inspector General (OIG). Enclosed please find the agency's response to the recommendations made by the Inspector General as outlined in the OIG's Preliminary Report on the Program Evaluation of Human Resources Management for Overseas Contract Staff (Project No. 21-EVAL-02) sent to the agency on August 10, 2023.

The agency appreciates the review of this important topic because as mentioned in the executive summary, a significant part of the agency's success depends on how well the agency engages, trains, and retains high-quality personal service contractors (PSCs). PSCs make up over 70 percent of the agency's workforce and are critical to many of the agency's overseas operations, including but not limited to administration, financial management, programming, and training. Overseas PSCs have a significant role in ensuring the effectiveness of Volunteers' service by supporting their work, health, and safety.

The agency recognizes the incredible overseas PSCs and appreciates the OIG recommending areas to improve our human resource management for this significant and critical population of our workforce.

#### **Recommendation 1**

The agency assigns a key role in the organizational structure that has the overall responsibility to manage human resources for overseas PSCs.

#### <u>Concur</u>

#### **Response:**

The Peace Corps will define the position(s) that will have the overall responsibility to oversee the management of human resources for overseas personal service contractors (PSCs). The agency will internally communicate this framework for a better understanding of the role the position(s) play and the work in supporting the post-based human resource management of overseas PSCs.

#### Documents to be Submitted:

• Flow chart of agency roles at Headquarters for human resource management of overseas PSCs

• Documentation of internal communication

#### Status and Timeline for Completion: June 2024

#### **Recommendation 2**

The agency creates or modifies data collection tools to gather the data necessary to conduct comprehensive reviews of human resources management for overseas PSCs that could improve performance outcomes and operational effectiveness.

#### <u>Concur</u>

#### Response:

The Peace Corps will establish a multidisciplinary group to create or modify a process on assessing human resource management for overseas PSCs. This process will include steps to

collect data on how to better support posts in human resource management of overseas PSCs along with procedures to analyze that data.

#### **Documents to be Submitted:**

• Process documentation on assessing human resource management for PSCs

#### Status and Timeline for Completion: June 2024

#### **Recommendation 3**

The agency conducts a comprehensive review of human resources management for overseas PSCs to improve performance outcomes and operational effectiveness.

#### <u>Concur</u>

#### **Response:**

The Peace Corps will convene a multidisciplinary group representing stakeholders from across the agency to conduct a comprehensive review of human resources management for overseas PSCs.

#### **Documents to be Submitted:**

• A comprehensive analysis of human resource management practices across the agency to be used as a guide for improving human resource management of overseas PSCs.

#### Status and Timeline for Completion: December 2024

#### **Recommendation 4**

The agency develops a plan to implement improvements identified in the comprehensive review of human resources management for overseas PSCs.

#### Concur Response:

The agency will use the analysis document prepared in accordance with the concurrence to Recommendation 3 to develop a plan for supporting posts in the areas of human resource management of PSCs that have been identified as needing improvement.

#### **Documents to be Submitted:**

• Plan for implementing identified areas of improvement for human resource management of PSCs

#### Status and Timeline for Completion: December 2024

#### **Recommendation 5**

The agency ensures that each post establishes a hiring process that includes a standard timeline for hiring and clarifies the responsibilities of staff that have a role in the process.

#### **Concur**

**Response:** The multidisciplinary group will assist posts in developing a post-level SOP outlining the hiring process at each individual post. This will build on, but be separate from, existing guidance on the personal services contract pre-award steps contained in the Overseas Contracting Handbook Chapter on Personal Services Contracts.

#### **Documents to be Submitted:**

- Communication to posts from multidisciplinary group directing them to complete this SOP
- Sample of post-level SOPs on the hiring process

#### Status and Timeline for Completion: June 2024

#### **Recommendation 6**

The agency establishes grievance policies and procedures for overseas PSCs that includes guidance about how grievances are raised and resolved.

#### **Concur**

**Response:** The Peace Corps appreciates the importance of ensuring there is a mechanism for overseas PSCs to address their concerns and for the agency to be aware of them. The agency will oversee the development of a PSC complaint and grievance policy.

#### **Documents to be Submitted:**

• Grievance policies and/or procedures for overseas PSCs

#### Status and Timeline for Completion: June 2025

#### **Recommendation** 7

The agency establishes a standard operating procedure that ensures staff handbooks are updated timely and effectively.

#### <u>Concur</u>

#### **Response:**

On March 30, 2023, the Associate Director of the Office of Global Operations (OGO) sent notification to all Peace Corps posts about an updated Staff Handbook Template and Staff Handbook General Guidelines. Posts were requested to complete an update of their Post Staff Handbook using the new Staff Handbook Template prior to October 1, 2023.

The Peace Corps agrees on the importance for all posts to implement the requirements communicated to them. The agency will formalize a process around timely updates to post staff handbooks.

#### **Documents to be Submitted:**

- Communication from AD/OGO to posts informing them of the release of the Staff Handbook Template
- Implementation of process to ensure Post Staff Handbooks are updated timely and effectively

#### Status and Timeline for Completion: June 2024

#### **Recommendation 8**

The agency ensures that posts develop and document an awards program that outlines eligibility criteria and process.

#### Concur Response:

The Peace Corps' Personal Services Contracts Chapter of the OCH currently requires each post to have an established awards program. The agency will work with posts through the Country Director and/or Overseas Contracting Officer to ensure each post documents their awards program and outline the eligibility criteria and process for awarding staff.

#### **Documents to be Submitted:**

• Sample of post-level awards programs documentation

#### Status and Timeline for Completion: December 2023

#### **Recommendation 9**

The agency develops and implements a plan to train USDH and local staff for their human resources management responsibilities.

#### **Concur**

#### **Response:**

Associated with the data collection in Recommendations 2, 3, and 4, and other tools, the agency will review training needs and knowledge gaps of USDH and local staff in human resources management responsibilities. If the agency committee determines that additional training is needed, the agency will develop training addressing these needs.

#### **Documents to be Submitted:**

- Training materials
- Communication to overseas staff regarding available training and the date by which it must be completed

#### Status and Timeline for Completion: June 2025

### **APPENDIX E: OIG COMMENTS**

Management concurred with all nine recommendations, which remain open. In its response to the preliminary report, management described the actions it is taking or intends to take to address the issues that prompted each of our recommendations. We wish to note that in closing recommendations, we are not certifying that the agency has taken these corrective actions or that we have reviewed their effects. Certifying compliance and verifying effectiveness are management's responsibilities. However, when we feel it is warranted, we may conduct a follow-up review to confirm that action has been taken and to evaluate its impact.

The OIG is encouraged that the agency's written response states that Peace Corps is committed to supporting the agency's overseas PSCs and their critical work in helping Volunteers stay healthy, safe, and productive. The agency acknowledges that a significant part of its success depends on how well it manages many of the human resources management challenges identified in this report.

The OIG recognizes that to address the recommendations in this report, the agency must engage in a multidisciplinary effort across headquarters, the regions, and the posts, and we anticipate the agency's implementation plan will come into clearer focus as those efforts progress. In our analysis, we have provided additional information to assist in management's effort to address the recommendations.

The OIG will consider closing recommendations 2, 3, 4, and 6 once it receives the documentation referenced in the agency's response to the preliminary report. OIG is requesting additional documentation for recommendations 1, 7, and 9, and may request examples of policy and process documentation for recommendations 5 and 8. These recommendations will remain open pending confirmation that the Chief Compliance Officer has received the documentation reflected in our analysis below.

1. The agency assigns a key role in the organizational structure that has the overall responsibility to manage human resources for overseas PSCs.

#### <u>Concur</u>

#### **Response:**

The Peace Corps will define the position(s) that will have the overall responsibility to oversee the management of human resources for overseas personal service contractors (PSCs). The agency will internally communicate this framework for a better understanding of the role the position(s) play and the work in supporting the post-based human resources management of overseas PSCs.

#### **Documents to be Submitted:**

• Flow chart of agency roles at Headquarters for human resource management of overseas PSCs

• Documentation of internal communication

#### Status and Timeline for Completion: June 2024

#### **OIG Analysis**

To close this recommendation, the agency should submit statements of work for the key positions that are responsible for the management of human resources for overseas PSCs.

# 2. The agency creates or modifies data collection tools to gather the data necessary to conduct comprehensive reviews of human resources management for overseas PSCs that could improve performance outcomes and operational effectiveness.

#### **Concur**

#### **Response:**

The Peace Corps will establish a multidisciplinary group to create or modify a process on assessing human resource management for overseas PSCs. This process will include steps to collect data on how to better support posts in human resource management of overseas PSCs along with procedures to analyze that data.

#### **Documents to be Submitted:**

• Process documentation on assessing human resource management for PSCs.

#### Status and Timeline for Completion: June 2024

#### **OIG** Analysis

To close this recommendation, the submitted documentation should include the data collection tools, how the tools are used, who uses the tools, and other information pertinent to the creation or modification of the tools used to gather the data.

## 3. The agency conducts a comprehensive review of human resources management for overseas PSCs to improve performance outcomes and operational effectiveness.

#### **Concur**

#### **Response:**

The Peace Corps will convene a multidisciplinary group representing stakeholders from across the agency to conduct a comprehensive review of human resources management for overseas PSCs.

#### **Documents to be Submitted:**

• A comprehensive analysis of human resource management practices across the agency to be used as a guide for improving human resource management of overseas PSCs.

#### Status and Timeline for Completion: December 2024

OIG Analysis: No additional documentation necessary.

## 4. The agency develops a plan to implement improvements identified in the comprehensive review of human resources management for overseas PSCs.

#### **Concur**

#### **Response:**

The agency will use the analysis document prepared in accordance with the concurrence to Recommendation 3 to develop a plan for supporting posts in the areas of human resource management of PSCs that have been identified as needing improvement.

#### **Documents to be Submitted:**

• Plan for implementing identified areas of improvement for human resource management of PSCs

#### Status and Timeline for Completion: December 2024

#### **OIG Analysis**

To close this recommendation, the agency should include in the plan timelines, roles, and oversight responsibilities to ensure effective implementation. The OIG encourages the agency to develop a recurring plan to collect and analyze data in a continuous manner that ensures sustained oversight for the management of human resources for PSCs.

5. The agency ensures that each post establishes a hiring process that includes a standard timeline for hiring and clarifies the responsibilities of staff that have a role in the process.

#### **Concur**

#### **Response:**

The multidisciplinary group will assist posts in developing a post-level SOP outlining the hiring process at each individual post. This will build on, but be separate from, existing guidance on the personal services contract pre-award steps contained in the Overseas Contracting Handbook Chapter on Personal Services Contracts.

#### **Documents to be Submitted:**

- Communication to posts from multidisciplinary group directing them to complete this SOP
- Sample of post-level SOPs on the hiring process

#### Status and Timeline for Completion: June 2024

#### **OIG Analysis**

To close this recommendation, the OIG may review a selection of SOPs from additional posts.

6. The agency establishes grievance policies and procedures for overseas PSCs that includes guidance about how grievances are raised and resolved.

#### <u>Concur</u>

#### Response

The Peace Corps appreciates the importance of ensuring there is a mechanism for overseas PSCs to address their concerns and for the agency to be aware of them. The agency will oversee the development of a PSC complaint and grievance policy.

#### **Documents to be Submitted:**

• Grievance policies and/or procedures for overseas PSCs

#### Status and Timeline for Completion: June 2025

#### **OIG Analysis**

To close this recommendation, the grievance policies and/or procedures must include guidance for grievance resolution.

7. The agency establishes a standard operating procedure that ensures staff handbooks are updated timely and effectively.

#### **Concur**

#### **Response:**

On March 30, 2023, the Associate Director of the Office of Global Operations (OGO) sent notification to all Peace Corps posts about an updated Staff Handbook Template and Staff Handbook General Guidelines. Posts were requested to complete an update of their Post Staff Handbook using the new Staff Handbook Template prior to October 1, 2023.

The Peace Corps agrees on the importance for all posts to implement the requirements communicated to them. The agency will formalize a process around timely updates to post staff handbooks.

#### **Documents to be Submitted:**

- Communication from AD/OGO to posts informing them of the release of the Staff Handbook Template
- Implementation of process to ensure Post Staff Handbooks are updated timely and effectively

#### Status and Timeline for Completion: June 2024

#### **OIG Analysis**

To close the recommendation, the agency must submit documentation of the process that will be used to ensure that the handbooks are updated timely and effectively.

8. The agency ensures that posts develop and document an awards program that outlines eligibility criteria and process.

#### <u>Concur</u>

#### **Response:**

The Peace Corps' Personal Services Contracts Chapter of the OCH currently requires each post to have an established awards program. The agency will work with posts through the Country Director and/or Overseas Contracting Officer to ensure each post documents their awards program and outline the eligibility criteria and process for awarding staff.

#### Documents to be Submitted:

• Sample of post-level awards programs documentation

#### Status and Timeline for Completion: December 2023

#### **OIG Analysis**

To close this recommendation, the OIG may review a selection of awards program documentation from additional posts.

## 9. The agency develops and implements a plan to train USDH and local staff for their human resources management responsibilities.

#### <u>Concur</u>

#### **Response:**

Associated with the data collection in Recommendations 2, 3, and 4, and other tools, the agency will review training needs and knowledge gaps of USDH and local staff in human resources management responsibilities. If the agency committee determines that additional training is needed, the agency will develop training addressing these needs.

#### **Documents to be Submitted:**

- Training materials
- Communication to overseas staff regarding available training and the date by which it must be completed

#### Status and Timeline for Completion: June 2025

#### **OIG Analysis**

To close this recommendation, the agency must submit supporting documentation of committee decisions to develop trainings, to include records of any reviews conducted to support those decisions. In addition, the agency must submit development and implementation plans for trainings.

## PROGRAM EVALUATION COMPLETION AND OIG CONTACT

PROGRAM EVALUATION COMPLETION	This program evaluation was conducted under the direction of Assistant Inspector General for Evaluations Reuben Marshall, Senior Evaluators Paul Romeo and Tanique Carter. Additional contributions were made by Senior Evaluators Christine Fagioletti and Kristine Hoffer.
OIG CONTACT	Following issuance of the final report, a stakeholder satisfaction survey will be distributed to agency stakeholders. If you wish to comment on the quality or usefulness of this report to help us improve our products, please contact Assistant Inspector General for Evaluations Reuben Marshall at <u>rmarshall2@peacecorpsoig.gov</u> .

## Help Promote the Integrity, Efficiency, and Effectiveness of the Peace Corps

Anyone knowing of wasteful practices, abuse, mismanagement, fraud, or unlawful activity involving Peace Corps programs or personnel should contact the Office of Inspector General. Reports or complaints can also be made anonymously.

## **Contact OIG**

## **Reporting Hotline:**

U.S./International: Toll-Free (U.S. only):

202.692.2915 800.233.5874

Email:OIG@peacecorpsoig.govOnline Reporting Tool:PeaceCorps.gov/OIG/ContactOIG

Mail:

Peace Corps Office of Inspector General 1275 First St NE Washington, DC 20526

### **For General Information:**

Main Office: Website: Twitter: 202.692.2900 peacecorps.gov/OIG twitter.com/PCOIG