Office of Inspector General

To:	Carol Spahn, Director of Peace Corps
From:	Joaquin Ferrao, Inspector General
Date:	August 29, 2023
Subject:	Management Implication Report: Impact of the SIMS Data Migration on Site Development (IG-23-05-SR)

EXECUTIVE SUMMARY

In March 2021, the Peace Corps shut down its Coordinated Incident Reporting System (CIRS), a repository of historical crime incidents reported by Volunteers, and replaced it with the Security Incident Management System (SIMS)[1]. The agency noted that SIMS would be placed on the same platform as other agency systems, resulting in key programmatic improvements that would increase usability, improve data structure, and allow for smoother data integration. SIMS auto populates crime incident report links into VIDA (Volunteer Information Database Application) through the agency's Customer Relationship Management (CRM) platform. OIG found that this process was more reliable than CIRS, which required staff to manually add the crime incident information into VIDA. OIG verified that the new procedure effectively linked crime incidents between SIMS and VIDA.

SIMS launched in April 2021 and the agency finished uploading the CIRS incident data into SIMS in December 2021. To address the technical challenges of the SIMS data migration, the agency implemented the Site History Global Cleanup project to ensure that the site locations with historical crime incidents according to CIRS were accurately mapped to the site files in VIDA. During the SIMS data migration, some posts began to identify and assess potential sites for returning Volunteers following the 2020 global evacuation due to the COVID-19 pandemic. OIG raised concerns about whether field staff had access to the historical crime data necessary to assess the safety of reused sites, consistent with site development requirements. We conducted this review to address these concerns[2].

OIG determined that the SIMS data migration did not impair the posts' capacity to meet agency site development requirements. While OIG found some instances of noncompliance with site development requirements, it was determined that they were not caused by the SIMS data migration. However, OIG also found that the SIMS guidance provided to the field regarding access to historical crime data was not sufficiently clear and not consistently or timely implemented. The Peace Corps issued its SIMS guidance, then subsequently reissued it twice with confusing changes. We also found that nine posts received the historical CIRS data 3 months or less before Volunteers arrived at the post. Peace Corps guidance states that the posts should review site history information 3 to 9 months before Volunteer arrival.

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[1] In this report the Office of Inspector General (OIG) uses the term "SIMS data migration" to describe the agency's transfer of historical CIRS data into the new SIMS application.
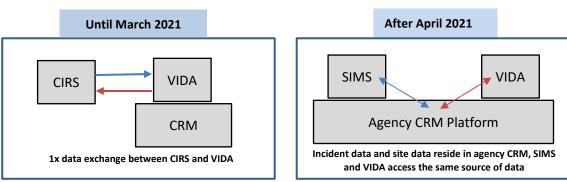[2] See Appendix A for the objectives, scope, and methodology for this review.

Despite these challenges, OIG found that the posts that successfully completed the SIMS data migration did not find any significant ongoing risks related to accessing the historical CIRS data that could impact future site development.

BACKGROUND

As part of a planned data modernization project,[3] the agency shut down its crime incident management system, CIRS, in March 2021. It was replaced by SIMS, which combines the functionality of the CIRS application with that of the Coordinated Agency Response System.[4] This allows all data related to crime reporting and case management to be stored in one location, so that staff only need to understand and use one system for crime incident reporting and case management. SIMS is linked with VIDA on the agency CRM platform (see figure 1). In this linked system, a SIMS ID number is auto populated in VIDA when staff enter a crime incident report into SIMS.

Figure 1: After Shutting Down CIRS, SIMS and VIDA Both Access Data in the Agency CRM

Source: Internal Agency Presentations

When vetting sites for future Volunteers, post staff should use crime incident data to determine if crime incidents involving past Volunteers indicate a risk for future Volunteers. To preserve access to CIRS's historical crime data, the agency migrated more than 40,000 historical incidents into SIMS. According to the agency, the crime incident location data was uploaded into SIMS as case notes, which post safety and security managers (SSM) could access. The agency determined that the location data needed to be reviewed and verified before linking the data with the site files in VIDA where those incidents occurred.

In September 2022, the agency implemented the Site History Global Cleanup Project to clean and verify the crime incident location information on a post-by-post basis. The project linked the historical CIRS incidents stored in SIMS to the related sites listed in VIDA. The Office of the Chief Information Officer reported that more than 40 percent of the posts had completed the Site History Global Cleanup project in January 2023. By April 2023 all posts had completed the project. As a result of the Site History Global Cleanup project, the agency reported that 90

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[3] The data modernization project is a multi-stage systematic analysis of IT products, services, and applications used by the Peace Corps.

[4] According to MS 461 Section 5.0: "The Coordinated Agency Response System (CARS) is a system under which a multidisciplinary team may come together to manage various elements involved in responding to an incident."

percent of the 9,042 incidents reviewed were associated with site files in VIDA, 40 percent of which were newly linked incidents that had not been recorded as occurring at sites in CIRS.

During the SIMS data migration, the Office of Safety and Security (OSS) issued interim Safety and Security Instructions (SSI) to guide the posts in using historical CIRS incident data with SIMS to make site management decisions for prospective Volunteers.

Objective 1: Determine the extent to which the SIMS data migration impacted access to crime incident data.

OIG found that historical crime incident data was available to posts after CIRS went offline. In February 2021, the agency announced that CIRS was going offline, and OSS informed the posts that the historical CIRS data was available by request. Seven of the ten posts in our sample requested this information for site development. The other three posts received the data from the SIMS team without requesting it. The timeline in figure 2 below shows the key milestones for the SIMS data migration on the left, and concurrent post site development activities on the right.

Figure 2: Timeline Comparing SIMS Migration and Volunteer Re-Entry Process

The SIMS Data Migration Milestones	Year and Month	Posts Prepare for Re-Entry
2021		
The agency announced that CIRS was going offline	February	
CIRS goes offline	March	
Agency began migrating legacy data from CIRS to SIMS		
SIMS launched, without legacy CIRS data uploaded	April	
	June	Posts began requesting CIRS data for site development
The agency announced that SIMS was available to posts, after migrating data into SIMS, however, incident location data was added as case notes due to inconsistencies	December	
2022		
	March	First Volunteers return to posts
Pilot for cleaning CIRS location data begins	September	33 posts received Volunteers
2023		
	March	49 posts have received Volunteers
All posts completed the Site History Global Cleanup Project, SIMS can be used as intended for vetting sites	April	

Source: Internal Agency Records and Communications: Director's Office, OSS, Office of Global Operations, the Office of the Chief Information Officer

The agency confirmed that the posts that had completed the Site History Global Cleanup project could access SIMS crime incident data through links in VIDA. To verify, we reviewed 64 incidents in SIMS and found that they all had links in VIDA. We found that this automatic

function was more reliable than the former system, which required staff to manually add CIRS information into VIDA. Staff from two posts told us that the Site History Global Cleanup project improved the quality of the historical CIRS data that was migrated into SIMS, and several other staff described SIMS as more reliable than CIRS. We concluded that the Site History Global Cleanup project effectively linked the CIRS legacy data to the site files listed in VIDA.

Objective 2: Determine whether the SIMS data migration impaired the posts' capacity to meet agency site development requirements.

OIG reviewed whether 10 of the 33 posts that conducted site development during the period of June 2021 through September 2022 followed the agency's site development requirements, per SSI 401, MS 270, and the Interim Site History File Guidance.[5] Although there were some instances of noncompliance, we determined that they were not caused by the data migration. Therefore, we concluded that the SIMS data migration did not impair the posts' capacity to meet agency site development requirements.

We asked the following questions based on site development requirements to assess compliance: (See Results Table in Appendix B)

- If a serious crime incident[6] occurred at a site within the last 10 years, was it noted in VIDA per SSI 401?

- If an active site had a serious crime incident within the last 10 years, did the SSM document in VIDA their determination about the location's risk to future Volunteers, per the Interim Site History File Guidance?

- Did country directors (CD) certify that the sites were vetted, as required in the Interim Site History File Guidance?

Compliance With SSI 401

Four posts in our sample were noncompliant with the 2018 SSI 401 requirement that staff must add a note in VIDA to flag serious crime incidents for the preceding ten years. Only 26 percent of the historical serious crime incidents at active sites that we reviewed were properly noted in VIDA, a significantly low level of compliance with an SSI requirement. Volunteers at four posts were placed in six sites with serious crime incident histories that were not noted in VIDA. In interviews, staff provided the following reasons:

- One post noted that they were more focused on pre-service training and stopped working on SSI 401 requirements.

- Another post responded that the serious crime incident had occurred in April 2012 and therefore was older than the 10-year requirement, when we inquired about it in November

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[5] Peace Corps rescinded the Interim Site History File Guidance and announced revisions to SSI 401 Site History File Guidance on April 26, 2023.

[6] "Serious crime incidents" were defined in SSI 401 and MS 461 Section 6.1 (h) to include incidents that should be reported to the Regional Security Officer, including homicide, kidnapping, rape or attempted rape, sexual assault, and crimes motivated by politics, terrorism, hate, or incidents that raise concerns for the safety of future Volunteers.

2022. However, the site's development occurred within the ten-year period preceding the incident. Therefore, this incident should have been noted in VIDA.

- The SSM at one post had recently been hired during the time the incidents occurred and said they were not trained on site history file requirements, as outlined in SSI 401.

- The SSM at another post acknowledged that they made a mistake in not creating a note in VIDA, in accordance with SSI 401. After the OIG inquired about the incident, the SSM added a note in VIDA.

We found no evidence that staff failure to flag serious crime incidents in VIDA was caused by the SIMS data migration.

Compliance with Interim Site History File Guidance

In August 2022, the agency updated its Interim Site History File Guidance and required the posts to evaluate crime incidents noted in the site history files for sites that were being considered for Volunteer placement and record their decisions about the safety of the sites for future Volunteers. We found that 15 out of 19 active sites in our sample with a record of serious crimes met these requirements. After speaking with post staff about the active sites that did not meet these requirements, we determined that the cause of noncompliance with the interim guidance was not related to the migration of CIRS location data. In two of the four cases, a follow-up interview with the SSM revealed that they evaluated the incidents but did not document their assessments in VIDA. In the other two cases, the SSMs did not evaluate the incidents or document their decisions in VIDA, even though they had the information about serious crime incidents at these sites in CIRS. In one of the cases, the SSM disregarded the incident because it was a "threat," and they incorrectly believed it was not a serious crime that needed to be evaluated or documented in VIDA. In the other case, the SSM judged the incident as not relevant because it occurred in the same large town but in a distant location that was not the Volunteer's site.

The guidance also required that the CD certify the site review process. We found that in a random sample of active sites, 96 percent were certified by their respective CDs and two sites were not certified due to technical issues with VIDA.

Objective 3: Assess the adequacy of the agency's response to the SIMS data migration issues and mitigation efforts to address ongoing risks that could impact future site development.

Multiple prior evaluations and OIG reports have identified areas of noncompliance with documenting crime incidents in site history files. Additionally, staff acknowledged that OSS and OIG frequently found posts to be noncompliant with site history file policies and procedures. OIG was concerned about the risk exposure for Volunteers assigned to sites with histories of incidents that had not been properly reviewed or vetted by staff.

Headquarters Support to Posts

We found that the agency lacked clear, consistent, and timely messaging to inform post staff about changes to the site development process due to the shutdown of CIRS. OSS initially advised CIRS users that historical site incident data was available upon request. In June 2021,

OSS disseminated the Interim Site History File Guidance to mitigate any issues created when CIRS went offline. The timeline below shows subsequent changes to post guidance on how to vet sites for previous crime incidents (see figure 3):

Figure 3: Interim Site History File Guidance to Posts about Vetting Sites for Previous Crime Incidents

2021	June	Guidance directed staff to request a review of all proposed sites by sending a list of these sites to headquarters.
	December	Revised guidance removed instructions requiring headquarters to review of all proposed sites.
2022	August	Second revision of guidance directed post staff to contact OSS with a list of their proposed sites.

Source: Interim Site History File Guidance and communications from headquarters to posts

We found that these changes confused two posts from our sample. They were unsure if they needed to send a list of prospective sites to headquarters for review or would receive the information they needed automatically. We found that the posts did not receive the data they needed to timely assess sites. According to Peace Corps guidance on site development, the posts should review site history files between 3 to 9 months before Pre-Service Training begins. However, seven posts in our sample received the historical CIRS data 3 months or less before Volunteers arrived at the post (see Appendix C). In other OIG reviews conducted recently, OIG found two additional posts that did not receive the historical CIRS data within the prescribed site development timeframe, which shows that the agency did not always provide timely access to critical site development data. As a result, OIG determined that the agency did not provide important data in coordination with all posts' site development timeframes.

We contacted the Peace Corps Office of Global Operations to determine whether this timing issue had been addressed. They confirmed that the 14 posts slated to receive their first input of Volunteers between January and May 2023 had received the necessary CIRS data. All posts completed the Site History Global Cleanup Project by April 2023. Our review of the SIMS system for the posts that completed this process did not find any significant ongoing risks related to accessing the historical CIRS data that could impact future site development.

  cc: David Fleisig, Acting Associate Director, Office of Safety and Security
          Lauren Stephens, Chief of Staff
          Ruchi Jain, General Counsel
          Thomas Peng, Chief of Operations and Administration
          Terry Michael, Acting Chief Information Officer

APPENDIX A: SCOPE AND METHODOLOGY

Objectives

1. Determine the extent to which the SIMS data migration impacted access to crime incident data.

2. Determine whether the SIMS data migration impaired the posts' capacity to meet agency site development requirements.

3. Assess the adequacy of the agency's response to the SIMS data migration issues and mitigation efforts to address ongoing risks that could impact future site development.

Scope

Our scope included a judgmental sample, based on crime incident rates, of 30 percent of 33 posts that received Volunteers between March and September 2022. We considered data from January 2021 to February 2023.

Methodology

OIG obtained and reviewed agency guidelines, policies, and procedures, such as SSI 401, Regional Site Development Guidance, Interim Site History File Guidance, and other documentation concerning agency re-entry policies and procedures. We created a sample of 10 posts that had developed sites for Volunteers entering service in 2022. OIG interviewed staff who work for offices located at Peace Corps headquarters and requested and analyzed documentation regarding communications with agency staff about the SIMS data migration and issues concerning the transference of data about the location of historical crime incidents.

We also reviewed records in VIDA concerning site development and notes about crime incidents. From the posts in our sample, we requested the crime incident location data spreadsheets they received from the SIMS team, and any documents or communications regarding support or guidance related to the data. We interviewed staff at the posts in our sample to determine if they experienced any problems with access to crime incident data that impacted the vetting of prospective sites. We also followed up with key staff at posts and headquarters to resolve any additional questions from our research.

APPENDIX B: RESULTS OF COMPLIANCE CHECKS ON SITE DEVELOPMENT AT SAMPLE POSTS

OIG assessed the degree of compliance with site development requirements in SSI 401 (updated 2018) and the Interim Site History File Guidance (updated August 2022) at the 10 posts in our sample. This sample included approximately 171 Volunteers. We found that there were 17 active sites with histories of serious crime incidents that occurred between 2012 and 2022. Posts 5, 6, 7, and 9 did not use any sites with a history of serious crime incidents in the preceding 10 years. Post 4 was working with the SIMS team to clean up its incident data, so we excluded the seven sites at this post with histories of serious crime incidents from our review. SSI 401 required a note in VIDA if there was a serious crime incident at a site in the last 10 years. We found that posts 1, 2, 8, and 10 did not comply with this requirement.

The Interim Site History File Guidance required that CDs certify the process of vetting the safety and security of prospective sites. We found that posts 5 and 7 did not meet this requirement. We sampled a selection of sites at each post to confirm that the CD certification was uploaded into VIDA and found that 96% of sites in our sample had uploaded CD certifications. The Interim Site History File Guidance also required that SSMs document their decision to use sites with a history of serious crime incidents in VIDA. We found that posts 1 and 10 were not in compliance with this requirement.

Figure 4: Results of Compliance Checks on Site Development at Sample Posts

10 Sample Posts, approximately 171 Volunteers			SSI 401 (2018)	Updated Interim Site History File Guidance (August 2022)	
Post	Number of Volunteers in the first cohort in 2022	Number of Active sites with serious crime incidents from 2012-2022	Note in VIDA about serious crime incidents	CD certification compliance	Crime incident review documented
1	6	3	No	Yes	No
2	22	1	No	Yes	Yes
3	12	2	Yes	Yes	Yes
4	21	7	*Excluded*	Yes	Yes
5	16	0	N/A	No	N/A
6	18	0	N/A	Yes	N/A
7	17	0	N/A	No	N/A
8	27	3	No	Yes	Yes
9	17	0	N/A	Yes	N/A
10	15	1	No	Yes	No

Key: Pink shading indicates noncompliance

APPENDIX C: COMPARISON OF DATES POSTS RECEIVED CIRS LOCATION DATA, COUNTRY DIRECTOR CERTIFICATION, AND VOLUNTEER RE-ENTRY DATES

Nine out of ten posts in our sample received the CIRS location data spreadsheets before CDs certified that sites were safe based on review of past crime incidents. Eight posts received volunteers before CDs certified sites were safe. Two posts received Volunteers before they received the location data. Seven posts (see posts 4 through 10) did not receive the location data spreadsheets in time for posts to comply with agency guidance that posts should review the history of crime incidents at sites at least 3 to 9 months before Volunteers arrive.

Figure 5: Comparison of Dates Posts Received CIRS Location Data, Country Director Certification, and Volunteer Re-entry Dates.

2022	Post 1	Post 2	Post 3	Post 4	Post 5	Post 6	Post 7	Post 8	Post 9	Post 10
January	1									
February										
March										
April		1	1	1						
May	3				1	1				
June				3	3		1		3	2 3
July				2		3		1	1	1
August	2				2		2		2	
September		3	2 3			2	3	3		
October			2							
November		2						2		
December										

Source: Peace Corps Re-Entry Updates and correspondence between post and headquarters staff

Key:

1. Location Data Spreadsheet Received – Red Shading
2. Country Director Certified sites – Yellow Shading
3. Volunteer Re-Entry – Green Shading

Blue shading indicates time elapsed between receiving the location data spreadsheets and Volunteer Re-entry and CD certification of sites

APPENDIX D: ACRONYMS

CD	Country Director
CIRS	Coordinated Incident Reporting System
CRM	Customer Relationship Management
OSS	Office of Safety and Security
SIMS	Security Incident Management System
SSI	Safety and Security Instructions
SSM	Safety and Security Manager
VIDA	Volunteer Information Database Application

APPENDIX E: AGENCY RESPONSE

MEMORANDUM

To: Joaquin Ferrao, Inspector General

Through: Emily Haimowitz, Chief Compliance and Risk Officer

From: Carol Spahn, Director

Date: August 21, 2023

CC: Thomas Peng, Chief of Operations and Administration
                 Lauren Stephens, Chief of Staff
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                 Allison Lange, Regional Security Advisor, AF
                 Dana Abro, Regional Security Advisor, EMA
                 Joshua O'Donnell, Regional Security Advisor, IAP
                 John Allen, Chief, Crime Response and Analysis, OSS
                 Gregory Yeich, Compliance Officer

Subject: Agency Response to Management Implication Report: Impact of the SIMS Data
                 Migration on Site Development (IG-23-05-SR)

Peace Corps appreciates the resources committed by the Office of the Inspector General (OIG) to review the transition of crime incident data from the agency's Coordinated Incident Reporting System (CIRS) to the Security Incident Management System (SIMS). On July 7, 2023, the agency received the Management Implication Report: Impact of the SIMS Data Migration on Site Development (IG-23-05-SR) issued by the OIG. The report documents the timeline and processes used by the agency to transition crime incident data to SIMS.

1

The implementation of SIMS, which was launched in April 2021, is a significant improvement in the agency's ability to document, track, and analyze crime incident data. The updates to the system result in more intuitive tracking of incidents for post staff, quicker and easier collaboration between post and headquarters staff on casework, and a seamless site history process. To prepare staff for the new system, the agency conducted initial SIMS trainings for all users when the system was rolled out and continue to hold regular webinars and refresher trainings with SIMS users.

As noted in the report, SIMS sits on the agency's Customer Relationship Management platform which allows for increased data integration and improved useability of crime incident data across multiple programmatic areas, both at post and headquarters. Specifically, the ability of SIMS to auto-populate crime incident report data into the Volunteer Information Database Application (VIDA), which is used by Peace Corps posts during the site identification and development process, allows post staff to effectively link crime incidents with sites. With this information linked, post staff are able to easily access and review accurate crime incident data before placing a Volunteer in a site. Immediately upon the release of the SIMS system, new incidents created in SIMS were linked to a Peace Corps site.

In order for the site history data to be complete, the agency implemented a Site History Global Cleanup project, with the goal of accurately transitioning all data from CIRS to SIMS. The project required each post to verify locations of crime incidents to ensure historical crime incidents are accurately linked to site history files in VIDA. The additional features of SIMS allow for greater data capture, thus enabling more incidents to be linked to specific sites. This project resulted in over 8,100 incidents being linked to a site, including over 3,000 incidents not previously associated with a site in CIRS, significantly improving the quality of the incident data.

The agency is pleased that the OIG concluded that the SIMS data migration did not impact posts' ability to perform effective site management or meet site management requirements as the agency returned Volunteers to service. As the agency transitioned crime incident data to SIMS, headquarters staff provided guidance, support, and training to post staff. An example of this support included migrating more than 40,000 historical incidents into SIMS as case notes which were accessible to posts' Safety and Security Managers. Additionally, the Office of Safety and Security provided posts with files of historical CIRS incident data that could be referenced during site management discussions. As part of the Site History Global Cleanup project, the agency revised guidance on reviewing site history files during site selection. The revised guidance requires that multiple post staff verify that crime incident data were reviewed and considered for all site selection decisions.

2

The transition from CIRS to SIMS occurred when no Volunteers were in the field and, while the agency recognizes that the transition was not seamless, it was a necessary exercise resulting in an improved crime incident data and site management process.

As the OIG noted in the Executive Summary of the report, the migration to SIMS did not impair posts' ability to meet site management requirements. Posts were able to effectively prepare sites for Volunteers to return to service after the 2020 global evacuation due to the COVID-19 pandemic. Finally, as noted at the end of the report, there are no significant ongoing risks related to accessing historical CIRS data posts that could impact future site development.

The agency appreciates the opportunity to respond to this Management Implication Report and welcomes further discussion on the topic.

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