PEACE CORPS
Office of
INSPECTOR
GENERAL

Management and Performance Challenges

Fiscal Year 2020

In accordance with the Reports Consolidation Act of 2000, the Office of Inspector General (OIG) is submitting what it has determined to be the most significant management and performance challenges facing the Peace Corps.

The Inspector General's (IG) management challenges are observations of the IG based on the work performed by OIG, as well as information uncovered during the performance of our oversight responsibilities.

Extraordinary Developments Impacting the Peace Corps in 2020

In March 2020, the Peace Corps responded to the COVID-19 pandemic by suspending all Volunteer activities and evacuating nearly 6,900 Volunteers from approximately 60 countries of service. In a matter of a few weeks, the agency brought all its Volunteers back to the United States. Evacuating all its Volunteers at the same time was unprecedented and required the agency to take extraordinary steps, including the chartering of international flights, to complete the task. For the first time in its nearly 60-year history, the Peace Corps does not have a single active Volunteer. The agency faces the tremendous challenge of planning for the resumption of its overseas Volunteer programs in the environment of uncertainty that the COVID-19 pandemic has created.

In addition to responding to the global pandemic, agency leadership, citing the killing of George Floyd, pledged to confront the issue of racial injustice. The Director issued multiple statements of commitment to addressing racial and social injustice in 2020 and dedicated resources to several initiatives aimed at increasing diversity and inclusion within the agency. Because of the agency's identification of this area as a management challenge and pointed efforts to address the need for enhanced diversity and inclusion, OIG is incorporating in this year's statement a description of the issue and how the agency is working to address it.

Significant management challenges facing the Peace Corps:

- **Volunteer Health and Safety**

- **Human Capital Management**

- **Information Technology Security Management**

- **Planning and Implementation**

- **Diversity and Inclusion of Staff and Volunteers**

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

Challenge: Volunteer Health and Safety

Why This Is a Challenge

As mentioned above, in response to the growing threat of the COVID-19 pandemic, in March of 2020 the Director ordered the evacuation of all Peace Corps Volunteers from their countries of service and their return to the United States. This decision and the resulting effort involved in transporting almost 6,900 Volunteers in a matter of weeks back to the U.S. was consistent with the agency's commitment to prioritizing the health and safety of its Volunteers. While lack of Volunteers in the field minimizes previously identified challenges to Volunteer health and safety, these unresolved challenges may become more complex as the Peace Corps begins to redeploy Volunteers amid the pandemic, and new challenges will surely arise.

Volunteer Medical Care

OIG remains concerned about the following aspects of the agency's Volunteer health related policies, procedures, and practices identified in our 2019 statement of management challenges:

- an incomplete approach to conducting root cause analyses of adverse or sentinel patient safety events;

- potentially insufficient medical support for Volunteers in remote countries with only one Peace Corps medical officer; and

- deficiencies in posts' medical action plans.

Furthermore, recent OIG evaluations identified Volunteer resilience and mental health as a challenge. The agency has established goals and objectives in its Strategic Plan related to resilience and mental health, i.e. establishing realistic expectations of service; increasing Volunteers' ability to independently manage inevitable adjustment challenges; and building the resources and skills of non-clinical staff, Volunteers, and partners to enhance Volunteers' resilience. In three recent country program evaluations, Volunteers reported being dissatisfied with either their ability to access counseling, or with the sufficiency of information and training about in-country stressors and challenges and how to manage them during service.

In addition to our previous concerns about Volunteer medical care, the COVID-19 pandemic and the efforts to resume Volunteer activities pose an unprecedented challenge for maintaining the health and safety of Volunteers and the communities they serve. In June 2020, the agency issued its Country Re-Entry Guide (CREG) that serves as comprehensive guidance for planning to return Volunteers to service, with primary emphasis on mitigating the risks of the COVID-19 pandemic. As stated in the CREG, "The COVID-19 pandemic and associated societal consequences are significantly impacting many lives globally, including the lives of [Volunteers/trainees] and the communities they serve."

As outlined by the CREG, the pandemic deeply impacts Peace Corps operations, requiring additional consideration for mitigating the impacts of COVID-19 in each of the following areas: pre-departure and staging; Volunteer training; housing, communities, and worksites; travel and transportation; Peace Corps offices and the health unit; psychosocial stressors; and symptomatic or COVID-19 positive Volunteers. Furthermore, the Peace Corps has had to modify its approach to medical screening for applicants due to the additional risks of COVID-19 for people with certain conditions.

Volunteer Site Development

The agency requires that posts maintain site history files with relevant safety and security information, and that post staff review these files when considering Volunteer site placement. However, during recent country program evaluations of Senegal, Paraguay, Thailand, Mozambique, Comoros, Kyrgyz Republic, Tanzania, Panama, and Eastern

Caribbean, OIG found site history files were incomplete, insufficiently organized, or not being used to inform site selection.

In addition, OIG found shortcomings with multiple posts' self-identified site selection criteria, which is required per MS 270 to ensure that Volunteer sites, housing, and work assignments are appropriate. Either criteria were inadequate and superficial, or posts were out of compliance with their criteria. Furthermore, appropriate staff (including the safety and security managers and Peace Corps medical officers) were not always sufficiently included in the site development process.

In several recent country program evaluation reports, we found that Volunteers were violating the posts' transportation policies that banned or limited the use of motorcycle taxis. Although they often said motorcycle taxis were simply more convenient, Volunteers also commonly reported that there were limited Peace Corps-approved transportation options to and from their sites, especially in rural areas. Without housing checks and proper site development, the agency may inadvertently place Volunteers in houses and sites where safety and security risks are unknown.

The COVID-19 pandemic may increase the difficulty of finding suitable sites for Volunteer placement. As briefly mentioned above, additional considerations will have to be factored into decisions regarding Volunteer housing, communities, and worksites to reduce the risk of COVID-19 transmission, as well as to prepare communities to host a Volunteer during the pandemic. This includes additional possible mitigation measures related to travel and transportation to reduce the risk of transmission through reduced travel or availability of safe modes of transportation. The added considerations will require posts to more carefully consider housing and work assignments as well as travel and transportation in the current environment.

Volunteer Drug Use

In August 2018, OIG issued a management advisory report on Volunteer drug use alerting the agency that efforts to address Volunteer drug use had been insufficient and that drug use continued to pose a serious risk to the integrity and reputation of the Peace Corps and to the health and safety of Volunteers.[1] OIG found that country directors struggled to resolve allegations of drug use through administrative action due to a high burden of proof and a lack of tools necessary to address the allegations in a fair and consistent manner. We also found that agency records on Volunteer misconduct related to drug use were incomplete, inaccurate, and inconsistent. While the agency has considered and rejected reasonable suspicion drug testing for Volunteers, it has not developed additional tools to help country directors resolve these allegations. Moreover, five of the six recommendations remain open.

Progress in Addressing the Challenge

Volunteer Medical Care

As mentioned above, the agency developed the CREG in June which provides a review process to first assess whether conditions in-country are favorable for re-entry, and subsequently to plan and prepare for re-entry. It includes tools and deliverables for safely returning Volunteers to service and reducing the risk of COVID-19 transmission once there. See challenge Planning and Implementation for more information on the CREG.

In last year's management challenges, we reported that the agency's oversight over malaria risk reduction and prevention was a challenge. In response to OIG's Management Advisory Report concerning the death of a Volunteer in Comoros, the agency made progress in several areas, including: updates to its malaria prevention and diagnosis training sessions for agency medical officers at continuing medical education sessions; the development of new malaria education materials for staff; updates to its technical

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1   Management Advisory Report: Volunteer Drug Use (2018)

guidelines for malaria prevention and treatment; updates to its clinical escalation policy; updates to its clinical documentation standards; and approval of the hiring of an additional medical officer for Comoros.

The agency also updated its patient safety procedures to include a safety assessment code matrix. This matrix categorizes patient safety events by probability and severity. It is a screening tool to select the events most appropriate for root cause analysis. Consequently, OIG closed the recommendation to implement a screening process. OIG reviewed the agency's recent root cause analyses and found some improvements in the area of system focus and action plans.

In addition, the agency reported to OIG that it had been piloting a Volunteer resilience training based on research and best practices for enhancing resilience, and that, as of the beginning of November 2019, 12 posts had either completed or started the pilot.

Volunteer Drug Use

The agency provided documentation of its efforts to increase Volunteer awareness of the impacts of drug use on their safety and the effectiveness of their service. Additionally, recent changes to policy in cases where Volunteers admit to, or are found to have engaged in, the use, possession, or distribution of drugs may streamline agency decision-making in such cases.

What Needs to Be Done

Ensuring the health and safety of Volunteers as they return to the field will require extensive coordination between work units at posts and between posts and headquarters offices. The CREG sets the expectation that posts will liaise closely with Region, OSS, and OHS representatives throughout the planning and review process to ensure that all criteria for re-entry are met. The CREG also emphasizes the need for posts' emergency action plans and medical action plans to be aligned to protect

the safety and health of Volunteers, with updates to the two documents requiring a team effort between medical, safety, administrative, and programming staff at posts. Further, the agency is requiring posts to complete a COVID-19 specific response plan as part of their emergency action plan. The CREG also requires additional safety & security and health training related to the security environment in-country and impacts of COVID-19. Posts should implement these requirements in order to ensure the health and safety of Volunteers during the pandemic.

Volunteer Medical Care

To improve the Volunteer health care program, the agency should implement recommendations from the 2016 Follow-Up Evaluation of Issues Identified in the 2010 Peace Corps/Morocco Assessment of Medical Care, including updating agency guidance to clarify oversight responsibility for medical units at Peace Corps posts. We also recommended in this report that the agency should work to improve their patient safety event review process, since this process will better ensure that the Peace Corps continuously learns how to better support Volunteer health and safety. Specifically, the agency should ensure reviews include key components like root cause and effect statements and process or outcome measures. The agency also needs to provide sufficient and appropriate staffing for case reviews. Related to its strategic objective on Volunteer resiliency, the agency should provide clearer communication to Volunteers that it may consider a medical separation necessary in the event that sufficient mental health support is not available to the Volunteer in the country of service. In addition, the agency should assess the need to have at least two qualified medical officers at posts with an active Volunteer population, prioritizing those posts with one medical officer in a vulnerable environment.

Because recent OIG evaluations have found medical action plans to be incomplete, the agency should improve its oversight of posts' medical action plans. Additionally,

due to the COVID-19 pandemic, the CREG requires each post to conduct a comprehensive review of their medical action plan. In addition to previous requirements, the assessment is to include host country public health reporting requirements, local testing and treatment regulations, possible transportation restrictions for COVID-19 positive patients, personal protective equipment requirements of the health unit, location for quarantine, and/or country-specific COVID-19 assessment and management measures.

Volunteer Site Development

In order to reduce safety and security risks to Volunteers, the agency should continue to provide training and technical assistance to overseas field staff to improve use of the electronic system to manage site history files. Furthermore, posts need to ensure that Volunteers' sites, housing, and work assignments meet their specified selection criteria and that appropriate staff are involved in inspecting and approving Volunteer housing.

To reduce the safety risks associated with Volunteer transportation, the agency should improve implementation and enforcement of motorcycle policies at Peace Corps posts. It should clarify with posts the importance of collecting more accurate information about the transportation options Volunteers will have at their sites and consider those options in relation to the post's transportation policy and standards.

To mitigate the risks associated with operating during the COVID-19 pandemic, the agency has established a broad set of considerations for field staff concerning the selection of Volunteer sites, including for housing, host families, work sites, and transportation options. Posts will need to implement a site development process that accounts for these considerations as part of the effort to resume Volunteer activities.

Volunteer Drug Use

The agency should take measures to better address Volunteer use of unauthorized drugs. Country directors need greater support in resolving drug use allegations at posts, and the agency needs to gather information on the prevalence of and factors contributing to unauthorized drug use in the context of Volunteer service, as well as improve the accuracy and analysis of data collection stemming from unauthorized drug use among Volunteers.

Key OIG Resources

Management Advisory Report: Peace Corps/Ghana Gas Tank Cooking Safety (2020)

Evaluation of Peace Corps/Eastern Caribbean (2020)

Evaluation of Peace Corps/Tanzania (2020)

Evaluation of Peace Corps/Panama (2020)

Evaluation of Peace Corps/Kyrgyz Republic (2019)

Evaluation of Peace Corps/Paraguay (2019)

Evaluation of Peace Corps/Comoros (2019)

Evaluation of Peace Corps/Thailand (2019)

Evaluation of Peace Corps/Mozambique (2019)

Evaluation of Peace Corps/Senegal (2018)

Management Advisory Report: Volunteer Drug Use (2018)

Evaluation of Peace Corps/Albania (2018)

Evaluation of Peace Corps/South Africa (2017)

Management Advisory Report: Site History Files (2016)

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

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

Challenge:

Human Capital Management

Why This is a Challenge

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

Nearly all Peace Corps U.S. direct-hire staff are subject to a 5-year term limit called the "5-year rule" (FYR). Congress enacted the FYR in 1965 to create a constant flow of new employees, including returned Peace Corps Volunteers; avoid the inflexibility associated with the civil service system; and prevent employees from working their entire career at the Peace Corps. In June 2012, OIG reported that, between 2005 and 2009, the annual pace of employee turnover was between 25 percent and 38 percent, quadruple the average turnover rate in the Federal government, and beyond the original intent of the FYR. We estimated that FYR-driven turnover accounted for approximately 60 percent of $20.7 million in total turnover management costs over that period.[2]

Hiring and Retaining Qualified Staff

Issues stemming from high turnover have persisted over time and affect multiple aspects of agency operations. The aforementioned report details some of these effects at headquarters, including a weakened ability to attract and retain qualified personnel for core management functions and shortened tenures of approximately 3 years. In July 2017, OIG issued the "Management Implication Report: Challenges Associated with Staff Turnover".[3] This report consolidated comments from post leadership from 27 evaluations between 2010 and 2015 on the negative effects of staff turnover on the agency's ability to maintain high quality Volunteer support at posts. We specifically cited a report by the Field Advisory Board which noted that persistent gaps in post leadership compromised post performance and the ability to perform core business functions.

In 2019, the Peace Corps requested the Office of Personnel Management (OPM) to conduct an assessment of its organizational design and performance to shed light on how the agency can better meet its workforce needs. The report similarly found that the FYR contributed to increased turnover, extended vacancies, and other difficulties in work processes. Focus group participants commented on how the FYR resulted in a lack of continuity and reduced the length of fully productive employment when considering onboarding, training needs, and employees' learning curves.

Training and Knowledge Management

Our 2012 FYR evaluation and 2017 management implication report highlighted how excessive personnel turnover and shortened staff tenures made it especially difficult for the agency to keep pace with meeting staff training needs, and to maintain sufficient institutional memory and effective knowledge management practices. With high turnover, the Peace Corps must rely on its policies, reports, and institutional knowledge to record and communicate key processes or initiatives.

We identified several deficiencies in our September 2014 evaluation of overseas staff training; 12 of the 25 recommendations remained open as of September 2020. These open recommendations addressed a range of staff training issues, including ensuring that all newly hired headquarters and overseas staff complete job-specific training, and implementing a process to assess the training needs of staff.[4]

2   Final Evaluation Report: Impacts of the Five-Year Rule on Operations of the Peace Corps (2012)
3   Management Implication Report: Challenges Associated with Staff Turnover (2017)
4   Final Program Evaluation Report: Training Peace Corps' Overseas Staff (2014)

Knowledge management, defined as capturing, distributing, and effectively using knowledge, becomes critical in environments with high turnover. Our FYR evaluation reported how frequent turnover had negatively affected the Peace Corps' institutional memory, a problem other studies from as early as 1974 have also noted. When experienced staff leave with no overlap with incoming staff or without sufficiently documenting the status of projects they were involved in, projects and initiatives sometimes fail to progress, and individuals or offices may "reinvent the wheel" in their efforts to address issues or institutional challenges. The OPM report expressed concern about inefficient processes as staff struggled to find documentation of past solutions or initiatives. Additionally, focus group participants noted that work silos created single points of failure because of the lack of documentation.

Progress in Addressing the Challenge

The OPM report was produced at the request of the Peace Corps. The agency intended that the report contribute to a strategic review of current organizational performance, design, and position management, and include recommendations for improvement. Further, the Office of Human Resources (HR) distributed the report to all supervisors in the agency and conducted discussions with them of ways to improve work processes in their units. This collaborative effort displays HR's commitment to identify, improve, and mitigate issues.

Hiring and Retaining Qualified Staff

In July 2019, the Director announced her exemptions of seven positions in four core operations units such as HR and the Office of the Chief Financial Officer as a result of the Sam Farr and Nick Castle Peace Corps Reform Act of 2018 which allows the Director to exempt certain critical positions from the FYR requiring specialized technical or professional skills and knowledge of Peace Corps operations. While exempting seven positions is likely to

improve institutional memory and enhance the continuity of operations in the affected offices, we have not assessed whether this step will have a broader organizational impact on addressing this challenge.

Training and Knowledge Management

We closed a recommendation based on the agency's document submission from our 2014 evaluation report on overseas staff training regarding the need to develop standard operating procedures and guidance to monitor the completion of mandatory staff trainings. The agency also recently launched a training course for overseas supervisory staff, which may address another recommendation in the report. Lastly, Peace Corps staff reported progress in implementing record keeping standards. By the fourth quarter of 2020, 68 percent of posts had enacted the Records Management Post File Structure.

What Needs To Be Done

Hiring and Retaining Qualified Staff

Following the recent workforce reduction, the agency must ensure that headquarters offices are properly equipped to provide quality support and oversight of overseas operations and consider exempting additional positions or core business functions in the agency. The agency still needs to address two open recommendations (recommendations 2 and 3) from our 2012 FYR report relating to better management of turnover and acquisition and retention of qualified personnel in core business functions. The agency should continue to take steps to address the challenges and recommendations identified by the OPM report.

Training and Knowledge Management

Peace Corps leadership should develop and enact an agency-wide strategy to formalize knowledge management practices related to recording institutional memory, developing standard operating procedures for key processes, and ensuring

accessibility. Also, the agency should consider the recommendations from the OPM report like creating a formal off-boarding policy and utilizing cross-training and communities of practice to determine beneficial actions. Finally, the agency should provide documentation to OIG of its efforts to improve training and knowledge management, for example its mandatory training course catalogue, which may facilitate the closure of open recommendations.

Key OIG Resources

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

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

[Evaluation of Impacts of the Five-Year Rule on Operations of the Peace Corps (2012)](#)

Challenge: Information Technology Security Management

Why This Is a Challenge

Effective information technology (IT) security programs help protect agency data from being misused by both internal and external actors and minimize the risk of threats to sensitive data. Federal laws and regulations governing IT security are designed to strengthen an agency's management of its overall operations. They also provide significant guidance to help prevent serious information security incidents. The Federal Information Security Modernization Act of 2014 (FISMA), is central to the Federal IT security program. The objective of FISMA is to ensure agencies develop, document, and implement an agency-wide program to provide information security for the information and systems that support their operations and assets.

The Peace Corps continues to lack an effective information security program and has made minimal improvement over the last 10 years. Foundational IT elements, such as having clearly defined boundaries and a complete listing of hardware, are missing. Some of the identified issues have been outstanding for over a decade, and the agency has struggled to implement corrective actions. Weaknesses across all five FISMA reportable areas exist because the agency has taken a predominately passive approach to compliance and has not integrated information security into business operations. OIG is concerned about the quality of the agency's IT security program, especially considering the sensitive data that the Peace Corps maintains, notably employee personnel records, Volunteer health records, and Volunteer sexual assault incident information.

Implementing change at the organizational level requires a serious and sustained undertaking with involvement and dedication from agency leadership and all relevant stakeholders. The agency does not have the appropriate planning, resource, and communications structures in place, but it nevertheless has continued to initiate extensive foundational changes to its IT infrastructure. During FY 2020, the Peace Corps relocated the data center, moved to a new headquarters building, and, due to the ongoing COVID-19 pandemic, evacuated all Peace Corps Volunteers. In implementing these major shifts, the agency focused on uninterrupted day-to-day operations without sufficient attention to the information security program. Specifically, the Office of the Chief Information Officer (OCIO) accepted information security risks to the infrastructure with the condition that remediation steps would be taken in a timely manner; however, the agency did not meet, and in some instances violated, the conditions established in the authorization. OCIO also continued to utilize outdated and unsupported assets in the Peace Corps' IT environment which left information vulnerable to malicious attacks. Furthermore, the agency has continued to make decisions for business convenience without understanding the information security risk or the impact to the entire agency. For example, the agency significantly changed its General Support System, which is the backbone of the agency's IT infrastructure, without evaluating the impact or added risks to the agency's operations. A similar infraction occurred in FY 2016 with the Peace Corps Medical Electronic Documentation & Inventory Control System. Despite successive years of problems there is an overall lack of accountability for achieving an effective information security program.

A key foundational issue is the absence of a fully-implemented, comprehensive, agency-wide risk management program that is effective at monitoring, identifying, and assessing security weaknesses and resolving related problems at the entity, business process, and information system levels. See the Management Challenge section titled Planning and Implementation. Without a robust risk management process, the Peace Corps is exposed to risk of attacks, environmental disruptions, and business failures.

What Needs to Be Done

In order to ensure the agency's information, operations, and assets are protected, it is critical that the Peace Corps achieve full compliance with FISMA and other Federal laws and regulations that apply to managing its IT security infrastructure. Our reviews of the Peace Corps' Information Security Program have contained several actionable steps that the agency should take to improve its security program. However, over the last decade, the agency has failed to make systemic changes to fully address these recommendations.

The Peace Corps will need to focus on improving its IT security program by elevating IT security decision making, ensuring agency policies are comprehensive, fostering individual and organizational accountability for poor program implementation, and prioritizing the time and resources necessary to become fully FISMA compliant and eliminate weaknesses. Also, a fully implemented comprehensive risk management program would establish a platform for the Peace Corps to evaluate information security risks that could impact the agency's ability to fulfill its mission and conduct critical business processes. Moreover, elevating the role and responsibilities of critical information security positions will help ensure that information security risks will be integrated into operational decisions. Until senior leadership is sufficiently involved and provided the full picture of IT security risks, the Peace Corps will not make notable progress in securing its information systems.

Key OIG Resources

[Review of the Peace Corps' Information Security Program (2019)](#)

[Summary of Internal Control Issues Over the Peace Corps' Financial Reporting (FY 2019)](#)

Challenge: Planning and Implementation

Why This Is a Challenge

In 2019, OIG's statement of management challenges included our concerns that the agency struggled to plan for the long-term impacts of risk and resource needs of the organization. Specifically, OIG highlighted areas of concern where the agency did not apply sufficient time and resources to document decisions, ensure the appropriate resources are assigned, and comprehensively consider risks to plan and implement new initiatives and programs.

Informed decision making involves consideration of data quality and consultation with those with applicable knowledge. Decisions should be documented for future consultation, to assign responsibility, and to ensure accountability as management develops programs and policies. Our management advisory report on the suspension of Peace Corps/Kenya found that the agency did not sufficiently document decisions and recommendations concerning continued operations in the country.[5] In addition, our management advisory report on Volunteer drug use found that an important obstacle to prioritizing and addressing Volunteer drug use was the agency's inadequate approach to maintaining the information it needs to understand the scope of the problem and ensuring data quality of the information it collected.[6]

When investing resources, the agency focuses on functions that directly relate to its mission and priorities, which largely revolve around direct Volunteer support, but management should also consider the administrative functions that enable the Peace Corps to provide that support. Namely, enterprise risk management (ERM) and information technology security are critical programs for efficient business processes, effective programming, and

the safeguarding of data. The agency committed to developing an ERM program in 2018. Information technology security meanwhile suffers from inadequate action and resources. See challenge Information Technology Security Management.

These deficiencies in planning and implementing could impede the agency's ability to effectively respond to the unprecedented challenges presented by the COVID-19 pandemic. The agency will have to effectively coordinate many offices and resources to continuously assess needs and resume Volunteer operations under uncertainty. As mentioned above, the Director made the decision in March to suspend all Volunteer activities, and the agency began evacuating all Volunteers.[7] Also in March, domestic Peace Corps staff moved to mandatory telework, with some exceptions, while overseas staff followed staffing and teleworking orders from their respective chiefs of mission. The agency as of September 2020 was in the process of implementing a phased approach to return staff to headquarters and other domestic facilities.

The COVID-19 pandemic continues to pose unique challenges for the Peace Corps that affect every aspect of operation as the agency attempts to resume normal operations by redeploying Volunteers to over 60 countries with varying pandemic responses, supporting infrastructure, and data reliability. Effective planning and implementation will be key to success. Even in countries with few to no COVID-19 cases the agency must carefully consider the reliability of transportation and the quality of medical care. Safe re-entry could prove complicated since part of the Peace Corps mission is to provide resources to countries in need where infrastructure may not be as well developed for protecting Volunteer and staff health and safety during the pandemic.

5   Management Advisory Report: Managing the Suspension of Peace Corps/Kenya: A Case Study (2018)
6   Management Advisory Report: Volunteer Drug Use (2018)

7   We use the term "Volunteers" to mean both Volunteers and trainees.

Progress in Addressing the Challenge

As part of its effort to implement an ERM framework, the agency's ERM Council approved risk categories to be examined and a format for the framework. The agency assigned additional personnel to an ERM secretariat to contribute perspectives from multiple offices within the agency. It has also begun developing office-level risk registers with plans to complete risk registers for all offices by the end of FY 2021.

In response to the COVID-19 pandemic, the agency has taken some important steps, particularly in planning for the resumption of Volunteer activities and the return to Peace Corps facilities. At the onset of the pandemic, the Peace Corps made an early decision to evacuate all Volunteers, using post- and Region-driven approaches to return them to the U.S. After the evacuation, the agency provided support to the evacuated Volunteers, including an additional month of health care benefits,[8] an evacuation allowance, a wellness stipend, and non-competitive eligibility for Federal jobs for sworn-in Volunteers even if they did not complete 12 months of service as normally required.

In January, the Director ordered the formation of a COVID-19 working group, which was converted in March to a task force comprised of 5 working groups to develop activities, tasks, and timelines to allow the agency to remain focused on its mission and objectives while planning its return to posts. The agency developed key guidance documents collected in the CREG, which directs management decision-making with the purpose of mitigating the risks of the global COVID-19 pandemic to staff, Volunteers, and host country communities. Developed by the task force's return-to-service working group with input from the Office of Health Services (OHS), Office of Safety and Security (OSS), Office of Global Operations (OGO), Regions, and other headquarters offices, the CREG provides a well-defined process and deliverables for re-entry planning. This process includes two separate reviews: an external review which assesses external conditions that

must be favorable for re-entry, and an internal review which assesses a post's planning and preparation for re-entry. After performing the reviews, an Approval Committee composed of representatives from Regions, OGO, OSS, OHS, and OCFO will make recommendations to the Director to approve a post for re-entry. Through the CREG, the agency set specific timelines to initiate the review process, to include weekly monitoring of external conditions at each post. The agency also issued Peace Corps Everlasting: Staff Roadmap to Return, which outlines the agency's plan for staff to return to Peace Corps facilities, both domestically and overseas. Additionally, the agency has developed COVID-19 Notification and Contact Tracing Procedures to use in the event an employee tests positive for COVID-19.

What Needs to Be Done

Decisions about Peace Corps priorities and initiatives should be assessed at the agency level and properly documented; efforts should be appropriately planned; and their implementation into agency policies and procedures should be timely and fully integrated. Additionally, the Peace Corps should continue to develop its ERM program to improve the agency's ability to successfully plan and implement new programs while properly considering possible setbacks and how to address them.

These considerations are especially pertinent regarding the resumption of Volunteer operations. The agency has expended significant amounts of time and resources in planning re-entry and continuation of Peace Corps activities. The challenge moving forward is to ensure effective and agile implementation of the CREG and Peace Corps Everlasting: Staff Roadmap to Return.

Key OIG Resources

2019 Review of the Peace Corps' Information Security Program

Management Advisory Report: Managing the Suspension of Peace Corps/Kenya: A Case Study (2018)

Management Advisory Report: Volunteer Drug Use (2018)

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8   The Peace Corps typically provides 1 month of health care for Volunteers after their service, but evacuees received 2 months.

Challenge:

Diversity and Inclusion of Staff and Volunteers

Why This Is a Challenge

This past year, the Peace Corps identified and prioritized the need to improve diversity and inclusion within the agency to better achieve the mission of promoting understanding of Americans on the part of the peoples served. The inclusion of a diverse workforce, leadership, and Volunteer corps is integral to the agency's ability to accurately represent America around the world. While the agency's mission and work incorporate these concepts, Peace Corps leadership recognized outstanding needs, especially considering the current US social climate. Peace Corps leadership has expressed that its diversity and inclusion efforts are being undertaken within the bounds of the recent Executive Order on Combating Race and Sex Stereotyping which specifies new prohibitions on Federal trainings related to certain 'divisive concepts.' OIG is including diversity and inclusion in this statement of management challenges because of the significant focus of agency leadership and resources on this topic, and to provide a summary of the diversity and inclusion efforts underway.

In June 2020, Director Olsen issued a statement on the killing of George Floyd. The Director indicated receiving concerns from Peace Corps staff and Volunteers about the agency's commitment to racial and social justice.[9] In response to those concerns, the Director committed resources on multiple fronts to address this challenge. The Director established a Diversity and Inclusion Taskforce, hired a senior advisor to strengthen strategies to support diversity, and designated funds for multiple activities supporting diversity initiatives among staff and Volunteers. In subsequent interviews, Peace Corps leadership communicated the importance of minority representation in post leadership, especially when supporting Volunteers of color. In addition, Peace Corps

officials expressed to OIG that the agency's ability to attract and retain highly-motivated applicants to serve as Volunteers will depend on how well it responds to questions or concerns they have about the Peace Corps' approach to diversity and inclusion and the impact in countries of service. Peace Corps staff also stated that Volunteers serve overseas and their effectiveness personally and professionally is dependent on understanding the environment of the countries in which they serve.

Even before June 2020, the agency had taken steps to address this challenge. In September 2019, the Director approved a plan and funding to conduct a comprehensive barrier analysis to satisfy the Management Directive 715[10] requirement instead of the perfunctory analysis usually performed by agencies' Equal Employment Opportunity functions. The government-wide directive instructs agencies to uncover, examine, and remove barriers to equal participation at all levels of the workforce and develop strategic plans to eliminate them.[11]

Data from the agency and OIG activities supports the need for increased inclusion and support of staff and Volunteers of color. One source of agency data shows a lower prevalence of racial minorities in senior positions at headquarters (FP 1 and 2, and experts) and U.S. Direct Hires at posts than at lower grades of employment and in the Federal government at-large. During our oversight activities, several senior leaders at the Peace Corps have voiced concerns over the way racial inequality and bias impacts the agency, its effectiveness, and its ability to support diverse Volunteers. In fact, results of the Annual Volunteer Survey show that an increasing number of Volunteers do not

9   https://www.peacecorps.gov/news/library/peace-corps-commitment-to-addressing-racial-and-social-injustice/

10   Management Directive 715 (MD-715) is the policy guidance which the Equal Employment Opportunity Commission (EEOC) provides to federal agencies for their use in establishing and maintaining effective programs of equal employment opportunity.

11   https://www.eeoc.gov/federal-sector/management-directive/instructions-federal-agencies-eeo-md-715-1

think that the Peace Corps is sufficiently inclusive and supportive of people of diverse backgrounds, the percentage rising from 6 percent in 2014 to 17 percent in 2019.

To improve diversity and inclusion, the Peace Corps has implemented initiatives in the past with varying effects and degrees of longevity. One of the most prevalent is Intercultural Competence, Diversity, and Inclusion (ICD&I) training delivered to post staff and Volunteers. This training was created in 2014 to help build understanding of cultural differences among local staff and U.S. citizens, including values and perceptions of Americans going overseas. The ICD&I team, in conjunction with local staff, tailors each training to the post and its historical and cultural context to better enable post staff to support people from different backgrounds. Another initiative is the Diversity Governance Council, a governing body that issues long-term organization-level recommendations to improve diversity. Some other initiatives in the past did not produce sustained action or results largely due to a lack of follow-through related to personnel turnover and insufficient knowledge management. See the Human Capital Management challenge.

Progress in Addressing the Challenge

The Office of Civil Rights and Diversity (OCRD) and HR began the first stage of a comprehensive barrier analysis in March 2020, during which the agency's barrier analysis team held focus groups and reviewed data from multiple sources to identify red flags, or triggers. In subsequent stages the team will analyze triggers to determine actual barriers, develop a plan to eliminate barriers, periodically assess the success of the response, and adjust the plan and response as necessary.

The purpose of the Diversity and Inclusion Taskforce is to receive information and recommendations from the Peace Corps community, develop short-, medium-, and long-term action plans, and determine which offices should have ownership to move initiatives forward. The taskforce consists of three working groups: one focused on

staff recommendations and two focused on Volunteers, from recruitment to completion of service and Third Goal. Since its creation in July, the taskforce has gathered feedback from staff, returned Volunteers, and agency stakeholder groups.

In addition, the agency has led conversations with post and headquarters staff to determine their needs, promote understanding, and encourage ongoing discussion. Lastly employee resource groups have held learning events for staff highlighting diverse experiences and leaders of the Peace Corps.

What Needs to Be Done

Besides including and supporting Volunteers and staff of diverse backgrounds, another goal communicated by agency leadership is to embed inclusion-oriented practices in all aspects of operations such as human resources, recruitment, Volunteer training, and program evaluation, instead of discrete or siloed programs. Staff further expressed that this is especially important to the Peace Corps' future as Volunteers and applicants look further into the Peace Corps' responsible and inclusive community engagement around the world. Agency leadership communicated the need to ensure sustainability by investing in long-term solutions, institutionalizing processes to continuously gather and use data, and determining how the Peace Corps' workforce will be involved in ongoing implementation.

The barrier analysis team will begin its second stage after receiving training from the Equal Employment Opportunity Commission, postponed until December 2020 because of COVID-19. In the next two stages, it will develop measurable actions to eliminate barriers and then assess progress and implement improvements on an ongoing basis. The team is expected to begin stage 4 of the barrier analysis in October 2021.

At the time of drafting this report, the diversity taskforce had paused its work. The agency awaited further guidance from the Office of Personnel Management on allowable activities under the Executive Order on Combatting Race and Sex

Stereotyping. Agency leadership also noted the importance of working within the larger system of the Federal government, recognizing specific regulations, shifting priorities, and managing expectations.

Key OIG Resources

The Peace Corps' Commitment to Addressing Racial and Social Injustice (Press Release 2020)

The Peace Corps Welcomes New Senior Advisor to the Director Dr. Darlene Grant (Press Release 2020)

Executive Order 13950 on Combating Race and Sex Stereotyping

OPM Memo: Mandatory Review of Employee Training under E.O. 13950 September 22, 2020