



PEACE CORPS  
Office of  
**INSPECTOR  
GENERAL**

# Management and Performance Challenges

## Fiscal Year 2021

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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 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 of its Volunteers back to the United States. Evacuating all of 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 60-year history, the Peace Corps does not have a single active overseas Volunteer. The agency faces the tremendous challenge of planning and executing the resumption of its overseas Volunteer programs in the uncertain environment created by the COVID-19 pandemic.

## **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 areas illustrate the most significant challenges facing the Peace Corps to effectively manage its resources and minimize the potential for fraud, waste, and abuse occurring in its operations. Successfully 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

### *Volunteer Medical Care*

In a 2016 evaluation of Volunteer health care, OIG found that the agency's medical technical guidelines provided unclear and ambiguous oversight responsibilities. Although the agency updated the guidelines related to health unit oversight responsibilities, our oversight activities documented additional problems related to the medical technical guidelines. For example, a 2016 evaluation of the agency's sexual assault risk reduction and response program found that the agency lacked a communication plan to inform staff about changes to the medical technical guidelines. In our 2019 review of the death of a Volunteer in Comoros, we found that the medical technical guidelines for treatment of malaria were outdated and not aligned with guidelines from the World Health Organization. Our 2021 review of the death of a Volunteer in Ghana identified unclear medical technical guidelines related to medical action plans. Due to these ongoing issues, OIG included an evaluation of the medical technical guidelines on the OIG annual plan for FY 2022.

In August 2021, OIG issued a report on the death of Peace Corps/Ghana Volunteer Chidinma Ezeani, who was medically evacuated to South Africa for treatment of severe burns after the gas stove in her home exploded. Our review identified systemic failures that contributed to significant delays in PCV Ezeani's care. For example, our finding that Peace Corps/Ghana's medical action plan did not fully comply with agency guidelines reflected a common area of finding from previous OIG oversight activities. We also found that the Peace Corps' Root Cause Analysis of the incident did not detect critical vulnerabilities and did not comply with industry standards, which prompted us to reopen a previously closed finding in this area.

Recent OIG evaluations of Peace Corps posts identified problems related to Volunteer resilience and mental health as a persistent challenge for the agency. The OIG's 2020 review of recurring issues at Peace Corps posts found that, from FY 2016 through FY 2019, five post evaluations included findings related to Volunteer mental health. Two of these evaluations found that Volunteers avoided mental health support out of fear of being medically separated.

The COVID-19 pandemic will continue to pose an unprecedented challenge for maintaining the health of Volunteers. In June 2020, the agency issued the Country Re-Entry Guide (CREG) to provide guidance for returning Volunteers to service, with an emphasis on mitigating the risks of the COVID-19 pandemic. Areas of Peace Corps operations that are impacted by COVID-19 considerations include pre-departure and staging; Volunteer training; housing, communities, and worksites; travel and transportation; Peace Corps offices and the health unit; psychosocial stressors; and medical screening. In FY 2022, OIG plans to initiate health and safety compliance reviews of posts to ensure CREG requirements and relevant health and safety measures have been met.

### *Volunteer Site Development*

The agency requires that posts use site selection criteria to ensure Volunteer sites, housing, and work assignments are appropriate. The OIG's 2020 review of recurring issues at Peace Corps posts found that all OIG post evaluation reports issued between FY 2016 to FY 2019 included findings related to site selection criteria. For example, OIG found that doors and windows were missing required locks or required mosquito screens in areas with malaria. OIG found housing without required access to treatable water. OIG also found that sites were not always approved by staff efficiently

and effectively. In 2021, we conducted a follow-up review of an evaluation of Peace Corps/Moldova and found that staff did not properly document their housing inspections.

The agency requires that posts maintain site history files, which comprise programming and safety and security information about past and current sites that could affect a future decision to use a site. OIG findings related to site history files are a longstanding issue, and OIG has previously identified weaknesses with agency oversight, guidance, and systems that increase the risk that Volunteers may be placed in unsafe sites. In 2016, OIG issued a management advisory report to highlight systemic deficiencies with site history files that included a recommendation to improve the data management system for site history files. The OIG's 2020 review of recurring issues at Peace Corps posts found that between FY 2016 and FY 2019, 12 post evaluations contained findings related to site history files, including missing documentation and missing crime information. In 2021, we conducted a follow-up review of an evaluation of Peace Corps/Moldova and found that crime incidents were not documented in the site history files as required, the same finding we reported in our 2013 country program evaluation of Peace Corps/Moldova.

In 2021, the Peace Corps began recording Volunteer crime data in a new system. The Peace Corps archived the historical crime data from the previous system, and those records became inaccessible to staff. However, historical crime data are required to be included in site history files, and OIG raised concerns that this issue would impact staff's ability to select and approve appropriate sites. In response to OIG concerns, the agency agreed to migrate the historical crime data to the new system by the end of 2021.

OIG is concerned that the COVID-19 pandemic may increase the difficulty of Volunteer site development. Steps to

mitigate the risks of COVID-19 transmission will likely impact decisions regarding appropriate Volunteer housing, communities, and worksites, in addition to travel and transportation.

### ***Volunteer Drug Use***

Due to the absence of Volunteers, OIG does not presently have concerns related to Volunteer drug use. In the past, OIG was concerned 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. OIG will continue to monitor this issue when Volunteers return to service. Five out of six recommendations issued in a 2018 OIG management advisory report on Volunteer drug use remain open.<sup>1</sup>

## **Progress in Addressing the Challenge**

### ***Volunteer Medical Care***

As mentioned above, the agency developed the CREG in June 2020, which includes tools and deliverables for returning Volunteers to service and reducing the risk of COVID-19 transmission once there. See the Planning and Implementation challenge for more information on the CREG.

In September 2021, the agency updated manual section 261 to provide at least two qualified medical officers at all posts with an active Volunteer population. Moreover, OIG closed two recommendations from a 2016 evaluation of Volunteer health care after the agency updated agency guidance related to health unit oversight responsibilities and ensured CDs receive clear guidance on their oversight responsibilities.

### ***Volunteer Site Development***

In 2021, OIG closed recommendations at three Peace Corps posts related to Volunteer housing and site development, such as

<sup>1</sup> [Management Advisory Report: Volunteer Drug Use \(2018\)](#)

improving compliance with housing safety criteria and providing staff more time to conduct housing checks. In addition, OIG closed a global site development recommendation related to cooking safety. OIG also closed recommendations at five Peace Corps posts related to improving the quality of site history files.

## What Needs to Be Done

Ensuring the health of Volunteers as they return to the field will require extensive coordination between work units at posts and between posts and headquarters. In addition to CREG requirements, the agency is requiring posts to complete a COVID-19 response plan as part of their emergency action plan. Posts should implement these requirements to ensure the health of Volunteers during the pandemic.

### *Volunteer Medical Care*

To improve the Volunteer health care program, the agency should implement the open recommendations from the 2016 Follow-Up Evaluation of Issues Identified in the 2010 Peace Corps/Morocco Assessment of Medical Care. We also recommended in this report that the agency ensure patient safety event reviews include key components like root cause and effect statements and outcome measures. The agency should provide sufficient and appropriate staffing for case reviews. To achieve the agency's strategic objective on increased Volunteer resiliency, the agency should: (1) provide clear communication to Volunteers on how to access counseling and support, (2) improve training for Volunteers on managing the challenges of service, and (3) intensify efforts to increase the capacity of non-clinical staff to support Volunteer resiliency.

The CREG requires each post to conduct a comprehensive review of their medical action plan, and the agency should improve its oversight to ensure each post has complete and updated medical action plans.

### *Volunteer Site Development*

Furthermore, posts must ensure that site selection criteria are clear, that Volunteers' sites, housing, and work assignments meet their criteria, and that appropriate staff inspect and approve housing and properly document the results. The agency should continue to provide training and technical assistance to overseas field staff to improve the use of the electronic system to manage site history files.

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. Posts will need to implement a site development process that accounts for these considerations while also avoiding the longstanding issues with site development that OIG has identified during oversight activities.

## Key OIG Resources

[Follow up Evaluation of Peace Corps/Moldova \(2021\)](#)

[Review of the Facts and Circumstances Surrounding the Death of a Peace Corps/Ghana Volunteer \(2021\)](#)

[Recurring Issues Report: Common Challenges Facing Peace Corps Posts, FYs 2016-2019 \(2020\)](#)

[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 \(2020\)](#)

[Management Advisory Report: Review of the Circumstances Surrounding the Death of a Volunteer in Peace Corps/Comoros \(2019\)](#)

[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 \(2019\)](#)

[Review of New Country Entry Guidance  
for Conflict-Affected Countries \(2019\)](#)

[Follow-Up Review of Peace  
Corps/Namibia \(2019\)](#)

[Follow-Up Review of Peace  
Corps/Nepal \(2019\)](#)

[Evaluation on Homestay Impact \(2019\)](#)

[Evaluation of Peace Corps/Senegal \(2018\)](#)

[Management Advisory Report:  
Volunteer Drug Use \(2018\)](#)

[Evaluation of Peace Corps/Albania \(2018\)](#)

[Case Study of Effective Site  
Development Practices \(2018\)](#)

[Follow-Up Review of Peace  
Corps/Uganda \(2018\)](#)

[Follow-up Review of Peace Corps/Peru \(2018\)](#)

[Management Advisory Report: Managing the  
Suspension of Peace Corps/Kenya \(2018\)](#)

[Evaluation of Peace Corps/South Africa \(2017\)](#)

[Evaluation of Peace Corps/Costa Rica \(2017\)](#)

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

[Evaluation of Peace Corps/Kosovo \(2017\)](#)

[Management Advisory Report:  
Site History Files \(2016\)](#)

[Evaluation of the Peace Corps' Sexual Assault  
Risk Reduction and Response Program \(2016\)](#)

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

[Evaluation of Peace Corps/Rwanda \(2016\)](#)

[Evaluation on Training Peace  
Corps' Overseas Staff \(2014\)](#)

[Evaluation of Peace Corps Sexual Assault  
Risk-Reduction and Response Training \(2013\)](#)

# Challenge: Human Capital Management

## Why This is a Challenge

OIG oversight activities have frequently identified concerns with staff hiring and retention and knowledge management, which are pillars of human capital management.

Nearly all Peace Corps U.S. direct-hire (USDH) 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. However, an OIG evaluation of the FYR in 2012 found that it resulted in high turnover – the rate was quadruple the government-wide average – compromised the agency’s ability to attract and retain qualified personnel for core management functions and contributed to brief staff tenures. These factors impaired the agency’s institutional memory and knowledge management practices.

### *Hiring and Retaining Qualified Staff*

The OIG’s 2020 review of recurring issues at Peace Corps posts found that, from FY 2016 to FY 2019, staff turnover and staffing gaps impaired emergency medical preparedness, led to ineffective Volunteer technical training, and resulted in heavy staff workloads that in some cases left required tasks incomplete. A 2019 Office of Personnel Management (OPM) assessment of the agency’s organizational design and performance found that the FYR contributed to increased turnover and extended vacancies that resulted in a lack of continuity and curtailed the agency’s productivity.

Available data demonstrates that staff do not wait five years to take other positions, rather they abbreviate their tenure. High turnover can also lead to vacancy gaps. For example,

the key HR leadership role of Chief Human Capital Officer (CHCO) position for the agency remained unfilled for the entirety of FY2021. The CHCO role was occupied by the previous incumbent from May 2018 until September 2020; a 2-year 4-month tenure. In its FY 2018 to 2022 Strategic Plan, Peace Corps acknowledged that vacancy gaps decrease the agency’s knowledge management capabilities, decrease staff and volunteer engagement and satisfaction, and complicate project management.

### *Knowledge Management*

Knowledge management, defined as capturing, distributing, and effectively using knowledge, becomes critical in environments with high turnover. OIG’s 2012 evaluation of the FYR unearthed a trove of internal and external reviews and studies from as early as 1974 that documented the agency’s dearth of institutional memory caused by the FYR. The 2019 OPM assessment also identified work process inefficiencies caused by inadequate documentation of past problem-solving and initiatives and siloed work practices.

As the agency updates business processes to improve core infrastructure, the OIG is concerned that it has not adequately ensured that all users receive sufficient training on new processes and systems. The agency launched a new talent acquisition system in June 2021 that included vendor-provided intensive training for HR staff that contributed to delays in processing staffing actions. Supervisors and non-HR staff will receive ad-hoc training on the new system from HR staff rather than training specialists. This approach may further burden HR staff. According to the Peace Corps, process improvements should lead to a decrease in the time it takes for vacancies to be filled. This is a critical outcome because vacancy gaps are considered a major risk factor for domestic and overseas operations.

## **Progress in Addressing the Challenge**

Staff training is one aspect of human capital management that has improved since the previous management challenges report. In FY 2021, OIG closed 9 recommendations related to improving and tracking staff training in the areas of sexual assault and risk reduction; safety and security; annual training; and supervisory training. OIG no longer considers staff training a management challenge.

### ***Hiring and Retaining Qualified Staff***

The 2018 Sam Farr and Nick Castle Peace Corps Reform Act authorized the agency to extend the appointments of positions designated by the Director as management or management support positions that require specialized technical or professional skills and knowledge of agency operations. The authority provides for additional five-year terms beyond the term limits provided in the Peace Corps Act. The agency has designated a total of 41 positions. In April 2021, the agency designated 30 positions critical to the agency's goals to redeploy Volunteers and support their health and well-being and the critical CHCO position in May 2021.

### ***Knowledge Management***

In January 2021, the agency launched an offboarding process in SharePoint to replace a paper-based system. The agency has reported that in 2022 it will begin using a global onboarding program for new hires. One of the goals of this program is to ensure all staff regardless of position or location receive organized, motivational, and impactful onboarding when they begin at the Peace Corps.

## **What Needs To Be Done**

### ***Hiring and Retaining Qualified Staff***

The agency has not addressed two recommendations (recommendations 2 and 3) from our 2012 evaluation of the FYR

relating to better management of turnover and retention of qualified personnel in core business functions. Although the agency has in effect exempted 41 positions from the 5-year term limit as authorized by the 2018 Peace Corps Reform Act, OIG believes that additional designations could increase the agency's ability to attract and retain qualified personnel for core management functions, such as contracting, financial management, information technology management, and human resources management. Moreover, the agency should consider offering additional workplace flexibilities and employment incentives to lengthen staff's tenure closer to five years.

The agency should continue its efforts to improve employee satisfaction to reduce vacancies and attract and retain qualified staff. Results of the 2020 Federal Viewpoint Survey (FEVS) show that, among small agencies, the Peace Corps ranks 6th as one of the best places to work. The FEVS indicates that employee satisfaction at the Peace Corps remains high and continues to increase year-over-year. However, just 68 percent of respondents believe that the Peace Corps' senior leaders are effective. While an improvement from previous years, this category is still the lowest scored, and remains an area of employee satisfaction that could be improved.

### ***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 information accessibility. Also, the agency should consider and where appropriate implement the recommendations from the 2019 OPM assessment of the agency's organizational design and performance.

## **Key OIG Resources**

[Recurring Issues Report: Common Challenges Facing Peace Corps Posts \(2020\)](#)

[Fiscal Year 2018-2022 Strategic Plan \(2018\)](#)

[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 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.

While the agency has worked to get some formalized policies and procedures in place, such as an Information Security Continuous Monitoring strategy, the Peace Corps continues to lack an effective information security program. 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 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. However, it also requires that those making decisions have access to and understand pertinent

information security risks and impacts that could result from business decisions. Unfortunately, the agency does not have the appropriate planning, resource, and communications structures in place to facilitate those conversations. Specifically, the Chief Information Security Officer (CISO) position has been vacant for the majority of this fiscal year. The Deputy Chief Information Officer has been serving as Acting CISO, but the lack of an independent voice within the Office of the Chief Information Officer (OCIO) to advocate for security focused decisions continues to negatively impact IT security. For yet another year, the OCIO failed to fully assess the security controls around its General Support System, which is the backbone of the agency's IT infrastructure. Since this system supports all operations within the organization, this leaves all aspects of agency operations vulnerable to attacks and puts Volunteer data at risk.

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 Planning and Implementation challenge. Without a robust risk management process, the Peace Corps is exposed to risk of attacks, environmental disruptions, and business failures.

## Progress in Addressing the Challenge

As part of our annual review of the agency's compliance with FISMA, a score is assessed to provide a consistent and comparable metric across government agencies. The five-level scale ranges from Level 1, Ad-hoc to Level 5, Optimized. A Level 4, Managed and Measurable is considered to be an effective level of security.

In FY 2021, the agency advanced to Level 2, Defined. Since we began reporting IT security as a management challenge in 2009, the agency's cybersecurity posture was at Level 1 Ad-hoc, indicating a reactive program without formalized policies and procedures. Moving to Level 2 indicates policies, procedures, and strategy are formalized and documented but not consistently implemented. During the past year, the Peace Corps has made progress in formalizing several core policies and procedures, such as an Information Security Continuous Monitoring strategy.

## 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, including the CISO, 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 \(2021\)](#)

[Summary of Internal Control Issues Over the Peace Corps Financial Reporting \(FY 2020\)](#)

# Challenge: Planning and Implementation

## Why This Is a Challenge

OIG's 2019 management challenges reported concerns about the agency's struggle 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 assignment of resources, and establish oversight to 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.<sup>2</sup> 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.<sup>3</sup>

Establishing sufficient oversight should be a key consideration when planning and implementing programs. Our management implication report on Peace Corps/Ukraine's PEPFAR Food Voucher Program communicated concerns that there was insufficient management awareness and oversight at headquarters for Peace Corps staff implementing PEPFAR-funded activities

without Volunteers. Proper oversight helps to identify and address risks and ensure that programmatic activities are consistent with the Peace Corps Act and further the agency's mission and goals. Our recurring issues report also highlighted how programmatic issues could be addressed by strengthening oversight over internal control systems and assigning responsibility or delegating authority appropriately. In addition, 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 the Information Technology Security Management challenge.

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 fewer COVID-19 cases, the agency must carefully consider the reliability of transportation and the quality of medical care. Re-entry has proven 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. Moreover, the changing nature of the pandemic, including new variants, have forced the agency to reconsider plans it had

<sup>2</sup> [Management Advisory Report: Managing the Suspension of Peace Corps/Kenya: A Case Study \(2018\)](#)

<sup>3</sup> [Management Advisory Report: Volunteer Drug Use \(2018\)](#)

initially developed for Volunteer re-entry.

In addition, on September 9, 2021, the White House issued an executive order (EO) mandating Federal agencies to implement a program to require COVID-19 vaccination of all employees and contractors. The order applies to all USDHs, experts, and applicable contractors regardless of duty station, location, schedule, or remote/telework status and requires full vaccination by November 22, 2021, except in cases of reasonable exception. Employees who do not satisfy the requirements may be subject to disciplinary measures. Given the worldwide presence of Peace Corps staff, implementing this EO and other related mitigation measures will have broad impact on the agency.

## **Progress in Addressing the Challenge**

As part of its effort to implement an ERM framework, the agency developed risk registers for several large offices critical to its business processes. The agency also added risk management responsibilities to the Chief Compliance Officer's job description and is in the process of hiring additional personnel to support advancement of the ERM program.

In response to the COVID-19 pandemic, the agency has taken some important steps, particularly in implementing President Biden's executive mandates that Federal agencies require Federal personnel and onsite contractors to attest to their vaccination status initially, and then demonstrate proof of vaccination. In accordance with the Presidential mandate, the Peace Corps required all domestic USDH staff to submit certification of vaccination forms by August 20, 2021, then established a portal for employees to submit proof of vaccination. In addition, the Peace Corps notified employees that anyone accessing Federal buildings at headquarters and U.S. regional offices must always wear a mask regardless of vaccination status.

The agency has expended significant amounts of time and resources in planning re-entry and continuation of Peace Corps activities. The COVID-19 Continuity of Operations Working Group has actively monitored multiple sources

to implement a data-driven, phased approach to return to optimal domestic operations. The group has made timely decisions about the headquarters re-entry plan and coordinates with office directors to implement changes and next steps. The agency developed key planning documents collected in the CREG, which guides management decision-making with the purpose of mitigating the risks of the global COVID-19 pandemic to staff and Volunteers. In April 2021, the agency issued CREG 2.0 which extended review of the external factors checklist during the approval process, added new criteria related to the vaccine rollout, and streamlined the review process. The agency also launched the re-entry portal which provides a platform for posts to update the external and internal checklists and agency leadership to view the completion status for all posts. In the past year, the Peace Corps completed the approval process and sent congressional notification for re-entry for five posts, but continued assessment of complicated and changing environmental factors, including new variants, halted efforts to re-enter these countries. Lastly, the agency administered a survey to gauge staff preferences for the future of telework and continues to monitor the changing environment and practices of other Federal agencies while assessing the ability to return to facilities.

## **What Needs to Be Done**

The Peace Corps must take critical steps to ensure appropriate planning and implementation of their programs and operations. Decisions about Peace Corps priorities and initiatives should be consistently assessed at the agency level and properly documented to support appropriate planning. Implementation of agency policies and procedures should be timely, fully integrated with the program or function, and ensure sufficient oversight. Additionally, the Peace Corps should continue to prioritize development of an 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 to resumption of Volunteer operations and the return to facilities. The agency will have to define exceptions and disciplinary actions for noncompliance with the vaccine mandate and determine appropriate ways to incorporate staff feedback about returning to facilities while ensuring their safety. The challenge moving forward is to ensure effective and agile implementation of internal and external requirements.

## **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 \(2018\)](#)

[Recurring Issues Report: Common Challenges Facing Peace Corps Posts - FYs 2016-2019 \(2020\)](#)

[Management Implication Report: Peace Corps/Ukraine's PEPFAR Food Voucher Program \(2021\)](#)

[Executive Order on Requiring Coronavirus Disease 2019 Vaccination for Federal Employees](#)

# Challenge: Diversity and Inclusion of Staff and Volunteers

## Why This Is a Challenge

In 2020, 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 U.S. social climate in 2020.

Upon taking office, President Biden issued an EO mandating that the federal government pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Through directives and implementing guidance, the administration has placed equity at the center of its agenda with a government-wide approach to embed racial justice across Federal agencies, policies, and programs. In FY 2021, the agency continued to prioritize and expand activities that address this challenge. 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 response to concerns about the agency's commitment to racial and social justice, former Director Olsen committed resources on multiple fronts to address this challenge. She 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. Peace Corps leadership communicated the importance of minority representation of historically underrepresented groups in post leadership, especially when

supporting Volunteers of color. Peace Corps staff also stated that while Volunteers serve overseas, their effectiveness personally and professionally is dependent on understanding the environment of the countries in which they serve. Even before this initiative, the agency had taken steps to address this challenge. In September 2019, the agency approved a plan and funding to conduct a comprehensive barrier analysis to satisfy the Management Directive 715<sup>4</sup> requirement instead of the perfunctory analysis usually performed by agencies' Equal Employment Opportunity functions. The government-wide directive instructs agencies to uncover and examine barriers to equal participation at all levels of the workforce and develop strategic plans to eliminate them.<sup>5</sup>

Data from the agency and OIG activities supports the need for increased inclusion and support of under-represented staff and Volunteers. Historically, one source of agency data showed a lower prevalence of racial and ethnic minorities in senior positions at headquarters (FP 1 and 2, and experts) and USDHs 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 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 enduring is Intercultural

<sup>4</sup> 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.

<sup>5</sup> <https://www.eeoc.gov/federal-sector/management-directive/instructions-federal-agencies-eeo-md-715-1>

Competence, Diversity, Equity, Inclusion, and Accessibility (ICDEIA) 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 ICDEIA 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. This training had been delivered to 80 percent of posts by the end of FY 21. Another initiative is the Agency Equity Council, which advises the agency's ICDEIA strategic planning. 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 Peace Corps has prioritized diversity, equity, inclusion, and accessibility in several ways over the last fiscal year. ICDEIA was a key component of the most recent strategic planning process. The Chief Diversity Officer was added as a voting member of the Senior Policy Committee to have an ICDEIA lens on all policy initiatives within the Agency. In addition, the agency's senior leadership doubled from six to 12 people of color—increasing the racial diversity of the leadership from 16 to 32 percent.

This year, the Office of Civil Rights and Diversity (OCD) completed the second stage of the comprehensive barrier analysis: identify specific barriers. Their analysis uncovered three issues: lack of transparency and consistency in the expert appointment process; insufficient processes to increase hiring of people with targeted disabilities; and lack of a formal recruitment plan to reach potential applicants from underserved communities. In the next phases of the process, OCD will develop a plan to address and eliminate identified barriers.

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.<sup>6</sup> In the past fiscal year, the taskforce has analyzed feedback and is scheduled to submit its final report to leadership in early FY 22.

The Biden administration issued four EO's and two Presidential Memos with requirements affecting the Peace Corps. The agency designated the Deputy Chief of Staff as the primary point of contact to coordinate fulfillment of deliverables, update senior leadership, and implement a communication strategy. The agency is tracking these deliverables to help align critical resources and funding that will be needed to advance this work in the future. For example, in compliance with EO 14035 (Diversity, Equity, Inclusion, and Accessibility of the Federal Workforce), agency leadership completed a survey on the agency's use of inclusive practices. Leaders used this tool to identify gaps and short to long-term goals to enhance the agency's strategy.

## 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

<sup>6</sup> "Third Goal" refers to the third goal of the Peace Corps mission "to help promote a better understanding of other peoples on the part of Americans."

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 third stage in October 2021. The fourth stage, which involves assessing and adjusting the action plan to increase effectiveness, is planned to begin in December 2021.

## **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](#)

[Executive Order 14035 on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce](#)