MEMORANDUM

To: Kathy Buller, Inspector General

From: Patrick J. Hogan, Associate Director for Safety and Security

CC: David Liner, Chief of Staff/Operations
                Allene Zanger, RD Inter-America and Pacific Region
                Henry McKoy, RD Africa Region
                Jay Katzen, RD Europe, Mediterranean and Asia Region
                Richard Parker, Director of Communications
                Rosie Mauk, AD Volunteer Recruitment and Selection
                Ruben Hernandez, Director of the Office of Strategic Information,
                    Research and Planning
                John Dimos, Chief Compliance Officer

Date: August 4, 2008

Subject: Preliminary Program Evaluation Report: Volunteer Safety and Security,
                dated March 31, 2008.

This is a joint response to the recommendations made by Acting Inspector General
Geoffrey Johnson, regarding Volunteer Safety and Security as outlined in the Preliminary
Program Evaluation Report: Volunteer Safety and Security dated March 31, 2008.

The Office of Inspector General (OIG) recommendations are numbered 1 through 20.
Appearing immediately after each recommendation and labeled as Disposition is the
Peace Corps response prepared by the appropriate staff element.

The affected offices concur with 10 and partially concur with 8 of 20 recommendations.

**1. That the regional directors establish policies and procedures to monitor the
   timeliness of crime incident report submissions from the posts.**

   Disposition: Concur. The Office of Safety and Security will work with the Office
   of the Chief Information Officer (OCIO) to devise a technological solution within the
   Crime Incident Reporting System to automatically notify all recipients about
   incidents which are not reported in a timely fashion. In the meantime, until this
   system is developed, the Regional Safety and Security Desk Officer (SSDO) will
   inform their respective Regional Directors about trends in late reporting or egregious
   lapses in time between post receiving the incident information and completing an

incident report. Regions will work with the Office of Safety & Security to develop policies and procedures to monitor timeliness of incident reports by October 1, 2008. The Office of Safety and Security will work with the OCIO to get a technical solution as soon as possible.

2. That the Office of Safety and Security conduct an independent review of agency safety and security incident data for validity and reliability.

Disposition: Partially Concur. The agency has recently launched a new incident reporting system which is intended to enhance quality assurance and control. Additionally, there are features which have been built into the new incident reporting system that provide "hints" when filling out the form, intended to minimize errors. Since this new system is designed to address many of the concerns associated with the interim incident reporting system (CIRF), the agency believes that it is premature to determine if an independent assessment is warranted. The Office of Safety and Security will monitor quality, validity and reliability on a quarterly basis and recommend follow-up actions as necessary.

3. That the Office of Safety and Security implement written policies and procedures that detail quality assurance requirements for Peace Corps' safety and security incident data.

Disposition: Concur. The Office of Safety and Security is working on policies and procedures that clarify quality assurance requirements with respect to incident data. Expected completion date is December 2008.

4. That the Office of Safety and Security establish an allowable data error rate and systematically check safety and security incident data fields for accuracy and consistency.

Disposition: Concur. The allowable data error rate will be a part of the policies and procedures outlined above. The Office of Safety and Security will monitor this on an ongoing basis and will include data error information as part of the Safety of the Volunteer report beginning with 2008 data.

5. That the Office of Safety and Security implement policies and procedures to guide post and CSA staff in accurately and consistently reporting safety and security incident data.

Disposition: Concur. The Office of Safety and Security will ensure that policies and procedures to guide post and Crime Statistics and Analysis Unit (CSA) staff are included in the policies and procedures that are being developed as noted above. These will be disseminated to the field upon completion. Expected completion date is December 2008.

6. That the Office of Safety and Security request a staffing assessment to determine whether the Crime Statistics and Analysis unit requires more personnel resources.

Disposition: Partially Concur. The Office of Safety and Security, CSA Unit has been primarily focused on two projects that have consumed the preponderance of their work hours: maintaining the now-superseded CIRF system, which was very labor intensive; and designing and developing a new replacement system. The new system, which was launched in April 2008, should significantly reduce the workload of the CSA unit, therefore allowing that unit to more carefully monitor quality assurance. The Office of Safety and Security believes that it is premature to conduct a staffing assessment until the impact of the new CIRS is evaluated. The staffing needs of CSA will be assessed during the spring 2009 IPBS process.

7. That the regional directors implement a process to ensure that safety and security incident data is effectively reviewed for accuracy and clarity by country directors before submission to headquarters.

Disposition: Partially Concur. The newly established incident reporting process automatically informs all staff at post with access to the incident reporting system about an incident. This is an improvement over the old system, which did not inform all staff about an incident. If there are concerns about clarity or accuracy, country directors can access and update information as necessary. The Regions and the Office of Safety and Security do not believe that it is necessary for CDs to review the incident reports before they are submitted however, as this may further hinder the timeliness of reporting. Since incident information is reviewed at HQ by the Office of Safety and Security and the Regions, any questions or concerns about clarity or accuracy can be addressed on an as-needed basis.

8. That the Office of Communications include in the Welcome Books

   (1) an internet link to the Safety of the Volunteer report and

   (2) a statement that informs potential Volunteers that risk factors in their country of service may vary from the global risk factors.

Disposition: Partially Concur.

   (1) The *Safety of the Volunteer* report is publicly available for any applicant to review. This report, however, contains technical information that is more difficult to digest and less relevant than the country-specific information that is currently available in the Welcome Books. The Office of Communications recommends instead using the "What About Safety" page on the website at www.peacecorps.gov/safety with the language in the attached document.

(2) The Office of Communications will begin including a statement in all Welcome Book revisions beginning October 1, 2008, which is also in the attached document.

9. That the Office of Volunteer Recruitment and Selection include a statement in its invitation materials to encourage potential Volunteers to review country of service risk factors in the most recent Safety of the Volunteer report.

Disposition: Do Not Concur. Welcome Book information currently has country-specific information related to the country of service to which the individual is being invited. This information is aggregated and averaged over a 5-year period and compares crime information to other posts within the same region. The *Safety of the Volunteer* report only provides country specific incidence rates and the number of actual incidents for a specific year. Due to the low numbers of actual incidents of serious crimes in a given year, this information is less informative than a 5-year trend average. None-the-less, the *Safety of the Volunteer* report is available online for any individual to consult.

10. That the Office of Safety and Security revise the Pre-Service Training Safety and Security competencies to include demonstrating culturally appropriate ways to respond to a crime situation.

Disposition: Do Not Concur. In the context of the OIG report, incident response strategies appear to refer to actions that a Volunteer would take to thwart an attack or improve their chances of survival. Training on averting an imminent attack must not be prescriptive and must recognize that individuals will respond according to their abilities and instincts. When taking action to either affect an escape or improve chances of survival, culturally appropriateness is not a consideration, and in fact, could further increase one's risk. Strategies to escape or defend oneself must be based on ability, circumstances and judgment.

11. That the regional directors provide the posts with:

• **Examples of well-developed post safety and security criteria.**

• **Examples of well-designed checklists for use in verifying whether post safety and security criteria have been met.**

• **An explanation of how to rank site** and housing criteria, including procedures for making exceptions to criteria.

Disposition: Partially Concur. Regions and the Office of Safety and Security believe that posts are being provided with sufficient guidance and examples about post safety and security criteria and checklists for evaluating whether the criteria is being met. As part of their routine post visits, Peace Corps Safety and Security Officers (PCSSO) review and propose enhancements to posts' criteria. However,

Regions and the Office of Safety and Security will review current strategies employed by posts and provide several good examples on the Peace Corps Intranet to ensure that posts have some examples. This will be done by October 1, 2008.

Regions and the Office of Safety and Security do not believe that posts need to rank site and housing criteria, nor do they necessarily need a process for making exceptions. Posts need a clear process to ensure that criteria are being met. Decisions about whether or not to "except" certain criteria are best made by post staff based on their knowledge of the security environment, site and other relevant factors.

12. **That the regional directors establish a system to ensure that posts develop and follow housing policy standards, such as inspecting every house before a Volunteer moves in, to ensure appropriate, safe, and secure Volunteer housing.**

    Disposition: Partially Concur. Regions concur that safe Volunteer housing is critical to the success of the Peace Corps and to Volunteer well-being. Based on current policy, Regions recognize that all sites must afford safe housing for Volunteers, and current MS 270 reporting requirements ask all CDs to ensure that site selection criteria and procedures are being met. The housing checklist is one of the means of verification. On the 2008 MS 270 compliance checklist, all posts indicate that they have and are using a housing checklist.

    Regions and the Office of Safety and Security have two concerns with the OIG findings related to safe and secure housing. The first is that some examples in the OIG report do not clearly demonstrate that the house failed to meet the criteria. For example, indicating that a break-in occurred does not mean housing failed to meet criteria. The implication is that the Volunteer was burglarized due to a housing security deficiency. The OIG does not demonstrate that this is the case. The second concern is that some of the items mentioned may demonstrate a maintenance issue rather than failure to initially meet criteria (i.e. latrine doors that had fallen off hinges).

    Regions and the Office of Safety and Security believe that improvements can be made, but are reluctant to be overly prescriptive due to the wide variation of Volunteer housing that is safe throughout the world. We also believe that Volunteers can and should be empowered to assume greater responsibility for ascertaining that their houses are acceptable and managing repairs where appropriate. The Office of Safety and Security and the Regions will work together to establish clearer policy guidance regarding Volunteer housing and procedures for ensuring that posts are ensuring housing meets criteria. Expected completion of the guidance is December 2008.

13. **That the regional directors implement a tracking and monitoring system for PCSSO recommendations.**

Disposition: Concur. This has been completed in all three regions. Examples are in Attachment B.

14. **That the Office of Safety and Security assist the regions to develop methods for evaluating PCSSO recommendations and establishing management priorities for addressing Volunteer safety and security.**

    Disposition: Concur. The Office of Safety and Security will work closely with the Regions to ensure that there are clear procedures for evaluating PCSSO recommendations and establishing management priorities. Expected completing October 1, 2008.

15. **That the regional directors ensure that all EAPs are reviewed and revised to contain:**

    • **Clear code words (if code words are used).**

    • **Logical trip wires that anticipate the most likely emergencies and posts' planned actions.**

    • **Communication responsibilities and contact information.**

    • **Readable street maps to Volunteers' consolidation points.**

    • **Contact information for all means of emergency transportation identified in the EAP, including charter flights and ground transportation.**

    Disposition: Partially Concur. Regions and the Office of Safety and Security concur that all necessary elements of EAPs need to be included and reviewed, but do not concur that all of the above-mentioned bullets must be included. In order to satisfy this recommendation, the Regions and the Office of Safety and Security will ensure that a revised and accurate checklist for reviewing EAPs is developed and disseminated. In addition, the Office of Safety and Security and the Regions will ensure that CDUs are trained in the use of the checklist to ensure they understand what components are critical when they are reviewing EAPs. A revised checklist will be developed and disseminated by October 1, 2008 and training will be ongoing after that date. All current regional employees with responsibility for reviewing EAPs will be trained by the end of Q2 2009.

16. **That the Office of Safety and Security develop and administer safety and security compliance training to all regional personnel responsible for reviewing MS 270 documents, including EAPs and MS 270 compliance reports.**

    Disposition: Concur. In collaboration with the Regions, the Office of Safety and Security will develop compliance training for all regional personnel responsible for

monitoring MS 270 compliance, including EAPs. This activity will be completed by the end of Q2, 2009.

17. **That the regional directors establish a system to ensure that all posts test their EAPs annually, including testing the EAPs under "varying conditions."**

    Disposition: Concur. This activity has been completed with updated guidance sent to all posts in March 2008. Guidance is in Attachment C.

18. **That the regional directors require Peace Corps staff members to fill out the most critical sections of site locator forms during site development visits and require country directors to hold staff responsible for the accuracy and completeness of those sections.**

    Disposition: Partially Concur. We agree that Country Directors should hold their staff responsible for the accuracy and completeness of the most critical sections of site locator forms, but it is not practical or operationally prudent to require staff members to complete them during site development visits. As part of the site selection process, staff already gather information that would enable them to reach or contact the site in an emergency situation. The site locator form is an important site entry tool for the Volunteer and giving the Volunteer a partially completed form negates the responsibility for the Volunteer to make valuable contacts and locate health clinics or police posts (which could be remote).

    Alternatives, such as a more robust review and follow-up process (including the project manager and/or the staff person who visited the site for the selection process) would enhance site locator forms as a reliable means of finding the Volunteer's site. The Office of Safety and Security will collaborate with Regions to ensure that guidance for improving the site locator form procedures is developed and disseminated by December 31, 2008.

19. **That the Office of Safety and Security determine if global positioning system tools would complement the agency's safety and security initiatives.**

    Disposition: Concur. The Office of Safety and Security recognizes the value of GPS and GIS technology and its capability to enhance other safety and security systems. The Office of Safety and Security will collaborate with ongoing efforts to pilot GPS/GIS solutions and continue to research the possible ways in which GIS/GPS technology would be effective for the Peace Corps. The Office will present a recommendation to the Director by the end of Q2, 2009.

20. **That the Office of Strategic Information Research and Planning ensure that Peace Corps' strategic goals, objectives, and performance indicators related to safety and security are meaningful and ambitious at the agency and individual office levels.**

Disposition: Concur

2009-2014 OSIRP is working with all Peace Corps organizations to improve the outcome nature of our performance goals and indicators. This work is being done in conjunction with the development of the Peace Corps 2009-2014 Strategic Plan. This information was made available to the OIG program evaluators prior to the release of this preliminary report. The Peace Corps Strategic Plan will be submitted to the Office of Management & Budget on September 30, 2008

Attachments (3)