HOUSE COMMITTEE ON FOREIGN AFFAIRS

U.S. HOUSE OF REPRESENTATIVES

MAY 11, 2011 9:30AM – PEACE CORPS AT 50

TESTIMONY OF KATHY A. BULLER

PEACE CORPS INSPECTOR GENERAL

Madam Chairman Ros-Lehtinen, Ranking Member Berman, and distinguished members of the Committee I thank you for inviting me to appear before you today. My testimony will outline the Peace Corps Office of Inspector General's (OIG) role in providing oversight of the Peace Corps, particularly its safety and security function. I will highlight the relevant work we have done and give my perspective on the status of safety and security initiatives at the Peace Corps. I hope my testimony will shed light on this important topic for the Peace Corps.

The Peace Corps OIG was established in 1989 after Congress amended the Inspector General Act of 1978 to include smaller agencies. I became the Inspector General (IG) on May 25th, 2008. In my role as the IG, I direct a small office of 20 employees composed of auditors, evaluators, criminal investigators, legal counsel and support staff. I am fortunate to work with individuals who have a broad range of skills and experiences, including seven returned Peace Corps volunteers, and three former General Accountability Office (GAO) employees. All of them have extensive private and public sector experiences. Last year our criminal investigators were granted full statutory law enforcement powers by the Attorney General including the authority to seek and execute search and arrest warrants, seize evidence, make arrests without a warrant while engaged in official duties, and carry firearms.

Our mission is to prevent and detect fraud, waste, abuse, and other wrongdoing in agency operations and programs as well as promote economy, efficiency and effectiveness. My office serves as an independent oversight entity and my duty is to keep Congress and the Director fully and currently informed about problems within the Peace Corps and the need for corrective action. When my auditors and evaluators visit posts, our scope of work and methodology always include a focus on volunteer safety and security.

My testimony explains how my office has integrated a focus on volunteer safety and security as part of our regular evaluations and audits of Peace Corps posts, and summarizes two major work products we conducted since 2008 to assess the effectiveness of the Peace Corps' overall safety and security program. My testimony concludes with the status of the agency's progress to reform its safety and security program. However, it is important to understand the nature of Peace Corps safety and security challenges.

Peace Corps' Safety and Security Challenges

The Peace Corps, like other international development agencies, is constantly mitigating safety and security risks. With volunteers serving in 77 countries, the agency faces a range of challenges that affect volunteer safety and security including: political unrest, natural disasters, rising crime rates, terrorism threats, and the complexity of dealing with varying legal systems in foreign jurisdictions. Unlike most other international agencies, however, the Peace Corps also faces unique safety and security challenges that result from the fact that the majority of volunteers serve at the grass roots level in rural communities, often in remote areas far from the capital city and the Peace Corps office. They live and work with people of diverse cultural backgrounds and languages. In short, the model of volunteerism that makes Peace Corps such a compelling experience for its volunteers can at the same time make the agency's efforts to ensure their safety a challenge.

Peace Corps' approach to safety and security is an 'acceptance model' that requires volunteers to integrate into their community so that local populations, including their host families, friends and local counterparts support and protect them. To make the acceptance model work, the Peace Corps must have a sound process for developing appropriate sites to place volunteers, as well as solid safety and security-related training for volunteers.

Site development includes locating safe and adequate volunteer housing, finding meaningful work for volunteers, ensuring that volunteers have host country counterparts who understand their roles, and making certain that each host community wants a volunteer. As part of site development, Peace Corps staff coordinate and liaise with local officials and communities. In preparation for their service volunteers receive local language and cultural training that includes understanding the nature of activities and behaviors that increase their risk of becoming ill or being injured. The task of providing a safe and secure environment for our volunteers is a team effort that does not solely depend upon safety and security personnel.

While the acceptance model places significant responsibilities on Peace Corps to ensure volunteer safety, it also requires that volunteers take responsibility for their own safety. This responsibility includes learning the language, adhering to the cultural norms of the community in which they live, and avoiding situations that could increase their risk of becoming ill or being injured.

The acceptance model has its limitations, but past GAO and recent OIG reports confirm it is the most viable model for agencies like the Peace Corps that place volunteers in remote locations and have a small security footprint. However, even with the best possible acceptance model in place, volunteers face risks living, working, and traveling in unfamiliar environments, having a limited (initially, at least) understanding of local languages and culture, and being perceived as a well-off foreigner. While Peace Corps cannot eliminate these risks entirely, it can mitigate them by having in place strong safety and security policies and procedures and implementing them consistently.

Since fiscal year (FY) 2004, OIG has visited 66 posts and issued recommendations related to safety and security at 56 of these posts (85 percent). Additionally, thirty-eight percent (25 out of

66) of these posts were found to be deficient in some aspect of their site development, which is an essential component of the acceptance model of safety and security. Inappropriate site development increases the risk that a volunteer's community safety net will be compromised if a threat arises.

How OIG Reviews of Overseas Posts Address Safety and Security Issues

OIG conducts audits and evaluations of overseas posts. These assess how effectively Peace Corps overseas operations, including post staff, provide support to volunteers. We review whether posts have adequate internal controls and whether they are complying with Peace Corps policies, and federal laws and regulations.

OIG Post Evaluations

Our post evaluations assess how effectively the country program is furthering Peace Corps' mission and goals. We focus on whether volunteers are working productively, and on the quality of posts' efforts to provide volunteers with good health care and personal safety training and support. We examine volunteer work site development, the safety of volunteer housing; and the quality of volunteer training, including language, technical, cross-cultural, health and safety and security training. We assess the adequacy of support provided by post staff—leadership, administrative, programming and training, medical, and safety and security staff members. Our evaluators review whether volunteers understand the post's emergency action plan (EAP) and if they know what to do in case of an emergency evacuation or other disaster. We speak with at least 20 percent of currently-serving volunteers, visit their sites and inspect their homes using the post's housing criteria. My evaluators also provide volunteers with information on OIG resources, for example the OIG hotline and encourage volunteers to contact OIG about any fraud, waste, abuse, misconduct, wrongdoing, or other related problems they encounter. Volunteers are assured that we keep their identities confidential.

During our post evaluations, our evaluators also interview State Department regional security officers (RSOs) at the local embassy to determine whether they are working well with the Peace Corps posts. We also review any recommendations that might have been issued by Peace Corps' safety and security officers (PCSSO) in the region and whether the post has implemented those recommendations.

OIG Post Audits

Our post audits focus on how efficiently and effectively the posts administrative and financial operations are functioning. Our auditors review how post resources are utilized and whether posts are complying with policies and regulations. In regards to safety and security, our auditors interview the RSO to discuss any safety and security concerns. Further, auditors review whether posts have obtained a background security investigation or suitability check on host country staff before they are hired and whether the necessary update has been conducted. This has been one of the most common safety and security issues identified during our audits, 44 percent (28 out of 63) of posts audited since 2004 did not comply. After the policy was revised in September 2009

to include short term contractors, OIG found that 73 percent of posts audited (11 out of 15) had not met this requirement.

OIG Coordination with Chief Compliance Officer

For all of our audits and program evaluations there is a process of corrective action whereby we coordinate with the agency to help ensure recommendations are implemented. Our work is facilitated by the agency's chief compliance office. A new chief compliance officer was hired in August of 2010; previously the position remained vacant for one year and seven months. The chief compliance officer has helped close over 300 recommendations since she started. However, as of May 2011; 205 recommendations remain open. At the post-level, 24 percent (22 out of 91) of open recommendations relate to safety and security issues. Implementing these recommendations often requires extensive coordination across various offices, communicating with field operations, revising or creating policy, and ensuring adequate resources for implementation.

OIG Criminal Investigators

OIG criminal investigators look at whether Peace Corps staff, contractors, and volunteers have violated any criminal laws and whether they have engaged in any misconduct. When OIG criminal investigators conduct overseas investigations, they coordinate with the RSO and FBI legal attaché, and, when appropriate, local host country law enforcement. OIG responded to cases of violent crime against volunteers serving overseas from 2003 to 2008. In 2008 that function was transferred back to the agency because it was determined that safety and security is a program function outside the mandate of the IG Act, as amended. However, we continue to conduct investigations of any crime where a Peace Corps staff member, contractor or volunteer is alleged to have been the perpetrator. We view those cases as misconduct and abuse squarely within OIG's mandate. In addition, we conduct inquiries, as appropriate, related to volunteer deaths and provide oversight over agency responses to volunteer deaths.

Other OIG Responses to Safety and Security of Volunteers

Our office is engaged in a broad range of outreach activities in support of Peace Corps' policy on handling allegations against Peace Corps staff, contractors, and volunteers. In the aftermath of the murder of volunteer Kate Puzey in 2009, the agency issued an interim policy on how to handle sensitive allegations against staff and contractors. Longstanding OIG and Peace Corps policy already provided volunteers the ability to report allegations confidentially to OIG. The interim policy focused on:

- The need for Peace Corps staff to treat allegations confidentially.
- Informing volunteers of their right to report allegations to OIG confidentially and encouraging them to so.
- Ensuring the safety and security of the volunteer making an allegation.
- Reminding staff of their obligations to report allegations to OIG.
- Assuring volunteers that agency policy prohibits reprisal or retaliation.

In January 2011 the interim policy was formalized as a *Peace Corps Manual* section. My staff worked with the agency to develop a training module on complying with this policy. Subsequently we participated in three training sessions for new overseas staff on the policy. We have worked with the agency to ensure the policy is included in the *Volunteer Handbook*. I have communicated directly with country directors (CDs) on the importance of reporting allegations to OIG and maintaining the confidentiality of those making the allegations. I have also provided CDs with OIG materials and posters to distribute and display at posts overseas to inform both staff and volunteers of the mission of the OIG and how to contact us to forward allegations or concerns related to waste, fraud and abuse in Peace Corps programs and operations.

In addition, we are currently conducting an evaluation on how the agency responds to instances of rape and sexual assault in response to the ABC News 20/20 television episode related to allegations of sexual assault of Peace Corps volunteers. We hope to issue a preliminary report by mid summer.

Peace Corps' Office of Safety and Security and Related Reforms since 2002

Madam Chairman, I would like to briefly provide some background on the Peace Corps volunteer safety and security program. In 2002, at the request of Congressman Meehan and Congresswomen McKinney, GAO conducted a review and issued a report of the Peace Corps safety and security program. The report identified several weaknesses including that the safety and security program was unevenly implemented. The following factors contributed to this uneven implementation: unclear guidance, inadequate staff training, spotty supervision and oversight mechanisms, and staff turnover. GAO outlined how the Peace Corps provides broad guidance to support overseas posts but relies on CDs to develop and implement effective safety and security practices.

The GAO report also stated that while volunteers were generally satisfied with the Peace Corps' efforts to provide security training and inform them about their security environments, the Peace Corps showed mixed performance in developing safe and secure housing and work sites for volunteers. The report also mentioned the uneven quality and comprehensiveness of Peace Corps Emergency Action Plans (EAPs), which are required by each post and address emergency situations that would likely impact Peace Corps personnel and operations.

The GAO report further noted a variation in how Peace Corps monitors and responds to volunteer concerns. For instance, while crime incidents had increased, the full extent of crimes against volunteers remained unknown due to underreporting. GAO also noted that it was difficult to interpret Peace Corps' sexual assault data and that the crime data analysis system could be enhanced. At the time of the GAO report, the Office of Medical Services collected information on assaults and produced analyses of violent crime incidences.

The agency's response to the GAO report detailed a number of significant improvements to the way the Peace Corps manages volunteer safety and security. The agency stated that it would create an Office of Safety and Security (SS) "to foster improved communication, coordination, oversight, and accountability for all Peace Corps safety and security efforts." The office would be led by an associate director for safety and security, who would report directly to the Peace

Corps Director, and the office would include the following divisions: Volunteer Safety and Overseas Security; Information and Personnel Security; and Emergency Preparedness Plans, Training, and Exercises. The office would also include a Crime Statistics and Analysis Unit to track crime statistics, identify crime trends, and highlight potential safety risks to volunteers.

In addition, the agency stated that it would authorize all of its overseas posts to employ a full or part-time safety and security coordinator (SSC) and added three new full-time safety and security desk officer positions, one for each region, and four additional field-based Peace Corps safety and security officers (PCSSOs). Furthermore, Peace Corps stated that it would revise its policies to require posts to implement the following six essential safety and security practices:

- Monitor, assess, and disseminate safety and security information to volunteers and trainees
- Continually train volunteers and trainees on culturally appropriate lifestyles and judgment that reduces risks
- Inspect volunteer and trainee work sites before their arrival to ensure housing and work sites are appropriate, safe, and secure
- Establish procedures for reporting safety and security incidents
- Develop and test EAPs
- Establish a system to collect contact and whereabouts information from volunteers when they are away from their communities

As stated in the agency's response, the primary responsibility for SSCs was to monitor and ensure that their post complied with these practices.

OIG Volunteer Safety and Security Audit and Evaluation Reports

More recently, my office issued both an evaluation report in 2008 and an audit report in 2010 focused on the agency's overall volunteer safety and security program. Both reports found that the security program has evolved significantly since the 2002 GAO report, and that the agency has made substantial progress in addressing its safety and security needs, e.g. establishing the office of safety and security, assigning SSCs to each overseas post, hiring nine regional based PCSSOs, and revising its safety and security policies. Yet both our 2010 audit and 2008 evaluation concluded that safety and security policies, procedures, practices, training, and resources were unevenly or inadequately applied.

2008 Safety and Security Evaluation

The safety and security program evaluation issued in 2008 assessed the effectiveness of the six safety and security practices implemented after the 2002 GAO report. Our evaluation contained 20 recommendations; six remain open today. Below are some of the most salient findings included in the report:

- The agency crime data was unreliable and not reported to headquarters in a timely manner. Staff did not have adequate training on the agency's new crime reporting tool.

- Although volunteers were provided with information about global safety and security risk factors, they were not provided country-specific risk factors.
- EAPs did not always contain essential information to facilitate volunteers' speedy and safe consolidation or evacuation from their country of service.
- Peace Corps did not ensure that emergency action plans were consistently tested in accordance with agency policy or under realistic conditions (e.g., in the absence of cell phones.)
- Forms that could be used to locate volunteers' sites in emergency situations were not always fully completed or accurate.
- PCSSOs had provided posts with substantial support; however, their recommendations were not systematically tracked and were often not implemented.
- Volunteers' houses did not always meet the posts' own criteria for safe housing.

At the end of March 2011, the agency submitted documentation to close the remaining six open recommendations. Of the six recommendations, the agency did not concur with one and partially concurred with three. Given that many safety and security practices have evolved since we issued the report in 2008, and that some of the recommendations require a global change in how SS does its work, my office wants to be sure that the action taken meets the intent of the recommendation before we can close them.

2010 Safety and Security Audit

Our audit report, issued in April of 2010, focused on the management and organization of the safety and security function at Peace Corps. Consistent with past reports, we found in 2010 that volunteers overwhelmingly state being satisfied with their level of safety and security and staff support. Moreover, we found that while Peace Corps maintains a much larger safety and security workforce than comparable international non-governmental organizations, safety and security staff at all levels lacked the experience and training needed to perform their jobs.

In addition, our report found that the security program lacked essential elements and did not keep up with the changing needs of the overseas posts because the volunteer safety and security program did not have a clear management structure, and no office accepted complete ownership of it. The audit also found that SS served as a consultative office, not an oversight office. This has resulted in SS relying on the Peace Corps' overseas posts to request its assistance and any recommendations from SS for safety and security improvements to be treated as suggestions. Furthermore, the audit determined that organizational structures and personnel practices have not matched the agency's shift in safety and security roles and responsibilities, causing confusion and inconsistencies in the program.

Specifically, the report found that the agency had not:

- Developed a comprehensive security strategy and plan that articulated how the agency's security policies related to the acceptance model.
- Directed the SS office to provide management and oversight of the safety and security program, including SSCs at posts.

- Aligned safety and security personnel's roles and responsibilities with the agency's stated priority of safety and security. We found that unclear lines of authority and communication created a weak safety and security structure and organization – insufficient input overall on agency operations and lack of oversight of post budget and operations. Essentially, regions and CDs, not SS, the office established to oversee and implement the Peace Corps safety and security program, drive safety and security priorities.
- Defined the skills and experience needed for all security positions; provided consistent training and development tracks that matched responsibilities; and developed standard operating procedures for performing duties.
- Consistently hired people with the skills and experience to fill its safety and security positions – including the SSCs at the posts and the regionally-based PCSSOs.
- Clearly defined the roles of headquarters safety and security staff and field safety and security staff to avoid unclear expectations and duplicate responsibilities.
- Standardized training for safety and security personnel.
- Consistently tracked and ensured that corrective action on PCSSO recommendations were taken.

All of these findings point to a volunteer safety and security program which has not been implemented evenly, increasing potential risks to volunteers. Since FY 2004 OIG issued recommendations related to staff roles, responsibilities and training at 23 percent of posts visited (15 out of 66).

Since the issuance of our 2010 audit report, the Peace Corps has taken important steps to close recommendations and improve its safety and security program. The more significant steps include:

- July 2010 – the Director issued a decision memorandum announcing that the SS would assume responsibility for technical oversight of the positions of safety and security coordinator and safety and security desk officer.
- September 2010 – SS defined training requirements for PCSSOs and SSCs. SS provided training for the safety and security personnel at its biannual conference.
- December 2010– Peace Corps reissued several *Peace Corps Manual* sections to include the revised safety and security roles and responsibilities.
- February and March 2011 – Peace Corps developed the "Peace Corps' Safety and Security Strategy"*, Before You Go...* [the Volunteer Safety and Security Handbook] and standard operating procedures for safety and security personnel. In addition, the agency issued revised *Peace Corps Staff Guidelines for Responding to Rape and Major Sexual Assault*, and required that staff training on the new guidelines be performed at every Peace Corps post.
- In addition, SS increased its oversight function by developing a process to verify whether required security background investigations and suitability checks for personal services contractors have been performed.

Despite the agency's substantial progress in reforming its safety and security program, my primary concerns continue to revolve around uneven implementation. Our post audits and

evaluations have indicated that posts have not been fully compliant with essential safety and security policies despite the numerous positions established to ensure and track implementation of these policies. Unclear procedures lead to potentially serious gaps in the safety and security process. We have found situations in which responses to crimes were inadequate and incomplete because staff roles were not clearly defined and communicated. Poorly defined staff responsibilities and unclear lines of authorities only increase risk to our volunteers when a timely and competent response by agency personnel is needed.

In our view a memorandum of understanding (MOU) to formalize the relationship between the State Department and the Peace Corps is a critical step to improving the agency's capacity to effectively respond to security situations. The MOU would define the roles and responsibilities of both agencies in supporting volunteer safety and security overseas and would serve as an essential protocol for adequately responding to volunteer safety and security incidents.

To date the agency has provided sufficient information to close 23 of 28 recommendations from our 2010 safety and security audit. We continue to collaborate closely with agency management, provide needed clarifications and comments to its proposed actions, as well as general advice with the aim of closing all remaining open safety and security recommendations. Closing the recommendations is an important step but it is not sufficient in and of itself. The agency will need to monitor the safety and security program to ensure the changes take hold. I believe that the successful implementation of these recommendations will depend in large part on whether SS functions as the management and oversight office it was intended to be, rather than a consultative office for overseas posts, providing assistance and suggestions when requested. For our part we plan to conduct a follow-up review on the effectiveness of implementing these measures in FY 2012.

Conclusion

The Peace Corps has a decentralized organizational structure in which top management relies primarily on CDs and their staff to manage programs and operations overseas, including its safety and security program. This model must have clear lines of communication, well established policies and procedures, and adequate management oversight functions at headquarters to ensure overseas posts are efficient and effective. In this regard, our audits and evaluations continue to highlight areas where management oversight is lacking and standard operating procedures are not in place. As a result, there is a lot of disparity among posts due to the quality and expertise of staff members and their ability to develop their own methods of managing safety and security challenges.

While some important OIG recommendations remain open, the agency has made substantial progress in recent years in developing a comprehensive safety and security program. Director Williams has pledged his full support to remediate all safety and security related findings and we are working with agency management to help ensure critical recommendations are implemented. The agency has shared drafts of their overall security strategy, revised policies, and developed a proposed memorandum of understanding with the State Department.

In conclusion Madam Chairman, putting in place a more effective Peace Corps volunteer safety and security function will require continued vigilance, prioritization of initiatives, greater accountability and management oversight, more emphasis on hiring and retaining quality security professionals, adequate financial and training resources, a focus on implementation, and greater coordination with other agencies like the State Department. While follow-through on these items and our recommendations will be challenging, it is necessary to ensure Peace Corps' sustainability for the next 50 years.