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**To:** Carrie Hessler-Radelet, Director  
Daljit Bains, Chief Compliance Officer

**From:** Kathy A. Buller, Inspector General 

**Date:** June 10, 2014

**Subject:** Final Report on the Audit of Peace Corps Applicant Screening Process  
(IG-14-04-A)

Transmitted for your information is our final report on the audit of Peace Corps Applicant Screening Process.

Management concurred with all eight recommendations. All eight recommendations remain open. In its response, management described actions it is taking or intends to take to address the issues that prompted each of our recommendations. We wish to note that when we close recommendations, we are not certifying that the agency has taken these actions, or that we have reviewed their effect. Certifying compliance and verifying effectiveness are management's responsibilities. Our comments, which are in the report as Appendix E, address these matters.

You may address questions regarding follow-up or documentation to Acting Assistant Inspector General for Audit Hal Nanavati at 202.692.2929 or to Lead Auditor Becca Underhill at 202.692.2351.

Please accept our thanks for your cooperation and assistance in our review.

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# Peace Corps Office of Inspector General

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**Final Audit Report:  
Peace Corps Applicant Screening Process  
IG-14-04-A**

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**June 2014**

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## EXECUTIVE SUMMARY

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### **BACKGROUND**

Volunteers are the core of the Peace Corps and essential to meeting the agency's mission. Since 1961, over 215,000 Peace Corps Volunteers have served in 139 host countries. In recent years, the Peace Corps has received more than 10,000 applicants each year. On average, approximately 30 percent of applicants have been invited to become a Volunteer.

### **OBJECTIVES**

Our objectives were to determine whether the Peace Corps Office of Volunteer Recruitment and Selection (VRS) had sufficient and reliable information to make appropriate suitability and eligibility determinations for Volunteer applicants; whether the Peace Corps' applicant screening process was consistent with the screening practices of other major volunteer organizations; and the prevalence, characteristics, and outcomes of serious Volunteer misconduct.

### **RESULTS IN BRIEF**

VRS uses a multi-level, in-depth screening process that evaluates not only applicants' eligibility, but also suitability to serve in the Peace Corps. While the screening process for Volunteers is different than the process for employees, it was generally consistent with similar organizations. We identified three practices common among Volunteer organizations that were lacking at Peace Corps: permanent information on previous Volunteers who were involved in misconduct, child safety policies for Volunteers interacting with minors, and verification of work history.

The Peace Corps did not have a formal procedure to review its screening process in order to analyze negative Volunteer separations. This procedure would allow it to determine if the applications had misconduct or other suitability issues that went undetected in the screening process, which could improve the applicant screening process. When a Volunteer committed serious misconduct, VRS would review the Volunteer's application for any suitability and eligibility issues that were missed, but only on an ad hoc basis. Evaluating the effectiveness of current practices is critical to continuously improve and identify weaknesses.

Peace Corps staff responsible for making screening decisions did not have access to all information on current applicants in a timely manner. Although applicant files contained all information about the initial screening and related decisions, if the applicant was a former Peace Corps Volunteer, the records lacked information about the applicant's former service. One essential document for determining if an applicant who reapplies to the Peace Corps is suitable and eligible is the administrative separation memo prepared for Volunteers that engage in misconduct. There was inconsistent and missing information about prior Volunteer service because the Peace Corps lacked a centralized or formal process for storing unfavorable Volunteer separations, including administrative separations or situations where the Volunteer resigned in lieu of separation, that describe misconduct that may render the person ineligible for future service as a Volunteer.

## **RECOMMENDATIONS**

Our report contains eight recommendations, which, if implemented, should strengthen the agency's applicant suitability and eligibility screening process.

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## BACKGROUND

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Our objectives were to determine whether VRS had sufficient and reliable information to make appropriate suitability and eligibility determinations for Volunteer applicants; whether the Peace Corps' applicant screening process was consistent with the screening practices of other major Volunteer organizations; and the prevalence, characteristics, and outcomes of serious Volunteer misconduct. See Appendix A for the audit objectives, scope, and methodology.

Peace Corps was established in 1961 for the purpose of promoting world peace and friendship. The Peace Corps' mission is to help the people of interested countries in meeting their needs for trained men and women; to help promote a better understanding of Americans on the part of the peoples served; and to help promote a better understanding of other peoples on the part of Americans.

The Peace Corps achieves these goals through Volunteers,<sup>1</sup> who serve abroad and are essential to meeting the agency's mission. Since 1961, over 215,000 Peace Corps Volunteers have served in 139 host countries. In order to ensure Volunteers are successful, VRS uses a multi-level screening process that evaluates not only applicants' eligibility, but also suitability to serve in the Peace Corps.

**Screening Process.** An individual interested in becoming a Volunteer submits an application online through the Database of Volunteer Experience (DOVE) system. This system collects demographic information, as well as information about a candidate's education, work, volunteer, and cross-cultural experiences, financial obligations, legal history, references, and motivation for service. When the application is submitted, DOVE performs checks to ensure that the candidate is minimally qualified. Specifically, the system verifies the applicant is a U.S. citizen and is at least 18 years of age. After this automatic screening, the application is assigned to a VRS recruiter to review the application for completeness and initial eligibility. The recruiter seeks to ensure that the applicant has the basic qualifications and skills to perform in the Peace Corps assignment areas.<sup>2</sup> During this initial screening, or at any point in the screening process, the recruiter can reject an applicant if the applicant:

- is not a U.S. citizen
- is under 18 years of age
- is not available within the next twelve months
- does not have skills that meet the qualifications for any assignment area
- will not meet legal eligibility requirements within the next year
- is under court-ordered probation or parole
- is deemed unsuitable for Peace Corps service for other reasons

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<sup>1</sup> Volunteers are not deemed to be U.S. federal employees. However, Volunteers take the same oath of office as those appointed to the civil service and uniformed service (22 U.S.C. § 2504).

<sup>2</sup> Assignment areas are different types of work within the Peace Corps' six main focus areas: education, youth and community development, health, business and information and communications technology, agriculture, and environment.

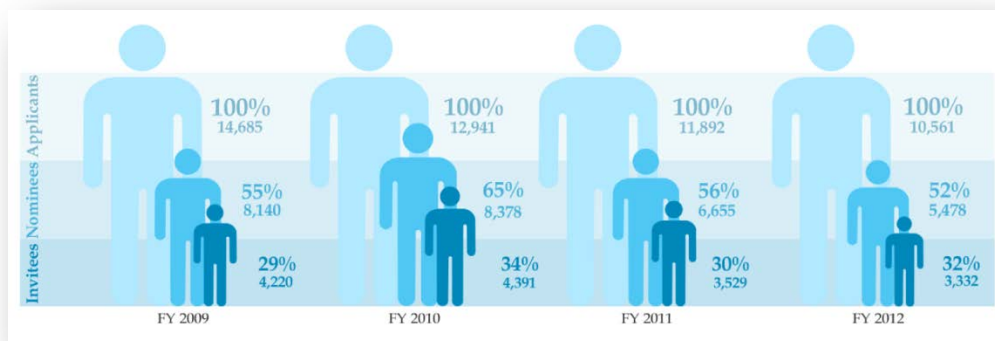
Applicants who pass this initial screening then complete and submit a legal kit, consisting of two fingerprint cards, and questionnaires.<sup>3</sup> Some applicants are also sent skill or legal addenda if additional information is needed to assess eligibility. These forms are used by the Placement Office to perform criminal history and other eligibility checks.

Peace Corps recruiters and placement officers then seek to determine: Motivation, Productive Competence, Emotional Maturity/Adaptability, and Social Sensitivity/Cultural Awareness. To make these determinations, the assigned recruiter conducts an interview with the applicant, either on the phone or in person. If the applicant meets basic skill and suitability requirements, the recruiter will then formally nominate the applicant for Peace Corps service.

After all checks and approvals, the Placement Office conducts a two-level review process for the nominated candidates. First, a placement associate will review each applicant’s file to ensure that applicant qualifications match assignment area skill requirements. Placement associates also check the file for clarity, accuracy, completeness, and indicators of the applicant suitability. If any information is missing or unclear, the placement associate will contact the recruiter or applicant. Then, the placement officer conducts a final review and looks not only at the applicant’s technical skills, but also the personal qualities necessary to work successfully in a specific Peace Corps assignment, as required by the Peace Corps “The Guide to Recruitment.” Placement officers make the final decision on whether to invite or not to invite a candidate to a training class. Though rejections do occur at this final stage, it is more common and preferred, for rejections to occur at the recruitment level.

**Statistics.** In recent years, the Peace Corps has received more than 10,000 applicants each year. On average, approximately 30 percent of applicants have been invited to become Volunteers. Figure 1 provides details on the screening process over fiscal years (FYs) 2009-2012.

**Figure 1. Application Data for FYs 2009-2012**



**Volunteer Misconduct.** Our review of Volunteer misconduct did not reveal any prior history in the VRS files that should have disqualified the applicant during the screening process. During

<sup>3</sup> VRS requires questionnaires for specific areas of concern that the applicant self-identifies. These questionnaires ask clarification and additional information about: drug and alcohol use, relationship status, and special dietary needs.

FYs 2011 and 2012, Peace Corps official records indicate 108 cases of Volunteer misconduct that led to administrative separation or resignation in lieu of termination.<sup>4</sup> The reasons for termination/resignation in lieu of separation<sup>5</sup> ranged from failure to comply with the requirement to notify Peace Corps staff when the Volunteer left his or her assigned site to sexual contact with a minor (an individual under 18 years old). Of the approximately 8,500 Volunteers in the field during this time period, one percent were separated on the basis of misconduct. See Table 1 for a breakdown of the most frequent instances of misconduct during FYs 2011 and 2012. This percentage does not include instances where Volunteers: (i) resign because of misconduct but prior to a formal proposal for administrative separation<sup>6</sup> and (ii) receive interrupted service.<sup>7</sup> *Peace Corps Manual* section (MS) 284, “Early Termination of Service,” states that interrupted service should not be used in lieu of administrative separation.

**Table 1. Most Frequent Types of Misconduct**

Incidence of Misconduct, <sup>8</sup> by type (FY 11-12)	
Unauthorized Absence	44
Inappropriate Conduct (non-sexual)	33
Failure to Adhere to Post Specific Policies	15
Unsatisfactory Work Performance	13
Aggressive/Disorderly Conduct	10
Inappropriate Sexual Behavior	6
Inadequate care or attention to personal safety	6
Illegal Drug Use	4
Physical or Sexual Assault	4
Financial Misconduct	3
Sexual contact with minor (under 18)	2
Inappropriate/Unauthorized Published Content	2
Nondisclosure during application or information revealed by NAC	2
Forgery	2

\*We created misconduct categories for the purposes of this audit.

We determined that the screening process performed was consistent with Peace Corps policy and procedures. We reviewed the applicant files of 108 Volunteers that later had misconduct issues. We found no clear relationship between the information in the applicant’s files and the instances of reported misconduct that should have been identified by the existing screening process.

<sup>4</sup> Administrative separation is Peace Corps policy to remove Volunteers with unsatisfactory conduct or performance, violation of any Peace Corps policy, or other grounds that diminish the effectiveness of the Volunteer or Peace Corps program. Resignation in lieu of separation occurs if the Volunteer decides to resign instead of being administratively separated.

<sup>5</sup> Since FY 2011, staff have been required to provide resignation reasons in the Volunteer End of Service Information system.

<sup>6</sup> According to *Peace Corps FY 2011 Early Termination Report* a number of Volunteers early terminate their Peace Corps service for reasons that constitute misconduct. However, in cases where Volunteers resign prior to a proposed separation action, their decision to early terminate would not be reflected as resignation in lieu of termination.

<sup>7</sup> Interrupted service permits a Volunteer to seek reinstatement or re-enrollment to Peace Corps service or seek transfer to another country, provided the country director endorses the Volunteers request.

<sup>8</sup> Forty-six percent (50/108) of the separated Volunteers engaged in multiple types of misconduct.



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## AUDIT RESULTS

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The Peace Corps has a multi-tiered screening process to assess applicants and ensure that selected Volunteers, with no previous Peace Corps experience, met the needs and requirements of the Peace Corps. We found that this process was generally consistent with other major Volunteer organizations. However we found that the Peace Corps did not have a process to regularly revisit, revise, and improve the applicant screening process and lacked centralized and consistent information on applicants with previous Peace Corps Volunteer service.

### *REQUIREMENTS FOR SCREENING PROCESS*

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The Peace Corps' Volunteer screening process met requirements established by the agency and was generally consistent with similar organizations. The Peace Corps' background investigation process for applicants is not consistent with the process used for Peace Corps employees. However, the application and interview process gathered sufficient information to allow Peace Corps officials to make determinations about an applicant's eligibility and suitability to serve as a Volunteer in accordance with Peace Corps policy.

**Background Investigations.** The Peace Corps Act<sup>9</sup> requires:

All persons employed or assigned to duties under this Act shall be investigated to insure that the employment or assignment is consistent with the national interest in accordance with standards and procedures established by the President...

Volunteers shall be deemed employees of the United States Government for the purpose of this section.

The legal position of the agency is that while Executive Order 10450 required a National Agency Check with Inquiry (NACI) for hiring employees, the Peace Corps is not required to follow these standards. The agency asserts that the Peace Corps Act and Executive Order 12137 provide the Peace Corps Director the authority to establish standards and procedures for Volunteers background investigations. The Director established such standards, which have been published in "Eligibility and Standards for Peace Corps Volunteer Service":<sup>10</sup>

Section 22 of the Peace Corps Act states that to ensure enrollment of a Volunteer is consistent with the national interest, no applicant is eligible for Peace Corps Volunteer service without a background investigation. The Peace Corps requires that all applicants accepted for training have as a minimum a National Agency Check. Information revealed by the investigation may be grounds for disqualification from Peace Corps service.

Based on the language in the Peace Corps Act indicating that Volunteers be deemed employees of the U.S. government for the purpose of security investigations we reviewed the background investigations of Volunteers compared to those provided to Peace Corps employees.<sup>11</sup> We noted

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<sup>9</sup> 22 U.S.C. § 2519.

<sup>10</sup> 22 C.F.R. § 305.

<sup>11</sup> Our review is not intended to address the legal position of the agency on the nature of the background or security investigations required of Volunteers by 22 U.S.C. §2519. This matter was outside the scope of the audit.

that the current level of investigation for applicants is not consistent with the level received by employees who serve more than six months.

**Table 2. Comparison of Investigations for Employees and Applicants**

Peace Corps Employees Serving in Non-Sensitive Positions		Peace Corps Volunteer Applicants
Less than Six Months	Longer than Six Months	
<p>National Agency Check (NAC) investigation includes searching records from:</p> <ul style="list-style-type: none"> <li>• Office of Personnel and Management’s Security/Suitability Investigations Index</li> <li>• Defense Clearance and Investigations Index</li> <li>• Federal Bureau of Investigation’s Division name and fingerprint files</li> </ul>	<p>NACI investigation includes:</p> <ul style="list-style-type: none"> <li>• NAC investigation</li> <li>• Inquiries on the past five years sent to current and past employers, schools attended, references, and local law enforcement authorities</li> </ul>	<p>Peace Corps screening process includes:</p> <ul style="list-style-type: none"> <li>• NAC investigation</li> <li>• a self-reported record of employment history</li> <li>• transcripts as evidence of education</li> <li>• completed reference forms from three references, to include a supervisor</li> </ul>

**Comparison to Other Volunteer Organizations.** The Peace Corps’ screening process was generally consistent with other major volunteer organizations. During the course of this audit, we interviewed six other major volunteer organizations with characteristics similar to Peace Corps mission and structure. We learned that most of these groups used a multi-level screening process that consisted of an application and interview. These organizations took similar steps to screen volunteers for eligibility and suitability. Table 3 shows the detailed comparison of the Peace Corps to these six volunteer organizations.

**Table 3. Comparison of Peace Corps Practices with Those of Other Volunteer Organizations<sup>12</sup>**

	Peace Corps	1	2	3	4	5	6
<b>“Do Not Hire” List</b>	no	yes	no	yes	yes	yes	yes
<b>Child Safety Program</b>	no	yes	yes*	yes*	no	yes	no
<b>Credit Check</b>	no	no	yes*	no	no	yes**	no
<b>Driving Records</b>	no	yes**	yes*	yes*	yes	no	no
<b>Federal Criminal Records</b>	yes	yes	yes*	yes	no	yes	yes
<b>Fingerprint Checks</b>	yes	yes	yes*	yes	no	no	no
<b>In-Person Interview Required</b>	no	yes	yes	no	no	yes	yes
<b>Personality Assessment</b>	no	no	no	no	no	yes	no
<b>Reference Checks</b>	yes	yes	yes	yes	yes	yes	yes
<b>Sex Offender Registry</b>	yes	yes	yes*	yes	no	yes	no
<b>State/Local Criminal Records</b>	yes	yes	yes*	yes	no	yes	yes
<b>Work History Verification</b>	no	yes	yes*	no	no	no	yes
* Conducted at local or partner level							
** Only certain programs							

The Peace Corps could improve the Volunteer screening process by adopting some of the additional policies and practices of other volunteer organizations. We noted that several volunteer organizations have a do not hire list, have a child safety program, and verify work history of applicants.

**Do Not Hire List.** Five of the six other volunteer organizations maintained a “do not hire” list of names of applicants the organization had decided not to work with, either based on their application or past volunteer experience with the organization. These do not hire lists were permanent, maintained in a centralized location, and updated frequently. Although we did not find such practice appropriate for the Peace Corps, we emphasize the need for the agency to improve Volunteer records. These records should better reflect poor performance or misconduct in order to make more informed suitability decisions when Volunteers reapply to the Peace Corps (see “Complete and Centralized Information on Former Volunteers Needed” section of this report for more information).

**Child Safety Program.** Four of the other organizations, all of which required volunteers to interact with minors had a specific and defined child safety policy and programs. Based on these policies we noted that child safety programs include strict policies, training and awareness, affirmation of responsibilities, and clearly defined prohibited practices. Furthermore, one organization disqualified any applicants with a history of misconduct related to child safety, including child abuse and sexual misconduct. The Office of Inspector General (OIG) has

<sup>12</sup> The names of the volunteer organizations have been withheld for privacy reasons.

investigated cases of child abuse and sexual misconduct that indicate the need for an agency-wide child safety policy. Three examples of convictions involving former Volunteers who admitted to engaging in inappropriate behavior with minors during their Volunteer service include:

- In June 2012, a former PC/South Africa Volunteer pleaded guilty to one count of traveling from the United States to South Africa to engage in illicit sexual conduct with children and admitted that he sexually abused four minor girls while he was a Peace Corps Volunteer. In October 2012 he was sentenced to 15 years in prison.
- In August 2011, a former PC/Honduras Volunteer pleaded guilty in to a charge of conspiracy to distribute child pornography. In February 2012, he was sentenced to a 60-month prison term and ordered to undergo 20 years of supervised release.
- In May 2007, a former PC/Costa Rica Volunteer was sentenced to 51 months in federal prison and three years of supervised release for sexually assaulting a minor while working in another country. The former volunteer admitted in February 2006 to one count of having ‘illicit sexual contact’ with an underage boy while he was in the country as a Peace Corps Volunteer working with the country’s child welfare agency.

The Peace Corps needs to develop a more comprehensive approach to address misconduct related to child safety due to the severe impact misconduct can have on victims of child sexual abuse. MS 204, “Volunteer Conduct,” states that the Peace Corps is committed to having Volunteers comply with U.S. laws on sexual behavior that apply overseas. Although the Peace Corps has strict policies regarding Volunteer conduct with minors, the agency could enhance its program by providing additional guidance, promoting greater awareness and prevention strategies, and enhancing training. By developing a comprehensive child safety program, the Peace Corps could mitigate the risk of additional Volunteer misconduct with minors.

**Verifying Work History.** Three of the other organizations routinely verify the work history of applicants and work history verification is required for Peace Corps employees. A work history verification confirms the individual was employed during the specific dates and can also provide information on the reason for leaving the job, whether the applicant can be rehired, and overall job performance. This process is useful to:

- Verify the accuracy of information given by applicants through other selection processes (e.g., résumés, occupational questionnaires, interviews).
- Predict the success of applicants by comparing their experience to the competencies required by the job.
- Uncover background information on applicants that may not have been identified by other selection procedures.

Peace Corps could enhance its process by obtaining this information from applicants’ past employers. This practice would be consistent with the NACI check required for employees.

**We recommend:**

- 1. That the Director develop and implement a specific child safety program to include ongoing training.**
- 2. That the Office of Volunteer Recruitment and Services require work history verification as part of the screening process.**

***CONTINUOUS IMPROVEMENT PROCESS***

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The Peace Corps screening process did not contain a formal review procedure to analyze adverse Volunteer separations and determine if the associated applications contained misconduct or other suitability issues that went undetected. However, on an ad hoc basis VRS would review the Volunteer's application for any suitability and eligibility issues that were missed when a Volunteer committed serious misconduct.

Successful programs are consistently reviewed and improved to ensure procedures are effective in meeting the desired program goal. Programs and procedures could be improved through experience and learning from problems that have occurred in the past. Programs essential to the Peace Corps mission should be evaluated on a regular basis to ensure they are operating at the highest level possible. Without a formal review process, the agency cannot be certain that its Volunteer screening process is adequately designed to identify potential eligibility and suitability issues.

As part of this audit, we conducted a survey of all 60 country directors (CDs), who were in place at the time of this audit, to determine the prevalence of misconduct issues and their views on the Volunteer screening process. Of the 51 responses received, 76 percent of CDs believed that misconduct issues could have been prevented through better applicant screening. One CD expressed that "at least three of my admin[istrative] separation actions should have been picked up at the applicant screening stage."

Four of the six volunteer organizations we interviewed had developed ongoing processes to revisit, revise, and improve their screening program. One organization stated that it reviewed all volunteer misconduct cases semiannually in order to make improvements to the screening process, which could prevent unsuitable applicants from becoming volunteers. At another organization, a senior level official reviewed each case of misconduct after an investigation had been completed.

The Peace Corps did not review specific instances or patterns of serious Volunteer misconduct in order to understand the extent to which its screening process had failed to identify unsuitable applicants. Without a formal review process, there is no assurance that the Volunteer screening process is capable of identifying all potential eligibility and suitability issues. By reviewing past cases of misconduct, the Peace Corps can use hindsight to learn from and improve controls in the

screening process. The Peace Corps must be diligent to ensure that the screening process is as robust as possible.

**We recommend:**

- 3. That the Office of Volunteer Recruitment and Services develop and implement a process to review all terminations, resignations in lieu of termination, and administratively separated cases on a periodic basis.**
- 4. That the Office of Volunteer Recruitment and Services establish an annual meeting with all involved parties to review and improve the Volunteer screening process. This discussion should include a review of all cases of misconduct and other volunteer organization best practices.**

***COMPLETE AND CENTRALIZED INFORMATION ON FORMER VOLUNTEERS***

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Peace Corps staff responsible for making screening decisions did not have access to all information on current applicants in a timely manner. Although applicant files contained all information about the initial screening and related decisions, if the applicant was a former Peace Corps Volunteer, there are no centralized records about former Volunteer misconduct. One essential document for determining if an applicant who reapplies to the Peace Corps is suitable and eligible is the administrative separation memo. There was inconsistent and missing information about prior Volunteer service because the Peace Corps lacked a centralized or formal process for storing unfavorable Volunteer separations, including administrative separations or situations where the Volunteer resigned in lieu of separation, that describe misconduct that may render the person ineligible for future service as a Volunteer.

When former Peace Corps Volunteers reapply for service it is critical that recruiters have an understanding of that applicant's previous experience as a Volunteer, including whether or not the applicant's performance was unsuccessful or problematic. Without complete and accurate information on former Peace Corps service, it is possible that a Volunteer who was separated for serious misconduct or resigned in lieu of administrative separation could be invited to serve again as a Volunteer. This could cause great harm to the Peace Corps mission and the people and country that the Peace Corps serves.

**Guidance.** MS 284, "Early Termination of Service," requires a "consideration of administrative separation memo" (separation memo) to document decisions to administratively separate a Volunteer. MS 284 states:

When considering administrative separation for a Volunteer, the CD shall inform the Volunteer orally or in a brief "consideration of administrative separation memo" of the grounds for the separation and the information in support of those grounds. See Attachment F for template for "consideration of

administrative separation memo.” The CD shall inform the Volunteer of the option to resign in lieu of administrative separation at any time before a final administrative separation decision is made.

If the Volunteer resigns in lieu of administrative separation, the CD shall forward to the Office of Volunteer Recruitment and Selection (VRS) a memo (which can be the “consideration of administrative separation memo”) that states that the V/T resigned in lieu of being administratively separated, and sets out the grounds for the action and the information in support of those grounds...If the Volunteer does not resign within 24 hours, the CD shall sign and provide to the Volunteer a written notification that he or she has been separated from service pursuant to 22 U.S.C. 2504(i)

MS 284 also provides a template for the separation memo and details the type of information that needs to be included. See Figure 2 for an example of this template.

**Figure 2. Excerpt from MS 284**

MS 284  
Attachment F  
5/05

TEMPLATE F

TO: PCV Name

FROM: Country Director Name – Peace Corps Country

DATE:

RE: Consideration of Administrative Separation Memo

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1. State grounds for “Consideration of Administrative Separation.”

Example: “This memo is to inform you that I am considering administratively separating you from Peace Corps service on the following grounds:” (*see* MS 284, Section 4.1.2)

2. Provide information in support of the grounds for administrative separation.

Provide any relevant information relating to the grounds for consideration of administrative separation.

3. Inform the PCV of the opportunity to respond.

4. Inform the PCV of the option to resign (*see* Section 4.1.2).

**Missing and Incomplete Information.** While applicant files contained information about the initial screening and decisions, recruiters need information about Volunteers current and past Peace Corps service in order to make fully-informed decisions about their eligibility and suitability for service. Specifically, required separation memos were missing and system coding was inaccurate.

Of the 108 Volunteers who were unfavorably separated during FYs 2011 and 2012, VRS did not have approximately 81 percent (88) of the separation memos, as required by MS 284. Furthermore, the content quality of the 20 “consideration of administrative separation memos” found in applicant files varied greatly from post to post. In many instances, the CDs did not provide enough detail in the memos about the Volunteer misconduct for the reader to gain an adequate understanding of the misconduct that took place. For example, the memo for one

Volunteer cited that he was “unsuitable for Peace Corps service” for his project assignment but did not include any other detail of the misconduct that caused the separation or why the CD found him to be unsuitable for service.

The Volunteer End-of-Service Information system contains a series of different codes to mark and identify why a Volunteer left Peace Corps service. These codes include the four types of early resignation: (1) resignation, (2) medical separation, (3) administrative separation, and (4) interrupted service. This system contains sub-codes that post staff enter to further explain if the resignation was in lieu of separation. In reviewing records from this system, we identified 12 former Volunteers who were erroneously marked as unfavorably separated in the system. In one instance, the region responded to our request for the supporting “consideration of administrative separation memo” by providing a positive reference from the CD. The CD noted in the letter that “the most noticed and valued attributions of [Volunteer Name Redacted] were her consistent positive attitude and devotion to improving the lives of others.” This reference strongly supports that this Volunteer should not have been coded as being unfavorably separated. However, when we followed up with the region to confirm that this Volunteer was miscoded as unfavorably separated, the region notified us that the post has since closed and staff is no longer with the agency, so they were not able to provide any clarification on this coding.

**Maintaining Record of Separation.** Inconsistent and missing information on prior Volunteer service resulted from the lack of a centralized or formal method for processing and storing unfavorable Volunteer separations. CDs prepare separation memos, but there was no established process for communicating those memos to headquarters offices on a consistent basis. Furthermore, there was no supervisory review process to ensure memos met the format outlined in MS 284.

Additionally, there was no centralized storage for separation memos. While CDs are supposed to send the separation memos to VRS, this only happened in nine percent (20) of the cases. Instead, this documentation was maintained at each specific post. However, Peace Corps staff were not able to locate 31 percent (34/108) of separation memos for the Volunteers who were unfavorably separated during FYs 2011 and 2012. This issue was further complicated by the Peace Corps’ lack of records retention policy for separation memos. In March 2012, the Peace Corps Office of Records Management proposed a 30-year destruction cycle for files related to administratively separated or resignation/early termination in lieu of administrative separation volunteers to the National Records and Archives Administration. However, in January 2014, the Peace Corps withdrew this request because moving forward all new separation documentation will be stored electronically in DOVE. However, this left the agency without a records retention policy for the already existing separation memos. In accordance with 16 CFR § 1228 (2000), “Disposition of Federal Records,” the Peace Corps should be maintaining all of these records until a records retention schedule is developed. Despite the regulation, we found that in some instances these memos have been destroyed, as the separation memo have been improperly stored within the VRS applicant file. These applicant files are destroyed on a four year cycle.

Without complete and accurate information on former Peace Corps service, VRS could accept a former Volunteer who was terminated for misconduct and later reapplied for Volunteer service. This could cause great harm to the Peace Corps mission and the people and countries that the



Peace Corps serves. In 2012, a former Volunteer, who was unfavorably separated, reapplied for Peace Corps service within a few days of the separation occurring. Fortunately, this applicant file contained the separation memo and the application was rejected. This case shows the importance of accurate and centralized information.

Furthermore, our [Evaluation on the Impact of the Five Year Rule on the Operations of Peace Corps](#) highlighted that one of the purposes of the five-year rule was to encourage Peace Corps Volunteers to be hired by the agency as staff. Maintaining accurate records concerning a Volunteers service is critical to making employee suitability determinations and decisions granting access to classified information.

**We recommend:**

- 5. That the Office of Global Operations implement a comprehensive process to maintain support for all administrative separation decisions, including those that result in resignation in lieu of. This process will include: standardizing the development of the memos, routing the memos to all relevant offices for review and approval, and retaining documentation in a centralized location.**
- 6. That the Office of Global Operations, in coordination with the Office of Volunteer Recruitment and Services and Office of Records Management, develop a records retention policy for files related to administratively separated or resignation/early termination in lieu of administrative separation Volunteers that allows the agency to use this documentation in the applicant adjudication process.**
- 7. That the Director require all records related to administratively separated or resignation/early termination in lieu of administrative separation be maintained until a records retention schedule is implemented.**
- 8. That the Office of Volunteer Recruitment and Services update the 108 administratively separated Volunteers from fiscal years 2011 and 2012 to ensure their records contain all of the necessary information, including separation memos, to aid in future application reviews.**

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## LIST OF RECOMMENDATIONS

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**We recommend:**

1. That the Director develop and implement a specific child safety program to include ongoing training.
2. That the Office of Volunteer Recruitment and Services require work history verification as part of the screening process.
3. That the Office of Volunteer Recruitment and Services develop and implement a process to review all terminations, resignations in lieu of termination, and administratively separated cases on a periodic basis.
4. That the Office of Volunteer Recruitment and Services establish an annual meeting with all involved parties to review and improve the Volunteer screening process. This discussion should include a review of all cases of misconduct and other volunteer organization best practices.
5. That the Office of Global Operations implement a comprehensive process to maintain support for all administrative separation decisions, including those that result in resignation in lieu of. This process will include: standardizing the development of the memos, routing the memos to all relevant offices for review and approval, and retaining documentation in a centralized location.
6. That the Office of Global Operations, in coordination with Office of Volunteer Recruitment and Services and Office of Records Management, develop a records retention policy for files related to administratively separated or resignation/early termination in lieu of administrative separation Volunteers that allows the agency to use this documentation in the applicant adjudication process.
7. That the Director require all records related to administratley separated or resignation/early termination in lieu of administrative separation be maintained until a records retention schedule is implemented.
8. That the Office of Volunteer Recruitment and Services update the 108 administratively separated Volunteers from fiscal years 2011 and 2012 to ensure their records contain all of the necessary information, including separation memos, to aid in future application reviews.

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## APPENDIX A: OBJECTIVE, SCOPE, AND METHODOLOGY

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In 1989, the Peace Corps OIG was established under the Inspector General Act of 1978 and is an independent entity within the Peace Corps. The purpose of OIG is to prevent and detect fraud, waste, abuse, and mismanagement and to promote economy, effectiveness, and efficiency in government. The Inspector General is under the general supervision of the Peace Corps Director and reports both to the Director and Congress.

The audit objectives were to determine:

1. Whether VRS has sufficient and reliable information available to make appropriate suitability and eligibility determinations for Volunteer applicants.
2. Whether the Peace Corps applicant screening process is consistent with the screening practices of other major Volunteer organizations.
3. The prevalence, characteristics, and outcomes of serious Volunteer misconduct.

Our audit conclusions are based on information from three sources: (1) document and data analysis, (2) interviews, and (3) direct observation. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We relied on computer-processed data from DOVE and verified such data with hard-copy documents as required. While we did not test the system's controls, we believe the information we obtained is sufficiently reliable for this report. Our audit criteria were derived from the following sources: federal regulations, the *Peace Corps Manual*, industry best practices, and other Peace Corps policies and initiatives.

The audit focused on reviewing the Volunteer screening process and applicant files for existing and former Volunteers. We conducted this performance audit at Peace Corps headquarters from December 2012 through June 2013. Internal controls related to the audit objectives were reviewed and analyzed. Throughout the audit, auditors were aware of the possibility or existence of fraud, waste, or misuse in the program.

**Methodology.** We gained an understanding of the screening process and control, reviewed relevant criteria, and interviewed Peace Corps management and staff in VRS to gain an understanding of their roles and responsibilities in the Volunteer screening process.

We surveyed 60 CDs about the characteristics, frequency, and outcomes of Volunteer misconduct they face at their posts; 51 of the 60 answered the survey questions and provided us other feedback. We developed our questions using our professional knowledge of the Volunteer misconduct investigated by our office and through a review of the grounds for unfavorable separation outlined in Peace Corps policy.

We reviewed the case files of all persons identified by the Office of Strategic Information, Research and Planning using the Peace Corps Volunteer Database Management System as having unfavorable separations during the two most recent years (FYs 2011 and 2012). Misconduct information provided by the agency consisted of “consideration of administrative separation memos,” and other information, such as email chains and performance improvement plans. Some memos and information provided did not provide information about the circumstances of the separation. We created misconduct categories for the purposes of this audit because the agency does not have a process to systematically categorize and monitor misconduct. We were unable to determine whether any of the Volunteers who did not have information available were miscoded. Any names and identifying information of Volunteers or staff have been redacted to protect privacy of respondents when used or referenced in this report.

We identified other major volunteer organizations by reviewing certain factors common with the Peace Corps. Some major factors we considered were number of volunteers, whether the majority of their workforce was volunteers, international assignments, volunteers who work directly with beneficiaries, at least 50 percent of beneficiaries are youth, and screens more than 3,000 applicants per year. We interviewed six organizations in person or over the phone about their screening processes. We did not identify the organizations by name in this report to allow representatives from these organizations to candidly discuss their processes. We communicated information from our interviews, including identifying contact information, to VRS at the end of our audit.

**Scope Limitation.** During this audit, we did not review certain components of the screening and placement process. Specifically, the audit objectives excluded medical screening process and medical accommodations, assignment of Volunteers to specific countries and sectors, and a review of interrupted service. These factors may have an effect on the misconduct and early termination rates. In addition, our audit was hindered by the issues noted in our findings with the consistency and availability of data on Volunteers that had misconduct issues.

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## APPENDIX B: INTERVIEWS CONDUCTED

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As part of this audit, we conducted interviews with 12 representatives from Peace Corps headquarters in Washington D.C. and six representatives from other volunteer organizations (not listed here for anonymity). In addition, we surveyed all 60 CDs and received 51 responses.

Position	Office
<b>Deputy Director</b>	Office of Health Services
<b>Chief of Information and Personnel Security</b>	Office of Safety and Security
<b>Chief Administrative Officer</b>	Africa Operations
<b>Expert</b>	Europe, Mediterranean, and Asia Operations
<b>Associate General Counsel</b>	Office of General Counsel
<b>Expert Senior Advisor to the General Counsel</b>	Office of General Counsel
<b>Associate Director for Global Operations</b>	Office of Global Operations
<b>Senior Advisor</b>	Office of Global Operations
<b>Records Management Officer</b>	Office of Management
<b>Placement Eligibility Specialist</b>	Office of Volunteer Recruitment & Selection
<b>Chief of Operations</b>	Office of Volunteer Recruitment and Selection
<b>Placement Manager</b>	Office of Volunteer Recruitment & Selection

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## APPENDIX C: LIST OF ACRONYMS

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ACRONYMS	
CD	Country Director
DOVE	Database of Volunteer Experience
FY	Fiscal Year
MS	Manual Section
NAC	National Agency Check
NACI	National Agency Check with Inquiry
OIG	Office of Inspector General
VRS	Office of Volunteer Recruitment and Selection

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## APPENDIX D: AGENCY'S RESPONSE TO THE PRELIMINARY REPORT

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Since 1961.

### MEMORANDUM

**To:** Kathy Buller, Inspector General

**Through:** Daljit K. Bains, Chief Compliance Officer *Daljit Bains*

**From:** Helen Lowman, AD, Volunteer Recruitment and Selection *Helen Lowman*

**Date:** May 15, 2014

**CC:** Carrie Hessler-Radelet, Acting Director  
Stacy Rhodes, Chief of Staff  
Joaquin Ferrao, Deputy Inspector General  
Carlos Torres, AD, Global Operations  
Earl Yates, AD, Management  
Bill Rubin, General Counsel  
Jacklyn Dao, White House Liaison  
Joseph Hepp, Chief Financial Officer  
Daryl Sink, Chief, Overseas Operations, Office of Safety and Security  
Barry Simon, Director, Office of Medical Services  
David Burgess, Chief of Operations, VRS  
Dick Day, Director, Africa Region  
Nina Favor, Acting Director, Inter-America and Pacific Region  
Kathy Rulon, Acting Director, Europe, Mediterranean and Asia Region  
Nicholas Bassey, Director of Placement, VRS

**Subject:** Agency Response to the Preliminary Report of Peace Corps Response to Preliminary Audit Report: Peace Corps Applicant Screening Process (Project No. 13-AUD-02)

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The Office of Volunteer Recruitment and Selection appreciates the feedback and recommendations that the Inspector General's Office has provided in connection with its

Preliminary Audit Report on the Peace Corps Applicant Screening Process. Some of the recommendations contained in the report would require action by the Office of Global Operations (OGO) and/or Peace Corps Response or the overseas Regions and the Office of Management. We have therefore coordinated our responses with OGO and Management.

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**Recommendation #1:**

**That the Director develop and implement a specific child safety program to include ongoing training.**

**Concur**

OGO will work with other units at Peace Corps to develop a policy and design and implement a child safety training program for invitees.

**Completion Date:**

January 30, 2015

**Recommendation #2:**

**That the Office of Volunteer Recruitment and Selection require work history verification as part of the screening process.**

**Concur**

Peace Corps management agrees that it is important to verify the work history of applicants for whom work history is a required qualification. In such cases, the Office of Volunteer Recruitment and Selection (VRS), and the Peace Corps Response program (OGO/PCR), routinely seek to verify the work qualifications of individual applicants. This screening effort involves reviewing university and graduate school transcripts or diplomas, reviewing current required licenses or certificates, and obtaining reference letters from former supervisors.

It should be noted that the overwhelming majority of Volunteer assignments do not require any specific work experience as a qualification for invitation. The agency's over-arching strategy is to focus on recent university graduates and to train them up to a level of performance and capacity commensurate with their assignments in the host countries. These recent university graduates typically have very limited work experience, and that experience is usually unrelated to their intended Volunteer assignments. Management does not verify an applicant's work history in such cases because that work history is not required for the Volunteer assignment and is usually not a meaningful factor in assessing an applicant's qualifications. However, where prior work history is a selection factor, VRS and PCR will continue to verify the applicant's work history.

**Completion Date:**

Ongoing – in effect since 1984



**Recommendation #3:**

**That the Office of Volunteer Recruitment and Selection develop and implement a process to review all terminations, resignations in lieu of termination, and administratively separated cases on a periodic basis.**

**Concur**

VRS agrees that it is important to have a comprehensive process to review on a periodic basis administrative separations, and resignations in lieu of administrative separation. Management believes that this Recommendation should be implemented in conjunction with Recommendation #4 (see below), because both recommendations address the review of Volunteers who are separated from service for issues related to conduct or behavior. See discussion below.

**Completion Date:**

October 15, 2014

**Recommendation #4:**

**That the Office of Volunteer Recruitment and Selection establish an annual meeting with all involved parties to review and improve the Volunteer screening process. This discussion should include a review of all cases of misconduct and other volunteer organization best practices.**

**Concur**

This response also incorporates Management's response to Recommendation #3. Management concurs that it should implement an annual meeting involving the relevant offices to improve the applicant screening process, and will initiate such meetings for FY2014. These periodic meetings will be organized by VRS, and will include reviews of Volunteers who have been administratively separated, as well as those who have resigned in lieu of administrative separation, in order to determine any necessary improvements to the applicant screening process. Participants will include staff from VRS, PCR, OGO, OGC, OHS and other offices as appropriate.

Management recognizes that most cases of Volunteer misconduct are minor and procedural, rather than being criminal or dangerous. But major misconduct does occur; fortunately less than one percent of all Volunteers are involved in serious incidents of misconduct. Minor infractions are currently addressed informally by Country Directors and other staff members at the Post level, without recourse to Administrative Separation, which is the agency's most severe Volunteer sanction. In a memorandum dated July 14, 2010, the Associate Director for Global Operations addressed the subject of Volunteer misconduct and set out a policy of progressive and informal discipline for all but the most serious offenses, or when a Post recognizes a pattern of ongoing minor offenses. In those circumstances, Administrative Separations are appropriate. Management regularly considers the practices and programs of other international Voluntary organizations in a variety of contexts, including participant safety and discipline, and will continue to do so.

**Completion Date:**

October 15, 2014

**Recommendation #5:**

**That the Office of Global Operations implement a comprehensive process to maintain support for all administrative separation decisions, including those that result in resignation in lieu of. This process will include: standardizing the development of the memos, routing the memos to all relevant offices for review and approval, and retaining documentation in a centralized location.**

**Concur**

The office of Global Operations will put together a working group composed of Regions, PCR, VRS, OGC and others to meet this recommendation.

**Completion Date:**

September 30, 2014

**Recommendation #6:**

**That the Office of Global Operations, in coordination with Office of Volunteer Recruitment and Services and Office of Records Management, develop a records retention policy for files related to administratively separated or resignation/early termination in lieu of administrative separation Volunteers that allows the agency to use this documentation in the applicant adjudication process.**

**Concur**

OGO in coordination with VRS and Records Management will develop a records retention policy or an amendment to current policy for files related to Administrative Separation or Resignation in Lieu of Administrative Separation that allows the Agency to use this documentation in the application selection process.

**Completion Date:**

September 30, 2014

**Recommendation #7:**

**That the Director require all records related to administratively separated or resignation/early termination in lieu of administrative separation be maintained until a records retention schedule is implemented.**

**Concur:**

The agency will send communication to all relevant departments indicating that all separation memos should be maintained until a records retention schedule for these documents is established.

**Completion Date:**

June 30, 2014

**Recommendation #8:**

**That the Office of Volunteer Recruitment and Selection update the 108 administratively separated Volunteers from fiscal years 2011 and 2012 to ensure their records contain all of the necessary information, including separation memos to aid in future application reviews.**

**Concur**

VRS has updated these 108 Volunteer files from Posts for the years FY2011 and FY2012, to include memoranda of Administrative Separation, or information related to Volunteer Resignations in lieu of Administrative Separation.

**Completion Date:**

April 4, 2014

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## APPENDIX E: OIG COMMENTS

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Management concurred with all eight recommendations. In its response, management described actions it is taking or intends to take to address the issues that prompted each of our recommendations. We wish to note that when we close recommendations, we are not certifying that the agency has taken these actions, or that we have reviewed their effect. Certifying compliance and verifying effectiveness are management's responsibilities. However, when we feel it is warranted, we may conduct a follow-up review to confirm that action has been taken and to evaluate the impact.

All eight recommendations remain open. OIG will review and consider closing recommendations pending confirmation from the chief compliance officer that the documentation reflected in OIG analysis is received. For recommendation 2, additional documentation is required.

### **2. That the Office of Volunteer Recruitment and Services require work history verification as part of the screening process.**

Concur: Peace Corps management agrees that it is important to verify the work history of applicants for whom work history is a required qualification. In such cases, the Office of Volunteer Recruitment and Selection (VRS), and the Peace Corps Response program (OGO/PCR), routinely seek to verify the work qualification of individual applicants. This screening effort involves reviewing university and graduate school transcripts or diplomas, reviewing current required licenses or certificates, and obtaining reference letters from former supervisors.

It should be noted that the overwhelming majority of Volunteer assignments do not require any specific work experience as a qualification for invitation. The agency's over-arching strategy is to focus on recent university graduates and to train them up to a level of performance and capacity commensurate with their assignments in the host countries. These recent university graduates typically have very limited work experience, and that experience is usually unrelated to their intended Volunteer assignments. Management does not verify an applicant's work history in such cases because that work history is not required for the Volunteer assignment and is usually not a meaningful factor in assessing an applicant's qualifications. However, where prior work history is a selection factor, VRS and PCR will continue to verify the applicant's work history.

**Documents Submitted:** N/A

**Status and Timeline for Completion:** Ongoing—in effect since 1984.

**OIG Analysis:** We recognize that the agency has been verifying an applicant's work history when prior work history is a selection factor. The intent of this recommendation was for the agency to begin verifying work histories for *all* applicants. In doing so, VRS will have more meaningful information to make suitability determinations and verify that the information on applications is truthful. Such verification could also be designed to elicit basic information about whether the applicant was ever disciplined or terminated by an employer, and whether the employer would hire this individual again. While this information might also be useful to assess Volunteer competencies, our recommendation was made to address suitability screening. Furthermore, this verification goes beyond the reference letter VRS collects from applicants,

because it would allow the agency to make direct contact with former employers and not the one specifically chosen by the applicant. This process could allow VRS to potentially uncover background information on applicants that was not disclosed in the application and is otherwise not available from another source. In order to close this recommendation, please submit the documented policy and procedure guidelines for collecting work history verification and a sample of the verification form that is sent to the applicant's former employer(s).

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## APPENDIX F: AUDIT COMPLETION AND OIG CONTACT

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### AUDIT COMPLETION

This audit was conducted under the direction of former Assistant Inspector General for Audit Bradley Grubb by Auditor Gabrielle Perret, Lead Auditor Rebecca Underhill, Senior Evaluator Susan Gasper, and Program Analyst Kaitlyn Large.



Hal Nanavati  
Acting Inspector General for Audit

### OIG CONTACT

If you wish to comment on the quality or usefulness of this report to help us strengthen our product, please contact Acting Assistant Inspector General for Audit Hal Nanavati at snanavati or 202.692.2929.

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Mail: Peace Corps Office of Inspector General  
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