TO: Carol Spahn, Director

U.S. Peace Corps

Paul D. Coverdell Peace Corps Headquarters

1275 First St NE

Washington, DC 20002

FROM: 2022 Peace Corps Sexual Assault Advisory Council

DATE: March 30, 2023

SUBJECT: 2022 Peace Corps Sexual Assault Advisory Council Annual Report

Dear Director Spahn:

In accordance with the Kate Puzey Peace Corps Volunteer Protection Act of 2011, and as required by federal law, the Peace Corps Sexual Assault Advisory Council (the "Council") respectfully submits this annual report following two productive summits at Peace Corps Headquarters (in May 2022 and October 2022) and review of relevant sexual assault response and prevention program training, policies, and documentation. In this report we, the 2022 Council, recognize the progress that the Peace Corps has made toward addressing the recommendations in the Council's 2021 report, provide focused additional recommendations for further improvement, and clarify select 2021 recommendations.

Since its inception, the Council has worked to remain volunteer-centered and to work collaboratively with Peace Corps as the agency supports and strengthens its volunteer-centered Sexual Assault Prevention and Response Program, guiding the program in a survivor-centric direction. The 2022 Council members are honored to have continued this tradition of partnership in support of the Peace Corps, Peace Corps trainees, volunteers, returned volunteers, and staff.

Sincerely,

2022 Sexual Assault Advisory Council Members

Megan Foster

Prevention Program Coordinator Oregon Attorney General's Sexual Assault Task Force Kimberly Castelin, PhD

(mititar) mix

Senior Service Fellow Centers for Disease Control and Prevention (CDC) Su Buse

Sarah Bristol, MSN, MPH, RN, SANE-A

Director of Clinical Program
DC Forensic Nurse Examiners

Noël Busch-Armendariz, PhD, LMSW, MPA

University Presidential Professor University of Texas at Austin

Cles Durand

Jill Dunlap, PhD

Senior Director for Research, Policy, and Civic Education

NASPA, Student Affairs Professionals in Higher Education

Christopher Kilmartin, PhD

Mity Wilmate

Independent Consultant

Mark Mogle

Mark Mogle

Assistant Director for Forensics International Criminal Investigative Training Assistance Program U.S. Department of Justice (DOJ) (holew One)

Andrew Busch, USAF, Ret. Lt. Gen.

Independent Consultant AE Busch Consulting

Kristin Daley, CA

Independent Consultant

Jamif A. Hegle

Jennifer Hegle, MPH

Health Scientist
Centers for Disease Control and Prevention (CDC)

Jennifer Longa

Assistant Dean of Students for Victim Support Services and Bystander Initiatives University of Connecticut

Tonette Ngassa

Grant Program Specialist
Office of Violence Against Women (OVW)
U.S. Department of Justice (DOJ)

7/4//

David Obergfell, DSW, LCSW, (CA, D-SAACP)

Senior Director of Crisis Services Terros Health Reserve Officer, Biomedical Services U.S. Air Force hors

Deanna Walters, PhD, MEd

Health Scientist
Division of Violence Prevention (DVP)
Centers for Disease Control and Prevention (CDC)

List of Acronyms

ВНО	Behavioral Health and Outreach Unit
CQI	Continuous Quality Improvement
DoD	Department of Defense
DoJ	Department of Justice
ICDEI	Intercultural Competence, Diversity, Equity and Inclusion
LOE	Level of Effort
OGC	Office of the General Counsel
OHS	Office of Health Services
OIG	Office of the Inspector General
OSS	Office of Safety and Security
OVA	Office of Victims' Advocacy
PC	Peace Corps
PCMO	Peace Corps Medical Officer
PCV	Peace Corps Volunteer
RAINN	Rape Abuse Incest National Network
RPCV	Returned Peace Corps Volunteer
SAAC	Sexual Assault Advisory Council
SANE	Sexual Assault Nurse Examiner
SAPR	Sexual Assault Prevention and Response
SARL	Sexual Assault Response Liaison
SARRR	Sexual Assault Risk Reduction and Response

Table of Contents

List of Acronyms	3
Table of Contents	4
Executive Summary	6
Priorities for the 2022 Council	8
2022 Report Organization	8
Summary of 2022 SAAC Recommendations	8
Methods Across Offices and Council Workgroups	9
2022 SAAC Recommendations and Clarification of 2021 Recommenda Implementing Office	ntions by
Office of Sexual Assault Prevention and Response Program (SAPR) Cross-cutt Recommendations	ting 10
Recognition and Observations	10
New Recommendations	10
Clarification of 2021 Recommendations	13
Overview of Information Reviewed by 2022 Council	13
Office of Victim Advocacy (OVA)	14
Recognition and Observations	14
New Recommendations	14
Clarification of 2021 Recommendations	14
Overview of Information Reviewed by 2022 SAAC	15
Office of Health Services (OHS)	15
Recognition and Observations	15
New Recommendations	15
Clarification of 2021 Recommendations	16
Overview of Information Reviewed by 2022 SAAC	16
Office of Safety and Security (OSS)	16
Recognition and Observations	16
New Recommendations	16
Clarification of 2021 Recommendations	16
Overview of Information Reviewed by 2022 SAAC	17
Office of the General Counsel (OGC)	17
Recognition and Observations	17
New Recommendations	18
Clarification of 2021 Recommendations	18
Overview of Information Reviewed	18
Office of Global Operations	18
Chief Executive Officer (CEO)	18
Recognition and Observations	18
New Recommendations	19
Overview of Information Reviewed	20

Conclusion and Suggested Areas of Focus for 2023		
Suggested Priority Areas for 2023 Council and Peace Corps Attention	23	

Executive Summary

The 2022 Sexual Assault Advisory Council Members (after this referred to as 'the SAAC' or 'the Council') acknowledge that the Peace Corps has sincerely and intentionally made progress on recommendations in the Council's 2021 Report. The 2022 Council recognizes the Peace Corps' efforts to address many of the concerns outlined in the Kate Puzey Peace Corps Volunteer Protection Act (after this referred to as 'the Act') of 2011 and the Sam Farr and Nick Castle Peace Corps Reform Act of 2018.

Among its many provisions, the Kate Puzey Volunteer Protection Act established the Sexual Assault Advisory Council (the "Council"), and mandated that:

The Council should meet not less often than annually to review the sexual assault risk-reduction and response training developed under section 8A, the sexual assault policy developed under section 8B, and such other matters related to sexual assault the Council views as appropriate, to ensure that such training and policy conform to the extent practicable to best practices in the sexual assault field.

The Act further required that:

On an annual basis for five years after the date of the enactment of this section and at the discretion of the Council thereafter, the Council shall submit to the President and the Committee on Foreign Relations and the Committee on Appropriations of the Senate and the Committee on Foreign Affairs and the Committee on Appropriations of the House of Representatives a report on its findings based on the reviews of the sexual assault risk-reduction and training and policy.

Members of the Council were appointed by the Peace Corps Director to meet the qualifications set forth in the Kate Puzey Volunteer Protection Act:

The Council shall consist of not less than eight individuals. At least one member shall be a Returned Peace Corps Volunteer who was a victim of sexual assault, and at least one member shall be a Returned Peace Corps Volunteer who was not a victim of sexual assault. The other members shall be governmental and nongovernmental experts and professionals in the sexual assault field. The number of members who are employees of federal, state, or local governments shall not exceed the number of members who are not employees of federal, state, or local governments.

The Sam Farr and Nick Castle Peace Corps Reform Act amended the SAAC's sunset date from October 1, 2018 to October 1, 2023.

The Council found that the Peace Corps has demonstrated investments in institutional resources to increase Peace Corps Volunteers' safety and well-being while improving its institutional response to sexual assault incidents. Of note in 2022, the Peace Corps has committed additional resources to further strengthen its systems, programming, and approach to sexual assault prevention and to improving trauma-informed approaches to supporting survivors. The Peace Corps has committed to further integrating prevention activities, ensuring trauma-informed

programming and approaches, and strengthening accountability¹. Some of these changes have already been codified. For example, the former Office of Sexual Assault Risk Reduction and Response (SARRR) is now named the Office of Sexual Assault Prevention and Response (SAPR)². As another example, the Peace Corps continued to independently explore how to address the sole non-concur recommendation from the Council's 2021 report related to supporting volunteers who receive disclosures of violence from community members (e.g. students, co-workers).

The 2022 Council made its observations and recommendations after review of training curricula, policy, and other relevant documents, as well as progress presented by Peace Corps staff during the May 2022 Summit, and subsequent discussions with implementing Peace Corps offices. This includes discussions that took place during the October 2022 Summit.

The Council observes that Peace Corps staff continue to dedicate time and effort to fully address the Council's 2021 recommendations. In addition to SAPR-specific efforts, the agency has also started to invest in more proactive ways to share and use data to improve performance. The Council commends these efforts as this capacity will support the ability to monitor, evaluate, and improve specific programs, including the SAPR Program. These efforts are made as the Peace Corps is rapidly working on a massive effort to return volunteers to service following the global evacuation in March of 2020 due to the COVID-19 pandemic.

The Council observes that in addition to the Office of Sexual Assault Prevention and Response (SAPR), several implementing offices have made rapid progress on the 2021 recommendations. The Office of Health and Safety (OHS), Office of General Council (OGC), and Office of Victim Advocacy (OVA) have shown notable speed, dedication, creativity, and rigor in their efforts to address relevant 2021 SAAC recommendations. The Council commends the staff in the Office of Safety and Security (OSS) for dedicating additional time to connect with Council members, and for their willingness to explore new ways to incorporate best practices around primary prevention into their current processes, policies, procedures, training, and systems. This is a challenging and critical task that prioritizes both the safety and autonomy of survivors and volunteers.

The Council recognizes the work Peace Corps is undertaking is challenging. The Council observes that Peace Corps is making progress toward becoming an organization of prevention and response, and is striving to become more trauma-informed and survivor-centered. The Council also believes that by addressing this culture change internally and in a way that supports staff to undertake highly challenging tasks, the Peace Corps' efforts will contribute to a stronger, more robust SAPR Program and will ultimately ensure volunteers feel respected, cared for, heard, and seen.

¹ Peace Corps. March 2022. Broadening the Peace Corps' Approach to Sexual Assault Prevention. https://files.peacecorps.gov/documents/20220315_SARRR_Brief_and_Roadmap_FINAL.PDF

² Peace Corps. MS 123 Office of the Director: Organization, Mission, and Functions. https://files.peacecorps.gov/documents/MS-123-Policy.pdf

Priorities for the 2022 Council

The Council appreciates Peace Corps' action to respond to the 2021 SAAC report and the efforts to work collaboratively. Peace Corps has dedicated significant time responding to the high number of recommendations in the 2021 SAAC report. The Council was able to review materials and share best practices with Peace Corps staff at more regular intervals in 2022. The Council recognizes it is more important to do this work well and with intention than do it quickly. The Council commends the Peace Corps for participating in a collaborative process with the Council this year. The 2022 Council looks forward to continued partnership with the Peace Corps in support of the SAPR Program.

2022 Report Organization

The remainder of the 2022 SAAC report includes a section for each of the main SAPR offices. These sections include recognitions and observations, recommendations, and an overview of specific documents reviewed or communications between Peace Corps staff and the 2022 Council. The 2022 SAAC report also includes a section for the Director and her team. This year's report does not include office-specific recommendations for the Office of Global Operations. Instead, the report section addressing this office highlights the key role the office will play in implementing all other recommendations. OGO's specific materials, processes, and implementation may be reviewed by the Council in future years.

Summary of 2022 SAAC Recommendations

The 2022 Council worked with relevant Peace Corps offices to collaborate on a series of new recommendations. While some do not have new recommendations specific to their office, the SAAC anticipates that all of the SAPR implementing offices will have a role in implementing new cross-cutting recommendations for SAPR. The Council also recognizes that other Peace Corps offices may not be officially designated as SAPR implementing offices but may still have key roles. For example, Peace Corps Office of External Affairs/Communications is central to successfully implementing communication-related recommendations from the 2021 report. The 2022 SAAC recommendations are outlined below and include the offices that the Council feels are best aligned to lead implementation. More context on each recommendation is provided later in the report.

Office of Sexual Assault Prevention and Response (SAPR)

- Implement a confidential reporting resource that aligns with best practices. The council
 anticipates that this office will spearhead this effort with cooperation and collaboration
 from all other SAPR implementing offices.
- 2. Distinguish between sexual assault and sexual harassment in policies and procedures, while following trauma-informed best practices in cases of sexual harassment.

Office of Victim Advocacy (OVA)

3. Anticipate possible need to expand staffing for the OVA at a level that reflects adequate capacity for trauma-informed response and supports best practices for reporting.

Chief Executive Officer (CEO)

- 4. Extend the SAAC's tenure regardless of whether Congress renews the mandate beyond 2023 to allow for continued support to the agency as it makes progress on its commitment to trauma-informed survivor-centered services and prevention. The 2022 Council and Peace Corps leadership see continued benefit from the expertise of an advisory council to support integration of best practices from across the field of sexual assault response and prevention.
- 5. Designate the SAPR Director and team members as exempt from the five-year term limit, similar to the designation used for OSS, OVA, and RSA staff³. The SAAC has found historically high position turn-over has created a challenge to coordinating the Peace Corps response to victim/survivors. In its 2022 Management and Performance Challenges Report, the OIG noted similar challenges at the Agency level and the Council commends the Peace Corps addressing this issue through using its hiring authority to exempt a total of 79 positions that play key roles in volunteer safety and security⁴. Applying this authority to move key positions from term-limited to permanent status in the Office of SAPR provides stability in leadership and human capital for a critical program across Peace Corps offices such as OSS, OVA, RSA, and OHS to realize Peace Corps' commitment to becoming a more trauma-informed organization.
- 6. Assure that composition of the SAAC is more inclusive and fully representative of the diversity of volunteer and survivor identities, including re-examining the SAAC Committee selection process to ensure inclusivity and diversity.

Methods Across Offices and Council Workgroups

The 2022 Council members attended two in-person Summits at Peace Corps Headquarters during the months of May and October 2022. During these summits, the Council reviewed progress on the 2021 SAAC report recommendations and provided clarification on recommendations to Peace Corps staff as needed. Specific documents reviewed by the Council and discussions with Peace Corps offices are documented in Office Sections of this report.

Following the May 2022 Summit, the Council followed these overarching methods to shape the review and collaboration efforts, and to develop their 2022 recommendations:

- The Council selected a set of priorities to guide the Council's review for 2022
- The Council formed workgroups organized by these priorities
- Workgroups completed document reviews of policies, training curricula, and other relevant reports and documents

³ 22 USC 2506: Peace Corps employees https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title22-section2506&num=o&edition=prelim

⁴ Peace Corps Office of Inspector General. Management and Performance Challenges Fiscal Year 2022. https://www.oversight.gov/sites/default/files/oig-reports/PeaceCorps/ManagementandPerformanceChallenges001.pdf

- Workgroups engaged in collaborative discussions with Peace Corps staff to better understand progress and context as well as provide input on best practices and evidence-informed strategies
- The 2022 Council received timely updates from the Office of Compliance to understand progress across SAPR implementing offices before drafting the 2022 report. The Council requests that these useful, timely updates continue in future years.

2022 SAAC Recommendations and Clarification of 2021 Recommendations by Implementing Office

Office of Sexual Assault Prevention and Response Program (SAPR) Cross-cutting Recommendations

Recognition and Observations for SAPR

The Director and staff in the Office of Sexual Assault Prevention and Response (SAPR) have provided exceptional support to the Council in both 2021 and 2022. Their dedication to volunteer survivors and ability to coordinate across Peace Corps units and posts deserves commendation. The Council recognizes that across units, Peace Corps staff members are dedicated to serving and supporting volunteer survivors. There are existing individuals in key staff positions within the SAPR team, Office of Victim Advocacy, Office of Health Services, and Office of the General Counsel who have deep experience and knowledge in areas of sexual assault prevention and response and/or in preventing gender-based violence. Staff in the agency can continue to access and learn from these colleagues.

The SAPR Program will benefit from the progress made to support the program, specifically progress made from 2021 recommendations to increase staffing in key subject matter roles. Increased staff capacity created through the SAPR Prevention Specialist, monitoring and evaluation staff, and a cooperative staff position with the Office of External Affairs/Communications specializing in support for SAPR communications will continue to support progress on recommendations related to those areas (e.g., 2021 recommendation SARRR 3).

New Recommendations for SAPR

1. Implement a confidential reporting resource that aligns with best practices

In Manual Section 243⁵, Peace Corps uses the terminology of "restricted reporting" and "standard reporting" to identify two different victim-informed reporting options. In this section we compare and contrast some best practices used by the Department of Defense (DoD) in survivor reporting options. DoD uses the terms "restricted reporting" and "unrestricted reporting" to provide victims a similar range of options. The DoD examples used in this section are offered as a means of supporting an analysis of potential reporting option enhancements.

Based on presentations provided by several Peace Corps offices during the May 2022 SAAC Summit, members of the 2022 SAAC determined that Peace Corps has an opportunity to

⁵ Peace Corps. (2018). MS 243 Responding to Sexual Assault. https://files.peacecorps.gov/documents/MS-243-Policy.pdf#:~:text=MS%20243%20Responding%20to%20Sexual%20Assault%20Procedures%201.0,Puzey%20Peace%20Corps%20Volunteer%20Protection%20Act%20of%202011.

advance toward best practices in the area of clarifying and handling confidential disclosures from PCVs. It is important to note the difference between the terms *disclosure* and a *report*. The following definitions and references come from the field of sexual violence research and best practices, and are not specific to Peace Corps SAPR Program.

A *disclosure* is defined as an instance "when a survivor tells [someone] official about his or her victimization in order to access services." ⁶

In the field of victim advocacy, "a disclosure is to be kept confidential by that official and does not require action against the person a victim identifies as having committed the violence." By contrast, a report signifies a separate additional process.

"A *report* is a survivor's official complaint. A report requires [an official] to take action against the person reported to have committed violence; the action likely will not allow total confidentiality, although [officials] should limit knowledge of the report to as few other officials as possible and may wish to put other confidentiality rules in place."

In the implementation of the Peace Corps' SAPR program, a restricted report does not require or include action against the person who committed the violence. Inherently, a restricted report precludes action by the Agency. The importance of a truly confidential person or place for survivors was underscored by the White House Administration in *Not Alone: The First Report of the White House Task Force to Protect Students From Sexual Assault*⁹ which was released in 2014 and stated, "For some, having a confidential place to go can mean the difference between getting help and staying silent."

Both fields of U.S. higher education and U.S. military have recognized the importance of this confidentiality and have developed an infrastructure for survivors to have a truly confidential method to disclose what happened to them and to explore their options for medical care, crisis services and longer-term support, and safety planning without initiating a formal process and without anyone else being notified without the explicit consent of the survivor. ¹⁰ For example, under the DoD Sexual Assault Prevention and Response Office (SAPR/DoD Sexual Assault Prevention and Response Office), a service member may present to the SAPR program, disclose a sexual assault event, and be provided with options for *restricted reporting* or *unrestricted reporting* (options currently referred to as a *restricted report* or a *standard report* in Peace Corps's SAPR program)¹¹. The disclosure itself does not constitute an official report (restricted

⁶ Cantalupo, N. (2015). Five Things Student Affairs Professionals Should Know About Campus Gender-Based Violence. NASPA Research and Policy Institute Brief.

⁷ Ibid.

⁸ Ibid.

⁹Whitehouse Task Force to Prevent Students from Sexual Assault.(2014). NOT ALONE: The First Report of the White House Task Force to Protect Students From Sexual Assault.

https://obamawhitehouse.archives.gov/sites/default/files/docs/report_o.pdf

¹⁰ Berman, R., Dunlap, J., & Henkle, J. (2022). A Snapshot of the Current State of Title IX: Recommendations for State and Federal Policymakers. *NASPA-Student Affairs Administrators in Higher Education*.

¹¹ United States Department of Defense (2021). DoD Directive 6495.01, DoD Instruction 6495.02, and DoD Instruction 6495.03. Sexual Assault Prevention and Response (SAPR) Program (2021/2022), https://www.sapr.mil/policy

or unrestricted) until the presenting survivor elects to engage in the reporting process. The DoD continues to implement efforts to offer a survivor the most available options by placing support services at the forefront of survivor engagement. Challenges, which are not dissimilar from those expressed by many organizations using a formal sexual assault reporting processes, often lie in information flow about disclosure and reporting options, how the confidential nature of the disclosure is relegated to specific offices (i.e., SAPR, mental health/medical providers, Installation Chaplains, and legal resources), and how those offices can receive a disclosure with confidentiality and advise the survivor of options. In other circumstances, the process for a *mandatory report* (referred to as a *standard report* in Peace Corps's SAPR program) starts if the disclosure is provided to someone in the Command chain or any other non-confidential service provider, both of which are *mandatory reporters*¹². Finally, the Department of Justice Office for Victims of Crime has developed guidelines for protecting the survivor's privacy¹³.

The SAAC acknowledges that the Peace Corps currently utilizes volunteer advocates, who are Peace Corps staff, in each host country known as Sexaul Assault Response Liasons (SARLs). A disclosure to a SARL, however, requires the SARL to notify the Peace Corps Medical Officer (PCMO) in each country, regardless of the wishes of the survivor. Peace Corps also has a contract with the Rape, Abuse, Incest National Network (RAINN) to provide access to a 24-hour confidential crisis line, PC Saves. However, PC Saves is unable to directly connect a volunteer to Peace Corps services, and is not meant to provide long term support. Thus, the SAAC feels strongly that Peace Corps needs a truly confidential resource for survivors who experience sexual assault while in service. This confidential resource could be provided in addition to the existing SARL program and 24-hour hotline services and thus would not alter protocols regarding existing restricted and standard reporting options.

In addition to the recommendation for Peace Corps to implement confidential resources for survivors, the SAAC feels strongly that Peace Corps should have a public, volunteer-accessible resource that details the processes involved in restricted and standard reports written in plain language. This empowers survivors to know who will be given access to their information and disclosure if they choose to report and who they can expect to interact with as they move forward from that initial decision to disclose and/or report. There are several good examples from the field of higher education that outline in graphic form a survivor's options for reporting or disclosing harm, and can inform the survivor of which offices are notified upon a formal report. This type of information can assist a survivor in knowing what to expect based on disclosing or reporting, and, crucially, provide them with a sense of control over the process.

⁻

 $^{^{12}}$ Independent Review Commission on Sexual Assault in the Military (2021). Hard Truths and the Duty to Change: Recommendations from the Independent Review Commission on Sexual Assault in the Military. https://media.defense.gov/2021/Jul/02/2002755437/-1/-1/0/IRC-FULL-REPORT-FINAL-1923-7-1-21.PDF/IRC-FULL-REPORT-FINAL-1923-7-1-21.PDF

¹³ Department of Justice. Strengthening Sexual Assault Victim's Right to Privacy. https://www.ojp.gov/pdffiles1/Digitization/226501NCJRS.pdf

¹⁴ University of Southern California. Office for Equity, Equal Opportunity, and Title IX. (2018). Get Help: Navigating the USC Policy on Prohibited Discrimination, Harassment, and Retaliation. https://eeotix.usc.edu/report/

2. Distinguishing between sexual assault and sexual harassment in policies and procedures.

Some communities view and respond to sexual harassment as a human resources or organizational issue, while sexual assault is viewed as a violent criminal offense. It is vital that Peace Corps understand that these language discrepancies can have personal, community, and societal-level implications for the severity and urgency with which others respond to these different offenses. Peace Corps must also understand the potential discrepancy in outcomes for the person harmed rather than viewing these as continuous issues.

Specifically the SAAC identified these examples of problematic language in SSI-550: "annoys" is used in reference to sexual harassment, an example is provided of a man exposing himself in a public place, and a suggestion to speak with the community is made. None of this language is currently in line with best practices in that it minimizes behavior that may have serious consequences and provides guidance that may not be appropriate in all situations.

The Council suggests Peace Corps address these specific areas—which are recognized as best practices—related to sexual assault and sexual harassment by doing the following:

- Update policies and procedures to address sexual harassment experienced by Volunteers
 as a matter that goes beyond a human resources or organizational issue and into the
 realm of sexual violence.
- Maintain the current practice of handling sexual harassment and sexual assault separately, but update sexual harassment policies with input from trauma-informed professionals.
- Ensure that language in both public-facing and internal materials is survivor-focused and trauma-informed. For example, SSI 550 currently refers to sexual harassment using the term "annoys," which is mild language for a serious subject and may serve to minimize the survivor's experience. Language should be updated to more appropriate terminology such as "disturbs" or "traumatizes" acknowledging that harassment in itself can be traumatizing or retraumatizing. Similarly, acknowledge that "unwanted calls or messages" CAN constitute sexual assault for example, unsolicited explicit content or coercion to send such content is a serious matter, as is the example used in SSI 550 of a man running in a park and exposing himself, which could conceivably constitute sexual assault.
- Continue to develop strategies reflective of current evidence-based best practices for policies and procedures to address, separately, both sexual assault and sexual harassment
- In documenting sexual harassment, consider keeping information about the perpetrator and/or the incident in a confidential database rather than tying the information to the PCV who experienced the harassment

Specifically, the Council recommends that Peace Corps implement the following:

• Obligate Peace Corps staff to document sexual harassment

- Consider the intersection between cultural context and emerging scholarship about harassment (e.g., community members' potential willingness to protect harassers) and strategize actions that mitigate driving the issue underground
- Update training curricula with the best pedagogy available, including short case studies, small group discussions, relevant readings, and culturally relevant films/videos
- Consider providing relevant and complex examples of harassment from the field. These
 examples may be used in training materials for both volunteers and Peace Corps staff
 and can support learners by identifying both ethical issues and ways to address the
 harassment given the complicated situations volunteers encounter in service.

Clarification of 2021 Recommendations

SARRR 2.1 "PC must improve transparency and communication related to its sexual assault prevention and response programming and should consider hiring or allocating 50% LOE of a PC Communications person to support SARRR with HQ and country office communication."

Clarification on SARRR 2.1: To clarify, this recommendation includes internal communication for staff, trainees, and volunteers, external communication like with the SAAC and other key interested parties, and publicly facing communications including posting Peace Corps' progress on prior year SAAC recommendations. Transparent communication as an ethos is important to embody trauma-informed practices. This would be a transparent step for survivors or other members of the public. It also embodies the Council's commitment to transparency and desire to be good stewards centered on volunteers.

SARRR 1.1 "We recommend anti-sexual assault messaging [be] incorporated into all aspects of PC training and onboarding as well as during their service. This includes transparent communication about potential risks and acknowledgment of sexual violence in communities where PCVs live.

Clarification on SARRR 1.1: Ensuring recruitment and on-boarding processes are transparent will strengthen trust with volunteers. For example, being up front about how common harassment may be on public transportation.

Overview of Information Reviewed by 2022 Council

The Council reviewed the Peace Corps response to the 2021 report and evidence of progress along 2021 SAAC recommendations to inform clarifications. To inform new recommendations, the Council referenced information from presentations given by Peace Corps staff during the May 2022 Summit and available Peace Corps documentation of policies and procedures and reviewed best practices. In particular, Peace Corps policy MS243 along with other relevant policy documents were reviewed to identify examples of instances where improvements are needed to language and systems for reporting so that policy centers on the survivor rather than the organization.

Office of Victim Advocacy (OVA)

Recognition and Observations

The 2022 Council wishes to recognize the outstanding work of the Office of Victim Advocacy in leaning into the Peace Corps' efforts to support survivors. OVA is leading by example to guide the Peace Corps toward a more survivor-focused model of response. They have strengthened the SARL program to continually improve both training and internal support systems for staff, a necessary component of work with high potential for secondary trauma. OVA's program aligns with the primary prevention model, an approach that enables the office to contribute to longer-term culture shifts that lead to broader societal change. OVA has managed to implement these critical updates to their program without incurring budget increases or additional staffing at post: SARLs generously volunteer their time for this additional collateral duties, a testament to OVA's commitment to serve survivors. The 2022 Council commends OVA on their staff's willingness to go above and beyond at the local and national levels, exemplifying dedication to survivors, volunteers, and their communities. The Council supports OVA's leadership in this space and welcomes the opportunity for OVA's work to serve as a roadmap for Peace Corps' overall approach to sexual violence to become more survivor-focused and trauma-informed.

New Recommendations

3. Anticipate possible need to expand staffing resources for the OVA at a level that reflects adequate capacity for trauma-informed response.

OVA has shown leadership in moving Peace Corps toward a more survivor-focused organizational culture. However, OVA faces limitations in operating in a fully functional victim advocacy role by the lack of a confidential reporting option (see related recommendation under OSAPR section). As advocates, their allegiance should be 100% to survivors, without having to straddle a line between survivor confidentiality and their duty to the Peace Corps. During the October 2022 summit, the OVA had on staff two full-time advocates. In the event of increased demand for services, Peace Corps needs to be prepared to rapidly increase advocates to meet that demand. A victim advocate's mission is to provide victims/survivors of sexual assault with a safe and confidential space in which they can learn about the dynamics of abuse, their rights and options, and be empowered to make their own decisions about justice and healing. Other organizations have experienced increases in reporting when confidential reporting options become available, and with this in mind, the Council sees a need for the OVA to scale to meet emergent needs if the Peace Corps experiences a similar reporting surge.

Clarification of 2021 Recommendations

The Council discussed clarifications during the 2021 May Summit and has no further clarifications to 2021 SAAC recommendations for this office.

Overview of Information Reviewed by 2022 SAAC

Communications with the Director of OVA during the 2022 Summit breakout on trauma-informed best practices were informative and productive. During the 2022 May Summit discussions and materials shared from this office documented a strong advocate program with core standards and expectations that centered on survivors and volunteers. The OVA continues to improve the SARL programming as that office works to navigate the dozens of cross-cultural contexts in which Peace Corps staff operate and maintain core standards of care for volunteer survivors.

Office of Health Services (OHS)

Recognition and Observations

In May of 2022, OHS outlined a sexual assault response training plan for PCMOs that exceeded the Council's expectations. It should be noted that OHS were already developing a strong training program before the 2021 SAAC report was released. Initiatives included traumainformed didactic and forensic skills training.

The Council appreciates the progress by OHS on integrating screening into routine PCMO and volunteer visits. The Council recognizes that integrating screening questions related to sexual assault and intimate partner violence into routine medical visits can be challenging. Also challenging is the ability to implement screening in a trauma-informed manner and to ensure disclosures are managed appropriately and with compassion. In particular, the Council commends the willingness shown by staff leading this work to collaborate, learn, and prioritize quality over speed. The 2022 Council members have expressed an interest in continuing to collaborate on this effort in 2023.

OHS is currently in the process of identifying an appropriate contractor to support their Tele-SANE initiative. OHS has also launched their Tele-Health Services via Zoom to provide direct patient care to PCVs. Behavioral Health and Outreach (BHO) is currently providing Tele-Health services and other providers will join soon. The Council is impressed with the progress OHS has made in these areas.

New Recommendations

The Council's only new recommendations for OHS are expressed in the Sexual Assault Prevention and Response Program section of this report. OHS has a key role to play in implementing a "confidential reporting resource that aligns with best practices in the context of confidential disclosures." Currently, PCMOs play a leading role in Peace Corps' reporting system and will continue to play a critical response role in providing health care to volunteers who experience sexual assault.

Clarification of 2021 Recommendations

The Council and OHS had time to clarify 2021 SAAC recommendations during the May 2022 Summit. The SAAC has no further clarifications at this time.

Overview of Information Reviewed by 2022 SAAC

The Council's discussion with OHS demonstrated that OHS had implemented trauma-informed, evidenced-based interventions in collaboration with the International Association of Forensic Nurses. OHS is clearly providing resources for PCMOs to improve their response to PCVs who have experienced sexual assault.

Office of Safety and Security (OSS)

Recognition and Observations

The Council worked collaboratively with OSS this year on efforts the operating unit has undertaken outside of and because of the 2021, and previous, SAAC reports. This includes the Council providing initial general feedback on some of the sexual assault risk reduction, response, and prevention training curricula for trainees during Pre-Service Training.

Regarding the SAAC recommendations from 2021 related to monitoring and evaluation and the Theory of Change, the Council wants to recognize progress made. The Council will continue to support these efforts next year, particularly around the collaborative creation of a Theory of Change. The Council wants to recognize the staff across offices, and the OSS in particular, that are contributing to this effort and leaning into courageous conversations and taking responsibility for building internal capacity so they can integrate primary prevention and trauma-informed outcomes.

New Recommendations

The Council's only new recommendations for OSS are expressed in the Office of Sexual Assault Prevention and Response section of this report. OSS has a key role to play in implementing both recommendations as this office leads use of reporting data and volunteer-facing training related to Peace Corps' policies and procedures for both sexual assault and harassment reporting. This office also plays a key role at post in responding to reports. The SAAC looks forward to this office's continued cooperation with OSAPR to implement both new 2022 recommendations.

Clarification of 2021 Recommendations

OSS 7: "Use trauma-informed and collaborative monitoring and evaluation approaches to streamline the logic model and Theory of Change into a single program description so that it 1) clearly reflects the volunteer experience and is trauma-informed; 2) includes strategic objectives identified in the updated, comprehensive Sexual Assault Prevention, Risk Mitigation, and Response strategy; and 3) identifies short, medium, and long-term outcomes, and overall impact."

Clarification on OSS7: The Council, in recommendation OSS7 from the 2021 SAAC report, specified that objectives from the strategy be included in the Theory of Change. The Theory of Change will be used to guide the monitoring and evaluation of the SAPR program. The 2022 Council clarifies that the strategic objectives may be integrated into the Theory of Change whenever they are available—they do not have to be developed before the Theory of Change work occurs. In other words, developing the Theory of Change and strategy can happen in parallel with objectives integrated as they are available. For example, the current work on the Theory of Change can continue and can focus on identifying relevant short- and mid-term outcomes that are then connected to the strategic objectives at a later time. It may help to engage key representatives from across SAPR units in a longer convening (e.g. a half or full day) led by an external facilitator. This will allow internal evaluators to participate in the process and open up the possibility of engaging the expertise of the SAAC in the Theory of Change development.

The Council recognizes that work on recommendation OSS 8 related to metrics will require a complete Theory of Change before a complete, final set of metrics and comprehensive SAPR Monitoring & Evaluation Plan can be developed.

Overview of Information Reviewed by 2022 SAAC

The workgroup focused on priorities related to monitoring and evaluation and reviewed prior year reports including select publicly posted reports from the Peace Corps Office of Inspector General (OIG). This workgroup also received written updates on Theory of Change progress and discussed progress and challenges with the OSS team during the October 2022 Summit and engaged in discussion with several other units to explore how the Peace Corps is supporting more proactive data-informed policy and procedural actions, generally and specific to the SAPR Program.

Office of the General Counsel (OGC)

Recognition and Observations

The SAAC recognizes and commends the strong cooperative work of the OGC with the SAAC throughout the past year, particularly in the review of IPS 1-12 policies and procedures. Members of the OGC met with Council members and reviewed definitions and language from the realm of higher education to modify existing documents to meet current common standards for consistency and best practices. The OGC was open to the Council's suggestions regarding trauma-informed language and best practices, and stated that they will continue to review and amend the IPS 1-12 policies and procedures to reflect these modifications.

The Council also recognizes the OGC team for support provided to the Council co-chairs to assure the Council was operating within its scope and meeting its mandated purpose.

New Recommendations

The Council's only new recommendations for OGC are expressed in the Sexual Assault Prevention and Response Program section of this report. This office will have a role to play in supporting the implementation of new recommendations, particularly regarding any policy changes needed to support confidential reporting options.

Clarification of 2021 Recommendations

The Council requests the opportunity to review the revised version of IPS 1-12 upon its completion and offers the expertise of the members of the SAAC to assist the OGC in an effort to continue our cooperative work going forward.

Overview of Information Reviewed

The Council reviewed a draft version of the updated IPS policy related to volunteer on volunteer sexual assault. This review supported informed discussion with the OGC team during the October summit where the Council was able to discuss input and direction for this policy with the OGC team.

Office of Global Operations

There are no specific recommendations for this office this year. As the agency continues to reopen posts and place volunteers, this office has a key role to play in implementing adjustments to training and policies when changes are finalized. This work may be reviewed by the Council in future years. This office will also have a key role to play in supporting implementation of 2022 recommendations as needed.

Chief Executive Officer (CEO)

Recognition and Observations

Peace Corps leadership took quick action to concur or partially concur and take action on 36 out of 37 of the recommendations made by the 2021 Council. Given that many of these recommendations originated in SAAC reports prior to 2021, and that many of the recommendations had been outstanding for at least five years, the 2022 Council commends this movement and recognizes the courage needed to commit to becoming more trauma-informed and integrating primary prevention into the SAPR.

The Council recognizes the incredibly heavy lift that these efforts required of staff across the organization. The Council understands that this commitment is a real challenge for a complex organization where there are barriers and limits to Peace Corps' sphere of influence once a volunteer arrives in country and is placed at site. The Council commends the leadership for transparently and publicly communicating about the commitment and plans to hold the

organization accountable moving forward. The Council supports and encourages continued, transparent, public communication about progress as Peace Corps continues these efforts. Modeling these steps from the top of an organization is key to supporting staff as they strive to move this challenging work forward. The Council wants to recognize the courage of both leadership and Peace Corps staff to lean into this work and commends the progress thus far. The Council also recognizes that organizational culture change includes institutional trauma-informed approaches that are both internal and volunteer and community facing. The Council underscores the importance of these efforts and recognizes that this shift will support Peace Corps' capacity to support survivors of sexual assault.

We are encouraged by Peace Corps' intention to maintain the SAAC. The Council recognizes that these are complex and nuanced issues within a unique organization. The implementation of programs designed to support survivors and volunteers not only requires regular updating to maintain best practices in the field, but will also benefit from the guidance of a diverse group of subject matter experts on the Council. These Council members are willing and able to support Peace Corps' integration of best practices for sexual violence response and prevention into their day-to-day work in the field.

New Recommendations

- 4. Extend the SAAC, regardless of whether Congress renews the mandate beyond 2023, to ensure support to the agency continues as it makes progress on its commitment to serving survivors. The 2022 Council and Peace Corps leadership see continued benefit from the expertise of an advisory council that will continue to support integration of best practices from across the field of sexual assault response and prevention into Peace Corps' SAPR program.
- 5. **Designate the SAPR Director and team members exempt from the five-year term limit, similar to the designation used for OSS, OVA, and RSA staff** ¹⁵. The SAAC has found that historically, high turn-over has created a challenge to coordinating the Peace Corps response to victims/survivors. Additionally, extension beyond a five year term provides stability in leadership and human capital across Peace Corps offices. This supports Peace Corps' ability to realize the agency's endeavor to become a more trauma-informed organization.
- **6. Assure that the SAAC is more inclusive and fully representative of the diversity of volunteer and survivor identities.** The heightened attention to the prioritization of diversity, equity, inclusion, and belonging over the past few years highlights the ongoing importance of these issues. To enrich processes and enhance outcomes, the SAAC must have the opportunity to learn from and work with experts from various backgrounds, experiences, perspectives, viewpoints, and ideas. We support the Peace Corps SAPR team's continuing work with the Chief Diversity Officer to assure

22

 $^{^{15}}$ 22 USC 2506: Peace Corps employees https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title22-section2506&num=0&edition=prelim

the SAAC is also aligned with the organization's Equity Plan on Diversity, Equity, Inclusion, and Accessibility (DEIA). Peace Corps should continue its progress in this area, including with the SAAC membership, by re-examining the SAAC Committee selection process to ensure inclusivity and diversity.

Overview of Information Reviewed

The Council was informed by discussions with Peace Corps staff and the Deputy CEO. Their work is also informed by best practices that members of the Council have used and have seen used across a variety of organizations. This work also incorporated a review of the Council's founding¹⁶ and continuing¹⁷ legislative statutes, charter, by-laws, and discussion with staff where they have recognized the value in having a multidisciplinary team spanning a variety of organizations to lend expertise and support.

Conclusion and Suggested Areas of Focus for 2023

The 2022 Council observes that Peace Corps has put forth significant time and effort to comply with the intent and specific direction of the Kate Puzey Peace Corps Volunteer Protection Act of 2011 and the Sam Farr and Nick Castle Peace Corps Reform Act of 2018. Additionally, Peace Corps has demonstrated commitment to working with the SAAC to strengthen the scope and implementation of their sexual assault prevention and response work. There is clear evidence that the Peace Corps considers its responsibility to address sexual violence thoroughly and appropriately critical to successful execution of its organizational mission. The SAAC recognizes that Peace Corps has a greater ability to control its response to survivors than to preventing sexual assault. This ability to control response efforts has also led to criticism in the past when the response has not been sufficient. Further, the SAAC observed strong commitment to these programs as evidenced by the comprehensive and evolving body of permanent policy Peace Corps has put in place to guide the behavior of the organization. The SAAC finds that substantial resources have been allocated to supporting these programs. However, this work must be ongoing in order to ensure compliance with the most current best practices in the field, and to maintain a high standard for evaluation of programs and training of staff. The 2022 SAAC report identifies six recommendations that are believed to help Peace Corps leadership move this program to the next level.

Suggested Priority Areas for 2023 Council and Peace Corps Attention

There is still ongoing work related to the 2021 SAAC recommendations that are not included in this report. The 2022 Council expects that Peace Corps will continue to provide specific updates on the agency's progress to address recommendations from prior years.

¹⁶ Kate Puzey Volunteer Protection Act of 2011.

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwi5yMfIhtz 7AhVWHjQIHVypChoQFnoECAwQAQ&url=https%3A%2F%2Fwww.congress.gov%2F112%2Fplaws%2Fpubl57%2FP LAW-112publ57.pdf&usg=AOvVaw2572M4hOdQGsEziQfuzcq9

¹⁷ Sam Farr and Nick Castle Peace Corps Reform Act of 2018. https://www.congress.gov/115/plaws/publ256/PLAW-115publ256.pdf

In order to prioritize specific recommendations from the 2021 SAAC report in 2022, some recommendations were only partially addressed this year and require continued attention and resolution. The SAAC identified priority recommendations for continued follow-up in 2023.

- Culture shift (SARRR1): The Peace Corps continues to make efforts to move toward prevention and embrace opportunities to become a more trauma-informed and survivor-focused organization. Examples of these efforts include the change of the name of the Sexual Assault Risk Reduction and Response Program to the Sexual Assault Prevention and Response Program, the development of the "Road Map for Broadening the Peace Corps' Approach to Sexual Assault Prevention," and the hiring of a Prevention Specialist within the SAPR office. As the Peace Corps continues these efforts and further institutionalizes prior efforts, the SAAC anticipates providing ongoing support including the completion of the Peace Corps Theory of Change and other activities that continue to foster a culture shift towards prevention and strengthening response efforts.
- Screening options for PCMOs (OHS2): In 2022, the Peace Corps explored options for screening PCVs for a history of violence, including routine screening or a universal education approach. In 2023, the SAAC will continue to work with Peace Corps on this effort.
- Prevention Strategy and the Theory of Change (SARRR1): Peace Corps will continue their efforts in 2023 to develop their Prevention Strategy and Theory of Change. The SAAC is committed to providing collaborative input and discussions around indicators and potential ways to measure change.
- Completion and implementation of the Communications Plan (SARRR2)
- Semi-annual updates with the compliance office
- Collaborative agenda-setting for Summits
- Increased focus on integrating Diversity, Equity, and Inclusion into the SAPR policies and training

In addition to these priorities, we recognize Peace Corps' efforts to better understand situations in which volunteers may witness or receive disclosures of violence from someone in their community. The SAAC acknowledges Peace Corps efforts to determine potential guidance and training to appropriately respond to these situations, and is committed to collaborating on these efforts.

In 2023, the SAAC will again participate in two in-person Summits with Peace Corps. The intention of the first summit will be to review ongoing activities from the 2021 report and updates on recommendations from the 2022 report. The second Summit will focus on wrapping up the SAAC recommendations and long-term support for Peace Corps.