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To: Jody Olsen, Director
Anne Hughes, Chief Compliance Officer

From: Kathy A. Buller, Inspector General 

Subject: Management Advisory Report: Volunteer Drug Use (IG-18-01-SR)

Date: August 7, 2018

The purpose of this Office of Inspector General (OIG) report is to bring to your attention our concern that the Peace Corps' efforts to address Volunteer drug use¹ have been insufficient, and that drug use continues to pose a serious risk to the integrity and reputation of the Peace Corps as well as the health and safety of Volunteers. In order to reduce these risks, the agency should take additional measures to support country directors in resolving drug use allegations at posts, gather accurate information on drug use among Volunteers, and place greater emphasis on educating Volunteers about the impacts of drug use on their safety and the effectiveness of their service.

This report includes six recommendations. The agency may provide a response to the six recommendations within 45 days of the issuance of the report. Should a response be provided, the report will be updated to include them in Appendix B.

Volunteer Drug Use and its Effect on Health, Safety, and Peace Corps Operations

Our 2016 'Recurring Issues' report² found that during the three-year period from 2012 to 2015, OIG had opened 25 cases relating to Volunteer drug use, nearly half of which occurred in 2015. We noted that a single case can often lead to administrative actions against multiple Volunteers, seriously affecting post operations. Since our 2016 report, drug use has remained a serious problem marked by further investigations, arrests, and lost years of Volunteer service.

From January 2015 to February 2018, at least 152 Peace Corps Volunteers separated³ from service across 26 countries in connection with drug use.⁴ As a result of these separations, students, counterpart agencies, host family members, and other community members lost

¹ For the purposes of this report, any reference to Volunteers is meant to be inclusive of trainees, unless otherwise specified. Additionally, any reference to drug use is intended to exclude the authorized use of pharmaceuticals for medical purposes.

² [Final Report on Recurring Issues: Common Challenges Facing Peace Corps Posts, Fiscal Years 2012-2015](https://s3.amazonaws.com/files.peacecorps.gov/documents/inspector-general/Recurring_Issues_Report.pdf) (IG-16-04-SR), available at https://s3.amazonaws.com/files.peacecorps.gov/documents/inspector-general/Recurring_Issues_Report.pdf

³ For the purposes of this report, 'separated' refers to instances where (1) the administrative separation process was initiated by the post after a finding of drug involvement, or (2) the Volunteer resigned after a credible allegation of drug involvement was made.

⁴ For the purposes of this analysis we compared complementary Volunteer separation information contained in two agency databases—Database of Volunteer Experience (DOVE) and Odyssey—with investigative records in the OIG Investigation Case Management system.

117 potential years of service and support from the Peace Corps.⁵ For context, this loss would be equivalent to the Volunteer service years lost if Peace Corps had decided to cease all operations at a small post such as Belize or Tonga over the same 3-year period.⁶

Beyond the impact to host country partners of removing a Volunteer, these lost years of service represent a substantial waste of agency resources. The Peace Corps domestic operations make significant investments of staff and resources in recruiting, screening, and placing Volunteers. At posts, the loss of a single Volunteer is further damaging because posts devote much of their resources to developing host country counterparts for Volunteers; identifying host families or other appropriate housing; making appropriate health, medical, and safety and security arrangements; and providing training on the local language, technical skills, and cultural issues. While it is difficult to express the worth of a Volunteer's service in dollar value, we have calculated that in training expenses alone, the premature separation of 152 Volunteers in connection with drug use totaled approximately \$482,000 in taxpayer and host country partner resources wasted.⁷ At posts found to have widespread drug use, large portions of the Volunteer population may be separated, resulting in an especially acute waste of resources.

Volunteers Separated from Posts in connection with Office of Inspector General drug investigations <i>From January 2015 to February 2018</i>		
9 Volunteers in	West Africa	representing 8% of Volunteers in country
18 Volunteers in	West Africa	representing 17% of Volunteers in country
13 Volunteers in	East Africa	representing 10% of Volunteers in country
19 Volunteers in	North Africa	representing 25% of Volunteers in country
21 Volunteers in	East Africa	representing 19% of Volunteers in country
9 Volunteers in	West Africa	representing 3% of Volunteers in country
2 Volunteers in	West Africa	representing 1% of Volunteers in country
8 Volunteers in	The Pacific	representing 35% of Volunteers in country
22 Volunteers in	Southern Africa	representing 9% of Volunteers in country

Volunteers separated in connection with OIG investigations have often been concentrated within a programmatic sector.⁸ In one such instance, 52 percent of one post's agricultural sector Volunteers were separated in connection with a single investigation. Another three investigations led to the separation of more than 30 percent of Volunteers in a single sector at other posts.

⁵ Volunteer service-years lost are calculated by subtracting months served since Volunteers' dates of oath of service from the projected 24-month term of service. Third-year Volunteers are calculated at a 36-month term. A separated trainee is counted as 24 months of service lost. Peace Corps Response Volunteers are calculated by subtracting months served from a projected 6-month term of service.

⁶ Calculated by using Peace Corps Volunteer/Trainee Years calculator in PCApps from January 1, 2015 to February 6, 2018.

⁷ This number is based on the agency's calculation of "Training Costs per V/T year" within the 2014-2017 Country Portfolio Review Historical Dataset. These costs were averaged across the four years of available data to provide a value for each post. This value was then adjusted for the number of months of service lost for each of the 152 Volunteers we examined.

⁸ OIG investigators note that 68% of Volunteers separated as a result of OIG investigations since 2015 were separated after a finding of marijuana use. Other cases include the use of cocaine, LSD, heroin, hashish, hallucinogenic mushrooms, valium, codeine, and other prescription drugs.

These large-scale removals have created serious disruptions to operations of affected posts and have the potential to harm the Peace Corps' partnerships with host country governments.

Any incident where a Volunteer is found to be using or in possession of drugs can have serious social, political, and legal ramifications for the Peace Corps.⁹ This is especially true when drug use compromises Volunteer health and safety. Between January 2015 and February 2018, one Volunteer died as a result of drug use, and seven were arrested by foreign law enforcement. One Volunteer was sentenced to 6 months in prison for drug trafficking,¹⁰ marking the second occasion in which a Volunteer was convicted of drug trafficking in the same country within the last five years.¹¹



Agency Policy on Volunteer Drug Use

The agency facilitates the separation of Volunteers found to be using drugs, or otherwise suspected of using drugs, through a zero-tolerance policy. Peace Corps manual section (MS) 204 states:

3.5.1 General Policy

Except as described in section 3.5.2 below regarding Voluntary Self-Referral, a V/T found to be involved with drugs in a manner not authorized by the Peace Corps for medical purposes, in any way in any country, will be administratively separated immediately pursuant to section 3.5.4. The Peace Corps enforces this strict policy not only because the cultivation, manufacture, and traffic in and use of drugs, including marijuana, is illegal in most countries; but also because drug involvement by V/Ts in any country could seriously jeopardize the entire Peace Corps program, as well as the safety and health of the V/Ts. Individuals separated in connection with involvement with drugs (whether via administrative separation, resignation in

⁹ See MS 204 3.5.3

¹⁰ The Volunteer was released from jail after 26 days.

¹¹ In 2013 another Volunteer in the same country was convicted of one count of trafficking in psychotropic substances and received a 12 month suspended sentence.

lieu of administrative separation, or medical separation) will not be considered for a transfer to another program or reinstatement regardless of the quality of their service.¹²

In addition to the strict consequences the agency has put in place for Volunteers found to be involved in drugs, the agency has recognized that Volunteer drug use seriously jeopardizes the entire Peace Corps program, as well as the safety and health of the Volunteer. As stated in MS 204:

3.5.3 Notice to Director

Because of the potentially serious social, political, and legal impact of such incidents, every case of V/T drug involvement shall be brought immediately to the personal attention of the Peace Corps Director and the appropriate Regional Director.

The requirement to bring cases of Volunteer drug use to the immediate attention of the director of the agency is unique among Volunteer misconduct policies and highlights the seriousness of the issue to Peace Corps management. Despite this emphasis on reporting, agency policy does not require that anything be done with this data after it reaches the Director. There is no aggregate tally of instances of drug use about which the Director has been notified, nor is this information forwarded to another office for analysis.

In September 2017, the agency amended MS 204 to provide for a self-referral option that allows a Volunteer to request help from Peace Corps staff if their drug use is associated with an illness requiring treatment. Under this provision, the Volunteer will not be immediately administratively separated if they report drug use prior to the Peace Corps or OIG having an indication that they are using drugs. The Peace Corps Medical Officer and the Office of Health Services (OHS) then assess the self-referring Volunteer and may recommend the Volunteer for medical evacuation. Per MS 204:

3.5.2 Voluntary Self-Referral

A [Volunteer] who is medically evacuated will not return to service. If the [Volunteer] is not medically evacuated or medically separated, the [Volunteer] will be referred back to the Country Director for administrative separation in accordance with Manual Section 284. In addition, if a [Volunteer] for whom medical treatment is recommended subsequently does not comply with recommended treatment, the OHS will notify the Country Director, who will initiate administrative separation procedures.

OIG requested information on Volunteer self-referrals from the Office of Health Services, but within the first 5 months the policy had been in place, that office was unable to identify any Volunteers who invoked the self-referral policy for drug use. However, our independent review identified one Volunteer who admitted marijuana use to a counselor, who then attempted to refer

¹² Peace Corps policy reflects a modification the agency made in December of 2017. In order to create immediate consequences should a Volunteer admit drug use to the Country Director or a member of OIG staff, the agency eliminated some requirements from the administrative separation process, including the Consideration of Administrative Separation memo, Volunteer response, Regional Director concurrence, and consultation with the Office of General Counsel. The new policy retained the opportunity for Volunteers to resign in lieu of administrative separation within 24 hours of being informed they are being administratively separated. Nearly every Volunteer in our analysis who was considered for administrative separation chose to resign in lieu. It is too early to evaluate whether this policy modification will be effective in streamlining administrative separations under MS 204, 3.5.1.

this Volunteer to the Peace Corps Counselling and Outreach Unit (COU) for treatment. After reviewing the Volunteer's case, COU determined that medical treatment was not appropriate, and the Volunteer was consequently referred to their post for administrative separation. Whether a self-referring Volunteer is successfully treated, refuses treatment, or is denied treatment, any self-referral will ultimately result in the termination of their Peace Corps service.

In short, agency policy recognizes the serious risks that Volunteer drug use poses to Volunteer safety and security as well as the integrity of Peace Corps operations. While the agency has made modifications to its policy on drug use – streamlining the administrative process when a Volunteer admits to drug use and providing a self-referral process – the current policy alone is insufficient to reduce the risks associated with Volunteer drug use.

Supporting Policy Enforcement

While the Peace Corps policy on Volunteer drug use is strict, OIG remains concerned that post management lacks sufficient guidance and tools to enforce MS 204, 3.5.1 consistently. In 2012, the agency changed its policy so that it was no longer mandatory for individual drug use by Volunteers to be reported to OIG for investigation. Instead, such misconduct is reported to post management so that it can be expeditiously addressed by the country director (CD), like some other aspects of Volunteer conduct are, as specified under MS 204, 3.3.¹³ As such, OIG does not typically investigate allegations of individual drug use by Volunteers, but rather may investigate such cases at the request of post staff or in the wake of significant events. In the past, this has included instances where drug use is alleged to be widespread among Volunteers at a post, in response to Volunteer arrests, and in one case in the wake of a Volunteer death.

Despite this shift, our analysis of agency data and OIG investigative records suggest OIG has remained a primary actor in investigating Volunteer personal drug use. Of the 152 Volunteers OIG identified as separated in connection with drug use from January 2015 through February 2018, 121 were separated as a result of field-based OIG investigations at 9 posts. The remaining 31 Volunteers were removed by in-country staff from 20 posts.¹⁴ Arrests by foreign law enforcement predicated 7 of these Volunteer separations. Given the documented impact of Volunteer involvement with drugs, and the potential harm articulated in the Peace Corps policy, OIG assesses that more can be done to support and encourage overseas posts to enforce the policy before a serious health and safety incident occurs, and before drug use becomes so widespread that OIG is asked to investigate.

When a policy requires further guidance in order to assure effective and consistent implementation across posts or units, the agency typically supplements it by issuing additional

¹³ The agency retained the requirement under MS 861, 7.1 to report to OIG cases involving the sale, distribution, or smuggling of illegal drugs or prescription drugs. In accordance with this policy, while Peace Corps OIG reserves the right to investigate any misconduct, OIG prioritizes allegations of widespread drug use at a post, or allegations involving the sale, distribution, or smuggling of drugs.

¹⁴ If OIG is contacted by country staff about possible Volunteer drug use, a record is created and tracked in the investigation case management system regardless of whether OIG takes an active role in investigating the claim.

procedures or guidance. In cases of drug involvement, CDs are expected, under agency policy, to consult with the Peace Corps Office of General Counsel (OGC), if feasible, when considering administratively separating a Volunteer. In these cases, OGC's role is to advise CDs on how to apply the policy, including the standard of proof necessary to administratively separate a Volunteer and how to provide accused Volunteers with a meaningful opportunity to reply to allegations.

OGC informed OIG that, since the 1970s, it has required that any finding of Volunteer involvement with drugs – which triggers the administrative separation process under MS 204 – be supported by ‘clear and convincing’ evidence.¹⁵ OGC reported that the requirements to meet the ‘clear and convincing’ standard are discussed in individual consultations with CDs and during the legal session on Volunteer misconduct at Overseas Staff Trainings (OST), as well as at annual CD conferences. To better understand how CDs apply this standard, OIG reviewed the Consideration of Administrative Separation memorandums available in DOVE for the three-year time period which is the subject of this report. In cases where Volunteers did not admit drug use, OIG found that the associated memorandums reflected inconsistent application of OGC's requirements. A lack of uniform application suggests that not all CDs may be aware of these requirements, or that they may need additional support to consistently meet the ‘clear and convincing’ standard.

While Volunteer and Staff misconduct is generally decided by a ‘preponderance of evidence’,¹⁶ the standard used for demonstrating “involvement with drugs” is ‘clear and convincing’, a standard that requires a higher level of certainty. Obtaining sufficient evidence can require interviewing reluctant or uncooperative Volunteers and weighing the truthfulness of conflicting statements, many times without physical evidence. Given the heightened evidentiary standard and the difficulty in developing sufficient evidence in drug use cases, CDs could benefit from the agency's provision of additional tools, such as reasonable suspicion drug testing, that would facilitate their decisions about disciplinary action.

Reasonable suspicion drug testing, also known as for-cause drug testing, could provide a mechanism for CDs to make more timely and better-informed decisions.¹⁷ In situations where a Volunteer denies drug use, but credible evidence exists, a country director could ask or require a Volunteer to submit to a drug test. The test results could provide exculpatory information or evidence of drug use and help a country director in formulating a decision. While there is a wide range of other drug testing modalities (i.e. random drug testing and applicant screening) that both public and private organizations have commonly employed to deter drug use, reasonable

¹⁵ Despite this policy interpretation, OIG notes that under the Peace Corps Act, Volunteers serve at the pleasure of the President. The authority of the President has been delegated through the Director of the Peace Corps to Country Directors.

¹⁶ E.g., Under agency policy evidence supporting a finding of Sexual Misconduct is considered under a ‘preponderance of the evidence’ standard, a lower evidentiary standard than ‘clear and convincing’. See Interim Policy Statement 1-12 Procedures Section 8.1 (last accessed: <https://files.peacecorps.gov/documents/IPS-1-12-Interim-Procedures.pdf>).

¹⁷ OIG notes that in 2004 drug testing was contemplated by the agency to address what agency officials considered a significant problem among Volunteers, especially in countries where drugs are more readily available. Our review was unable to identify what, if any, decisions or actions came out of the discussion.

suspicion testing could provide CDs with evidence to support findings of drug use.¹⁸ Regardless of the continued debate about the deterrent effect of drug testing, advances in testing technologies currently provide relatively reliable and objective indicators of recent use of most types of commonly used illicit drugs.¹⁹

CDs bear great responsibility in addressing allegations of Volunteer drug use because of the realized risk to health and safety of Volunteers and the impact Volunteer drug use has on the integrity of agency operations. In order to resolve allegations of drug use in a more independent and expeditious manner at posts, the agency should give CDs greater support and guidance for making decisions about corrective actions.

We recommend:

- 1. That the Director of the Peace Corps provide country directors with additional support to resolve allegations of drug involvement under manual section 204, 3.5.1 and specifically consider the efficacy of reasonable suspicion drug testing as a means of doing so.**
- 2. That the Office of General Counsel review the evidentiary standard required to administratively separate a Volunteer suspected of involvement with drugs to determine whether the standard, and its application, is consistent with promoting the integrity of the program and continues to serve the policy interest of the Peace Corps.**

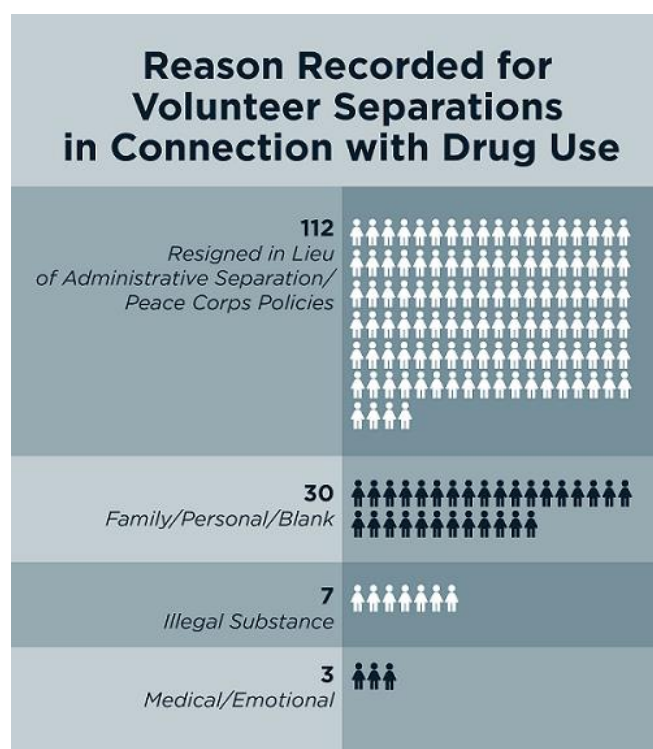
Incomplete Data Obscures the Scope of Drug Use

Our review concluded that there are substantial gaps in the data that the Peace Corps collects related to Volunteer resignations due to drug use. As a result, the agency is limited in its ability to identify basic information about Volunteer drug use. Such information should include how many Volunteers have separated within any given time period due to involvement with drugs, which regions or countries those Volunteers served in, and other common conditions of Volunteer service. Lack of such information obscures the scope of drug use among Volunteers and remains an obstacle to prioritizing and addressing the problem.

¹⁸ Our review did not make a finding about the potential deterrent impact of drug testing Volunteers in the Peace Corps environment. While multiple studies suggest that in some circumstances drug testing could be an effective deterrent to drug use, others studies disagree. Moreover, literature reviews we examined have noted methodological gaps and weaknesses in some of the studies. OIG makes no comparison here about the efficacies of different modes of testing.

¹⁹ See Pidd K, Roche AM. 2014. How effective is drug testing as a workplace safety strategy? A systematic review of the evidence. *Accident Analysis and Prevention* 71:163.

The Volunteer End of Service Information (VESI) application is the means by which all posts out-process their Volunteers, regardless of how the Volunteers end their service. In a requirement specific to Volunteer resignations, posts must fill out the *Volunteer/Trainee Resignation Form* as part of their VESI submission.²⁰ The form allows posts to choose one or two selections from a list of 39 pre-defined codes to explain the reasons behind Volunteer resignations. Among the 39 codes that can be assigned by post, one is ‘illegal substance’. The information provided in VESI is then included in an Odyssey database, which produces the Terminated Volunteers Report we reference in this analysis.²¹ Because information provided in VESI is the basis for aggregate statistics on how, when, and why Volunteers separate or leave service, it is important that the data input into it be accurate and complete.



In reviewing the Odyssey database, we found that resignations in connection with drug use were often not identified as such. Of the 152 Volunteers we identified as having been separated in connection with drug use from January 2015 to February 2018, only seven were coded as ‘illegal substance’.

Our review revealed that overseas staff too often use non-descriptive codes to characterize resignations on the Volunteer/Trainee Resignation Form. Specifically, ‘Resignation in Lieu of Administrative Separation’ and ‘Peace Corps Policies’ frequently appear in Odyssey without a secondary reason to explain the nature of misconduct. Coded in this fashion, Volunteers who are found to

have violated drug policy are indistinguishable from those who violated travel policies, committed sexual assault, or were simply found to be ill-suited for Peace Corps service. Even though there is a field in the Volunteer/Trainee Resignation Form providing an opportunity for staff to include a secondary reason for the resignation, it has only be used 9 percent of the time to explain the circumstances behind a ‘Resignation in Lieu of Administrative Separation’ or ‘Peace Corps Policies’ coding.²² The agency has not provided comprehensive, authoritative guidance on

²⁰ Appended to this report as Appendix A.

²¹ The Office of Strategic Information, Research, and Planning (OSIRP) uses the agency’s Volunteer database, PCVDBMS, to aggregate statistics on early terminations. Resignation data in PCVDBMS mirrors what is available in Odyssey.

²² Of the 309 resignations within our sample coded as either Resignation in Lieu of Administrative Separation or Peace Corps Policies, 28 supplied secondary codes to describe circumstances. An additional 17 supplied Resignation in Lieu of Administrative Separation or Peace Corps Policies as a secondary code, but were not counted in this total.

how to appropriately code Volunteer resignations, or who is responsible for ensuring that the data input into VESI is accurate, complete, and consistent across posts.

Distinct from VESI, Database of Volunteer Experience (DOVE) is the agency's official record of administrative separation documentation, including documentation related to resignations in lieu of administrative separation. DOVE is an essential tool for managing Volunteer applications and placement but is limited as an official record of misconduct because it does not provide a means of aggregating separation data across individual Volunteer profiles. Our limited review also found records in this system to be incomplete. Of the Volunteers we found to have been separated in connection with drug use, the agency recorded 100 as having resigned in lieu of administrative separation in their VESI submission, yet 25 of these individuals had no separation documentation in their DOVE profile at the time of our review. Three of these individuals had been arrested by foreign law enforcement.

The agency's current approach to Volunteer separation data leaves multiple opportunities for important information to be lost. Even with the benefit of investigative records to supplement our analysis of agency records, we found it difficult to determine how many Volunteers were separated due to a finding of drug involvement. The chart below compares the record of a single OIG investigation with the agency's resignation data, as found in Odyssey and in each Volunteer's DOVE profile.

Volunteer	OIG Record	Data in Odyssey		Data in DOVE
	Record from OIG case management system	Assignment Status	Primary Resignation Reason	Record of Separation
Volunteer A	Admitted- Marijuana Use	ET-Resignation	Illegal Substance	None
Volunteer B	Admitted- Marijuana Use	ET-Resignation	Other Personal/Family Related	None
Volunteer C	Admitted- Mushrooms Use	ET-Resignation	Other Personal/Family Related	None
Volunteer D	Admitted- Marijuana Use	ET-Resignation	Other Personal/Family Related	None
Volunteer E	Admitted- Marijuana Use	ET-Resignation	Other Personal/Family Related	None
Volunteer F	Admitted- Marijuana and mushrooms Use	ET-Resignation	Illegal Substance	None
Volunteer G	Admitted- Provided marijuana and mushrooms	ET-Resignation	Illegal Substance	None
Volunteer H*	Admitted- Marijuana Use	ET-Resignation	Other Personal/Family Related	None

* Volunteer H later reapplied and was accepted to another Peace Corps program.

In sum, gathering data on the reasons why Volunteers separate from service early provides important information that could guide policy decisions. This is especially important in instances of drug use, as agency policy states that each instance entails a “potentially serious social, political, and legal impact” to the Peace Corps.²³ If the agency's data on Volunteer separations is inaccurate, incomplete, or inconsistent, it will necessarily lack insight into the application of its policy, and thus risk making uninformed decisions about corrective action to address serious Volunteer misconduct issues like Volunteer drug use.

²³ MS 204 3.5.3

We recommend:

- 3. That the Director of the Peace Corps make necessary changes to policies, procedures, and forms related to Volunteer resignations and administrative separations, so that Volunteer files and early termination statistics include accurate information regarding unauthorized drug use.**
- 4. That the Director of the Peace Corps take effective steps to ensure ongoing compliance and consistency in implementation of the Volunteer separation recordation processes.**

Understanding the Volunteers' Drug Use Environment

In most matters concerning Volunteer health and safety, the agency has made an effort to understand the experiences of Volunteers by asking what challenges they face. The Annual Volunteer Survey (AVS) is a confidential global survey, and the primary means by which the agency collects Volunteer opinions on a variety of issues related to their service, including health and safety. Within the AVS, there are seven questions that assess a Volunteer's exposure to, and resiliency toward, different forms of harassment. Similarly, there are five questions that gauge a Volunteer's alcohol consumption and factors that contribute to potential alcohol abuse. The AVS is a significant tool in guiding the agency's improvements, yet it includes no questions that address drug use.

Information captured through the AVS on matters of harassment, sexual assault, and alcohol abuse is analyzed by the agency and guides the trainings it provides to Volunteers on how to reduce their risks and establish resilient behaviors. A similar process of gathering feedback about Volunteer experiences related to drugs, through the AVS or another data-gathering tool, could be used to better understand the problem and inform the agency's actions to mitigate Volunteer drug use. While it would be challenging to elicit honest responses from Volunteers about personal drug use, the agency could ask questions about the influences and pressures Volunteers face while serving.²⁴

Without asking Volunteers about their experiences, the agency is limited in its understanding of the circumstances surrounding drug use in the field. Establishing baselines for the influences and

²⁴ Questions could include whether they have observed drug use during service, how they perceive the availability of drugs in their community, how well their training has prepared them to navigate these influences and pressures, or how they perceive the agency's policy itself. Additionally, the agency could consider asking recently returned Volunteers, or those closing service, more direct questions about their personal experiences in order to understand the efficacy of the agency's current policies and practices.

pressures factoring into Volunteer drug use would give the agency insight into where the challenges may exist currently, and may later lead to more innovative, post-specific trainings or other interventions.

We recommend:

- 5. That the Director of the Peace Corps gather and analyze continuous information on the prevalence of, and factors contributing to, unauthorized drug use in the context of Volunteer service, through the Annual Volunteer Survey or another data gathering tool.**

Opportunities to Develop and Enhance Training

The training the agency provides Volunteers on drugs is limited to a focus on compliance with policy. At multiple points through the application and training processes, the agency makes applicants and Volunteers aware of the Peace Corps' drug policy and asks them to acknowledge that they understand it. The training process includes a mandatory session on Peace Corps policies during pre-service training with a group discussion about a hypothetical situation in which a Volunteer finds other Volunteers smoking marijuana at a party. In this situation, Volunteers are instructed to report the use of marijuana to their country director for administrative action. This hypothetical scenario exercise is optional, and a small aspect of a broader training on Peace Corps policy.

The agency also provides Volunteers with a series of resiliency training sessions from pre-service to mid-service, aimed at designing safe and healthy coping strategies and avoiding high-risk behaviors. Drug use is identified in the resiliency sessions as a high-risk behavior, along with excessive alcohol consumption, unprotected sex, leaving site unannounced, and general isolation, but this discussion is limited to identifying these behaviors as outcomes of ineffective resiliency practices.

The agency has devoted considerable resources to developing training in response to other serious threats to Volunteer health and safety. During pre-service training (PST), trainees attend sessions on personal security and risk reduction, unwanted attention, transportation safety, sexual assault awareness, and bystander intervention – complemented by in-service trainings on sexual assault reporting and response, and a follow-up collaborative training on shared experiences.

Additionally, the agency has mandated that all trainees attend a session on alcohol awareness, in which they identify the effects of alcohol use, the ways that alcohol puts them at risk, and strategies to manage consumption; and then they develop personal plans to manage their consumption during service.

While the agency provides information to Volunteers on its strict drug policy during PST and acknowledges Volunteers might use drugs as an unhealthy coping behavior, the agency has not

developed a training program proportionate to the importance it has assigned to the Volunteer drug use problem. Promoting resiliency among Volunteers throughout the service lifecycle is important, but more can be done. Through effective messaging and dedicated training, Volunteers could be made more aware of the risk that drug use poses to their safety, the effectiveness of their service, and the operations of their post. Training sessions with this focus could be structured to share the anonymous experiences of current and former Volunteers. Part of the discussion could connect drug use with the impact on a community or on a post when a Volunteer is abruptly separated, including how even the rumors of drug use could affect a Volunteer's and the Peace Corps' reputation.

We recommend:

- 6. That the Director of the Peace Corps provide training to Volunteers that raises awareness of the risks that drug use poses to their health and safety, the effectiveness of their service, and the operations of the post itself.**

Conclusion

Drug use among Peace Corps Volunteers risks damaging host-country relations and has led to foreign incarceration, loss of life, and the premature departure from service of many Volunteers. The Peace Corps' policy has placed a unique level of urgency on Volunteer drug use by requiring that every case of drug involvement be brought to the attention of the Peace Corps Director, yet the agency's action has not been proportional to the urgency placed on the problem. The agency needs to re-examine its strategy by first assessing ways it can more effectively support CDs in resolving allegations of drug use at their posts. Further, the agency should gather accurate information on drug use among Volunteers and the extent to which its policy is enforced. Through this information, the agency can further develop and enhance Volunteer training and communication that treats drug use as a serious threat to Volunteer health and safety, as well as post operations.

List of Recommendations

We recommend:

1. That the Director of the Peace Corps provide country directors with additional support to resolve allegations of drug involvement under manual section 204, 3.5.1 and specifically consider the efficacy of reasonable suspicion drug testing as a means of doing so.

2. That the Office of General Counsel review the evidentiary standard required to administratively separate a Volunteer suspected of involvement with drugs to determine whether the standard, and its application, is consistent with promoting the integrity of the program and continues to serve the policy interest of the Peace Corps.
3. That the Director of the Peace Corps make necessary changes to policies, procedures, and forms related to Volunteer resignations and administrative separations, so that Volunteer files and early termination statistics include accurate information regarding unauthorized drug use.
4. That the Director of the Peace Corps take effective steps to ensure ongoing compliance and consistency in implementation of the Volunteer separation recordation processes.
5. That the Director of the Peace Corps gather and analyze continuous information on the prevalence of, and factors contributing to, unauthorized drug use in the context of Volunteer service, through the Annual Volunteer Survey or another data gathering tool.
6. That the Director of the Peace Corps provide training to Volunteers that raises awareness of the risks that drug use poses to their health and safety, the effectiveness of their service, and the operations of the post itself.

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APPENDIX A: VOLUNTEER/TRAINEE RESIGNATION FORM



Resignation Form Staff Copy

The Peace Corps works to define the reasons that Volunteers and trainees decide to end their service early. Your feedback can help to improve the Peace Corps' programs and policies. Per the Peace Corps Manual, MS 284, you are required to complete this form for resignations. Complete this form ONLY for resignations.

Resignation Date: _____ Post: _____ Volunteer Name: _____

What is the primary reason for resigning? Please review the list of reasons and write the code in the box below:

Primary Reason

Peace Corps Support

- 110 technical support
- 111 medical support
- 112 administrative support
- 113 Peace Corps policies
- 114 Peace Corps staff in country
- 115 other Peace Corps support

Peace Corps Program/Work Assignment

- 210 technical skills
- 211 language skills
- 212 host country counterpart/support
- 213 matching skills with work assignment
- 214 amount of work
- 215 project/site development
- 216 political/civil unrest
- 217 other program/work assignment

Personal Health

- 310 physical health
- 311 emotional/mental health
- 312 illegal substance
- 313 alcohol

Country Assignment/Adaptation

- 410 host country culture
- 411 host community/host family
- 412 living arrangements/housing
- 413 site location
- 414 preferred another country/region
- 415 other country assignment/adaptation

Personal Safety

- 510 crime and personal safety
- 511 physical assault/harassment
- 512 sexual assault/harassment
- 513 road safety/traveling
- 514 other personal safety

Personal/Family-Related

- 610 romantic interest
- 611 further education
- 612 other career opportunity
- 613 financial
- 614 spousal responsibility
- 615 friend(s) or other family responsibility
- 616 other personal/family related

Other

- 710 resignation in lieu of administrative separation
- 711 other volunteers/trainees
- 712 unrealistic expectations

If the volunteer had a secondary reason, please indicate it here:

Please use the space below and the back of this form to tell us why the Volunteer resigned.

*PRIVACY ACT NOTICE: This notice is provided under the Privacy Act of 1974, as amended (5 U.S.C. 552a). The information requested is collected under the authority of the Peace Corps Act, 22 U.S.C. §2501 et seq., for Peace Corps to study reasons for volunteer and trainee resignation. The information may also be used for the routine uses listed in the System of Records Notice PC-7, Peace Corps Volunteers: Reasons for Resignation, available in our electronic reading room at <http://www.peacecorps.gov>. Providing the material herein is completely voluntary. Failure to provide sufficient information will result in the information not being processed by Peace Corps.

APPENDIX B: AGENCY RESPONSE TO THE REPORT



MEMORANDUM

To: Kathy Buller, Inspector General

From: Anne Hughes, Chief Compliance Officer

Date: September 6, 2018

CC: Jody Olsen, Director
Michelle Brooks, Chief of Staff
Matthew McKinney, Deputy Chief of Staff/White House Liaison
Carl Sosebee, Senior Advisor to the Director
Robert Shanks, General Counsel
Shawn Bardwell, Associate Director, Office of Safety and Security
Jill Carty, Acting Associate Director, Office of Health Services
Tina Williams, Acting Associate Director, Office of Volunteer Recruitment and Selection
Patrick Young, Associate Director, Office of Global Operations
Richard Swartz, Chief Financial Officer
Steve Dillingham, Director, Office of Strategic Information, Research, and Planning
Johnathan Miller, Regional Director, Africa Region
Kris Besch, Acting Regional Director, Europe, Mediterranean, and Asia Region
Greg Huger, Regional Director, Inter-America and the Pacific Region

Subject: Agency Response to the Management Advisory Report: Volunteer Drug Use (IG-18-01-SR)

As the OIG's Management Advisory Report (MAR) recognizes, the Peace Corps has long had a strict "zero tolerance" policy regarding drug use by Volunteers. The Peace Corps' General Policy on Drug Use, in Peace Corps Manual Section (MS) 204 *Volunteer Conduct*, paragraph 3.5.1, provides for mandatory separation of Volunteers found to be involved with drugs. Historically, the agency referred all cases of Volunteer drug use to the OIG for investigation. In 2012, agency policy and practice changed based on an agreement with the OIG, whereby only cases of drug sale, distribution, smuggling, or widespread drug use by Volunteers would be referred to OIG on the basis that these situations constitute violations of Peace Corps policy that may have a serious impact on the integrity of Peace Corps programs or operations. Until this year, the OIG has the exclusive authority to investigate cases of alleged widespread drug use, leaving cases of alleged individual use to country directors (CDs), under guidance. Most early separations have been the result of major OIG investigations of alleged widespread drug use in relatively few countries.

With respect to guidance to CDs on individual drug use cases, the agency has regularly provided oral and written guidance to CDs on each case of suspected drug use, including dissemination of a memorandum on the topic from the Office of the General Counsel, as well as an information sheet for CDs on “OIG Investigation of Volunteer Drug Use at Your Post.” Furthermore, the agency provides guidance and training to incoming CDs during Overseas Staff Training on cases involving Volunteer drug use.

To understand the problem that the Peace Corps policy addresses, it is worth noting that drug use is not only a Peace Corps problem, it is a national problem in the United States. For example, according to the Substance Abuse and Mental Health Services Administration, in 2016 one in four young adults aged 18-25 in the United States used an illicit drug within the past 30 days. The National Institute on Drug Abuse states that “[i]n 2013, an estimated 24.6 million Americans aged 12 or older – 9.4 percent of the population – had used an illicit drug in the past month.” The number of Volunteers separated (152) for drug involvement during the roughly three-year period cited in the MAR, from January 2015 to February 2018, represents about 1.5 percent of the approximately 10,000 Volunteers who served during that same period.¹ While the number of early separations is concerning, it is not remarkable when viewed in the broader context of drug use by young people in the United States. Also, while the figures for drug-related early separations only represent those who were caught or who admitted to involvement with drugs, there is no basis for concluding that drug use among Peace Corps Volunteers is higher than, or even as pervasive as within the general U.S. population.

While the number of early separations highlighted in the MAR from 2015-2017 is higher than that for the previous three-year period, it is not possible to conclude from these numbers alone that drug use increased during the relevant period. For instance, the numbers could also indicate heightened awareness of this issue, leading to increased reporting of drug use, and heightened enforcement efforts. The data is equally consistent with the conclusion that the Peace Corps’ strict drug policy is working to find and remove individuals who are in violation of our “zero tolerance” policy.

The agency recognizes that drug use is a pervasive societal problem across the world, and, despite aggressive criminal laws, enforcement, and treatment options, no country or institution has yet identified a means to eliminate drug use completely. Nevertheless, as confirmed by the agency’s “zero tolerance” policy, the Peace Corps does not tolerate drug use by Volunteers.

While we are not persuaded that drug use among Peace Corps Volunteers is any more pervasive than that among the general US population, we do agree with the OIG that drug use by a subset of Volunteers poses a serious risk to the integrity and reputation of the Peace Corps, as well as to the health and safety of our Volunteers, which are our highest priorities. We have devoted considerable efforts to developing and enforcing our strict policy against drug use, and to

¹ The MAR asserts that 152 Volunteers were separated from service from January 2015 to February 2018 “in connection with drug use” but notes that, of these, the agency recorded only 112 as administrative separations or resignations in lieu of a separation. Therefore, a significant number of the Volunteers counted by the OIG as having been separated in connection with drug use actually resigned without any formal agency determination as to whether they were actually involved with drugs and may have had reasons for their resignations that are independent of any pending allegations of drug use. Pursuant to the Peace Corps Act, a Volunteer may resign at any time, for any reason.

supporting our CDs in their efforts to enforce this policy in our posts around the world, as well as ensuring that all allegations of widespread use or trafficking are promptly reported to the OIG for investigation. However we recognize that we can always adapt and find ways to make our policies and procedures more effective and to provide additional tools to CDs to help resolve allegations of Volunteer drug use. Therefore, we appreciate the OIG's efforts in this report and are giving very serious consideration to the recommendations.

Recommendation 1

That the Director of the Peace Corps provide country directors with additional support to resolve allegations of drug involvement under manual section 204, 3.5.1 and specifically consider the efficacy of reasonable suspicion drug testing as a means of doing so.

Concur

Response: While the agency has in the past regularly provided CDs with support to resolve allegations of drug involvement, the Offices of Global Operations, Health Services, Safety and Security, and the General Counsel will collaborate to develop additional guidance to ensure CDs are properly prepared to resolve such allegations in line with agency policy. In addition, while drug testing of Volunteers is not a new topic and has previously been considered, the agency will reassess its validity and will complete its consideration in the coming months.

Documents to be Submitted:

- Documentation of additional guidance for CDs on resolution of allegations of drug involvement.
- Documentation of the outcome of renewed consideration of reasonable suspicion drug testing

Status and Timeline for Completion:

February 28, 2019

Recommendation 2

That the Office of General Counsel review the evidentiary standard required to administratively separate a Volunteer suspected of involvement with drugs to determine whether the standard, and its application, is consistent with promoting the integrity of the program and continues to serve the policy interest of the Peace Corps.

Concur

Response: The agency has for many years required "clear and convincing" evidence of involvement of drugs before a Volunteer could be administratively separated. This strict evidentiary standard was developed in connection with the "zero tolerance" policy and in recognition of the fact that administrative separation is mandatory in all cases of drug involvement and that this penalty has significant adverse consequences for the separated Volunteer. The Office of the General Counsel will review the evidentiary standard as recommended.

Documents to be Submitted:

- Documentation of Office of the General Counsel review of the evidentiary standard

Status and Timeline for Completion:

February 28, 2019

Recommendation 3

That the Director of the Peace Corps make necessary changes to policies, procedures, and forms related to Volunteer resignations and administrative separations, so that Volunteer files and early termination statistics include accurate information regarding unauthorized drug use.

Concur

Response: The agency has already taken steps to revise policy to ensure more consistent recordation of drug-related allegations against Volunteers. In particular, since the issuance of the MAR, the agency has implemented a new policy and system to track allegations of serious misconduct, including drug involvement, that are pending when Volunteers leave service (MS 284 *Early Termination of Service*, Section 6, and Attachment J). The agency will review whether additional changes are needed to policies, procedures, and forms.

Documents Submitted:

- Updated MS 284 and Attachment J

Documents to be Submitted:

- Any necessary revised policies, procedures, and forms related to Volunteer resignations and administrative separations

Status and Timeline for Completion:

February 28, 2019

Recommendation 4

That the Director of the Peace Corps take effective steps to ensure ongoing compliance and consistency in implementation of the Volunteer separation recordation processes.

Concur

Response: The agency has several existing procedures designed to record information surrounding Volunteer separations, such as those described in MS 284 *Early Termination of Service*, Attachments D (Resignation Form), H (Notification to VRS of Administrative Separations and Process for Capturing Documentation (Records)) in DOVE, and J (Volunteers/Trainees Who Early Terminate Pending Investigation or Inquiry). In addition, the Office of Volunteer Recruitment and Selection regularly audits its database to ensure that documentation of administrative separations and resignations in lieu of administrative separation is appropriately recorded. The agency is analyzing its processes on recording reasons for Volunteer separation and will take necessary steps to ensure ongoing compliance and consistency. After a thorough review of current procedures, any needed changes will be

identified and implemented to improve compliance and consistency in recording reasons for Volunteer separations.

Documents to be Submitted:

- Updated procedural documents

Status and Timeline for Completion:

May 31, 2019

Recommendation 5

That the Director of the Peace Corps gather and analyze continuous information on the prevalence of, and factors contributing to, unauthorized drug use in the context of Volunteer service, through the Annual Volunteer Survey or another data gathering tool.

Partially Concur

Response: The Peace Corps agrees that a better understanding of Volunteers' experiences related to the prevalence of, and contribution to, unauthorized drug use will be useful to inform the agency's actions taken to mitigate Volunteer drug use. Thus, the Peace Corps will explore the feasibility and utility of several options, including the Annual Volunteer Survey, for gathering information on the prevalence of, and factors contributing to, unauthorized drug use in the context of Volunteer service.

Additionally, the agency plans to analyze its external alternatives for data gathering to determine the best option for collecting drug use information, providing final results and options to senior leadership. The agency will consider the external alternatives based on budget availability combined with the potential usefulness and credibility of the data it hopes to acquire.

Documents to be Submitted:

- Documentation of the agency's determinations on feasibility of internal agency data gathering tool options and outputs, if acquired, of any survey administered on this topic
- Results of analysis of external data gathering options

Status and Timeline for Completion:

December 2018

Recommendation 6

That the Director of the Peace Corps provide training to Volunteers that raises awareness of the risks that drug use poses to their health and safety, the effectiveness of their service, and the operations of the post itself.

Concur

Response: The responsibility of Volunteers to not use illicit drugs is already covered in the Medical Policies and Procedures session at Pre-Service Training, as well as by Peace Corps Medical Officers and through other training material that individual posts may add on this topic

locally (see, for example, *Pre Service Training (PST) sessions “Medical Policies and Procedures”* and Peace Corps Medical Technical Guideline 520, Alcohol Misuse and Abuse Section 3, Prevention). The agency is developing a core training module for all Volunteers that addresses fundamental drug-related issues relevant in all posts, such as basic health and safety risks, risk to the effectiveness of their service, risk of arrest and imprisonment, and risk to the reputation and efficacy of the Peace Corps. This module will be required for all Volunteers. The agency will also issue guidance to posts on the required development of a post-specific component of the training to provide local contextual information.

Documents to be Submitted:

- Standard Agency-Wide Required Pre-Service Training module

Status and Timeline for Completion:

May 31, 2019

APPENDIX C: OIG COMMENTS

Management concurred with five recommendations, and partially concurred with one.

In its response, management recognized opportunities to adapt policies and procedures and better support Country Directors in resolving allegations of Volunteer drug use. While this is a positive step, OIG is concerned that the agency confused the problem and its associated risks when it stated that the number of Volunteers separated “is not remarkable when viewed in the broader context of drug use by young people in the United States.”

OIG makes no assertion that the problem of drug use among Volunteers is better or worse than the U.S average, nor do we agree that a comparison between the number of Volunteers disciplined by the agency and the number of young adults believed to be using drugs in the United States is a productive means of measuring the risk presented to Peace Corps and its Volunteers. As Volunteers serve abroad, agency policy is focused not on behavioral norms in the United States, but on the conditions of service and the laws in the countries where Volunteers serve. Agency policy highlights the potentially serious social, political, and legal impacts of Volunteer drug use and describes how it can seriously jeopardize the entire Peace Corps program, as well as the safety and health of the Volunteers. It is because of this risk that Peace Corps policy requires that every case of Volunteer drug involvement must be brought immediately to the personal attention of the Peace Corps Director.

In our report, we discuss the agency’s limitations in understanding the scope of the drug problem. This problem is underscored in the agency’s response. The agency reasons that a “significant number” (40) of the 152 Volunteers counted in OIG’s analysis may have had reasons for resignation that were independent of any allegation of drug use. The number cited comes from the agency’s own records in Odyssey. Of the Volunteers who appear in Odyssey to have resigned without a formal agency determination, 25 admitted drug use during an interview with OIG investigators or senior post officials, or were otherwise recorded by the agency as having resigned due to illegal substances. Another 15 Volunteers resigned shortly after they were made aware of a credible allegation of drug involvement against them. Although OIG examined the details of every one of the 152 cases outlined in our report, we found multiple instances where Volunteer involvement with drugs was not captured by Peace Corps systems. Agency records should be viewed only as a starting point to discuss this issue.

Finally, with respect to OIG involvement in investigating cases of widespread drug use, while OIG has encouraged staff to report such cases, and has made itself available to management to address such incidents, it is important to clarify that agency policy has not given OIG the “...exclusive authority to investigate...” these cases.

All six recommendations remain open pending acceptance of documentation listed in the agency’s response. We wish to note that, in closing 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.