



# Office of Inspector General

Office  
202.692.2900  
[Website](#)  
[OIG Reports](#)

Hotline  
202.692.2915 | 800.233.5874  
[Online Contact Form](#)  
[OIG@peacecorpsig.gov](mailto:OIG@peacecorpsig.gov)

---

**To:** Sheila Crowley, Acting Director, Peace Corps

**From:** Kathy Buller, Inspector General, Peace Corps 

**Date:** August 10, 2017

**Subject:** OIG's review of unredacted documentation of sexual assault cases related to our 2016 evaluation of the sexual assault risk reduction and response program

---

This memo summarizes the results of our review of unredacted documentation for a sample of cases we reviewed as part of our 2016 evaluation of the agency's sexual assault program. The memo will be appended to our "Final Evaluation Report: The Peace Corps' Sexual Assault Risk Reduction and Response Program [IG-17-01-E]," which was issued and made public in November 2016.

As you know, the Kate Puzey Peace Corps Volunteer Protection Act of 2011 required OIG to conduct a case review of a statistically significant number of sexual assault cases as part of an evaluation of the agency's sexual assault risk reduction and response program. OIG conducted this evaluation and case review with documentation the agency provided. Half of the cases reviewed were "restricted" cases, and the relevant documentation the agency provided related to its response to those sexual assault victims had been redacted to remove any personally identifiable information. As a result, OIG included a data limitation in the report.<sup>1</sup>

In December 2016, the President signed into law the Inspector General Empowerment Act of 2016 affirming OIGs' right to access all documents needed in our work. Accordingly, we requested a sample of unredacted documents from the case review. This was necessary in order to compare the complete documents to the redacted ones we were originally provided with the purpose of verifying the accuracy of documentation we relied on for the case review.

OIG identified a random sample of nine restricted cases and specified particular documentation from those cases that had been redacted; we then requested that the agency provide copies of the same documents in their original, unredacted form. In July 2017, OIG received the unredacted documents in hard copy and compared them to the redacted versions reviewed during the case review.

The agency provided 14 of the 15 unredacted documents, and our comparison between those and the redacted documents we relied on for our case review verified the accuracy of the documentation. One of the documents we requested in unredacted form could no longer be retrieved from an agency system that had been discontinued. However, we were able to verify the accuracy of the redacted document in question by using other documents provided to us.

---

<sup>1</sup> "Final Evaluation Report: The Peace Corps' Sexual Assault Risk Reduction and Response Program [IG-17-01-E]," pages iii, 70, and 71.

In sum, OIG has no concerns related to the accuracy of documents we relied upon to conduct our case review for the 2016 evaluation. We plan on including the results of this review in our next Semiannual Report to Congress and will post this memo on our external web site.

cc: Kathy Stroker, Acting Deputy Director  
Carrie Ross, SARRP Director  
Angela Kissel, Acting Chief Compliance Officer  
Da Shawna Townsend, Director, Office of Victim Advocacy  
Shawn Bardwell, Associate Director for Safety and Security  
Jill Carty, Acting Associate Director, Office of Health Services  
Yefat Levy, Associate General Counsel  
Joaquin Ferrao, Deputy Inspector General/Legal Counsel  
IGChron  
IG



# Office of Inspector General

Office  
202.692.2900  
[peacecorps.gov/OIG](http://peacecorps.gov/OIG)  
[OIG Reports](#)

Hotline  
202.692.2915 | 800.233.5874  
[Online Reporting Tool](#)  
[OIG@peacecorpsig.gov](mailto:OIG@peacecorpsig.gov)

---

**To:** Carrie Hessler-Radelet, Director  
Anne Hughes, Chief Compliance Officer

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

**Date:** November 28, 2016

**Subject:** Final Evaluation Report: The Peace Corps' Sexual Assault Risk Reduction and Response Program (IG-17-01-E)

Transmitted for your information is our final report on the evaluation of the Peace Corps' sexual assault risk reduction and response program.

The Peace Corps concurred with all 36 recommendations. Three recommendations have been closed based on the provided documentation. The other 33 recommendations will remain open pending confirmation from the chief compliance officer that the documentation identified in management's response has been received. In its response, management described actions it is taking or intends to take to address the issues that prompted each of our recommendations. We wish to note that 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.

We assessed that additional information is required on 2 recommendations. Please respond with documentation to close the remaining open recommendation within 90 days of receipt of this memorandum.

You may address questions regarding follow-up or documentation to Assistant Inspector General for Evaluation Jeremy Black at 202.692.2912.

We would like to thank Peace Corps staff at headquarters and overseas for their cooperation and all the Volunteers who shared their insights and experiences. We are exceptionally grateful to the survivors who selflessly shared their story to help the Peace Corps improve.

cc: Carlos Torres, Deputy Director  
Laura Chambers, Chief of Staff  
Ken Yamashita, Associate Director, Global Operations  
Shawn Bardwell, Associate Director for Safety and Security  
Paul Jung, Associate Director, Office of Health Services  
Kathy Stroker, Acting General Counsel  
Da Shawna Townsend, Director of the Office of Victim  
Peter Redmond, Acting SARRR Team Lead  
Kate Raftery, Former SARRR Team Lead

Jeremy Haldeman, Director of External Affairs  
Angela Kissel, Compliance Officer

PEACE CORPS  
Office of Inspector General  
TOGETHER WE MAKE A BETTER PEACE CORPS



## FINAL REPORT

### The Peace Corps' Sexual Assault Risk Reduction and Response Program

IG-17-01-E

November 2016



# PEACE CORPS

## Office of Inspector General

TOGETHER WE MAKE A BETTER PEACE CORPS  
202.692.2900 · [OIG@PEACECORPS.GOV](mailto:OIG@PEACECORPS.GOV) · [WWW.PEACECORPS.GOV/OIG/CONTACTUS](http://WWW.PEACECORPS.GOV/OIG/CONTACTUS)

### Background

The Kate Puzey Peace Corps Volunteer Protection Act of 2011 (the Kate Puzey Act) required the Peace Corps to undertake a number of reforms, including providing sexual assault risk reduction and response (SARRR) training for Volunteers, developing a comprehensive SARRR policy, and training overseas staff on that policy. The Act directed the Peace Corps OIG to evaluate the effectiveness and implementation of the training and policy, and to review a statistically significant number of sexual assault cases.

Volunteers reported 251 sexual assaults in 2014 and 241 sexual assaults in 2015. The assaults in 2015 included 52 rapes, 35 aggravated sexual assaults, and 154 non-aggravated sexual assaults.

### Objectives

There were three objectives for this evaluation:

1. Has the Peace Corps implemented the sexual assault risk reduction and response training and policy required by the Kate Puzey Act?
2. How effective is the Peace Corps' sexual assault risk reduction and response training and policy?
3. Does the Peace Corps provide the required support to victims of sexual assault?

### Evaluation of the Peace Corps' Sexual Assault Risk Reduction and Response Program

November 21, 2016

#### What We Found

The Peace Corps largely complied with the requirements in the Kate Puzey Act.

Compared to our SARRR evaluation in 2013, the Peace Corps markedly improved how it supported Volunteers who had reported a sexual assault. However we found individual cases where the Peace Corps did not meet its standard to respond effectively and compassionately to victims of sexual assault, including a few instances of victim blaming and improperly sharing confidential details with staff.

Some applicants were either not aware of the crime and risks previous Volunteers had faced in their country of service or they did not understand the information that was provided to them.

The SARRR program did not fully utilize some staff with SARRR expertise. The SARRR program would also benefit from a risk reduction strategy that tailors training to the country of service, addresses the risks of sexual harassment, and identifies factors that make sites unsafe.

Finally, the SARRR training's design and delivery may have detracted from Volunteer comprehension and learning.

#### What We Recommended

The Peace Corps should improve timely access to counseling, expand how it collects feedback on the SARRR program from Volunteers and staff, and conduct individual and systemic case reviews to improve the support provided to sexual assault victims. The Peace Corps should enhance how it presents crime and risk information to applicants, better tailor the training to each country of service, and integrate SARRR training throughout the Volunteer's 27 months of service.

The Peace Corps should also maximize use of existing staff expertise, create a program manager position, and clarify staff roles and responsibilities. The SARRR program should include risk reduction strategies that are culturally appropriate and relevant to the Volunteer population.

SARRR training design, implementation, and facilitation should be improved so Volunteers better comprehend the policies and program.

These changes should be incorporated into Peace Corps policy and clearly communicated to all staff.

## EXECUTIVE SUMMARY

---

In November 2011, the President signed into law the Kate Puzey Peace Corps Volunteer Protection Act of 2011 (the Kate Puzey Act). It required the Peace Corps to undertake a series of reforms, including providing sexual assault risk reduction and response training for Volunteers, developing a comprehensive sexual assault policy, and training overseas staff on that policy. The Act directed the Peace Corps OIG to evaluate the effectiveness and implementation of the training and policy, and to review a statistically significant number of sexual assault cases. This report contains the results of our evaluation.

Our evaluation found that the Peace Corps had generally complied with the Act's requirements. However, we identified several aspects of the agency's sexual assault risk reduction and response program that needed improvement to better train Volunteers and enhance the Peace Corps' response to sexual assault victims.

### **Volunteer Training on Sexual Assault Risk Reduction and Response**

Our evaluation found that the agency had provided contact information for: the Peace Corps Inspector General, a 24-hour sexual assault hotline for Volunteers, the Peace Corps Office of Victim Advocacy, and the Sexual Assault Response Liaison in the Volunteer's country of service as required by the Act.

However, we also found that the Peace Corps had not provided applicants with required information on crimes and risks in an effective manner. As a result, many Volunteers had accepted invitations to serve without fully understanding the crimes and risks Volunteers had experienced in their countries of service.

We found that the Peace Corps had developed its sexual assault training in accordance with the Kate Puzey Act requirements: it incorporated available best practices, it consulted with experts in the sexual assault field, and it involved the Office of Victim Advocacy in the training design process.

However, we found that some Volunteers had not learned important information in the sexual assault risk reduction and response sessions, including the difference between restricted and standard reporting, the services available to a victim of a sexual assault, how to report a sexual assault incident, and the identity and role of Sexual Assault Response Liaisons at post. The training was insufficiently tailored to the country of service (as required by the Act), was not responsive to the needs of diverse Volunteers, and did not address the problem of sexual harassment. In addition, some staff delivered the training inconsistently due to poor training skills. Furthermore, the Peace Corps' approach to assessing the Volunteer training was incomplete and did not provide a useful measure of training effectiveness.

### **Implementation of Sexual Assault Policy and Case Review**

As part of this evaluation we reviewed 138 reported cases of sexual assault to determine if the services required by the Kate Puzey Act had been offered to Volunteers. We found that staff had generally offered and provided the requested services in a timely manner. Since the issuance of our 2013 sexual assault and risk reduction evaluation report, the Peace Corps had markedly

improved its ability to demonstrate that the required services were offered, requested, and provided to Volunteers as required by the Act. OIG assessed that the standardization put in place through Manual Section 243 *Procedures for Responding to Sexual Assault* had improved the consistency with which the agency responded to sexual assault victims.

However, we found a few cases where the Peace Corps did not meet its standard to “respond effectively and compassionately to Volunteers who have been the victim of sexual assault.”<sup>1</sup> Some Volunteers reported that staff were not compassionate, blamed victims, or improperly shared confidential information with other staff. We also identified Volunteers who had difficulty accessing counseling in a timely manner.

In addition, while the agency often accommodated Volunteers’ requests to change sites for safety and security reasons, in some cases Volunteers were separated from the Peace Corps rather than relocated to another site. Volunteers we interviewed felt disenfranchised from the discussions regarding their safety and continued service.

While the Peace Corps’ sexual assault policy generally complied with the requirements in the Act, our evaluation identified aspects of the program that needed improvement. Specifically, our report found that the sexual assault risk reduction and response program needed:

- Clearer roles and responsibilities for staff involved in the program
- A more comprehensive strategy to identify and reduce the risk of sexual assault, including improved monitoring and evaluation of risk reduction efforts
- Improved documentation of staff training completion
- Development of staff training requirements
- Effective communication on policy, specifically on policy changes

One particularly important area of policy confusion concerned the number of counseling sessions that were available to Volunteers following a sexual assault. We found that staff and Volunteers had a mistaken belief that they were limited to six or fewer counseling sessions after a sexual assault. As a result, some Peace Corps Medical Officers provided incorrect information about the availability of counseling. We concluded that some Volunteer sexual assault survivors could have been deterred from reporting their need for counseling.

We concluded that the success or failure of the sexual assault risk reduction and response program hinged on the level of trust and confidence that Volunteers had in the Peace Corps’ ability to manage their case compassionately and effectively. Effective sexual assault case management required clear roles and responsibilities, good communication, and teamwork in order to meet the agency’s commitment to sexual assault victims to provide a compassionate and supportive response.

Our report made 36 recommendations intended to help the agency improve implementation and effectiveness of the sexual assault risk reduction and response program. The agency concurred with all recommendations and their full response can be found in Appendix G.

---

<sup>1</sup> Peace Corps Manual Section 243, *Procedures for Responding to Sexual Assault* (Introduction page 4).

## Data Limitations

Beginning in September 2013 the Peace Corps issued policies denying OIG access to restricted reporting information relating to victims of sexual assault. These policies impeded OIG's ability to carry out its oversight responsibilities, and resulted in a disagreement between OIG and the agency. For more information, see pages 12 and 13 of our *Semiannual Report to Congress: October 1, 2015 to March 31, 2016*.

In May 2014 the agency and OIG executed a memorandum of understanding that permitted OIG access to some, but not all, of the records in question. As outlined in Appendix A, the remaining limitations did not prevent OIG from reviewing a statistically significant sample of sexual assault cases for this evaluation, which the Kate Puzey Act required. However, OIG's limited access to identifying information in restricted reports, which constituted half of the cases we reviewed, impeded OIG's ability to determine that documentation received for each case of sexual assault was documentation of the agency's response to that case, rather than documentation relevant to a different case.

# TABLE OF CONTENTS

---

<b>EXECUTIVE SUMMARY .....</b>	<b>1</b>
Volunteer Training on Sexual Assault Risk Reduction and Response .....	i
Implementation of Sexual Assault Policy and Case Review.....	i
<b>BACKGROUND.....</b>	<b>1</b>
<b>Introduction .....</b>	<b>1</b>
The Peace Corps' Operating Environment.....	1
Global Prevalence of Sexual Assault.....	1
Sexual Assaults Reported by Volunteers in 2014 and 2015.....	2
Under-Reporting of Sexual Assaults by Volunteers.....	2
<b>Overview of the Peace Corps' Sexual Assault Risk Reduction and Response Program .....</b>	<b>4</b>
Offices and Staff Positions With SARRR Program Responsibilities .....	6
<b>EVALUATION OBJECTIVES.....</b>	<b>9</b>
<b>Evaluation Methodology .....</b>	<b>9</b>
<b>EVALUATION RESULTS OF THE PEACE CORPS' SEXUAL ASSAULT RISK REDUCTION AND RESPONSE TRAINING FOR VOLUNTEERS .....</b>	<b>11</b>
<b>Contact Information Requirements.....</b>	<b>11</b>
<b>Crimes and Risks Information for Applicants .....</b>	<b>12</b>
<b>Sexual Assault Risk Reduction and Response Training .....</b>	<b>15</b>
SARRR Training Design, Delivery, and Assessment Improvement.....	16
<b>EVALUATION RESULTS OF THE PEACE CORPS' SEXUAL ASSAULT POLICY .....</b>	<b>32</b>
<b>Case Review .....</b>	<b>32</b>
Case Review Methodology .....	32
Case Review Results .....	33
Restricted and Unrestricted Reporting .....	36
Sexual Assault Response Liaisons and Victim Advocates .....	37
Emergency Healthcare .....	39
Provision of Counseling and Psychiatric Medication.....	40
Safety and Medical Treatment Plan.....	43
Medical Evacuation .....	44
Provide Applicable Law Enforcement and Prosecutorial Options.....	45

Forensic Exams .....	45
Site Change, If Requested.....	46
Case Review Conclusions .....	47
<b>SARRR Program Effectiveness .....</b>	<b>49</b>
The SARRR Program Needed Improvement in Key Areas. ....	49
Clearer Roles and Responsibilities for SARRR Program Staff.....	49
A More Comprehensive Strategy to Identify and Reduce the Risk of Sexual Assault .....	54
Improved Documentation of Staff Training Completion.....	58
Develop Staff Training Requirements.....	60
Effective Communication on Policy, Specifically Changes to Policy .....	63
<b>LIST OF RECOMMENDATIONS.....</b>	<b>66</b>
<b>APPENDIX A: OBJECTIVE, SCOPE, AND METHODOLOGY .....</b>	<b>69</b>
<b>Objective .....</b>	<b>69</b>
<b>Scope .....</b>	<b>69</b>
<b>Methodology.....</b>	<b>69</b>
<b>APPENDIX B: SUMMARY OF 2013 EVALUATION REPORTS ON THE PEACE CORPS' SEXUAL ASSAULT POLICY AND PROGRAM .....</b>	<b>72</b>
<b>APPENDIX C: LIST OF ACRONYMS AND GLOSSARY OF TERMS .....</b>	<b>75</b>
<b>APPENDIX D: INTERVIEWS CONDUCTED.....</b>	<b>77</b>
<b>APPENDIX E: DESCRIPTION OF SARRR SESSIONS .....</b>	<b>81</b>
<b>APPENDIX F: FEEDBACK ON SARRR SESSIONS.....</b>	<b>82</b>
<b>APPENDIX G: AGENCY RESPONSE .....</b>	<b>85</b>
<b>APPENDIX H: EVALUATION COMPLETION AND OIG CONTACT .....</b>	<b>110</b>

---

# BACKGROUND

---

## INTRODUCTION

In 2010 and 2011, Returned Peace Corps Volunteers expressed concerns about the Peace Corps' support of victims of sexual assault. Their action prompted Congressional hearings in May and September of 2011, and resulted in the President signing into law the Kate Puzey Peace Corps Volunteer Protection Act of 2011. The Act was named in honor of Kate Puzey, a Peace Corps Volunteer who was killed while serving in Benin in 2009. It required the Peace Corps to undertake a series of reforms, including:

- Providing sexual assault risk-reduction and response training for Volunteers
- Developing a sexual assault policy and training for staff
- Establishing an Office of Victim Advocacy
- Establishing a Sexual Assault Advisory Council
- Implementing monitoring and evaluation plans for all Peace Corps programs
- Creating policies on stalking and confidentiality protection
- Removing a Volunteer from a site determined to be unsafe

## The Peace Corps' Operating Environment

The Peace Corps Act of 1961 declared that it is the policy of the United States to promote world peace and friendship by sending “men and women of the United States qualified for service abroad and willing to serve, under conditions of hardship if necessary, to help the peoples of such countries and areas in meeting their needs...” An inherent risk of sending Volunteers abroad under conditions of hardship is the risk of crime or violence. The Peace Corps tells applicants that “crime can pose a serious threat to Volunteer safety,” and that “Volunteers may be more vulnerable to crime than the citizens of a host country, especially when outside of their own communities.”<sup>2</sup> The Peace Corps website includes documents to orient applicants to some of these risks, the agency's approach to safety and security, and the Volunteer's responsibilities related to staying safe and secure during service.

## Global Prevalence of Sexual Assault

In 2013, the World Health Organization released a comprehensive study of global sexual assault.<sup>3</sup> This study provides some additional context for the risk environment in which Peace Corps Volunteers serve. It found that “35% of women worldwide have experienced either physical and/or sexual intimate partner violence or non-partner sexual violence” and that “most of this violence is intimate partner violence.” The report stated that “these findings send a powerful message that violence against women is not a small problem that only occurs in some pockets of society, but rather is a global public health problem of epidemic proportions, requiring urgent action.” A 2002 World Health Organization report estimated that the prevalence of sexual assaults committed against men ranged across countries from under four percent to 20 percent,

---

<sup>2</sup> Peace Corps, *Safety and Security Highlights to Help You Prepare for Peace Corps Service*. August 2011.

<sup>3</sup> World Health Organization, London School of Hygiene and Tropical Medicine, and South African Medical Research Council. *Global and regional estimates of violence against women: prevalence and health effects of intimate partner violence and non-partner violence*. 2013.

and concluded that assaults against men were likely to be severely under-reported for a variety of reasons.<sup>4</sup>

## Sexual Assaults Reported by Volunteers in 2014 and 2015

Peace Corps Volunteers and trainees<sup>5</sup> reported 251 sexual assaults in 2014 and 241 sexual assaults in 2015. The assaults in 2015 included 52 rapes, 35 aggravated sexual assaults, and 154 non-aggravated sexual assaults.<sup>6</sup> Female Volunteers reported the majority of these sexual assaults (228 cases). Male Volunteers reported 13 sexual assaults including 1 rape, 6 aggravated sexual assaults, and 6 non-aggravated sexual assaults.

The reported rate of sexual assaults decreased slightly from 2014 to 2015, from 3.8 assaults per 100 Volunteer-trainee years in 2014 to 3.7 in 2015. The Peace Corps calculates reported rates of crime against Volunteers, including the rate of sexual assault, using a measure called the “Volunteer-trainee year” to account for fluctuations in the Volunteer population over a calendar year. A “Volunteer-trainee year” reflects both the number of Volunteers and trainees who served in a year and the length of time each served in that year.<sup>7</sup> For more information about crimes against Volunteers, including summary data from 2004 to 2014, see the *Statistical Report of Crimes Against Volunteers 2014* available on the Peace Corps’ website.<sup>8</sup>

## Under-Reporting of Sexual Assaults by Volunteers

The Peace Corps Director has stated, “Our overriding objective is to encourage Volunteers who are victims of sexual assault and other crimes to come forward so we can provide them with the services they need and deserve.”<sup>9</sup>

Starting in 2014, the Peace Corps began surveying Volunteers at the close of their service regarding crimes they had experienced and not reported to the agency. Survey results indicated that the proportion of Peace Corps victims who did not report one or more rapes or aggravated sexual assaults was similar to the proportion of Peace Corps victims who did not report other crimes: roughly 50 percent of crimes against Volunteers were not reported. This Peace Corps analysis indicated that 53 percent of rapes and 49 percent of aggravated sexual assaults were not reported. It also showed that 85 percent of surveyed respondents who experienced at least one non-aggravated sexual assault had not reported one or more of them to the Peace Corps.

---

<sup>4</sup> World Health Organization, *World report on violence and health*. 2002.

<sup>5</sup> The Peace Corps refers to individuals in pre-service training who have not yet taken the oath of service as “trainees.” For the sake of simplicity in this report OIG will use the term Volunteer to refer to individuals who have arrived in their future country of service but are still technically in training.

<sup>6</sup> Peace Corps definitions of rape, aggravated sexual assault, and non-aggravated sexual assault are provided in Appendix C.

<sup>7</sup> For example, two Volunteers who both serve six months in a given year would account for one Volunteer-trainee year. This is a more accurate reflection of Peace Corps population risk than the total number of Volunteers who serve in a given year. In 2015, there were 6,919 Volunteers and trainees who served in 59 posts (the maximum number at any point during the year), however there were 9,761 individuals who served during that year (some served less than one month while others served all 12 months). This equates to 6,652 Volunteer-trainee years for the year.

<sup>8</sup> The [Statistical Report of Crimes Against Volunteers 2014](http://www.peacecorps.gov) can be accessed at [www.peacecorps.gov](http://www.peacecorps.gov)

<sup>9</sup> Message from Peace Corps Director to all employees: *Our Journey of Reform*. November 30, 2015.

The analysis summarized the primary reasons Volunteers had not reported their sexual assaults, which included: embarrassment, self-blame, not perceiving the sexual assault as a crime or serious event, and believing that there was nothing the Peace Corps could do about the assault. For non-aggravated sexual assaults—which were both the most frequently reported type of assault, as well as the most under reported—surveyed Volunteers had not reported them for three main reasons: they did not think the incidents were serious or threatening; they perceived the

**50%**

of all crimes were not reported

**53%**

of all rapes were not reported

**49%**

of all aggravated sexual assaults were not reported

incident as commonplace in the environment where they served; and they did not believe there was anything the Peace Corps could do to address it.

Other reasons that surveyed Volunteers said they had not reported their sexual assaults included concerns about how Peace Corps staff might respond, such as blaming the victim for their assault, failing to respect the victim's privacy and confidentiality, or simply not responding to the victim in a timely and supportive manner. Volunteers also indicated in their survey responses that they had not reported a sexual assault because they anticipated adverse consequences, such as being required to change their site, sent home, or punished

for having violated a Peace Corps policy. These concerns were significantly more pronounced for rape victims and aggravated sexual assault victims than for non-aggravated sexual assault victims.

Among surveyed Volunteers who had not reported their assaults to the Peace Corps because they were concerned about how staff would respond to them or the potential adverse consequences of reporting, a relatively high percentage had served at a small number of posts. Two of the 54 posts in the survey constituted almost 25 percent of the Volunteers who did not report their assaults because of these concerns. Nine posts represented nearly 50 percent of the Volunteers who had not reported an assault for similar reasons.

The Peace Corps compared its survey results to the National Crime Victimization Survey and concluded that the rates of unreported assaults on Volunteers were not unique compared to the general population of the United States. OIG also compared the survey results to a December 2014 Department of Justice study on rape and sexual assault victimization among females between 18 and 24 years old and found that Peace Corps survey results were reasonably similar.<sup>10</sup> The Department of Justice study found that 80 percent of college students and 67 percent of non-students did not report their sexual assault to the police. While the Department of Justice study used a population different from the Peace Corps' population, the study provides national context for the issue of under-reporting of crimes and shows that under-reporting of sexual assault is not a problem unique to the Peace Corps. The Department of Justice report stated similar reasons for not reporting: the victim felt it was a personal matter, feared reprisal, or believed that the police either would not, or could not, help.

<sup>10</sup> Sinozich, Sofi and Langton, Lynn. *Special Report: Rape and Sexual Assault Victimization Among College-Age Females, 1995-2013*. U.S. Department of Justice, December 2014.

## OVERVIEW OF THE PEACE CORPS' SEXUAL ASSAULT RISK REDUCTION AND RESPONSE PROGRAM

The agency stated in a 2015 Sexual Assault Risk Reduction and Response (SARRR) evaluation report that the mission of the program is “to employ comprehensive measures to reduce the risk of sexual assault against Volunteers and provide compassionate and highly competent support through an approach that addresses the needs of the individual and agency.”

The SARRR program is primarily governed by Peace Corps Manual Section (MS) 243 *Responding to Sexual Assault* and the accompanying *Procedures for Responding to Sexual Assault* which provides detailed instructions according to each position or office engaged in the response process. In addition, the Peace Corps Director articulated the agency’s *Commitments to Sexual Assault Victims*, which are in MS 243 *Procedures* as well as documents and presentations that applicants and Volunteers have received:

<b>PEACE CORPS COMMITMENTS TO SEXUAL ASSAULT VICTIMS</b>
Peace Corps is committed to providing a compassionate and supportive response to all Volunteers who have been sexually assaulted. To that end, the Peace Corps makes the following commitment to our Volunteers who are victims of sexual assault.
<b>COMPASSION</b> We will treat you with dignity and respect. No one deserves to be a victim of a sexual assault.
<b>SAFETY</b> We will take appropriate steps to provide for your ongoing safety.
<b>SUPPORT</b> We will provide you with the support you need to aid in your recovery.
<b>LEGAL</b> We will help you understand the relevant legal processes and your legal options.
<b>OPEN COMMUNICATION</b> We will keep you informed of the progress of your case, should you choose to pursue prosecution.
<b>CONTINUATION OF SERVICE</b> We will work closely with you to make decisions regarding your continued service.
<b>PRIVACY</b> We will respect your privacy and will not, without your consent, disclose your identity or share the details of the incident with anyone who does not have a legitimate need to know.
Peace Corps staff worldwide will demonstrate this commitment to you through our words and action

According to the Peace Corps Director, there have been over 30 policy changes related to the sexual assault and risk reduction program in the past five years.

**Table 1.** Overview of Sexual Assault-Related Policies Issued because of Kate Puzey Act

POLICY	INITIAL ISSUANCE DATE	LAST REVISION DATE*	ITERATIONS
MS 243 Responding to Sexual Assault (IPS 3-13)	8/30/13	11/5/15	5
MS 243 Procedures for Responding to Sexual Assault (IPS 3-13)	8/30/13	11/5/15	4**
IPS 2-13 Sexual Assault Response Liaisons	8/30/13	9/1/13	1
MS 240 Immunity from Disciplinary Action in Sexual Assault Incidents (IPS 1-11)	11/21/11	5/22/15	2
MS 242 Stalking Policy and Procedures (IPS 1-13)	8/30/13	6/20/16	2
MS 241 Anonymous Sexual Assault Hotline Policy and Procedures (IPS 2-12)	2/15/13	6/15/15	2

\* Revision dates and iterations include conversion from an Interim Policy Statement (IPS) to a MS even if no revisions were made to the document

\*\* Concluded from versions in documents provided by the agency.

The agency also revised other policies to align with the Kate Puzey Act or enhance services provided to sexual assault victims. MS 264 *Medical Evacuation* included provisions for accompaniment for sexual assault victims. MS 774 *Retention of Counsel* included a section mandating explanation of prosecutorial rights and allowing retention of a lawyer for victims. In all, we identified 15 manual sections and interim policy statements and 13 other office-level documents that pertained to implementation of the SARRR program.

## Offices and Staff Positions With SARRR Program Responsibilities

Figure 1 portrays the notification process for Peace Corps staff overseas and at headquarters who have responsibilities to respond to and support Volunteers who report their sexual assault.<sup>11</sup>

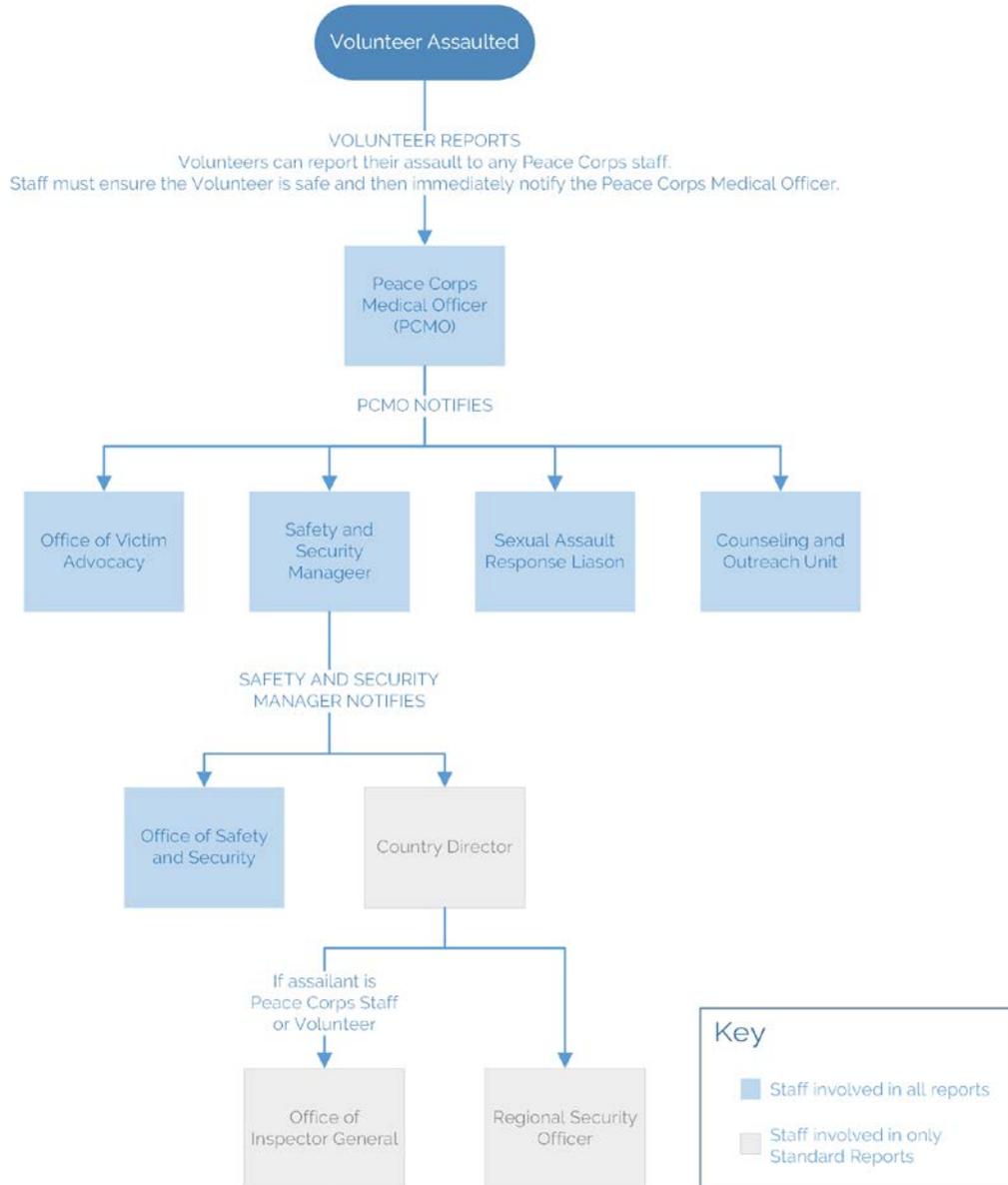


Figure 1: Peace Corps SARRR flow chart.

<sup>11</sup> The Kate Puzey Act required the Peace Corps to create a system “for restricted and unrestricted reporting of sexual assault.” Volunteers may file either a “restricted” or a “standard” report, depending on which response services they would like the agency to provide. According to MS 243 *Procedures*, the restricted reporting option “allows Volunteers to request certain specific services without dissemination of personally identifying information about the Volunteer or the details of the sexual assault beyond those who are directly providing the services, and without automatically triggering an official investigative process.” The agency treats all reports as restricted until the Volunteer decides to choose a standard report, and a Volunteer may elect to convert his or her restricted report to standard at any time.

### *Overseas Staff*

Among the overseas staff with SARRR program responsibilities, the agency selected three positions as “designated staff” who are allowed to receive restricted reports of sexual assault: the Peace Corps Medical Officer, Safety and Security Manager, and Sexual Assault Response Liaison. Other staff, including the Country Director, are involved in the SARRR program but do not have responsibilities for directly providing services and support to sexual assault victims.

**The Peace Corps Medical Officer (PCMO)** is the physician, physician assistant, or nurse responsible for providing medical care to Volunteers at post. The PCMO may direct the Volunteer to local health care or provide the medical care themselves. Their SARRR-related duties include assessing the medical and mental health needs of Volunteers who report their sexual assault to the post.

**The Safety and Security Manager (SSM)** implements the post’s safety and security procedures and risk mitigation and response strategies. Their SARRR responsibilities include assessing the safety and security risks facing a sexual assault survivor and developing an immediate response plan to safeguard the Volunteer. SSMs may also assist the Volunteer within the host country’s law enforcement and legal system.

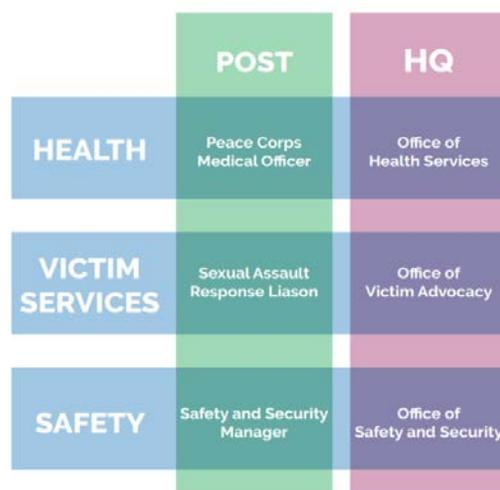
**The Sexual Assault Response Liaison (SARL)** is a post staff member with other principal duties who has volunteered to be available to help Volunteers who report a sexual assault. The SARL may accompany Volunteers to meetings with Peace Corps staff, law enforcement personnel, legal counsel, and host country medical or mental health providers.

**The Country Directors** are not designated staff and cannot receive restricted report information. Under the SARRR program, if a Volunteer submits a standard report, the Country Director leads the post’s response by coordinating with the PCMO, SSM, and SARL to ensure that all services are offered and provided to Volunteers according to the agency’s sexual assault response policies and procedures.

### *Headquarters Staff*

Overseas staff with SARRR program responsibilities were supported by personnel in Peace Corps Headquarters. Certain positions within two offices have been designated to respond to sexual assault victims, as explained below.

**The Office of Health Services (OHS)** provides technical support to PCMOs related to emergency medical care and mental health screening for Volunteers. OHS also provides technical assistance to the PCMO when the Volunteer has requested a sexual assault forensic examination. Within OHS is the agency’s **Counseling and Outreach Unit** that provides technical support to the PCMO on all matters related to mental health care of the Volunteer. The agency’s counselors also directly provide Volunteers with mental health consulting, screening, and treatment.



**Figure 2.** Three major functions of the SARRR program and potential for stovepipes by function or geography.

**The Office of Safety and Security (OSS)** serves as the technical support for the SSM. Designated security specialists within OSS provide assistance and advice to staff overseas regarding safety and security considerations after an assault.

**The Office of Victim Advocacy (OVA)** assists overseas staff and Volunteers to understand the services and options available to victims of sexual assault. Victim Advocates in this office are also designated staff who can receive restricted reports, and are tasked under the Kate Puzey Act with ensuring that “volunteers who are victims of sexual assault receive services specified [in the Act] and facilitate their access to such services.”

The relationship between these various positions and offices is portrayed in Figure 2 which shows the three primary support functions for sexual assault victims: Volunteer health and well-being; victim support and services coordination; and Volunteer safety and security. The positions and offices are displayed by their geographic location: either the field post or the Peace Corps headquarters in Washington, DC.

## EVALUATION OBJECTIVES

---

The Kate Puzey Act directed the Peace Corps OIG to evaluate the SARRR program and provide reports to Congress by November of 2013 and 2016. The Act specified the purpose of these evaluations:

1. Evaluate the effectiveness and implementation of the sexual assault risk-reduction and response training
2. Evaluate the effectiveness and implementation of the sexual assault policy, including a case review of a statistically significant number of cases

See Appendix B for a summary of OIG's 2013 evaluation reports, including a list of the recommendations in the reports and the status of each.

OIG announced its evaluation of the Peace Corps' sexual assault risk reduction and response program on November 9, 2015. We used the following researchable questions to guide our work:

- Has the Peace Corps implemented Sexual Assault Risk Reduction and Response training for Volunteers, and provided information to applicants, as required by the Kate Puzey Act?
- How effective is Peace Corps SARRR training for Volunteers?
- Has the Peace Corps implemented policy required by the Kate Puzey Act?
- How effective are the agency's SARRR program policies and procedures?
- Are the services provided to Volunteers consistent with the requirements in the law and Peace Corps SARRR policy, as determined through OIG's case review?

## EVALUATION METHODOLOGY

OIG conducted fieldwork from November 2015 through August 2016, and included interviews with 58 agency managers and staff in the offices of Safety and Security, Health Services, Overseas Programming and Training Support, Global Operations, Victim Advocacy, Volunteer Recruitment and Selection, Peace Corps Response, General Counsel, and other offices. In addition, we interviewed outside experts in the sexual assault field, members of the Sexual Assault Advisory Council, and other stakeholders interested in the Peace Corps' program.

We visited six countries (Morocco, South Africa, Mozambique, Guatemala, Peru, and Paraguay) based on the high number and types of reported sexual assaults relative to other countries where the Peace Corps operates. We interviewed 69 field staff about the agency's sexual assault response program, policies, procedures, and related training and we held 12 focus group meetings with 72 Volunteers in those countries. Our Volunteer focus group discussions solicited Volunteer perspectives and feedback on the agency's SARRR program, including the Volunteer training as well as the policies and procedures to support and respond to Volunteers who report a sexual assault.

In addition, OIG conducted a review of a statistically significant representative sample of 138 sexual assaults that had been reported to the Peace Corps between September 3, 2013 and

September 29, 2015. We reviewed agency records on these cases to determine if the Peace Corps had offered all of the required services specified in the Kate Puzey Act, and if the Peace Corps had provided all the services that Volunteers requested. In addition, we interviewed 11 sexual assault survivors who were among the 138 cases we had reviewed, in order to directly ask the Volunteers how they would characterize the way the agency responded to their assault. We then compared those responses to the commitments the Peace Corps made to victims to offer a compassionate, supportive, and victim-centered response.

# EVALUATION RESULTS OF THE PEACE CORPS' SEXUAL ASSAULT RISK REDUCTION AND RESPONSE TRAINING FOR VOLUNTEERS

---

The Kate Puzey Act required the Peace Corps to provide a range of information and training to applicants and Volunteers. This included providing each applicant with the contact information for:

- The Peace Corps Inspector General
- A 24-hour sexual assault hotline for Volunteers
- The Peace Corps Office of Victim Advocacy
- The country of service's Sexual Assault Response Liaison

The Act also mandated that the Peace Corps provide all applicants with information regarding crimes and risks in their proposed country of service, including an overview of past crimes committed against Volunteers in the country.

In addition, the Act required the Peace Corps to develop and provide comprehensive sexual assault risk reduction and response training to all Volunteers, using best practices and consulting with experts in the sexual assault field. It specified that this comprehensive training be tailored to the country of service, and include:

- Cultural training on gender relations
- Risk reduction strategies
- Availability of medical treatment (such as post-exposure prophylaxis for HIV, pregnancy testing, and sexually transmitted illness testing)
- Medical evacuation procedures
- Legal/law enforcement processes and an explanation of the victim's right to pursue legal action

## CONTACT INFORMATION REQUIREMENTS

Based on our fieldwork, OIG determined that the Peace Corps complied with the requirements to provide contact information for various offices to applicants.

### ***The Peace Corps provided applicants with contact information for OIG.***

The Peace Corps provided Volunteers with OIG's contact information, which was included in applicant invitation materials ("Safety and Security Highlights" and the "Peace Corps Volunteer Handbook"), as well as the Staging Workbook given to invitees who attended an orientation before departing to their countries of service.

### ***The Peace Corps complied with the requirement for a 24-hour sexual assault hotline.***

As noted in our 2013 evaluation report, the Peace Corps initially piloted a hotline in seven countries. In June 2015, the Peace Corps launched a 24-hour anonymous sexual assault hotline

for Volunteers operated by the Rape, Abuse & Incest National Network (RAINN), an anti-sexual violence organization. Volunteers could access the hotline by phone, online chat, requests for a call back, and text message. However, few Volunteers had contacted it prior to fieldwork for this evaluation. OIG concluded that the hotline had not been in place long enough for us to assess its effectiveness by, for example, analyzing if usage rates were indeed lower than should be expected, and if so, for what specific reasons.

***The Peace Corps provided applicants with contact information for the Office of Victim Advocacy and the Sexual Assault Response Liaison.***

The Peace Corps provided the contact information for the OVA and SARL in multiple ways, including in the Volunteer Handbook, applicant Welcome Book, Safety and Security Pre-Service Training Supplemental Workbook, and wallet cards.

## **CRIMES AND RISKS INFORMATION FOR APPLICANTS**

***Volunteers were unaware of the information the Peace Corps made available about crimes and risks previous Volunteers had experienced in their country of service.***

OIG found that the Peace Corps had not effectively provided crimes and risks information to each applicant, as the Kate Puzey Act requires. Although the information could be accessed through a hyperlink embedded in the “Welcome Book” that all applicants received, almost none of the Volunteers we spoke to were aware of the information. During our focus group discussions with more than 70 Volunteers in six different countries, very few Volunteers reported that they had seen post-specific crimes and risks information prior to their arrival in country.<sup>12</sup> Further, the information was not clearly presented nor easily understood. As a result, many applicants applied to and accepted invitations to serve in countries without fully understanding the crimes and risks they could face as Volunteers.

This has been an outstanding issue since our 2013 evaluation of the Peace Corps’ Sexual Assault Risk Reduction and Response training. At that time, OIG recommended that the Peace Corps “ensure that at the time applicants receive their invitation for service, all have received the most recent information on crimes and risks specific to their country of service.” As of September 2016, the recommendation remained open.

***The crimes and risks information was not shared in an appropriately accessible and prominent location.***

The Peace Corps shared crimes and risks information in two ways. First, the agency sent each invitee a Welcome Book that contained a hyperlink to crimes and risks information specific to their potential country of service. One focus group Volunteer described challenges with finding the crime data: “The welcome packet was a big mess. It had different links, different password requirements, and other issues with the presentation of the material that made it difficult to find and really, not worth the effort.”

The second way in which the agency made crimes and risks information available to the public was on its website, in a report file titled “Statistical Report of Crimes Against Volunteers.” The

---

<sup>12</sup> There were a small number of focus group participants from each post who recalled having reviewed the crimes and risks information during pre-service training or other times during their service.

Peace Corps included links to this report on several of its highly-trafficked internet pages. However, only a small percentage of people who visited those pages opened the document.

There were more appropriate, visible locations for the agency to provide all applicants with the information on crimes and risks. In 2014, the Peace Corps revised its application system so that applicants could apply to specific countries, instead of general regions. A focus group Volunteer suggested that the agency should include country specific information on crimes and risks facing Volunteers on the same webpage as the Volunteer job description, so that applicants could make a more informed decision when selecting where to apply. A senior official in the Office of Volunteer Recruitment and Selection told us that putting the crime information in the agency's online Volunteer job description would get it to applicants earlier in the process, when they are making decisions about which country to select.

***The crimes and risks information was presented in an unclear manner.***

When we provided the Peace Corps' crimes and risks information to the focus group Volunteers, some reported that the data reflected their perception of the types and level of crime in their country. However, many Volunteers also found the presentation of the statistics on reported crimes to be confusing and difficult to interpret. Figure 3 provides an example of the crime data graphs the agency had developed for applicants.

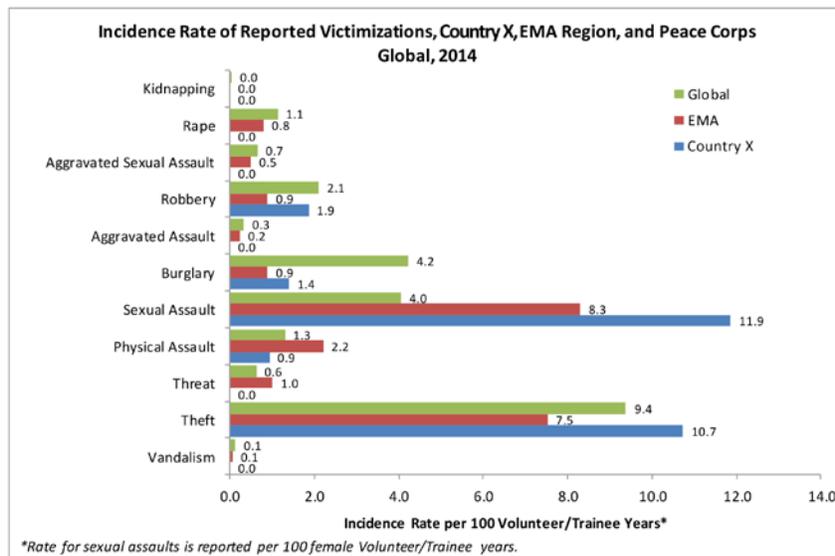


Figure 3. Example of crime data provided to prospective Volunteers. Source: The Peace Corps.

When we asked focus group Volunteers how the Peace Corps could improve the presentation of this data, they suggested the agency should:

- **Define the different crimes**, for example, explaining the difference between sexual assault, aggravated sexual assault, and rape
- **Explain jargon** such as Volunteer/Trainee Years and EMA (“Europe, Middle East, and Asia”)
- **Include testimonials** or narratives from Volunteers on safety to add context to the data
- **Include sexual harassment** data and information

- **Improve context** by comparing the data in a meaningful way to statistics about other locations, such as neighboring Peace Corps countries or large U.S. cities

Some Peace Corps overseas staff we interviewed reported that the crimes and risks information gave applicants an incomplete understanding of risks they might face in-country. As one Peace Corps Safety and Security Officer said, “We need to better define the terms and explain what the numbers really mean. Trainees are always asking about the statistics, so I don’t think we do a good job at explaining. We need to clarify what it means, but also what Peace Corps is doing to address the crimes.”

The Peace Corps Director expressed to OIG her expectation that applicants have full access to information on crimes and risks, as required by the Kate Puzey Act, so that they can make an informed choice when applying to be a Volunteer. We found that because the agency had not provided crimes and risks information to all applicants in an effective manner, applicants had accepted invitations to serve in countries without fully understanding the risks of service.

**We recommend:**

1. That the Director prioritize closing Recommendation 1 in the Office of Inspector General’s 2013 evaluation report (IG-14-01-E) related to ensuring that all applicants have received the most recent information on crimes and risks specific to their country of service.
2. That the Director improve the presentation of crimes and risks information (including qualitative information on the risk of sexual harassment) for applicants by making this information more accessible to all applicants and easier to understand.

**The Peace Corps’ response to our recommendations:**

The Director concurred with recommendations 1 and 2. The Peace Corps updated the Volunteer application website to include crime and risk information in October 2016 to address recommendation 1. A multi-office working group will be convened to address recommendation 2, and they plan to complete their work by July 2017.

**OIG’s reply:**

The Director’s reply was fully responsive to the recommendations. The OIG closed recommendation 1, and recommendation 2 will remain open until the Peace Corps provides documentation that the crime and risk

information, to include information on sexual harassment, is easier for applicants to understand.

## SEXUAL ASSAULT RISK REDUCTION AND RESPONSE TRAINING

The Congressional mandate to deliver comprehensive sexual assault risk reduction and response training tailored to more than 60 different countries created a challenge for the Peace Corps. While the agency referred to this training internally as its “Safety and Security Global Core Training Package,” in this report we will simply refer to the training as SARRR training. In general the agency’s SARRR training was meant to equip every Volunteer who entered service with competency in sexual assault risk mitigation, the ability to report, and an understanding of the response they could expect from the Peace Corps.

The agency provided Volunteers with the following standardized SARRR trainings:

1. *Personal Security and Risk Reduction*
2. *Sexual Assault: Awareness and Impact*
3. *Sexual Assault: Reporting and Response*
4. *Bystander Intervention*
5. *Coping with Unwanted Attention*

The first four were rolled out in October 2011. The fifth was introduced in June 2014, along with a Safety and Security Supplemental Workbook and a Terminal Learning Objective (TLO) assessment to complement the five trainings. For a detailed description of these sessions, sequencing instructions, and allotted time of each session, see Appendix E.

### ***The Peace Corps developed SARRR trainings in accordance with Kate Puzey Act requirements.***

OIG found that the Peace Corps developed its sexual assault training in accordance with the Kate Puzey Act requirements: it incorporated available best practices, it consulted with experts in the sexual assault field, and it involved the Office of Victim Advocacy in the training design process.

#### *Available best practices informed the SARRR training.*

The Peace Corps’ sexual assault training conformed to available best practices in the sexual assault field, as required by the Kate Puzey Act. OIG found that during the SARRR training research and design process, the agency sought input from staff with relevant expertise, consulted with external sexual assault experts, and used other resources to identify relevant best practices. When the

As one sexual assault expert and former SAAC member pointed out, sexual assault training in the United States had only recently begun to gain attention and become more evidence-based at the time the Peace Corps was designing its SARRR training, and that best practices in this field were constantly evolving.

Sexual Assault Advisory Council (SAAC)<sup>13</sup> reviewed the SARRR training that the agency had updated in 2014, it determined “the training and materials were generally comprehensive and adhered to best practices in sexual assault awareness and response training.”

*The Peace Corps consulted with experts on sexual assault.*

The Peace Corps consistently consulted with experts on sexual assault and incorporated their recommendations into the training design, and had continued to consult with experts on sexual assault training. As of December 2015, the Peace Corps had consulted with more than 45 internal and external experts, including experts on its SAAC. In its reports to the agency from 2012 and 2015, the SAAC issued more than 25 recommendations related to Volunteer training.

The Kate Puzey Act recommended, but did not require, that the Peace Corps’ SARRR training “should be credentialed by a national victims assistance body.” The Peace Corps, with input from SAAC members, decided not to have its sexual assault training credentialed by a national victim’s assistance body because there was not an appropriate organization to credential the agency’s training. Members of the SAAC we interviewed agreed that the agency’s decision not to seek credentialing of the training was reasonable.

*The Peace Corps included the Office of Victim Advocacy in training design and revision.*

OIG determined that the Peace Corps had involved the OVA in the initial development of SARRR training, as required by the Act, and that recommendations from the office had been incorporated into revisions to the SARRR training sessions in 2014.

## **SARRR Training Design, Delivery, and Assessment Improvement**

***Sexual Assault Risk Reduction and Response training needed improvement in its design, delivery, and assessment.***

A few overseas staff we spoke to thought the SARRR training had been improved in 2014 with the addition of the session *Coping with Unwanted Attention*, among other changes. Volunteers in our focus groups also expressed appreciation for some of the participatory activities in the training, and remarked that the SARRR training conveyed to them that the Peace Corps took the problem of sexual assault seriously.

However, OIG determined the SARRR training needed improvement. Although the agency had designed the SARRR training to comply with the requirements in the Kate Puzey Act, we found that some Volunteers had not learned important information in the SARRR sessions, including:

- The difference between restricted and standard reporting
- Services available to a victim of a sexual assault
- How to report a sexual assault incident
- The role of Sexual Assault Response Liaisons and who the SARLs were at post

In addition, our discussions with Volunteers indicated that many of them did not hear or trust the key message staff had sought to convey throughout the SARRR sessions: that if a Volunteer

---

<sup>13</sup> Section 8D (a) and (c) of the Kate Puzey Act required the Peace Corps to establish an external sexual assault advisory council that would, among other tasks, review the agency’s SARRR training and policy “to ensure that such training and policy conform to the extent practicable to best practices in the sexual assault field.”

should become a victim of a sexual assault, they should report it and that the Peace Corps would support them.

OIG determined that the effectiveness of the SARRR training was impaired for three main reasons: the design and content of the training required improvements; facilitation skills of the trainers delivering SARRR sessions were often weak; and the way the Peace Corps assessed Volunteer learning of the training material did not provide a useful measure of training effectiveness. These topics are addressed in more detail below.

### *SARRR Training Design and Content*

The design and content of the SARRR training was hampered in four ways. It had been standardized and did not offer sufficient flexibility to posts to tailor it to the country-specific risks and related risk reduction strategies Volunteers needed; it was not integrated throughout training and Volunteer service; it was not responsive to the perceived needs of diverse Volunteers, including male and LGBTQ Volunteers;<sup>14</sup> and it did not sufficiently address the issue of sexual harassment.

*The SARRR training sessions were rigidly scripted and not tailored to the country of service.* The Kate Puzey Act required the Peace Corps to provide comprehensive sexual assault risk reduction and response training tailored to each country where Volunteers serve. This requirement created training design and delivery challenges for the Peace Corps. The agency faced the difficult problem of conveying a consistent message to Volunteers in more than 60 countries regarding the congressionally mandated elements of the SARRR training, while also tailoring the training to each country's unique sexual assault risk factors, gender relations, and legal system.

Tailoring SARRR training to the sexual assault risk factors of each country of service is important because studies have shown that the prevalence of sexual violence, in particular against women, varies according to local social norms about gender relations. A World Health Organization report on sexual violence found the risk of sexual violence varied from country to country and was influenced by local social norms:

#### **Social norms**

Sexual violence committed by men is to a large extent rooted in ideologies of male sexual entitlement. These belief systems grant women extremely few legitimate options to refuse sexual advances... Many men thus simply exclude the possibility that their sexual advances towards a woman might be rejected or that a woman has the right to make an autonomous decision about participating in sex.<sup>15</sup>

The Peace Corps designed standardized training sessions that included scripts for those delivering each session. The agency required all SARRR facilitators to follow the scripts when delivering sessions and provided the following guidance to all trainers:

---

<sup>14</sup> Volunteers who identify as lesbian, gay, bisexual, transgender, or queer.

<sup>15</sup> [World Report on Violence and Health](#), Chapter Six. Sexual Violence. World Health Organization. 2002.

To ensure that all trainees and Volunteers get the same information, it is critical that the Facilitator follow this session plan as presented here. Do not add or omit anything or otherwise deviate from the curriculum.<sup>16</sup>

After receiving feedback from post staff that the SARRR training was too rigidly designed and scripted, the agency changed the sessions' facilitation instructions in 2014 and specified in some SARRR sessions where posts could adapt the content for greater relevance to the host country and culture.

However, our evaluation indicated that the design of the SARRR training sessions and related guidance on delivering the training still did not provide sufficient opportunity for posts to tailor the training to the country of service as the law demanded. Except for the *Coping with Unwanted Attention* session, there were very few opportunities provided to posts to customize the sessions. The *Bystander Intervention* session had no opportunities for customization. Further, some staff we spoke to remained uncertain about whether or not they could deviate from the scripts they had been provided. One Director of Programming and Training observed that staff were reluctant to make any changes to the SARRR sessions: "Even though OSS has backed off a little, I still think there are some residual emotions behind it. Staff is still afraid of doing it wrong."

Multiple Volunteers reported to us that they had "tuned out" and not listened closely to the SARRR trainings because the scripted sessions caused them to lose interest. One Volunteer commented, "I had a hard time with the training because it felt very scripted." Another recalled how the facilitators would begin the session by apologizing for reading from the script and asking trainees to "bear with them." Volunteers in our focus groups reported that the use of scripts had created a barrier to listening and learning the information in the SARRR training, and had negatively affected the authenticity and credibility of the facilitator. As a result, some Volunteers had failed to learn the information in the SARRR sessions. By not tailoring SARRR training to the country of service, the agency was also not clarifying for Volunteers the variety of different risks that were present in the different environments where Volunteers serve.

*SARRR training was not integrated throughout Volunteer training and service.*

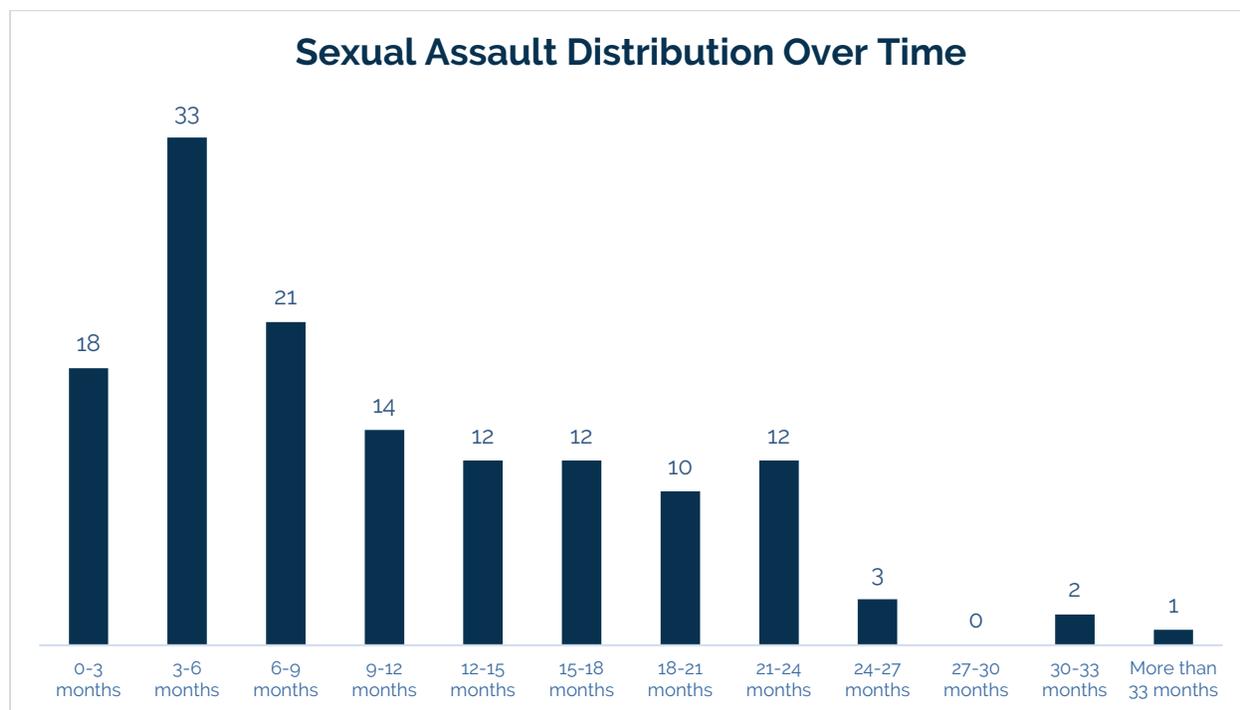
OIG assessed that another reason Volunteers did not learn the sexual assault training content was that the training was not designed in accordance with the agency's internal guidance for training design and evaluation. The SARRR training, which was delivered as standalone sessions during pre-service training, was not integrated with other training material, and was not revisited throughout the Volunteer's service. The agency's internal guidance stated that when designing trainings, staff should follow the training design and evaluation (TDE) process to integrate learning objectives and sequence them throughout the 27 months of Volunteer service. When followed, the TDE process reduces redundancies and incorporates training topics throughout each post's training curriculum so that different training components reinforce each other and available training time is used efficiently.

Data we analyzed through our review of sexual assault cases (to be discussed in detail later in this report) showed the importance of providing sexual assault training during pre-service training due to the higher risk of assault earlier in a Volunteer's service. As Figure 4 displays, Volunteers faced the highest risk of sexual assault within their initial nine months of service,

---

<sup>16</sup> *Personal Security and Risk Reduction for Volunteers and Trainees, Facilitator's Guide*. Spring 2012.

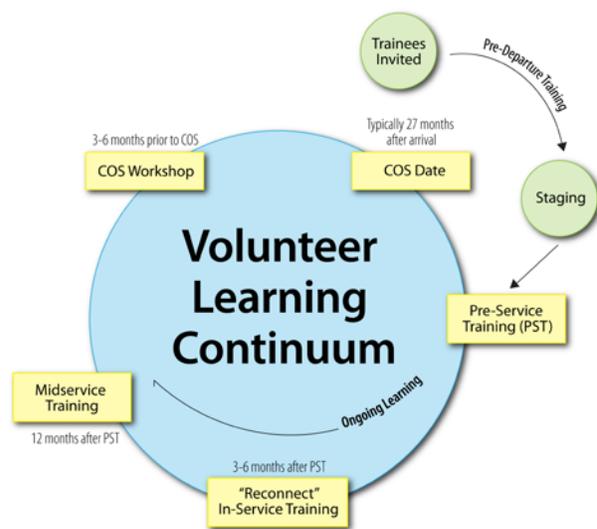
though some risk remained throughout service. Therefore, we assessed that it was important for the agency to provide the initial SARRR training during pre-service training, and to reinforce it subsequently throughout service.



**Figure 4.** Number of sexual assaults from the date arrived in country for service. The standard length of service is 27 months, some Volunteers choose to extend their service. n=138

The 27-month Volunteer Learning Continuum, which is represented in the graphic from the agency’s internal training guidance (see Figure 5), shows how Volunteer training is normally distributed across a series of training events throughout the Volunteer’s service.

During focus groups, several Volunteers said that when they received the SARRR training during pre-service training, they could not fully appreciate the importance of the content. One Volunteer told us that it had been difficult to grasp the relevancy of SARRR training, and that it was only later at site that the training’s importance became apparent. Peace Corps post staff also recognized the need to provide refresher training on the SARRR content.



**Figure 5.** Volunteer Learning Continuum. Source: The Peace Corps Programming, Training and Evaluation Guidance

The SAAC had also recommended that the Peace Corps integrate SARRR training throughout the 27-month Volunteer learning continuum. In 2012, the SAAC made multiple recommendations about extending training on sexual assault beyond pre-service training. A

committee member we interviewed in 2016 pointed out the need for the agency to provide Volunteers with refresher training during service, as Volunteers do not yet have a good understanding of the local culture or work context during pre-service training.

Some post staff had developed refresher training events to deliver during in-service trainings. These trainings tended to focus on how Volunteers could cope with unwanted attention at site. Overseas staff we interviewed expressed the need for Volunteer refresher trainings in order to reinforce key messages from the SARRR training. However, some staff believed that they did not have the authority to cover content on sexual assault in sessions that were separate from the standardized SARRR sessions. The agency had not provided guidance to staff concerning refresher training for Volunteers at other times during their service. As one SSM explained:

“I do not feel that I have the flexibility to do additional sessions on sexual assault whenever I want to. It is a sensitive topic and I don’t feel that I can make up another session about sexual assault and deliver it. I can talk about some related topics, but I don’t think that if a sexual assault training I developed went bad, I would have the support of the agency.”

In addition, staff and Volunteers we interviewed said that the SARRR sessions consumed too much training time during pre-service training and felt repetitive. As one Volunteer commented, “We had an enormous amount of sexual assault training. At a certain point it felt like they were just saying the same thing over and over.” Several staff members commented that the training took time away from other critical content, such as language, technical training, and other safety and security topics. Some field and headquarters staff had recognized the importance of integrating the SARRR training content into other pre-service training sessions and had attempted to do so. However, overseas staff responsible for training design and delivery wanted to have more permission and guidance from the Peace Corps to take the learning objectives and content of the SARRR sessions and integrate them into other language, cultural, or training sessions related to personal safety.

*SARRR training did not address risks specific to male and LGBTQ Volunteers.*

SARRR training effectiveness had been diminished because Volunteers did not see how the focus of the SARRR training was relevant to male and LGBTQ Volunteers. Generally, the SARRR training was focused on the experience of women assaulted during encounters with men. As a result, some male and LGBTQ Volunteers were disengaged during trainings and did not learn the necessary skills and information needed to identify and respond to the risks of sexual assault and harassment. Those risks can be unique and very severe in countries where violent intolerance of LGBTQ individuals is relatively commonplace.

During OIG’s interviews with survivors of sexual assault, several of the interviewees reported either that they did not remember anything from pre-service SARRR training or that they recalled it had not been helpful. One Volunteer commented, “I would kind of tune out a little bit, just because there was nothing for guys.” Another male Volunteer told us, “Men also face harassment. I wish I knew how to deal with it in a culturally sensitive way. I did not expect so much harassment as a guy.”

The SARRR trainings were written from the viewpoint of women in interactions with men. In OIG’s analysis of the genders and types of relationships represented in SARRR scenarios,

activities, and case studies, we found multiple gender neutral examples, as well as those featuring male-female interactions. But in every example in which genders were identified, the aggressor was male and the victim was female. There were no obvious examples of same-sex sexual assaults.

According to a note in the *Sexual Assault: Awareness and Impact* session, the sessions were written with the female pronoun because statistics indicate that women are the victims of most sexual assaults. However, the scenarios in the SARRR sessions that portrayed all sexual assault victims as women and all perpetrators as men did not help to facilitate discussion or reflection with male or LGBTQ Volunteers about their risks of sexual assault.

Some overseas staff members had recently voiced concerns to headquarters about the scenarios in the training sessions. Headquarters staff told us that the agency planned to address male and LGBTQ sexual assault risks in scenarios in future SARRR training revisions. The agency had also received feedback from the SAAC on this topic. In its 2015 report, the SAAC recognized the need for the Peace Corps to make the SARRR sessions more inclusive. It recommended that the agency “consider improvements to be made to its sexual orientation and gender identity-related training to ensure it supports the risk reduction and response needs of those potentially affected by [LGBTQ], sexuality, and/or gender issues.”

In addition, as fieldwork for this evaluation was being conducted, the agency was delivering Intercultural Diversity and Inclusion (ICD&I) workshops at posts. The purpose of these workshops was to cultivate cultural awareness and self-awareness among staff and promote equity and inclusion. Reports about the results of ICD&I training indicated that post staff believed the training had increased their capacity to support diverse Volunteers.

We identified three areas for improving the SARRR training design, which if implemented should address the barriers to learning we assessed through the evaluation.

**We recommend:**

3. That the Director clarify and support the process of tailoring training to the country of service, with a particular emphasis on incorporating culturally-specific information and expertise on gender and interpersonal relationships.
4. That the Director develop guidance for posts on integrating sexual assault risk reduction and response training into the pre-service training curriculum and 27-month Volunteer learning continuum.
5. That the Director clarify and support the process of customizing training specifically to address sexual assault risks for male and LGBTQ Volunteers.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendations 3, 4, and 5. The Office of Safety and Security will update the sexual assault risk reduction and response training to include instructions to incorporate country and culturally-specific information on gender and interpersonal relationships by October 2017. Multi-office working groups will update training and develop guidance for recommendations 4 and 5 by August 2017.

**OIG's reply:**

The Director's reply was fully responsive to the recommendations. The recommendations will remain open until the Peace Corps provides documentation that the actions have been taken.

In its response to recommendation 3, the agency did not clearly state that posts would be given greater flexibility to adapt and integrate the material locally using the agency's established training design and evaluation process. OIG believes that the agency's training design and evaluation process should inform its guidance and messaging to posts on how to integrate sexual assault risk reduction and response training throughout the entire 27-month learning continuum.

Recommendation 3's documents should also include an overview of the multi-layered communication strategy referenced in the agency's response, a list of experts consulted regarding international perspectives on gender-based violence, and instructions provided to posts on how to source culturally-specific information.

Recommendation 4's documents should include guidance, objectives, and instructions to posts regarding the safety planning exercises. In addition, the agency should include a description of how it expects overseas staff to provide feedback to Volunteers on areas that require additional training and skill-building. OIG encourages the agency to submit documentation for recommendation 4 that has been informed by its efforts to respond to recommendation 25, regarding staff capacity to talk sensitively and candidly to Volunteers about sexual assault risk identification and reduction strategies tailored to the country of service.

*The agency's SARRR training did not adequately prepare Volunteers to cope with sexual harassment.*

The Kate Puzey Act required the Peace Corps to develop and provide sexual assault risk reduction and response training that was “comprehensive.” In addition to the design issues described above, OIG concluded that the SARRR training lacked an important area of content: the risk of sexual harassment. Many staff and Volunteers in our focus group discussions spoke about the high levels of stress Volunteers experience due to frequent sexual harassment. Volunteers reported that some Volunteers had quit the Peace Corps in response to harassment.

Sexual harassment posed a risk to Volunteers but was not part of the SARRR program. The Peace Corps defined sexual harassment in the *Sexual Assault: Reporting and Response* session. However, the definition was generally limited to the context applicable to Equal Employment Opportunity rules: offensive conduct of a sexual nature between Volunteers, trainees, or Peace Corps staff in an employment setting. This definition did not encompass or consider harassment by other people living, working, or traveling in the same communities as the Volunteers.

The U.S. Department of Justice defines sexual violence as a group of crimes “including sexual harassment, sexual assault, and rape.” It specifies that sexual harassment includes a range of behaviors “from degrading remarks, gestures, and jokes to indecent exposure, being touched, grabbed, pinched, or brushed against in a sexual way.”

Both Volunteers and post staff reported that the Peace Corps did not adequately prepare Volunteers during training to deal with sexual harassment. The session *Coping with Unwanted Attention*, introduced in 2014, was designed to help Volunteers cope with a range of unwanted attention. While the session did include a case study on sexual harassment, staff and Volunteers expressed to us that the session overall did not directly deal with the problem of sexual harassment. The session primarily addressed verbal harassment, such as catcalls. Volunteers reported that they felt the session did not include sufficient opportunity to discuss sexual harassment coping strategies.

We found that some Volunteers did not know how or when to report sexual harassment to the Peace Corps. Furthermore, a few Volunteers told us that they felt reporting was a waste of time because there was nothing the agency could do to address sexual harassment in their communities. As a result, the Peace Corps was limited in its ability to help Volunteers who experienced sexual harassment. Staff explained to us that sexual harassment could often escalate into sexual assault. One Safety and Security Manager told us: “We explain in training that harassment can lead to sexual assault. The offender may be testing his

At one post, the Training Manager stated that prior to the roll out of the sexual assault training package, the post provided a more effective and extensive training on coping with sexual harassment. At another post, the Safety and Security Manager reported that he provided trainees information on sexual harassment coping strategies as a handout without discussion because there was not enough time given all of the required training during pre-service training.

boundaries.” Another Safety and Security Manager stated, “[harassment] usually doesn’t get reported until the issue gets out of the hands of the Volunteer.”

Because the SARRR training did not address the often pervasive risk of sexual harassment, Volunteers in our focus groups said the agency did not understand or appreciate the toll that constant harassment had on Volunteers. One Volunteer described constant sexual harassment as a form of trauma. Another told us that other Volunteers had elected to end their service early due to the stress of coping with sexual harassment.

**We recommend:**

6. That the Director define how the agency should address the problem of sexual harassment in relation to the sexual assault risk reduction and response program.
7. That the Director provide guidance and support to posts to integrate culturally appropriate training on sexual harassment into the Volunteer 27-month learning continuum.
8. That the Director provide Volunteers with clear guidance on how and when to report sexual harassment to the Peace Corps.

**The Peace Corps’ response to our recommendations:**

The Director concurred with recommendations 6, 7, and 8. Multi-office working groups will develop procedures and training to address the risk of sexual harassment, and will provide guidance for reporting sexual harassment by August 2017.

**OIG’s reply:**

The Director’s reply was fully responsive to the recommendations. The recommendations will remain open until the Peace Corps provides documentation on how sexual harassment will be addressed, integrated into training, and reported.

*Training Delivery*

*Some SARRR trainers had insufficient facilitation skills.*

In addition to the training design issues described above, we found that SARRR training effectiveness had been impaired by weak facilitation skills of some staff. While the official guidance allowed any qualified staff member to deliver the SARRR sessions, the responsibility

commonly fell to the designated staff, particularly the Safety and Security Managers and Peace Corps Medical Officers. Yet many Volunteers and staff reported that some of these staff members lacked the advanced facilitation and English language skills required to successfully deliver the SARRR sessions. Multiple Volunteers at the posts we visited complained that their PCMO or SSM was abrasive, didn't answer questions, made them uncomfortable, or was a bad public speaker. Several Volunteers characterized their facilitators' responses to questions and discussion about sexual assault risk reduction as preemptive victim blaming.

OIG assessed that these training delivery issues occurred because staff members without advanced facilitation skills were leading trainings on a complex, sensitive topic. In a few cases, trainers spoke in insensitive ways that led to Volunteers deciding not to pay attention or walking out of the session in protest. When this occurred, Volunteers did not learn the information in the session, and it negatively impacted their trust in post staff to respond to a sexual assault in a sensitive matter.

In addition, the agency had not provided clear guidance to non-designated, supervisory staff at post regarding oversight of the quality of SARRR training delivered by designated staff, especially the SSM or PCMO. At several posts we visited, the training staff had tried to improve the designated staff's facilitation skills, yet designated staff was not always receptive to those efforts. At one post, senior staff responsible for the quality of training had struggled to get the medical team to focus on improving their SARRR training delivery despite negative feedback from trainees. At another, staff explained that the designated staff did not always attend the post's annual workshop to improve the skills and preparation of staff facilitating SARRR sessions.

SARRR training delivery was also inconsistent because the agency's Medical Officers and Safety and Security Managers had been recruited primarily for their subject matter expertise, not their training experience or skills. Yet the agency lacked formalized procedures for improving the facilitation skills of staff delivering SARRR training.<sup>17</sup> In 2014, the Office of Health Services, with the support of the Office of Overseas Programming and Training (OPATS), dedicated the annual continuing medical education conference to training the trainers. More recently in 2016, OSS worked with OPATS to create a 15-hour facilitation skills training program that was delivered at the Safety and Security Manager Regional Conferences. At the time fieldwork was completed, the agency did not have plans to sustain these skill development trainings.

---

<sup>17</sup> In the [IG-14-07-E Final Report on the Program Evaluation of the Peace Corps' Training of Overseas Staff](#), OIG recommended "that the chief of staff develop and implement a process to conduct staff training needs assessments on an ongoing basis." At the time this report was issued, this recommendation was open.

At the time of fieldwork, the last training of trainers to build facilitation skills of overseas staff who provided the SARRR training to Volunteers occurred in 2011 and 2012. This training included Training Managers, Safety and Security Managers, and Directors of Programming and Training from each post. The training was intended to develop a team approach to delivery of the SARRR sessions, but SARLs and PCMOs were not included. Further, due to the Peace Corps' high staff turnover rate, many of the attendees had left the agency. Programming and training staff who had been hired since 2012 had not received similar training on their roles in the delivery of the SARRR sessions or how to take a team approach to these sessions.

The Office of Overseas Programming and Training's Intercultural Diversity and Inclusion workshops may improve post staff's ability to confidently facilitate sessions on sensitive issues. However, at the time of this evaluation, the workshop was not mandatory for all posts and staff attendance was determined by post leadership.

Several posts reported that the presence of American staff—particularly the Country Director or Director of Programming and Training—during the SARRR sessions helped ensure that trainees were receiving the intended message. These staff could monitor the quality of the training, provide greater authority and importance to the concepts covered, and help clarify trainees' questions to ensure that they received accurate answers.

When marginally skilled facilitators delivered the Volunteer SARRR sessions, it was easy for the training to have a negative impact on Volunteers. A misunderstanding or misinterpreted word or concept could offend Volunteers who were often particularly sensitive to the subject of the training. During focus group discussions, we heard of several examples of sessions in which a facilitation mistake had offended Volunteers and caused them to stop listening or walk out of the sessions. At one post, Volunteers from different cohorts reported opposite viewpoints on the effectiveness of the same SARRR sessions, the difference being which staff had delivered the session. As a result of facilitation errors, many trainees had lost trust in staff. OIG determined that such breaches in trust could result in Volunteers being less likely to report an assault during their service out of concern that they would be judged and not understood or supported by designated staff. As discussed above in the section about under-reporting of sexual assaults by Volunteers, nine posts represented nearly half of Volunteers who did not report their assault due to concerns about how staff would respond, or the potential adverse consequences of reporting.

### **We recommend:**

9. That the Director develop a plan to provide professional development opportunities to staff, including sexual assault response liaisons, to improve staff capacity in the delivery of sexual assault risk reduction and response training.
10. That the Director consider incorporating intercultural diversity and inclusion training in the agency's plan to

improve staff capacity to deliver sexual assault risk reduction and response training.

11. That the Director develop guidance to clarify the role of other programming and training staff at post in supporting the planning and delivery of sexual assault risk reduction and response training throughout the 27-month Volunteer learning continuum.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendations 9, 10 and 11. Multi-office working groups will identify and/or develop training opportunities for all staff. Appropriate intercultural diversity and inclusion training will be adapted for inclusion in sexual assault risk reduction and response training. Guidance will be developed to allow the staff with the best facilitation skills at overseas posts to deliver the sexual assault risk reduction and response training, while ensuring the designated staff remain involved with Volunteer training to reinforce the team-based approach that is used to respond to sexual assaults.

**OIG's reply:**

The Director's reply was fully responsive to the recommendations. The recommendations will remain open until the Peace Corps provides documentation that these actions have been taken.

***Volunteers who did not attend the SARRR sessions received inconsistent exposure to the sexual assault training.***

Recognizing that participation in SARRR trainings could be very difficult for some Volunteers, and concerned about the potential to unintentionally re-traumatize a Volunteer with a history of assault, the Peace Corps gave Volunteers the choice whether or not to attend the training with their group. Also, some Volunteers did not attend SARRR sessions due to other reasons such as illness. The Peace Corps expected Volunteers who decided not to attend group sessions to instead attend a one-on-one session to cover the SARRR training material, typically led by either their PCMO or SSM. However, we found that Volunteers who did not attend the SARRR group sessions had received inconsistent exposure to the sexual assault training, and may as a result have been poorly prepared to reduce their risk of assault or seek support from the Peace Corps.

Staff we interviewed expressed concerns about the lack of consistency in how the Peace Corps handled the problem of providing individualized SARRR instruction to Volunteers who did not attend the session with their training group. Some staff had made concerted efforts to provide

Volunteers with a thorough make-up session. Others acknowledged that sometimes Volunteers who had missed the sessions received little to no make-up training because staff had not followed up with the Volunteers who were absent from the session.

We found that an important reason Volunteers had received inconsistent exposure to SARRR training was that the agency had not clarified its guidance on how it expected overseas staff to provide make-up sessions. Staff expressed the need to have such guidance, especially for those Volunteers who had opted out of the SARRR training and were evidently highly sensitive to the topic area. Staff we interviewed explained that the SARRR sessions were all designed to work in a group setting, with group response and interaction with the topic. They were frustrated that the agency had only provided SARRR sessions that worked in a group setting, and expressed a need to have an alternative make-up session designed to match the needs of the individual learner who was absent from SARRR training.

OIG determined that it was important for the agency to provide guidance to overseas staff on how to conduct make-up trainings for Volunteers who did not attend SARRR sessions.

**We recommend:**

12. That the Director provide posts with alternative training guidance for Volunteers who do not attend sexual assault risk reduction and response sessions with their training group.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendation 12 and will provide guidance on how to conduct the sexual assault risk reduction and response training when a Volunteer misses group sessions by August 2017.

**OIG's reply:**

The Director's reply was fully responsive to the recommendation. The recommendation will remain open until the Peace Corps provides documentation on how the individual sexual assault risk reduction and response training will be conducted.

*Training Assessment*

*Training assessment was not sufficiently comprehensive.*

OIG determined that in order to address existing weaknesses in the SARRR training, which have been presented above, the agency would need to improve the way it assessed Volunteer learning of the SARRR training. The agency's approach to measuring Volunteer learning did not provide

a useful measure of SARRR training effectiveness, and as a result the agency had an inaccurate and incomplete understanding of the effectiveness of the training.

The Kate Puzey Act required the Peace Corps to establish goals, metrics, and monitoring and evaluation plans for its programs, including the SARRR program. While the agency established a monitoring and evaluation plan, as required, OIG found that the agency did not sufficiently monitor SARRR training effectiveness.

The Peace Corps' internal evaluation guidance uses a four-level model (the "Kirkpatrick Model") to evaluate Volunteer training. Each level is more time-intensive and requires more analysis than the one before (see Figure 6). The Peace Corps' goal was to assess Volunteer learning at Level 2, in order to know the extent to which Volunteers had learned the knowledge, skills, and attitudes the SARRR training was designed to achieve.

According to officials we interviewed in the Office of Safety and Security, the effectiveness of the SARRR trainings was assessed through a review of three sources of information: test scores of Volunteers related to the "terminal learning" objectives of the SARRR training; results from the agency's annual all Volunteer survey; and qualitative feedback on the SARRR training from staff. For different reasons, each of these sources of information did not provide the agency with a useful measure of SARRR training effectiveness.

**Terminal Learning Objective (TLO) Assessment.** The TLO Assessment was meant to test trainees' understanding of four of the five SARRR sessions: *Personal Security and Risk Reduction, Coping with Unwanted Attention, Sexual Assault: Awareness and Impact, and Bystander Intervention*.<sup>18</sup> The assessment consisted of 10 questions, and Volunteers were expected to score 80 percent or higher to demonstrate that they understood the material. Volunteers could take the test online or in-person. However, our analysis of the TLO assessment showed that it did not measure whether Volunteers had learned the material conveyed through SARRR trainings. Staff and Volunteers we interviewed said that the questions were too easy and the assessment scenario was not relevant to most Volunteers' experiences. Staff explained that the TLO assessment did not capture whether Volunteers were internalizing the information, nor test Volunteers' understanding of the content presented in the SARRR session.

In addition, the lack of a centralized Learning Management System made it difficult for headquarters to track whether or not all Volunteers had taken the TLO assessment. Agency officials reported to OIG that only 67 percent of Volunteers took the SARRR TLO assessment in 2015. When we reviewed documentation of training completion we were only able to confirm that 63 percent of posts had delivered the TLO assessment to Volunteers in 2015. When we asked why only two-thirds of Volunteers reportedly completed the TLO assessment, staff explained that offering posts the choice to deliver the Volunteer assessment using either an online or in-person test had created a difficult challenge in gathering accurate records of training completion.

---

<sup>18</sup> The TLO Assessment did not test Volunteers' comprehension of the *Sexual Assault: Reporting and Response* training.

**All Volunteer Survey (AVS).** The agency used AVS results to determine whether or not Volunteers reported having used some of the skills they were taught in SARRR trainings, including personal security awareness, sexual assault awareness, and bystander intervention skills. These survey results were meant to provide the agency with some evidence of training effectiveness at Level 3. The agency selected a target for AVS survey results: that at least 30 percent of Volunteers report having used each of the desired skills. However, the way the question was asked did not allow the Peace Corps to know the extent to which SARRR training had contributed to Volunteers' use of the skills.



Figure 6. The Kirkpatrick Model for evaluating effectiveness of training.

**Qualitative Feedback.** In 2015, the Peace Corps gathered qualitative feedback on the SARRR program from staff at a selection of posts. Staff involvement in this feedback process varied based on their interest. The agency did not have a process to gather and review feedback from Volunteers as part of its monitoring and evaluation plan. Several Volunteers in our focus groups expressed frustration that many of their suggestions on how to improve SARRR trainings were often not addressed, which they believed was due to the sessions' standardization for all countries. Headquarters staff we interviewed said that the Peace Corps should develop a way to collect feedback and suggestions from Volunteers on the SARRR training, particularly on whether or not Volunteers were applying the skills they had learned in training. While headquarters staff had sought feedback from staff at some posts, those discussions with staff had provided limited insight into concerns about or ways to improve Volunteer training.

In its 2015 SARRR Monitoring and Evaluation Report, the agency did not include Volunteer training—a primary means of reducing sexual assault risk—in the SARRR program's theory of change. Furthermore, the report's discussion of Volunteer training was limited to a brief discussion on how many Volunteers passed the TLO Assessment. The report made no recommendations related to Volunteer training and risk reduction.

In sum, OIG concluded that the agency's monitoring and evaluation plan was not sufficiently comprehensive and that it had provided agency managers with an incomplete and inaccurate understanding of the effectiveness of the SARRR training. Without a more comprehensive monitoring and evaluation approach that measures Volunteer learning and collects Volunteer feedback, the agency's ability to assess the effectiveness of the SARRR training and use the results to make improvements to it was compromised.

**We recommend:**

13. That the Director revise the terminal learning objective assessment to provide posts with a better understanding of Volunteers' comprehension of the content of the training.
14. That the Director implement and communicate a process that tracks Volunteer completion of specified learning events (both in person and online) and comprehension of the sexual assault risk reduction and response training on the agency's learning management system.
15. That the Director establish a process to utilize feedback from Volunteers and staff on how to improve the training.
16. That the Director establish a process to gather information on Volunteers' use of risk reduction and response skills taught in the training, and use it to make improvements to the training.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendations 13, 14, 15, and 16. The sexual assault risk reduction and response training team will revise the terminal learning objective assessment by August 2017. The Office of Safety and Security will implement a phased approach to improving completion and comprehension of training starting in January 2017 and will complete the work by October 2017. The sexual assault risk reduction and response training team will begin collecting feedback after the sessions have been updated in 2017 and anticipates the system will be in place by December 2018.

**OIG's reply:**

The Director's reply was fully responsive to the recommendations. The recommendations will remain open until the Peace Corps provides documentation supporting the actions taken on these recommendations.

# EVALUATION RESULTS OF THE PEACE CORPS' SEXUAL ASSAULT POLICY

---

The Kate Puzey Act required the Peace Corps Inspector General to evaluate the effectiveness and implementation of the agency's sexual assault and risk reduction policy, and to examine a statistically significant number of cases as part of the evaluation. This section of the report includes the results of OIG's evaluation of the agency's sexual assault policy. It begins with the results from our case review, which shed light on the agency's implementation of the Kate Puzey Act requirements.

In addition to assessing the agency's adherence to the Kate Puzey Act requirements through the case review, OIG evaluated the implementation and effectiveness of the Peace Corps SARRR program through other methods and interviews with staff, Volunteers, and external subject matter experts. These discussions provided insight into areas where the Peace Corps could improve its SARRR program. The presentation of the results from our case review is followed by our findings related to the overall effectiveness of the SARRR program.

There are eight services for victims of a sexual assault that the Peace Corps' sexual assault policy must include, as required by the Kate Puzey Act:

1. The option of pursuing either restricted or unrestricted reporting of an assault
2. Provision of a Sexual Assault Response Liaison (SARL) and Victim's Advocate to the Volunteer
3. At a volunteer's discretion, provision of a sexual assault forensic exam in accordance with applicable host country law
4. If necessary, the provision of emergency health care, including a mechanism for such volunteer to evaluate such provider
5. If necessary, the provision of counseling and psychiatric medication
6. Completion of a safety and treatment plan with the Volunteer, if necessary
7. Evacuation of such volunteer for medical treatment, accompanied by a Peace Corps staffer at the request of such Volunteer. When evacuated to the United States, such volunteer shall be provided, to the extent practicable, a choice of medical providers including a mechanism for such volunteers to evaluate the provider
8. An explanation to the Volunteer of available law enforcement and prosecutorial options, and legal representation

## CASE REVIEW

### Case Review Methodology

The purpose of OIG's case review was to determine if the services provided to Volunteers were consistent with the requirements in the Act and Peace Corps policy. There were 513 sexual assaults entered into the Peace Corps' Consolidated Incident Reporting System (CIRS) between

September 3, 2013 and September 29, 2015. A proportional random sample of 138 cases was selected from these 513 reported cases.<sup>19</sup>

OIG reviewed these 138 cases to determine if the eight services required by the Kate Puzey Act were offered to Peace Corps Volunteers who were victims of sexual assaults. The Kate Puzey Act also requires the Peace Corps to remove Volunteers from a site if there is a risk of imminent bodily harm. For the purpose of the case review, site change was treated as another service that the Peace Corps offered to Volunteers.<sup>20</sup>

The Peace Corps also contacted about 100 individuals from these 138 cases and requested permission for OIG to interview them about the support they received. Eleven people agreed to be interviewed. These interviews were conducted either by telephone (eight interviews) or by email (three interviews). The information from the interviews supplemented the case review information.

OIG attempted to assess, based on available documentation as well as the interviews with sexual assault survivors, if the agency's response had been in keeping with its commitment to provide "a compassionate and supportive response to all Volunteers who have been sexually assaulted."

## Case Review Results

In general, the required services were offered to almost every Volunteer who reported a sexual assault to the Peace Corps. OIG assessed that the documentation of the provision of most services usually showed that staff had offered and provided the requested services in a timely manner.

Some of the cases in the random sample were missing documents to verify that the Peace Corps offered and provided the required services. For example, there were 17 sexual assault cases that did not have the Volunteer Reporting Preference Statement (VRPS). The VRPS was the document used to record the services offered and requested by a sexual assault victim. Also, the Peace Corps was not able to provide documentation to validate the provision of some services (for example, counseling or medical care) in a few cases.

While these shortcomings were important, they did not create a meaningful impediment to the analysis of the 138 cases. It was possible to determine what services were offered, requested, and provided by examining medical records, Victim Advocate case management documents, safety and security accounts, or other supporting evidence such as emails. A lack of documentation did not mean the required services were not offered or provided, only that the Peace Corps was unable to provide evidence that those services were offered or provided.

Based on OIG's case review, the Peace Corps offered the required services to between 88 percent and 100 percent of Volunteers who reported their sexual assaults. Figure 7 details some of the required services, such as the restricted reporting option or the provision of a Victim Advocate, and the percentage of cases that were offered those services.

---

<sup>19</sup> Refer to the Objective, Scope, and Methodology section (Appendix A) for more information on the proportional random sample methodology.

<sup>20</sup> Refer to Appendix A.

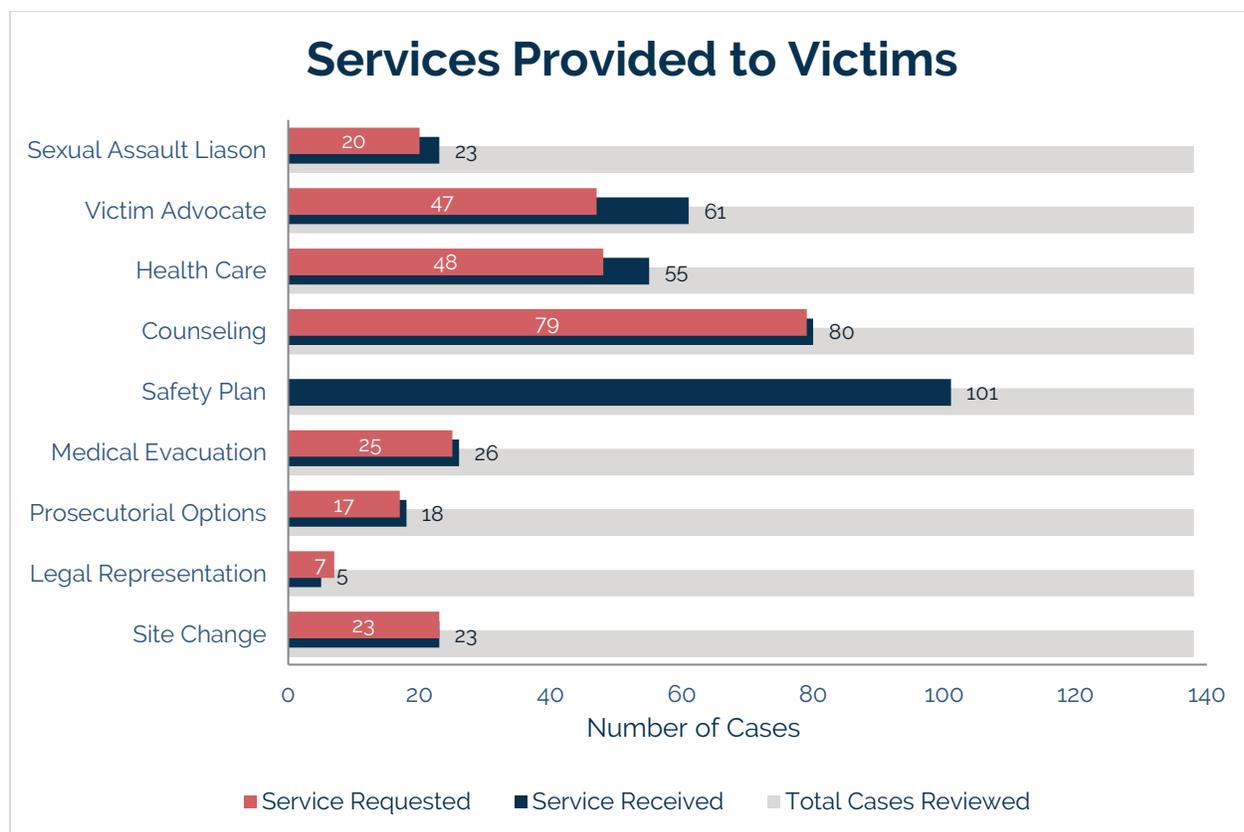
While almost every Volunteer that reported their sexual assault was offered the required services, not every Volunteer requested those services, as displayed in Figure 8. Some services, such as reporting to law enforcement, were used very infrequently. Several options were used slightly more often than they were initially requested, such as the provision of a Victim Advocate. This reflects a few individuals who initially declined the service but later requested and received that service.

There was one service, requested legal representation, which was provided less than it was requested. In two cases we reviewed, the documentation appeared to indicate the Volunteers had changed their minds about pursuing prosecution.

Safety plans were not required in every case. If, for example, a Volunteer was sexually assaulted during a vacation away from their country of service or far from where other Peace Corps Volunteers serve, the Safety and Security Manager might determine no serious or imminent threat existed that would require the development of a safety plan.



**Figure 7.** Percent of cases reviewed where required services were offered. The case review found Volunteers were offered services for the "eight plus one" service areas in 88 percent to 100 percent of cases. n=138



**Figure 8.** Number of cases in which Volunteers requested a service and the number of cases where the service was provided. The case review found the number of Volunteers to request services varied among types of service. n=138

However, there were cases where the Peace Corps did not meet its standard to “respond effectively and compassionately to Volunteers who have been victims of sexual assault.” Examples of such cases include:

- A case where post staff allegedly failed to respond to several reported sexual assaults from one Volunteer
- Several Volunteers who believed they were disenfranchised from discussions related to their continuation of service
- Volunteers who were unable to begin counseling in a timely manner
- Several cases where non-designated staff members were provided unnecessary details of a sexual assault
- Volunteers who believed that post staff had engaged in victim blaming behavior

Compared to the 2013 OIG case review, the Peace Corps markedly improved in documenting that the required services were offered, requested, and provided to Volunteers who had reported being sexually assaulted. In 2013, we noted that the lack of documentation and the need to rely on staff recollections created uncertainty and “made it difficult to determine whether the services had been offered.” The 2016 case review largely relied on standardized processes and forms to determine what services were offered, requested, and provided. While there were some missing documents in the 2016 case review, the amount of uncertainty decreased compared to the 2013

case review. OIG assessed that the standardization put in place through MS 243 *Procedures for Responding to Sexual Assault* had improved the consistency with which the agency responded to sexual assault victims.

## Restricted and Unrestricted Reporting

The Kate Puzey Act states that “the President shall develop and implement a comprehensive sexual assault policy that includes a system for restricted and unrestricted reporting of sexual assault.” The Act required the Peace Corps to create a system for reporting that allows the Volunteer to confidentially disclose the details of the sexual assault to only those individuals who are required for the provision of the mandated services. The Act also states that confidentially reporting a sexual assault will not automatically trigger an official investigation, unless specific exceptions apply. Under the reporting system the Peace Corps developed, Volunteers may file either a “restricted” or a “standard” report, depending on which response services they would like the agency to provide. According to MS 243 *Sexual Assault Risk Reduction and Response*, the agency treats all reports as restricted until the Volunteer decides to choose a standard report, and a Volunteer may elect to convert his or her restricted report to standard at any time.

In the 2013 case review, the Peace Corps had not initiated a process for offering restricted reporting or the provision of a Sexual Assault Response Liaison. In the 2016 case review, the Peace Corps’ policy and procedures were in place and included a standardized process across all posts. Volunteers elected to have a restricted report in 50 percent of the cases.

OIG found that the Peace Corps had adhered to the requirements of the Kate Puzey Act for providing the Volunteer the choice to submit either a restricted or a standard report in almost every case we reviewed. The Peace Corps provided the option of restricted or standard report to 136 of the 138 sexual assault cases in our review. The two cases that were not provided the option of a restricted report were communicated to the Peace Corps before the September 1, 2013 policy on restricted reporting was implemented. Twelve of the 69 restricted cases were subsequently converted to standard reports. Eleven of those were voluntary conversions and one was a mandatory conversion that resulted from a Peace Corps decision to change the Volunteer’s site because of a perceived security risk.

We found no evidence to indicate a systemic failure to allow the victim to determine if the case should be restricted or standard, but noted three cases where designated staff may not have fully complied with Peace Corps policy regarding providing the victim the choice of restricted or standard reporting.

Two of the 11 Volunteers we interviewed reported that their Country Director had been told about the sexual assault when the report was restricted. According to MS 243, Country Directors should not be provided the name or any details of a restricted sexual assault report. Agency policy is based on the Kate Puzey Act, which subject to a few exceptions, prohibits sharing the victim’s name or other personally identifying information with non-service providers. These Volunteers reported a decreased confidence in the Peace Corps’ program because of that breach of confidentiality.

## Sexual Assault Response Liaisons and Victim Advocates

The Kate Puzey Act required the Peace Corps to create a sexual assault policy that includes Sexual Assault Response Liaisons and a Victim Advocate. The Kate Puzey Act further “requires SARLs to immediately contact a Victim Advocate upon receiving a report of sexual assault in accordance with the restricted and unrestricted reporting guidelines promulgated by the Peace Corps.”

In the 2013 case review, the Peace Corps had not initiated a process for the provision of a Sexual Assault Response Liaison. In the 2016 case review, the Peace Corps’ policy and procedures were in place and included a standardized process to document that victims were offered access to a SARL at all posts.

The Peace Corps offered the support of a Sexual Assault Response Liaison in 130 of the 138 cases (94 percent). Fourteen percent of the cases requested SARL support (20 cases), but 17 percent of the cases received support from a SARL (23 cases). Of the eight cases that were not offered SARL services, we were unable to determine if a SARL had been requested in five cases, one case was reported after the Volunteer left service (and could not receive SARL support), and two cases were reported before the Peace Corps policy offering SARL support had been implemented.

Victim Advocate support was offered to 98 percent of the victims in both the 2013 and 2016 case review, though in 2013 the agency was unable to demonstrate how many Volunteers had received OVA services. In the 2016 case review the agency was able to show how many Volunteers had requested and received OVA services.

Our review determined that the Peace Corps offered support from the OVA in 135 of the 138 cases. Of these cases, 34 percent requested OVA support (47 cases), but 44 percent received OVA support (61 cases). Of the three cases that we determined were not offered OVA support, we were unable to determine if OVA support had been requested in one case. Two cases were reported before the Peace Corps had put in place a mechanism to demonstrate that OVA services had been provided.

Figure 9 below displays how long it took for OVA to contact the victim after the post was notified of a sexual assault for the 61 cases that received OVA assistance. There was one case where OVA was notified on a Friday by the Volunteer, but the post did not respond until Monday. Therefore, in that case, OVA was notified three days before the post. OVA responded on the same day that the assault was reported in 34 percent of cases (21 cases), 75 percent of the victims had been contacted by OVA within three days after the assault was reported (46 cases), and 95 percent of the victims had been contacted within 10 days (58 cases). There was no single reason for the delays after the fifth day; it was a combination of delays in the post notifying OVA and delays in OVA responding. We found no evidence of any systemic barriers or failures that prevented OVA from providing timely support to Volunteers.

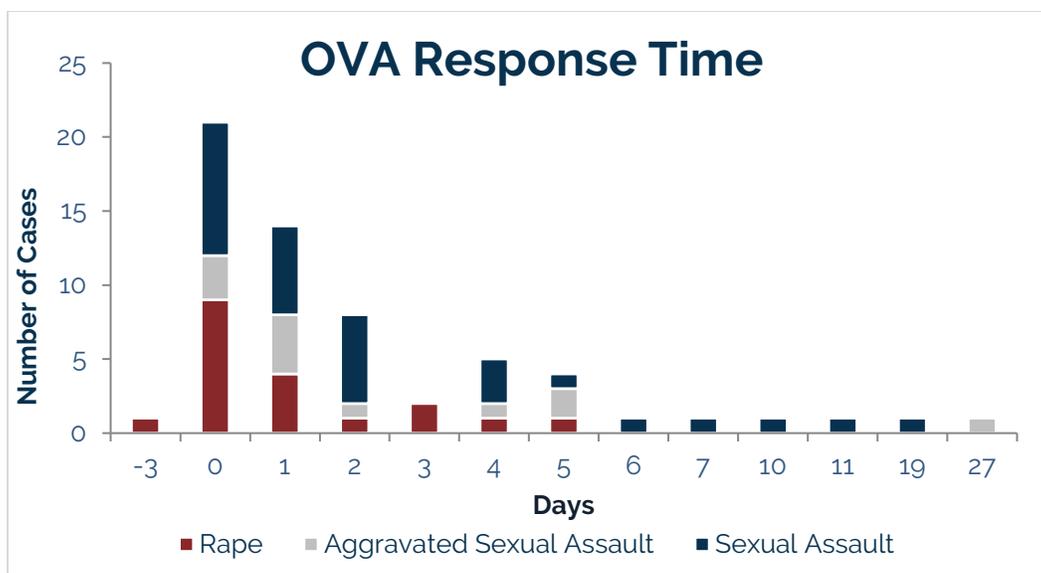


Figure 9. Number of days from when the post received notification of an assault to OVA contact with the victim. n=61

Delays in OVA involvement, when they did occur, could have negatively impacted the support provided to Volunteers. One Volunteer we interviewed mentioned that OVA was not able to contact her until after she had returned to her home of record for a medical evacuation. She had difficulty finding a counselor and was disappointed with the care that was provided. She was not aware that the Peace Corps had counselors on staff that were trained to provide “evidence-supported immediate post assault care.” It is possible that this Volunteer would have received more appropriate counseling care from the Peace Corps’ counselors than was provided at her home of record.

When OVA is engaged with the Volunteer early, it is able to help navigate the Peace Corps’ system of care. One Volunteer specifically mentioned that OVA was responsive and helpful, and the SARL was very compassionate.

The Peace Corps adhered to the requirements of the Kate Puzey Act in most cases. We found no evidence to indicate a systemic failure to provide either SARL or OVA services to Volunteers, but noted two cases where Peace Corps policy may not have been followed regarding the provision of OVA services.

***Peace Corps procedures for notification of OVA were not consistent with the requirement in the Kate Puzey Act.***

OIG noted a discrepancy between Peace Corps policy and the Kate Puzey Act with respect to notification of OVA. The Kate Puzey Act “requires SARLs to immediately contact a Victim’s Advocate upon receiving a report of sexual assault.” However, Peace Corps Manual Section 243 *Procedures for Responding to Sexual Assault* lists the immediate notification requirement as a duty of the PCMO. The Peace Corps’ notification procedures were based on the knowledge that Volunteers frequently did not request SARL involvement in their case.

The OVA supported changing the immediate notification requirement to be with the PCMO due to PCMOs’ consistent role in assisting the sexual assault victim. In addition, OVA stated that the

current process of having PCMOs provide the immediate notification to them worked. As we assessed in our case review, the practices used appeared to provide OVA with timely notification of an assault in most cases.

The Peace Corps' Office of General Counsel stated that this shift in responsibilities from the SARL to PCMO is in keeping with the intent of the law to ensure that OVA is always informed of all cases of sexual assault in a timely manner.

Nevertheless the Peace Corps' procedures are not consistent with the language in the Kate Puzey Act.

**We recommend:**

17. That the Director pursue a change in the language of the immediate notification requirement in Sec 8B (a) (3), of the Kate Puzey Act to allow any designated staff person to perform the immediate notification of the Victim Advocate.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendation 17 and has requested Congress consider this legislative proposal.

**OIG's reply:**

The Director's reply was fully responsive to the recommendation and OIG has closed this recommendation based on the actions taken. OIG commends the Peace Corps' proactive response to address this issue.

## Emergency Healthcare

The Kate Puzey Act requires the agency to provide emergency healthcare, if necessary, to a Volunteer who has been a victim of sexual assault. It also requires the agency to provide a mechanism for a Volunteer to evaluate the emergency healthcare provider.

A significantly higher percentage of Volunteers requested and received health care from the Peace Corps in the 2016 case review. Only 10 percent of the cases in the 2013 review received medical care, but 40 percent received medical care in the 2016 case review.

The Peace Corps offered to provide emergency health care in 136 of the 138 cases; one case was reported to the Peace Corps after the Volunteer had completed their service, and we were unable to determine if medical care had been offered in the second case. Thirty-five percent of the Volunteers requested health care (48 cases). However, health care was provided to 40 percent of the Volunteers (55 cases).

In both the 2013 and the 2016 case reviews, OIG was unable to determine if any of the Volunteers who received medical care were provided the opportunity to evaluate the provider as required in the Kate Puzey Act. While the Peace Corps does an anonymous health care satisfaction survey and also advertises the Quality Nurse Line, none of the 11 Volunteers we interviewed for the case review were aware of these feedback mechanisms. Furthermore, the Peace Corps may not be able to distinguish when a sexual assault victim has provided feedback (compared to a regular medical encounter) using these methodologies.

Three of the 11 Volunteers that we interviewed were dissatisfied with the medical care they received from the Peace Corps. They encountered victim blaming or uncompassionate care from their PCMO. However, there were two Volunteers that were satisfied with the quality and compassion of care provided by the PCMO.

We found no evidence to indicate a systemic failure to provide emergency healthcare to Volunteers.

### Provision of Counseling and Psychiatric Medication

The Kate Puzey Act requires the agency to provide counseling and psychiatric medication, if necessary, to a Volunteer who has been a victim of sexual assault.

A similar percentage of Volunteers requested and received counseling in both the 2013 and 2016 case reviews. In 2013, 51 percent of the Volunteers received counseling support; in 2016, 58 percent received counseling. However, in the 2016 case review OIG identified that some Volunteers had difficulty accessing counseling in a timely manner. While 69 percent of the Volunteers who requested counseling received it within two weeks, 14 percent had to wait four weeks or longer for care.

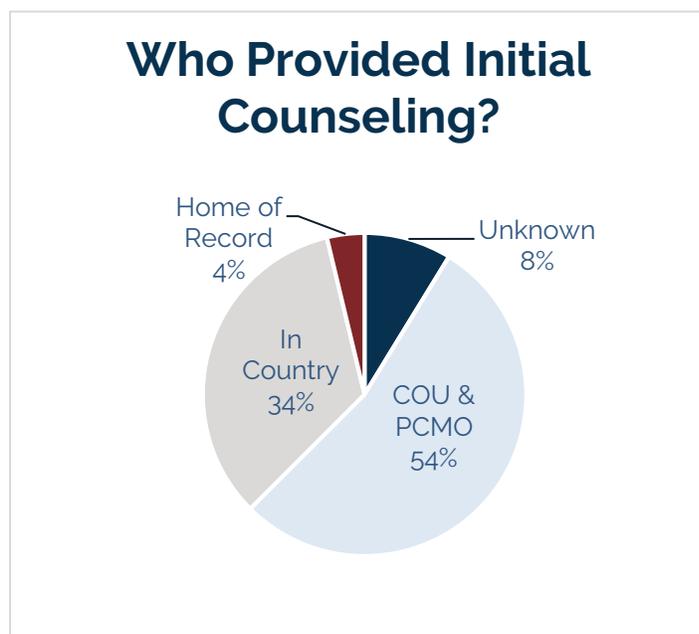
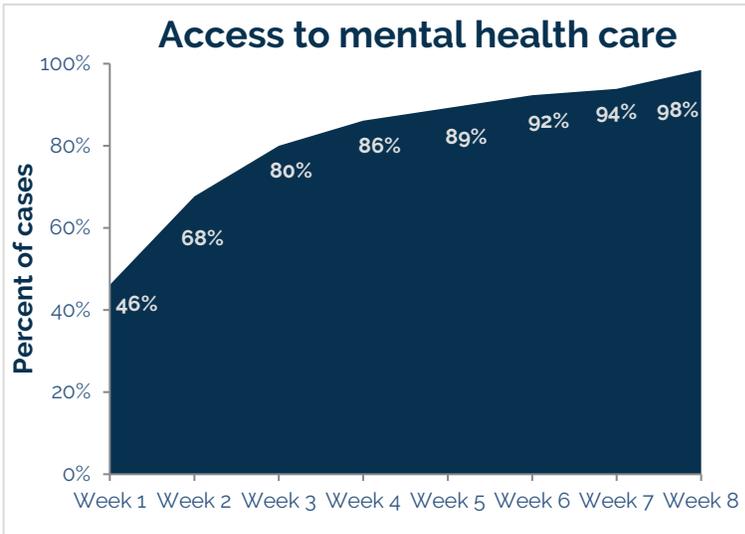


Figure 10. Source of first counseling session. n=80

The Peace Corps offered counseling to 138 Volunteers (100 percent). Fifty-seven percent requested counseling (79 cases), and 58 percent received counseling (80 cases).

Fifty-four percent of the Volunteers who received counseling received that care initially from the Peace Corps' Counseling and Outreach Unit or from a Peace Corps Medical Officer (43 cases). Thirty-four percent received their counseling from a Peace Corps contracted counselor in their country of service (27 cases). Four percent received their counseling at their home of record (three cases). In eight percent of the cases, OIG was unable to determine, based on available records, who provided counseling (seven cases).



**Figure 11.** Access to care: Number of days from requesting counseling to initial session. n=65

Figure 11 displays the time between the request for counseling services and when the first clinical mental health session was provided. This figure shows that 86 percent of the Volunteers who requested counseling began treatment within four weeks. However, 14 percent of the Volunteers waited more than four weeks. OIG was not able to determine the date of counseling in 14 of the 79 cases. Based on the documents provided to OIG, it was difficult to determine the reason(s) for these delays and no trends were identified.

There were six cases where psychiatric medications were prescribed to the Volunteer as part of the treatment plan (four percent). We did not identify any cases where psychiatric medications were denied to a Volunteer.

Two of the 11 Volunteers we interviewed mentioned the difficulty they had in receiving timely, quality counseling at their home of record during a medical evacuation.

Other Volunteers we interviewed were treated by the Counseling and Outreach Unit and were satisfied with the care they received. This included two Volunteers whose care was provided in the Washington, DC office and one Volunteer who used tele-counseling in their country of service.

However, one Volunteer who received care from the Counseling and Outreach Unit noted difficulty reaching the unit by phone because of host country communications limitations, and also commented that the final counseling session ended abruptly without closure.

Five of the 11 Volunteers interviewed received counseling services from someone in their country of service. Two of these Volunteers mentioned that they were very satisfied with the quality of care they received.

***The agency lacked access to care standards for mental health treatment.***

The Peace Corps issued Medical Technical Guidance 545 *Sexual Assault: Mental Health Assessment and Care* on September 1, 2013, which provides for evidence-based, trauma-informed care that meets the emotional needs of Volunteers who have been sexually assaulted. Section 6, “Psychological treatment in the immediate aftermath of a trauma,” states that “psychotherapy in the immediate post-trauma period (i.e., first days up to one-month post-trauma) may be helpful for some assault survivors.”

In discussions with current and former Volunteers, some noted they had experienced delays receiving their counseling services. One focus group member expressed that although they reported a sexual assault to the post's safety and security office in August, they were not able to start in-country counseling until December. The counselor commented on the psychological impact of this delay in their treatment summary note. As a result of the delay, the Volunteer was distressed, frustrated, and disappointed by the Peace Corps' apparent lack of support.

The delays in victims receiving timely counseling services was also impacted by the Peace Corps not having a timeliness standard for when a victim should receive mental health treatment following a sexual assault. While TG 545 states that counseling can be most helpful when started within a month after trauma, the guidelines do not specify a requirement for how quickly counseling should be provided after a victim has requested this service. Furthermore, there are no guidelines for Volunteers or staff on how to notify management if counseling services are not provided in a timely manner.

Without timely mental health care, the Peace Corps did not provide compassionate support to some victims who had requested counseling support. This frustrated those victims, delayed the victims' recovery, and may have undermined the credibility of the Peace Corps' SARRR program.

**We recommend:**

18. That the Director develop and implement mental health access to care timeliness standards for victims of sexual assault with a mechanism to notify management when these standards are not met.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendation 18 and will update Medical Technical Guideline 540 "A Resource Guide for the Clinical Management of Sexual Violence" to establish a standard for Volunteers to receive care from the Peace Corps' Counseling and Outreach Unit or in-country provider within 72 hours after a consult has been submitted by a Peace Corps Medical Officer. It will also establish a standard that Volunteers will travel within three to five days after deciding to receive a medical evacuation. The guideline will be updated by December 2017.

**OIG's reply:**

The Director's reply was partially responsive to the recommendation. The medical standards that are proposed are fully responsive. However, the reply did not fully

address the need for a mechanism for Volunteers or staff to notify management when the standards are exceeded. This mechanism is particularly important when a Volunteer is medically evacuated. While the Peace Corps does not have the ability to influence access to non-Peace Corps providers, it does have a responsibility to manage the care of Volunteers regardless of their location. If lack of access to care during medical evacuation adversely impacts the well-being of a Volunteer, Peace Corps management should be aware of that delay and take appropriate action. This report identified a lack of guidelines for Volunteers or staff to notify management when counseling was delayed.

Specifically, the Kate Puzey Act requires the Office of Victim Advocacy to “ensure that volunteers who are victims of sexual assault receive services...”<sup>21</sup> OIG believes that this office’s role in providing management oversight should be clearly defined in agency guidance.

Therefore, OIG would like for the Director to develop guidance on the mechanism for non-medical staff, such as the Office of Victim Advocacy, sexual assault response liaisons, and the sexual assault risk reduction and response program director, to notify management when the proposed standards are not met. This guidance should be included in the documents to be submitted to close the recommendation.

## Safety and Medical Treatment Plan

The Kate Puzey Act requires staff to work with a Volunteer who has been the victim of a sexual assault to complete a safety and a treatment plan, if necessary.<sup>21</sup>

The documentation of a safety plan was significantly better in the 2016 case review than it was in the 2013 case review. In 2013, OIG found that it “was difficult for us to determine whether the agency fulfilled this requirement in the 59 cases we reviewed.” In 2016, OIG determined that 73 percent of the cases had a documented safety assessment or plan.

The Peace Corps completed a safety plan for 73 percent of the reported sexual assaults in the sample (101 cases). This included 85 percent of the rape cases (23 cases), 71 percent of the aggravated sexual assault cases (12 cases), and 70 percent of the sexual assault cases (66 cases). OIG could not find any indication of systemic failures to conduct safety plans.

---

<sup>21</sup>According to the agency’s *Procedures for Responding to a Sexual Assault*, designated staff may determine that a safety plan is not necessary for a variety of reasons, including for example if there is no serious or imminent threat to the Volunteer’s health; the Volunteer does not live or work in close proximity to the offender; or the offender could not present a serious threat to the Volunteer or other Volunteers.

One of the Volunteers that was interviewed by OIG mentioned that the professional response provided by the Safety and Security Manager directly contributed to the Volunteer being able to complete their service. The SSM's understanding of the Volunteer's community and compassionate support enabled the healing process.

The development of a treatment plan was the same for both the 2013 and 2016 case reviews; every Volunteer who received medical care had a documented treatment plan. An additional seven cases were identified where a treatment plan was developed although medical care had not been provided. In these cases, the PCMO usually had developed a plan to follow-up with the Volunteer to check on their well-being and mental health.

We found no evidence to indicate safety and treatment plans, when necessary, were not developed.

### **Medical Evacuation**

The Kate Puzey Act requires the Peace Corps to provide evacuation for the purpose of medical treatment, accompanied by Peace Corps staff when requested by the Volunteer. It also requires the Peace Corps to provide the Volunteer, to the extent practicable, a choice of medical providers and a mechanism to evaluate the provider.

Significantly more Volunteers in the 2016 case review were medically evacuated. In 2013, seven percent of the Volunteers in the case review had been medically evacuated and all were rape victims. In 2016, 19 percent of the cases were medically evacuated; this included 48 percent of the rape cases, 35 percent of the aggravated sexual assault cases, and 7 percent of the non-aggravated sexual assault cases.

The Peace Corps provided medical evacuation to 19 percent of the Volunteers out of the 138 cases in the sample (26 cases). Documentation was provided that indicated that four Volunteers requested treatment from a specific provider, five did not request a specific provider, and we were unable to determine if a specific provider was requested in 17 cases.

There were Volunteers that had a positive medical evacuation experience; one commented that the staff at headquarters was fully supportive and compassionate. However, another Volunteer did not believe they received quality counseling at their home of record during their medical evacuation.

Two Volunteers accepted the Peace Corps' offer to have someone accompany them during their medical evacuation and nine Volunteers declined. OIG was unable to determine if accompaniment was offered in 15 cases. However, we found no evidence to indicate that the Peace Corps refused to provide accompaniment as required.

OIG was unable to determine if any of the Volunteers who were medically evacuated were provided the opportunity to evaluate the provider as required in the Kate Puzey Act. While the Peace Corps does an anonymous survey and advertises the Quality Nurse Line, we noted in interviews with Volunteers that few were aware of these feedback mechanisms. Furthermore, the

Peace Corps may not be able to distinguish when a sexual assault victim has provided feedback (compared to a regular medical encounter) using these methodologies.

### **Provide Applicable Law Enforcement and Prosecutorial Options**

The Kate Puzey Act requires that the Peace Corps' sexual assault policy provide victims of sexual assault with an explanation of legal and prosecutorial options, as well as legal representation.

Documentation of the explanation of law enforcement, prosecutorial options, and legal representation was decidedly better in the 2016 case review. In the 2013 case review, OIG found that "post staff generally did not document the conversations they held with Volunteers" on these options. In the 2016 case review, we had documentation in 88 percent of the cases that these options had been explained and that the Volunteer had decided which options they wanted to pursue.

The Peace Corps explained the available law enforcement, prosecutorial, and legal representation options to 88 percent of the 138 cases in the sample (121 cases). We were unable to verify if law enforcement, prosecutorial, and legal representation options were explained in the 17 cases that were missing the VRPS form.

There were 17 cases that notified local law enforcement of their sexual assault, and seven cases that requested legal representation.

Some Volunteers we interviewed did not believe that the Peace Corps helped them understand the legal system in their country of service or provided timely feedback on how to navigate the legal system. One Volunteer ultimately contacted a law professor from a university in the United States because of the delay in finding a suitable attorney in the country of service.

There was no evidence in our case review that the Peace Corps did not provide assistance with notifying local law enforcement or legal representation to the Volunteers who requested it. However, for two of the seven cases in which Volunteers requested legal representation, the Peace Corps was not able to engage the services of a local attorney in an expedited fashion (as mentioned above). In addition, as noted later in this report, some Peace Corps Medical Officers we spoke to during fieldwork did not think it was appropriate for the agency's *Procedures for Responding to Sexual Assault* to require them to explain to victims their prosecutorial options and how to report to local law enforcement.

### **Forensic Exams**

The Kate Puzey Act requires that the Peace Corps provide, at the Volunteer's discretion, the option of a sexual assault forensic examination (SAFE) in accordance with host country laws.

Very few Volunteers requested a SAFE in both the 2013 and 2016 case reviews. Only two percent of the 138 sexual assault cases in the 2016 case review requested a SAFE (three cases). This is consistent with Peace Corps technical guidance which states that forensic examinations should be conducted only for incidents of rape and aggravated sexual assault. The assault would have had to result in forensic evidence for the SAFE to be warranted.

There are different host country laws that govern SAFE processes. In some countries, a request for a SAFE may require law enforcement notification and investigation. Therefore, a Volunteer who wanted their report to remain restricted may not have been inclined to request a SAFE.

A SAFE should be conducted shortly after an assault has been reported. Depending on the host country laws, a SAFE may have to be performed within 72 hours to seven days. Therefore Volunteers who did not report their assault within their country's timeframe would have no reason to receive a SAFE.

There was no evidence that any Volunteer who requested a forensic examination was denied that examination.

### **Site Change, If Requested**

The Kate Puzey Act requires that “if a volunteer requests removal from the site in which such volunteer is serving because the volunteer feels at risk of imminent bodily harm [the Peace Corps] shall, as expeditiously as practical after receiving such request, remove the volunteer from the site.”

The 2013 case review did not assess the issue of site change. In the 2016 case review, the Peace Corps moved 23 Volunteers to a new site out of the 138 Volunteers in the sample (17 percent). Most of these site changes were at the request of the Volunteer, however we noted one case where the Volunteer wanted to stay at the site but post staff determined that a site change was warranted for safety and security reasons.

In general, the documentation showed that the Peace Corps often appeared to have accommodated Volunteers' requests to change sites for safety and security reasons. However, we did find cases where Volunteers were separated from the Peace Corps rather than relocated to another site. Frequently, these Volunteers stated that they felt disenfranchised from the discussions regarding their safety and continued service.

One Volunteer we interviewed stated that there were several security incidents, including several sexual assaults, which were reported to post staff without any action. After the Peace Corps Medical Officer became aware of the sexual assault, the Volunteer was temporarily removed from the site. The Volunteer was returned to their site after safety and security conducted a safety assessment, and was the victim of an attempted break-in that same night. The Volunteer then requested a site change, which was denied because staff was unable to find a suitable location in a timely manner. As a result, the Volunteer believed the Peace Corps had not provided a compassionate response to the assault.

OIG recently issued a management advisory report to the Peace Corps to draw attention to problems related to the management and use of site history file information, which has been a frequent subject of recommendations in our country program evaluation reports.<sup>22</sup>

One Volunteer stated that they requested a site change after four assaults, but was offered early separation instead. This Volunteer asserted they were not included in any post or Peace Corps

---

<sup>22</sup> The Peace Corps Office of Inspector General, [Management Advisory Report: Site History Files](#). August 24, 2016.

headquarters discussions related to their request for a site change. In this Volunteer's words, the "site change request was a failure."

Another Volunteer stated they were "largely left out of the conversation with post staff about having a site change" and that they felt "like developing a new site was my responsibility."

## Case Review Conclusions

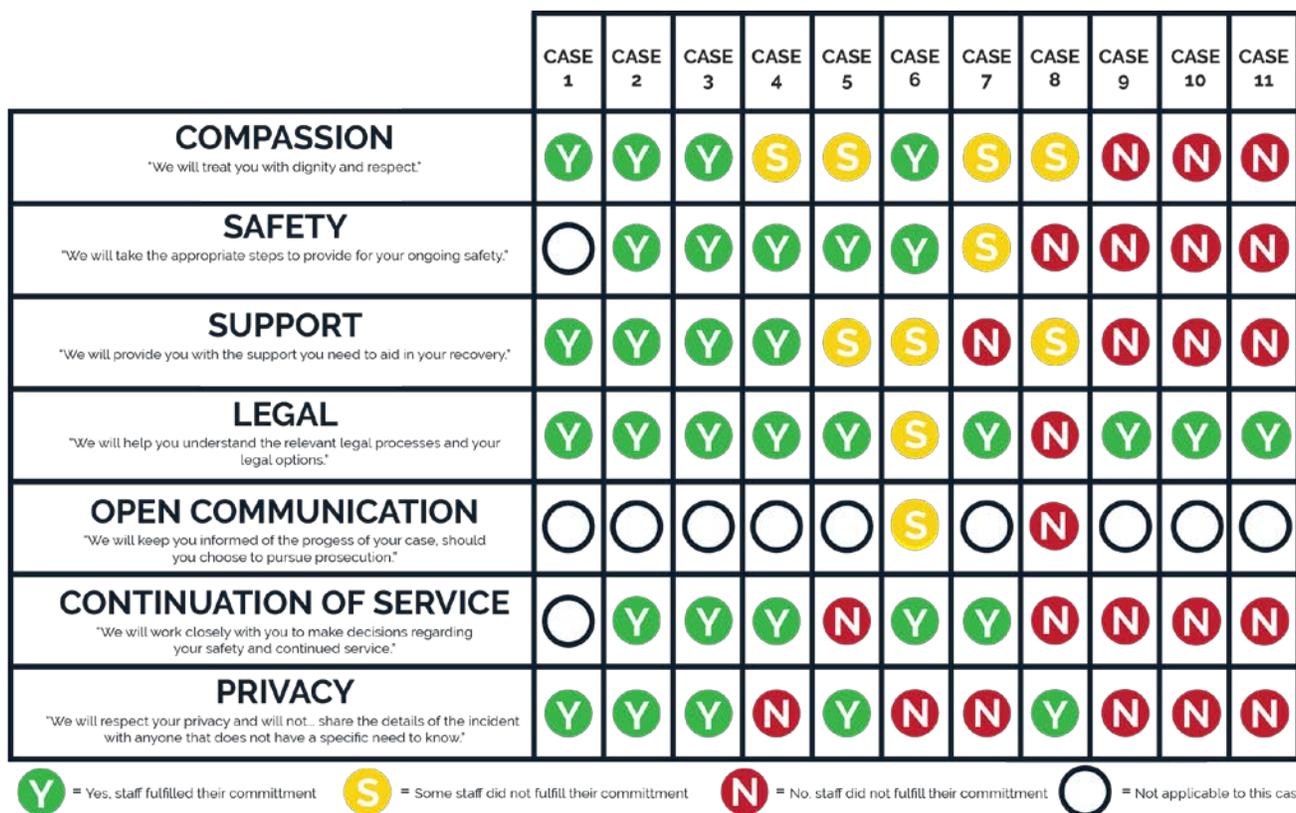
OIG concluded that the Peace Corps had improved its ability to ensure that the required services were consistently offered, requested, and provided to Volunteers who had reported being sexually assaulted.

However, there were cases where the Peace Corps did not uphold its commitment to respond effectively and compassionately to Volunteers who have been victims of sexual assault.

OIG concluded that the success or failure of the SARRR program hinged on the level of trust and confidence that Volunteers had in the Peace Corps' ability to manage their case compassionately and effectively. Effective sexual assault case management required clear roles and responsibilities, good communication, and teamwork in order to meet the agency's commitment to sexual assault victims to provide a compassionate and supportive response.

The table below summarizes the opinions expressed by the 11 Volunteers we interviewed for the case review using the *Peace Corps' Commitments to Sexual Assault Victims* from MS 243 *Procedures*.

For the purpose of this summary, a "Yes" response indicates the Volunteer expressed opinions indicating they felt the Peace Corps upheld its commitment to sexual assault victims. A "No" response indicates that the Volunteer did not believe the Peace Corps upheld the commitment. A "Some" response indicated that the Volunteer responded that some Peace Corps staff did uphold the commitment, while other staff did not.



**Figure 12.** Results of voluntary interviews with a sample of Volunteers whose sexual assault cases were included in the 138 cases of the case review. Volunteers were asked to assess each of Peace Corps’ seven commitments to victims of sexual assault and whether staff fulfilled their commitment. 100 individuals were contacted for interview, 11 responded and agreed to be interviewed.

Figure 12 illustrates the challenges of managing the Peace Corps’ response to a sexual assault. Three of the 11 Volunteers interviewed indicated that they felt the Peace Corps had fully upheld the commitments (Cases 1 – 3). Three other cases reported that the Peace Corps upheld at least three of the seven commitments (Cases 4 – 6), and one case had two of each response (Case 7). Four cases had between four and five “No” responses (Cases 8 – 11). Most cases had two or more areas where the Volunteer was dissatisfied with the Peace Corps’ response.

We note that the results from these interviews differed markedly from many of the findings in the Peace Corps’ Response Quality Survey. The July 2015 analysis of this Peace Corps survey indicated that 97 percent of the respondents reported that their confidentiality was respected, 85 percent reported that staff listened to the Volunteer, and 96 percent reported that the Peace Corps took their preferences into account when making decisions. Given the very different methodologies used by the Peace Corps in the Response Quality Survey and OIG as part of the case review, these two analyses should not be compared against each other.

## SARRR PROGRAM EFFECTIVENESS

### The SARRR Program Needed Improvement in Key Areas.

The Peace Corps' sexual assault policy generally complied with the requirements in the Kate Puzey Act. However, our evaluation of the effectiveness of the Peace Corps' sexual assault policy and procedures identified aspects of the program that should be improved, and required management attention. Specifically, our evaluation of the SARRR program found that its effectiveness could be improved in the following areas:

- Clearer roles and responsibilities for staff involved in the program
- A more comprehensive strategy to identify and reduce the risk of sexual assault, including improved monitoring and evaluation of risk reduction efforts
- Improved documentation of staff training completion
- Development of staff training requirements
- Effective communication on policy, specifically on policy changes

The General Accountability Office's *Standards for Internal Control in the Federal Government* outlines

the steps and processes an entity must follow to ensure that the agency effectively meets the objectives of its program. These controls include defining objectives, defining roles and assigning responsibilities, analyzing risk, and establishing monitoring activities.

### Clearer Roles and Responsibilities for SARRR Program Staff

The Peace Corps has defined the roles and responsibilities for staff involved in responding to sexual assaults. MS 243 *Procedures for Responding to Sexual Assault* includes detailed instructions to such staff at post and headquarters. Our evaluation found that the SARRR program's effectiveness could be enhanced if the roles and responsibilities of certain staff and offices were further clarified and leveraged. These roles included: the SARRR team lead or program director, the regionally-based Peace Corps Safety and Security Officers (PCSSOs),<sup>23</sup> SARLs, and the Office of Civil Rights and Diversity.

#### ***The agency lacked a permanent, senior SARRR team lead to manage the program.***

Based on lessons learned in the early years of implementing the SARRR program, the agency identified the need for a senior-level team lead position with responsibility to improve and oversee more effective coordination and communication among SARRR program team



**Figure 13.** Illustration of areas of responsibility covered by a Sexual Assault Response and Risk Reduction program director with oversight of the full SARRR program.

<sup>23</sup> The Peace Corps has ten PCSSOs based overseas who serve as safety and security resources to the posts in the sub-regions under their responsibility. PCSSOs provide overseas posts with guidance and training to implement a volunteer safety and security program that is appropriate for the local environment in accordance with agency policies and procedures.

members. In August 2014, the agency established a temporary senior program team lead for this purpose. Staff reported that the temporary team lead had made important improvements in the way SARRR team members collaborated in their sexual assault response efforts. Overseas staff we spoke to said that support they received from headquarters had improved. The acting SARRR senior team lead achieved these improvements without having formal decision-making authority. Agency leadership had recognized the key role that a senior SARRR program team lead played, and had made plans to make this position permanent. As this report was being developed the agency was in the process of hiring for the position.

**We recommend:**

19. That the Director designate a full-time program manager for the sexual assault risk reduction and response program.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendation 19 and has established the position and begun recruitment for a program director.

**OIG's reply:**

The Director's reply was fully responsive to the recommendation and has closed this recommendation based on the actions taken. The OIG commends the Peace Corps' proactive response to address this issue.

***Some staff with SARRR program responsibilities and expertise, in particular Sexual Assault Response Liaisons and Peace Corps Safety and Security Officers, were not utilized effectively.*** According to the Government Accountability Office's standards related to human capital management:

Only when the right personnel for the job are on board and are provided the right training, tools, structure, incentives, and responsibilities is operational success possible. Management continually assesses the knowledge, skills, and ability needs of the entity so that the entity is able to obtain a workforce that has the required knowledge, skills, and abilities to achieve organizational goals.

Our review found that some staff with SARRR program-related duties, in particular SARLs and PCSSOs, were under-utilized. Sexual Assault Response Liaisons were one of the three designated staff positions at post, but our case review showed that SARLs were not routinely involved in the agency's sexual assault response efforts.

Volunteers explained to us that they had not sought the services of SARLs primarily because they did not understand the SARL's role or know the SARL well enough to have established sufficient trust with them. SARLs often had roles at post that did not bring them into contact with Volunteers either during pre-service training or subsequently in terms of ongoing Volunteer

support. In addition, OIG concluded based on Volunteer focus group discussions that some Volunteers were reluctant to go to a SARL at their post because others would be able to deduce that they had been sexually assaulted.

The agency was aware that SARLs had not been utilized as originally envisioned by the Kate Puzey Act and staff told us that they were exploring ways to better engage SARLs with Volunteers at post.

Under the agency's SARRR program policies, PCSSOs—the main source of technical support for SSMs at post—were only allowed to advise SSMs on how to support a sexual assault victim who had filed a standard report. If a Volunteer elected to report their assault to the Peace Corps as a restricted report, the agency's policy did not allow PCSSOs to directly advise the SSM. Thus, for approximately 50 percent of all reported sexual assaults (all restricted cases), the agency's regionally-based security experts were unable to assist or oversee the quality of the response by the SSM in their region.

In those cases, the SSMs could seek guidance from two senior security specialists based in the Office of Safety and Security at the agency's headquarters. These headquarters security specialists had a strong background and experience handling sexual assault, and were widely regarded as being highly effective in their roles. However, the agency's PCSSOs usually had a closer working relationship with the SSM as well as the ability to respond more efficiently to the SSM's requests for support as a result of being positioned in the same region.

In 2015, Peace Corps modified its *Procedures for Responding to Sexual Assault* to allow PCSSOs to “review circumstances surrounding the sexual assault with the SSM and Designated Security Specialist to determine the extent of any serious or imminent threats to the safety of the Volunteer or others.” Nevertheless, one PCSSO we interviewed expressed frustration related to the PCSSO's limited role in responding to sexual assault:

“If we supported the SSMs in responding to sexual assaults, we could be more flexible and our responses would be more timely and accurate than headquarters-based staff. There are times when the SSM is in the office right next to me. I can tell something is going on, but the SSM can't come next door to ask for assistance. The problem is that we are training the SSMs on sexual assault, but we can't advise them when it is most important to help them. Also we are the tech supervisors, but we can't actually know anything about what they are doing when responding to sexual assaults.”

Several staff at Peace Corps headquarters and experienced SSMs at posts we visited stated they would like PCSSOs to be part of the designated SARRR team able to assist the response efforts for Volunteers who filed a restricted report. This would allow PCSSOs to advise SSMs at post, directly participate in case management, and lend their expertise and knowledge to the post and headquarters. One SSM we interviewed said the expertise the PCSSO could bring to the management of specific incidents concerning logistics, local police, and other factors could be very helpful. In addition, because PCSSOs support multiple posts and do not have a role in everyday post operations, their involvement would be less visible to victims and unlikely to discourage reporting.

**We recommend:**

20. That the Director assess and redefine, if necessary, the roles and responsibilities of sexual assault response liaisons to make more effective use of existing staff capacity.
21. That the Director continue to explore ways to better engage sexual assault response liaisons with Volunteers during pre-service training and as needed during service.
22. That the Director assess and redefine, if necessary, the role and responsibilities of Peace Corps safety and security officers to make more effective use of existing staff capacity.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendations 20, 21, and 22. The role of the sexual assault response liaison will be reviewed and their training updated to help prepare them to deliver relevant training sessions during pre-service training (and other points during the 27-month learning continuum).

The Director stated that the November 2015 update to *Procedures for Responding to Sexual Assault* allows the Peace Corps safety and security officers to be involved as a member of the consolidated agency response system team under certain circumstances.

**OIG's reply:**

The Director's reply to recommendations 20 and 21 was fully responsive. The recommendations will remain open until the Peace Corps provides documentation on actions taken, to include the results of the review that will be conducted on the role of the sexual assault response liaison.

The Director's reply to recommendation 22 was partially responsive. This report acknowledged the changes that were made to the *Procedures* in November 2015. However, our interviews with overseas post staff happened after this change had taken place and yet many of the overseas staff we interviewed requested the Peace Corps safety and security officers be given additional responsibilities.

OIG recommends the Peace Corps include questions addressing the role of the Peace Corps safety and security officers in its staff survey launched in August 2016 (recommendation 28) and reassess the effects of the most recent change to determine if the *Procedures* allow Peace Corps safety and security officers to provide adequate support to overseas safety and security managers.

***The role of the Office of Civil Rights and Diversity was not defined in the SARRR program.***

The role of the Office of Civil Rights and Diversity (OCD) in the SARRR program was unclear. Requesting an investigation by OCD was an option on the Volunteer Preference form, but OCD's role in responding to victims was not defined in SARRR-related policies and procedures. In addition, OCD staff we spoke to did not understand under what circumstances it would be appropriate for Volunteer sexual assault victims to seek their support.<sup>24</sup> The case review identified four instances when a victim requested an OCD investigation. Yet, in none of these cases was the offender a Volunteer or staff member, so no OCD involvement ensued. OIG assessed that the role of OCD needed to be more clearly defined within the SARRR program, and communicated to staff and Volunteers.

**We recommend:**

23. That the Director define and communicate the role of the Office of Civil Rights and Diversity in responding to sexual assaults.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendation 23 and the Peace Corps will update the *Procedures for Responding to Sexual Assault* to include information on the role of the Office of Civil Rights and Diversity.

**OIG's reply:**

The Director's reply to recommendation 23 was fully responsive. The recommendations will remain open until the Peace Corps provides documentation that the changes have been made and provides evidence for how it was communicated to headquarters and overseas post staff.

---

<sup>24</sup> While OCD's role is not defined in SARRR policy, the office is authorized under MS 645 to respond to an individual harassment complaint submitted by a Volunteer when the alleged offender is either a Peace Corps Volunteer or staff member.

## **A More Comprehensive Strategy to Identify and Reduce the Risk of Sexual Assault**

*The agency lacked a comprehensive strategy to identify and reduce the risk of sexual assault.*

To date, sexual assault risk reduction strategies had not been a sufficient focus of the SARRR policies or procedures. Existing policies and procedures emphasized response to individual victims of sexual assault. While some aspects of risk reduction were addressed through SARRR training for Volunteers during pre-service training, the agency's SARRR program did not take a sufficiently comprehensive approach to sexual assault risk reduction. In the following section we discuss some of the improvements that the agency could make to better identify and reduce the risk of sexual assault.

*Staff lacked guidance on how to manage site history files after a reported sexual assault.*

Maintaining site history files is one area where post staff reported the need for additional guidance from headquarters. Specifically, SSMs were unsure how to maintain Volunteer confidentiality when handling a restricted report of sexual assault while also ensuring that the post's site history files were accurate. Some SSMs had resorted to maintaining separate site history files that other staff did not have access to, others relied on their memories, and some included a simple note in the post's site history file that instructed staff to consult with the SSM about the security of the site. As a result of the lack of guidance about how to manage site history files and maintain the confidentiality of sexual assault victims, OIG determined that there was greater risk that program staff could make Volunteer placement decisions that inadvertently placed Volunteers in a site with a history of sexual assault.

### **We recommend:**

24. That the Director develop and communicate guidance for overseas staff on documenting site-specific security incidents in site history files while maintaining Volunteers' confidentiality, and on using the information in site history files as part of post's site vetting process.

### **The Peace Corps' response to our recommendations:**

The Director concurred with recommendation 24 and a multi-office senior working group will issue interim guidance by the end of December 2016, and will issue final guidance by September 2017.

### **OIG's reply:**

The Director's reply to recommendation 24 was fully responsive. The recommendations will remain open until the Peace Corps provides documentation that the guidance has been communicated to all overseas posts.

*Some overseas staff did not know how to discuss risk reduction strategies with sexual assault victims.*

Some Peace Corps staff reported to us that they were unsure how to talk to Volunteers about personal safety and risk reduction strategies without inadvertently using victim blaming language. When the agency developed the SARRR program, it implemented the program with a victim-centered approach with an emphasis on not blaming the victim. This initiated a cultural shift in how staff handled crime against Volunteers. For example, the agency revised the process for safety planning with Volunteers to encourage a Volunteer-led conversation with designated staff about strategies to enhance their safety. However, the unintended consequence of this cultural shift was that post staff reported being fearful of talking with Volunteers about topics such as the risks associated with alcohol misuse, for fear of being accused of victim blaming. Overseas staff had received limited guidance from headquarters on how to conduct these conversations while taking a victim-centered approach.

These conversations between post staff and Volunteers were difficult for both parties, and OIG assessed that additional guidance and skills development was required to help post staff have these discussions with Volunteers. A poorly managed conversation about safety could re-traumatize victims or result in a loss of trust between staff and Volunteers. While the Peace Corps had placed more emphasis on avoiding victim blaming language, it had yet to offer the same level of guidance on how to have productive discussions with Volunteers about improving their personal safety.

**We recommend:**

25. That the Director provide implementation guidance and training to improve overseas staff capacity to talk sensitively and candidly to Volunteers about sexual assault risk identification and reduction strategies tailored to their country of service, and about known risks to personal safety such as alcohol abuse.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendation 25 and the Peace Corps will train sexual assault risk reduction and response facilitators in the summer of 2017. The Peace Corps will also revise online training for all overseas staff to include additional sensitivity training.

**OIG's reply:**

The Director's reply to recommendation 25 was fully responsive. The recommendations will remain open until the Peace Corps provides documentation of the actions taken.

*Sexual harassment was not addressed in the SARRR program.*

As we have already noted, sexual harassment posed a risk to Volunteers but was not part of the SARRR program. Volunteers received training on coping with unwanted attention during their pre-service training. However, during our focus group interviews, many expressed needing additional strategies to deal with sexual harassment. We heard from Volunteers that intense sexual harassment had negatively affected their service and their psychological well-being.

By not sufficiently addressing sexual assault risk reduction, including the risks and effects of sexual harassment, the Peace Corps may compromise its ability to establish and maintain trust with Volunteers, which in turn may reduce Volunteer willingness to report sexual harassment and assault. OIG recommended above, when presenting our findings on the training provided to Volunteers, that the Director assess and define how the sexual assault risk reduction and response program should address the risk of sexual harassment.

*The agency's approach to monitoring and evaluating the SARRR program was not comprehensive or fully implemented.*

The Peace Corps was required by the Kate Puzey Act to “establish goals, metrics, and monitoring and evaluation plans for all Peace Corps programs.” They had developed a monitoring and evaluation plan for the SARRR Program, which is an annex to MS 243 *Procedures for Responding to Sexual Assault*. The Peace Corps also initiated the Response Quality Survey in July 2014. In addition, the Office of Safety and Security had published several monitoring and evaluation reports.

Two former members of the SAAC that we interviewed complemented the Peace Corps' monitoring and evaluation plan. One was impressed with the emphasis that the Peace Corps had placed on monitoring and evaluation; the other stated that the agency's SARRR evaluation plan was a strength of the program.

However, we found that the agency's monitoring and evaluation of the SARRR program could be improved to provide more information about the effectiveness of risk reduction and response efforts. The agency's monitoring and evaluation plan lacked risk reduction measures, individual and systemic case reviews, and mechanisms for staff and Volunteers to provide their feedback on the program's effectiveness.

The agency's monitoring and evaluation of the SARRR program did not yet include data on its risk reduction efforts. The Peace Corps stated in its 2015 SARRR monitoring and evaluation report that it had not tried to incorporate risk reduction in its SARRR monitoring and evaluation plan:

A systematic integration of the SARRR response elements with SARRR risk mitigation elements has not yet been attempted and many mitigation elements are not yet in the SARRR evaluation plan.

The importance of case reviews to the Peace Corps' SARRR program was articulated in MS 243 Annex XIV *Monitoring and Evaluation Procedures*: “Two forms of case review will be held to help ensure continued learning and a quality response.” Those included individual case reviews done by OVA and systemic case reviews conducted by the SARRR program team lead. However, the agency had not yet conducted case reviews at the time fieldwork was completed.

Another aspect of the agency's monitoring and evaluation plan was to help headquarters staff "determine which practices work in the field and how the needs of Volunteers who are victims of sexual assault can be balanced with the requirements of the Kate Puzey Act and policies necessary to protect the safety and security of the Volunteers and the Peace Corps."<sup>25</sup>

The Office of Safety and Security had collected feedback from staff through group phone discussions with select post staff and interviews with headquarters staff. The objective of these efforts was to understand implementation of the SARRR program in the field and collaboration at headquarters. Whereas this feedback provided valuable insight about the SARRR program, the agency's plan to collect feedback going forward was not clear. Field staff we interviewed were eager to provide their perspective and feedback on the SARRR program to headquarters.

To obtain feedback directly from Volunteers who had reported their sexual assault to the Peace Corps, the agency sent a survey that allowed Volunteers to rate the quality of the response they received from staff. The purpose of the survey was to measure Volunteer perception of the quality of the Peace Corps' response, and to inform the evaluation of the SARRR program. The Peace Corps decided not to interview Volunteers who were assaulted. However, an agency report about the SARRR program noted that, rather than relying solely on results from a survey, "a better approach is to plan complementary evaluation activities that use different methods," such as both surveys and interviews.

As OIG learned from interviewing Volunteers who were assaulted, Volunteers were willing to discuss both positive and negative aspects of the agency's response with the purpose of helping the agency to improve the SARRR program.

**We recommend:**

26. That the Director expand the monitoring and evaluation plan for the sexual assault risk reduction and response program to include sexual assault risk reduction measures.
27. That the Director conduct individual and systemic sexual assault case reviews, and involve monitoring and evaluation staff in the process.
28. That the Director develop a plan to improve the collection of feedback from Volunteers, post, and headquarters staff on the effectiveness of the sexual assault risk reduction and response program.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendations 26, 27, and 28. The Peace Corps re-initiated the inter-office case review process in August 2016, and has implemented an

---

<sup>25</sup> MS 243 *Procedures for Responding to Sexual Assault*, p. 96

online case management system in March 2016. The Peace Corps intends to develop a plan to collect additional feedback from Volunteers and staff, and conducted one staff survey in August 2016. These activities, along with other ongoing research, will inform future risk reduction monitoring and evaluation efforts.

**OIG's reply:**

The Director's reply to recommendations 26, 27, and 28 was fully responsive. The recommendations will remain open until the Peace Corps provides documentation that these actions have been taken, and also provides evidence that monitoring and evaluation staff will routinely be included on the review boards (such as a charter for these boards).

## **Improved Documentation of Staff Training Completion**

### ***The agency's documentation of staff training completion was lacking.***

The Kate Puzey Act requires that the agency train all of its overseas staff on its sexual assault policy and procedures. In a previous SARRR evaluation, OIG was unable to confirm that the agency had complied fully with this requirement. OIG has made several recommendations to improve the management of training records and the development of an agency-wide system to track training.<sup>26</sup> These recommendations remained open.

For this evaluation, we reviewed agency records to determine how effectively the Peace Corps was training overseas staff on the SARRR program. Our analysis of agency records showed that as of May 2016, approximately 58 percent of overseas staff had completed the SARRR training and passed the associated test. Records indicated that the agency was more likely to have evidence of SARRR training completion for staff in designated positions: 89 percent of current designated staff had successfully completed SARRR training.

While records indicated that the majority of designated staff had been trained, we identified two posts that did not have trained designated staff. Specifically, one post did not have a trained SSM and another was missing both trained PCMOs and SSMs. Seven of the 18 PCMOs who had not completed designated staff training started at the Peace Corps within six months of our June 2016 data analysis. These PCMOs had not taken the assessment test. Another six of these 18 PCMOs who did not take the assessment test did complete the 2015-2016 refresher training for designated staff and passed the designated staff refresher assessment test.

In 2015 through 2016, PCSSOs were providing all overseas staff with in-person SARRR refresher training. Records indicated that as of June 2016, approximately 95 percent of current

---

<sup>26</sup> *Final Report on the Program Evaluation of the Peace Corps' Training of Overseas Staff* (IG-14-07-E) and, *Final Evaluation Report: Peace Corps Volunteer Sexual Assault Policy* (IG-14-02-E)

designated staff had passed this refresher assessment test and 59 percent of all other staff had passed an assessment test.

Our review of training records indicated that in general, the more critical a staff member was to the SARRR program, the more likely that person was to have completed training. Designated staff—those with the most SARRR responsibility—had the highest training completion rates. The next highest training completion rates belonged to senior post leadership. The lowest training completion rates were associated with the remaining overseas staff.

OIG could not verify that all overseas staff had received SARRR training because the agency lacked a functioning learning management system to help staff track which overseas staff needed training and who had completed required training. OIG was not able to identify a complete list of overseas staff required to take SARRR trainings. The Peace Corps lacked a master list of all designated staff; SARRR training records were kept in multiple places; and there were multiple spreadsheets of training records maintained by OSS that contained outdated designated staff test results.

Without an adequate records system, the agency could not demonstrate all overseas staff had received SARRR training as required by the Kate Puzey Act. As a result of the agency's ineffective record keeping systems and processes, highly qualified training staff in OSS with responsibilities to design and deliver SARRR training were required to spend inordinate effort struggling to maintain accurate records related to staff training. This labor-intensive process had diverted technical training staff from their many job responsibilities and had not yielded accurate records. It impacted staff's ability to assess training needs and further enhance SARRR training sessions. One staff member stated:

“It would be nice to be able to run reports on who hasn't taken training and know what the universe of people are. Right now this is extremely labor intensive and there is no way to know if we are correct. It takes up half my time just to track, which is time I could be working to develop better training and assess the needs of the population.”

While working to close existing open recommendations regarding a learning management system, overseas staff training, and record keeping, the agency should make better use of its existing staff with expertise in sexual assault training.

**We recommend:**

29. That the Director dedicate additional administrative support to maintain accurate, up-to-date, centralized, and easily accessible overseas staff sexual assault risk reduction and response training records.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendation 29. The responsibility for tracking staff sexual assault risk reduction and response training will move to the Office of Staff

Learning and Development by September 2017, and that office will determine what additional administrative resources are required at that time. In the interim, the office of safety and security will receive temporary staff support.

**OIG's reply:**

The Director's reply to recommendation 29 was fully responsive. The recommendations will remain open until the Peace Corps provides documentation that these actions have been taken, to include evidence that temporary staff have been assigned to the Office of Safety and Security.

## **Develop Staff Training Requirements**

*The Peace Corps lacked a formal program to onboard and continuously train staff with SARRR responsibilities.*

Our 2013 SARRR policy evaluation<sup>27</sup> recommended that “the agency develop and communicate expectations for training newly hired overseas staff, including training methods and deadlines.” This recommendation remains open.

The Peace Corps had provided multiple SARRR trainings each year since 2011 for a variety of overseas staff, which had contributed to an organizational cultural change regarding sexual assault awareness and improved agency response to sexual assault incidents. However, we found that there was inconsistent onboarding and continuing education processes for critical SARRR staff positions. Furthermore, many individuals who were likely to step into designated staff roles as backup providers or temporary duty staff did not have any SARRR training requirements. While the content of the trainings received by critical staff positions covered the SARRR policies, staff needed additional training on the non-technical competencies (such as coaching skills and teamwork skills) to uphold the Director's commitments to sexual assault victims.

*Onboarding processes for designed staff were not standardized.*

The onboarding processes for designated staff were not standardized. While all designated staff were required to take and pass the same online *Designated Staff Post Assessment* test with a score of at least 80 percent following their participation in the in-person training, the material and training delivery was different for each of the designated staff positions. PCMOs had the most formal onboarding program, which included one-on-one mentoring, checklists of requirements, and in-person training. The SARL onboarding process included formal 40-hour in-person training to prepare for their responsibilities.

The SSM was the only designated staff position without a formal onboarding process. SARRR-specific training for SSMs was delivered by PCSSOs who travelled to posts to provide one-on-one training. However, PCSSOs had heavy workloads that sometimes prevented them from training new SSMs in a timely manner. The lack of a formal onboarding program for new SSMs raised the level of risk that an SSM would be poorly equipped to respond to a Volunteer

---

<sup>27</sup> *Final Evaluation Report: Peace Corps Volunteer Sexual Assault Policy* (IG-14-02-E)

reporting a sexual assault. In our case review, approximately 28 percent of victims initially reported their sexual assault to the SSM. The concern that SSMs may not receive designated staff training in a timely manner was echoed by a variety of staff in OSS. One PCSO stated:

“I am not stationed at each post, so I have to travel around to provide support, it can be hard to get to a post with a new SSM quickly. There can be a few months lag time from when they start till when I can visit them. I am worried in those cases, the SSM is in the position to make major decisions and they might not have the training or support to make those calls yet.”

Further, back-up SSMs and back-up PCMOs were also not part of designated staff and had no formal training program or assessment requirement.

*Training for temporary duty staff overseas was lacking.*

The Peace Corps often experienced gaps in senior post leadership positions. In order to fill these gaps, headquarters staff traveled to posts to fill in for a few weeks or months. There was no SARRR training requirement for these temporary senior post staff members, though permanent senior post leadership positions were required to take the *Sexual Assault Policy Overview* and *Sexual Assault Awareness and Victim Sensitivity* online courses and pass the associated online assessment tests within 30 days of entering on duty.

*More training to promote collaboration and interpersonal skills among designated staff was needed.*

Staff reported to us that while the focus of the SARRR training had been on the policies and procedures for responding to a victim of sexual assault, there was a need for additional material on interpersonal skills. The agency did provide onboarding sessions for PCMOs on how to support victims of traumatic crime that included scenarios and table-top exercises to improve PCMOs’ communication to Volunteers. Also, recent PCSO-delivered refresher trainings for designated staff highlighted the need for interpersonal skills when managing incident response and speaking with victims. Still, many staff we spoke to expressed a desire to expand this type of training, especially interpersonal skills and teamwork for designated staff. An OSS staff member who was familiar with the SARRR staff training commented that “everyone needs these soft skills” and that “all the rest of the training is useless if they [staff] can’t get along with Volunteers.” As OIG noted in the case review conclusions, effective case management required good communication and teamwork in order to meet the agency’s commitments to sexual assault victims.

A formal training program that included training on all needed skills was critical. Without the proper skills, staff may not have handled sexual assault cases with the necessary empathy, which may have hindered the victim’s recovery and discouraged Volunteers from reporting future incidents of sexual assault. Developing scenario-based, cross-functional training would allow designated staff to work together in a safe environment to better understand the process and responsibilities, and build trust between these critical SARRR roles, staff, and Volunteers.

*The SARRR training program lacked an organizational owner.*

The agency had not formally communicated training expectations for more than two years, and there was no owner of the training content. In August 2013, the acting Peace Corps Director issued a memo, *Final Rollout of Peace Corps’ Sexual Assault Risk Reduction and Response*

*Program*, that stated “all post staff and designated headquarters staff will be required to take online training on the new policies and procedures, and the Office of Global Operations (OGO) will be sending specific information on the online training to all staff members required to take the training.” On the same date, a subsequent memo from OGO was issued outlining staff trainings provided during 2013 and initial online training offerings to be completed by December 2013. However, OIG could not identify what the agency’s expectations were in terms of onboarding and continuing training for staff beyond these memos.

Because no office or individual owned the SARRR training program, each individual SARRR program office developed the content for their respective onboarding and continuing education training courses. Furthermore, OVA did not have a training specialist and relied on help from OSS to develop training materials for the SARL position.

The need for formal training extended to backup PCMOs, backup SSMs, and other temporary duty staff who could have SARRR response roles at post. *MS 261 Medical Offices and Peace Corps Medical Officers* was updated in June 2016 and required backup PCMOs to be used on a regular basis, which would increase the chances that a backup provider would be needed to process sexual assault cases.

**We recommend:**

30. That the Director develop a formal onboarding and continuing education training program for all designated staff positions.
31. That the Director define and communicate the expectations related to sexual assault trainings for all Peace Corps staff, to include training for staff temporarily filling an overseas position.
32. That the Director assess sexual assault staff training needs, to include interpersonal skills and teamwork, and modify training programs accordingly.
33. That the Director identify an appropriate staff position to provide oversight and coordination of sexual assault training for staff.

**The Peace Corps’ response to our recommendations:**

The Director concurred with recommendations 30, 31, 32, and 33. The Peace Corps will develop a formal onboarding process for all designated staff positions by August 2017. The Director will continue to define and communicate to all staff the expectations related to sexual assault, to include temporary duty staff, by November 2016.

The Office of Safety and Security surveyed designated staff in August 2016 on training needs related to interpersonal skills and teamwork, and training will be updated based on this feedback by August 2017.

The newly created position of sexual assault risk reduction and response program director will provide overall oversight of staff training, working with the training team, by August 2017.

**OIG's reply:**

The Director's reply to recommendations 30, 31, 32, and 33 was fully responsive. These recommendations will remain open until the Peace Corps provides documentation showing that the actions have been taken and communicated with headquarters and overseas staff.

### **Effective Communication on Policy, Specifically Changes to Policy**

*The agency lacked a policy roadmap and communication plan to keep staff accurately informed about their SARRR-related responsibilities.*

The SARRR program encompassed many policies and other forms of guidance that were interrelated and subject to periodic revisions. Following a recommendation from the 2013 SARRR policy evaluation,<sup>28</sup> the agency composed a document to detail the manual sections and interim policy statements comprising their comprehensive sexual assault policy. However, there were many other guidance documents that informed implementation, namely medical technical guidelines, safety and security instructions, and OVA scopes of practice not included in or connected to this document. Relevant manual sections and interim policy statements were missing, such as MS 114 *Delegation of Authority*, Attachment K, *the Kate Puzey Act*; MS 461 *Crimes Against Volunteers*; and IPS 2-15 *Respite Leave*.

We found that the agency's method of communicating policy changes and other guidance to posts via email was not effective. Staff reported that email correspondence from headquarters occurred frequently and was easy to overlook considering the volume of messages some staff received and the active nature of their jobs. One staff member suggested a phone call from headquarters or a conversation with their Country Director about the policy change as a way to reinforce the information, especially concerning its effect on their specific responsibilities. Staff also communicated their need for additional training activities, especially activities that strengthen teamwork with other designated staff, and reinforce their understanding of changes to SARRR policies or procedures that affect their responsibilities.

Without an overarching policy roadmap and communication plan, staff may be confused about the latest version of policy and changes in their responsibilities. For example, under previous versions of the response procedures, PCMOs were required to explain prosecutorial options to

---

<sup>28</sup> *Final Evaluation Report: Peace Corps Volunteer Sexual Assault Policy* (IG-14-02-E)

victims. That responsibility later transferred to SSMs, yet we spoke to PCMOs who believed that they were responsible for it and said the responsibility would be better placed with SSMs.

Another example of widespread policy confusion concerned the number of counseling sessions available to Volunteers following a sexual assault. The Peace Corps had several medical guidance documents related to the provision of counseling for Volunteers. One of them specified a limit for in-country counseling sessions for adjustment disorders.<sup>29</sup> Another document, which specifically addressed mental health counseling following a sexual assault, outlined a case-by-case approach that may take two to three months.<sup>30</sup> We found that staff and Volunteers had a mistaken belief that they were limited to six or fewer counseling sessions after a sexual assault. As a result, some PCMOs were providing incorrect information to Volunteers about the availability of counseling. We concluded that some Volunteer sexual assault survivors could be deterred from reporting their need for counseling for fear of exceeding a perceived limit of authorized counseling sessions, and facing the prospect of separation from the Peace Corps as a result.

We also encountered confusion among staff and Volunteers concerning other policies connected to the SARRR program, including the immunity policy, respite leave policy, the sexual misconduct policy, and third-party reporting policy.

In reviewing office level procedures, we found many documents that still referred to a previous version of the sexual assault response procedures. OIG determined that the agency required a policy roadmap and better communication to staff about the SARRR policies and procedures. The policy roadmap would help the agency to make its SARRR policies and procedures consistent with guidance for staff.

**We recommend:**

34. That the Director create and make available an overarching policy roadmap that encompasses all policies and procedures that support the sexual assault risk reduction and response program.
35. That the Director develop specific guidance to Peace Corps medical officers to clarify the standards and expectations for the provision of counseling services, and communicate that guidance to Volunteers.
36. That the Director develop an internal communication plan to notify staff in a more timely and consistent manner regarding policy changes, especially those affecting the job responsibilities of staff in sexual assault risk reduction and response program designated positions.

<sup>29</sup> TG 510 *Mental Health Assessment and Support*. July 2015

<sup>30</sup> Technical Guideline 545 *Sexual Assault: Mental Health Assessment and Care*. September 1, 2013.

**The Peace Corps' response to our recommendations:**

The Director concurred with recommendations 34, 35, and 36. The Peace Corps will update the existing policy overview document by July 2017.

A memorandum from the Office of Health Services to Peace Corps Medical Officers regarding the standards and expectations for counseling was sent to country directors on October 27, 2016. The new safety and security resource guide will include specific information on counseling services for Volunteers by August 2017.

The newly created position of Sexual Assault Risk Reduction and Response Program Director will work with various Peace Corps offices to develop an internal communication plan by July 2017.

**OIG's reply:**

The Director's reply to recommendations 34, 35, and 36 was fully responsive. These recommendations will remain open until the Peace Corps provides documentation showing that the actions have been taken.

## LIST OF RECOMMENDATIONS

---

### WE RECOMMEND:

1. That the Director prioritize closing Recommendation 1 in the Office of Inspector General's 2013 evaluation report (IG-14-01-E) related to ensuring that all applicants have received the most recent information on crimes and risks specific to their country of service.
2. That the Director improve the presentation of crimes and risks information (including qualitative information on the risk of sexual harassment) for applicants by making this information more accessible to all applicants and easier to understand.
3. That the Director clarify and support the process of tailoring training to the country of service, with a particular emphasis on incorporating culturally-specific information and expertise on gender and interpersonal relationships.
4. That the Director develop guidance for posts on integrating sexual assault risk reduction and response training into the pre-service training curriculum and 27-month Volunteer learning continuum.
5. That the Director clarify and support the process of customizing training specifically to address sexual assault risks for male and LGBTQ Volunteers.
6. That the Director define how the agency should address the problem of sexual harassment in relation to the sexual assault risk reduction and response program.
7. That the Director provide guidance and support to posts to integrate culturally appropriate training on sexual harassment into the Volunteer 27-month learning continuum.
8. That the Director provide Volunteers with clear guidance on how and when to report sexual harassment to the Peace Corps.
9. That the Director develop a plan to provide professional development opportunities to staff, including sexual assault response liaisons, to improve staff capacity in the delivery of sexual assault risk reduction and response training.
10. That the Director consider incorporating intercultural diversity and inclusion training in the agency's plan to improve staff capacity to deliver sexual assault risk reduction and response training.
11. That the Director develop guidance to clarify the role of other programming and training staff at post in supporting the planning and delivery of sexual assault risk reduction and response training throughout the 27-month Volunteer learning continuum.

12. That the Director provide posts with alternative training guidance for Volunteers who do not attend sexual assault risk reduction and response sessions with their training group.
13. That the Director revise the terminal learning objective assessment to provide posts with a better understanding of Volunteers' comprehension of the content of the training.
14. That the Director implement and communicate a process that tracks Volunteer completion of specified learning events (both in person and online) and comprehension of the sexual assault risk reduction and response training on the agency's learning management system.
15. That the Director establish a process to utilize feedback from Volunteers and staff on how to improve the training.
16. That the Director establish a process to gather information on Volunteers' use of risk reduction and response skills taught in the training, and use it to make improvements to the training.
17. That the Director pursue a change in the language of the immediate notification requirement in Sec 8B (a) (3), of the Kate Puzey Act to allow any designated staff person to perform the immediate notification of the Victim Advocate.
18. That the Director develop and implement mental health access to care timeliness standards for victims of sexual assault with a mechanism to notify management when these standards are not met.
19. That the Director designate a full-time program manager for the sexual assault risk reduction and response program.
20. That the Director assess and redefine, if necessary, the roles and responsibilities of sexual assault response liaisons to make more effective use of existing staff capacity.
21. That the Director continue to explore ways to better engage sexual assault response liaisons with Volunteers during pre-service training and as needed during service.
22. That the Director assess and redefine, if necessary, the role and responsibilities of Peace Corps safety and security officers to make more effective use of existing staff capacity.
23. That the Director define and communicate the role of the Office of Civil Rights and Diversity in responding to sexual assaults.
24. That the Director develop and communicate guidance for overseas staff on documenting site-specific security incidents in site history files while maintaining Volunteers' confidentiality, and on using the information in site history files as part of post's site vetting process.

25. That the Director provide implementation guidance and training to improve overseas staff capacity to talk sensitively and candidly to Volunteers about sexual assault risk identification and reduction strategies tailored to their country of service, and about known risks to personal safety such as alcohol abuse.
26. That the Director expand the monitoring and evaluation plan for the sexual assault risk reduction and response program to include sexual assault risk reduction measures.
27. That the Director conduct individual and systemic sexual assault case reviews, and involve monitoring and evaluation staff in the process.
28. That the Director develop a plan to improve the collection of feedback from Volunteers, post, and headquarters staff on the effectiveness of the sexual assault risk reduction and response program.
29. That the Director dedicate additional administrative support to maintain accurate, up-to-date, centralized, and easily accessible overseas staff sexual assault risk reduction and response training records.
30. That the Director develop a formal onboarding and continuing education training program for all designated staff positions.
31. That the Director define and communicate the expectations related to sexual assault trainings for all Peace Corps staff, to include training for staff temporarily filling an overseas position.
32. That the Director assess sexual assault staff training needs, to include interpersonal skills and teamwork, and modify training programs accordingly.
33. That the Director identify an appropriate staff position to provide oversight and coordination of sexual assault training for staff.
34. That the Director create and make available an overarching policy roadmap that encompasses all policies and procedures that support the sexual assault risk reduction and response program.
35. That the Director develop specific guidance to Peace Corps medical officers to clarify the standards and expectations for the provision of counseling services, and communicate that guidance to Volunteers.
36. That the Director develop an internal communication plan to notify staff in a more timely and consistent manner regarding policy changes, especially those affecting the job responsibilities of staff in sexual assault risk reduction and response program designated positions.

## APPENDIX A: OBJECTIVE, SCOPE, AND METHODOLOGY

---

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

The Evaluation Unit provides senior management with independent evaluations of all management and operations of the Peace Corps, including overseas posts and domestic offices. OIG evaluators identify best practices and recommend program improvements to comply with Peace Corps policies.

### OBJECTIVE

OIG's Evaluation Unit announced its evaluation of the Peace Corps' sexual assault risk reduction and response program on November 9, 2015. We used the following researchable questions to guide our work:

- Has the Peace Corps implemented Sexual Assault Risk Reduction and Response training for Volunteers, and provided information to applicants, as required by the Kate Puzey Act?
- How effective is Peace Corps SARRR training for Volunteers?
- Has the Peace Corps implemented policy required by the Kate Puzey Act?
- How effective are the agency's SARRR program policies and procedures?
- Are the services provided to Volunteers consistent with the requirements in the law and Peace Corps SARRR policy, as determined through OIG's case review?

### SCOPE

The scope of the evaluation primarily emphasized policy and program changes implemented by the Peace Corps since the conclusion of the fieldwork on June 30, 2013 for the previous OIG SARRR reports.

### METHODOLOGY

We conducted our fieldwork from November 2015 through August 2016, and included 58 interviews with agency managers and staff in the offices of: Safety and Security, Health Services, Overseas Programming and Training Support, Global Operations, Victim Advocacy, Volunteer Recruitment and Selection, Peace Corps Response, General Counsel, and other offices. In addition, we interviewed outside experts in the field of sexual assault risk-reduction and response, members of the Sexual Assault Advisory Council, and other stakeholders interested in the Peace Corps' program.

We visited six countries (Morocco, South Africa, Mozambique, Guatemala, Peru and Paraguay) based on the high number and types of reported sexual assaults relative to other countries where

Peace Corps operates. We interviewed 69 staff and 72 Volunteers at those posts. We held focus group meetings with Volunteers in these countries to discuss the agency’s SARRR program including the training they had received, and the Volunteers’ perspectives on the policies and procedures to support and respond to Volunteers who report a sexual assault. We interviewed staff concerning the agency’s sexual assault response program, policies, procedures, and related training.

One of the five objectives of the 2016 OIG’s Kate Puzey Act evaluation was to determine, through case reviews, if the services provided to Volunteers were consistent with the requirements in the law and Peace Corps Policy.

There were 513 sexual assaults entered into the Peace Corps’ Consolidated Incident Reporting System between September 3, 2013 and September 29, 2015. The distribution of these reported sexual assault cases by type of assault is portrayed in Figure 14.

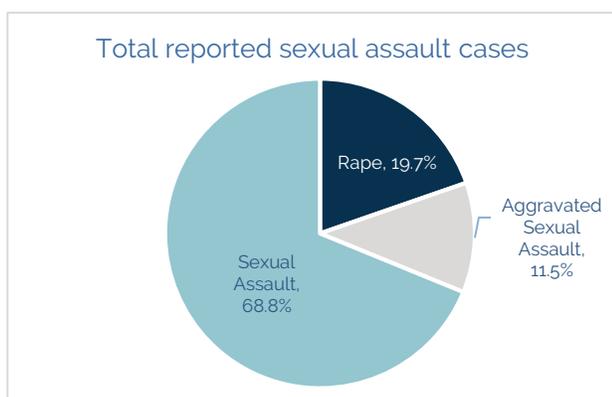


Figure 14: Types of sexual assaults (N=513)

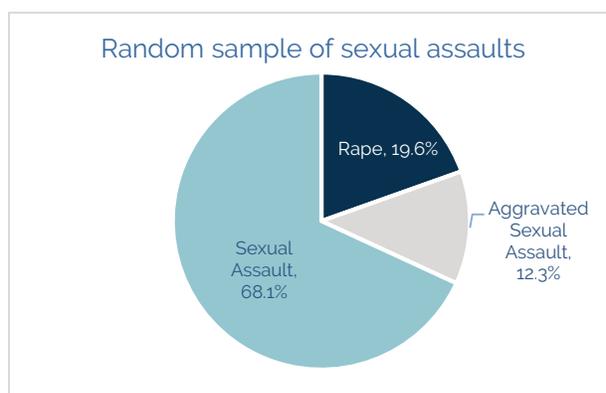


Figure 15: Random sample of sexual assaults (n=138)

A proportional random sample of 138 cases was selected from these 513 reported cases. The distribution of these randomly selected sexual assault cases is portrayed in Figure 15. The proportional random sample was based on type of sexual assaults, and not on other factors such as gender or country of service. This proportional random sample provided a 95 percent confidence interval (95 percent CI) with a margin of error of five percent (+/- 5 percent).

OIG reviewed these 138 cases to determine if the eight services required by the Kate Puzey Act were offered to Peace Corps Volunteers who were victims of sexual assaults. The Kate Puzey Act also requires the Peace Corps to remove Volunteers from a site if there is a risk of imminent bodily harm. For the purpose of the case review, site change was treated as another service that the Peace Corps offered to Volunteers. The Peace Corps OIG identified 64 data elements associated with the “eight plus one” Kate Puzey Act required services.

We encountered several limitations to the data used in the case review analysis. These limitations, while meaningful, did not provide an insurmountable impediment to our analysis. We found three broad areas of limitations:

- Denial of access to restricted reporting information

- Redacted reports
- Limited number of interviews

OIG relied on the Peace Corps to provide all safety and security, medical, legal, OVA, and other related documents and emails. OIG had no independent means of verifying that all relevant documents were provided. Also, there were certain documents missing from some cases. As previously mentioned, there were 17 cases that were missing the Volunteer Reporting Preference Statement. When missing documents were identified, OIG asked the Peace Corps to conduct a verification of their files. Despite the impasse over access to restricted reporting information, the Peace Corps appeared to be very responsive and forthcoming in their efforts to support the OIG evaluation.

The second data limitation for the case review was related to documents being redacted by the Peace Corps. In accordance with Peace Corps policy, OIG was not provided access to personally identifying information or explicit details of the sexual assault when a case was submitted as a restricted report. The personally identifying information redacted from the documents included:

- First and last name
- Home or other physical address
- Contact information (including a postal address, email, IP address, telephone number, or facsimile number)
- Social Security number

Redacting this information prevented OIG from knowing with certainty that every document was for the particular individual and/or the correct cases. OIG was able to identify some cases where dates or other details that were not redacted appeared to conflict, and the Peace Corps was generally responsive in resolving or explaining these inconsistencies.

The third limitation on the data for the case reviews was related to the limited number of people that OIG was able to interview. Through the Office of Victim Advocacy, the Peace Corps contacted every restricted case and 32 of the standard cases to request those Volunteers' permission for OIG to contact them. Only 11 of these Volunteers agreed to be interviewed by OIG. While this is a small sample size, none of the data from the interviews informed any recommendations. The interviews were used to provide additional context to the data obtained from the case reviews.

In the professional judgement of OIG evaluators, these limitations did not cause material misstatement or significant inaccuracies in the data. We believe that our control measures ensured the data was sufficiently reliable and valid for use in meeting the inspection objectives.

This evaluation was conducted in accordance with the Quality Standards for Inspections, issued by the Council of the Inspectors General on Integrity and Efficiency. The evidence, findings, and recommendations provided in this report have been reviewed by agency stakeholders affected by this review.

## APPENDIX B: SUMMARY OF 2013 EVALUATION REPORTS ON THE PEACE CORPS' SEXUAL ASSAULT POLICY AND PROGRAM

---

### Summary of Results from OIG's 2013 Evaluation Reports

In its 2013 report to Congress about SARRR training for Volunteers, OIG found that the Peace Corps had provided to applicants most of the information required by the Kate Puzey Act, including sexual assault training to all two-year Volunteers, and contact information for OIG. In addition, SARRR training for Volunteers addressed each of the training topics specified in the Kate Puzey Act. However, the Peace Corps did not provide applicants with consistent and current crime and risk information specific to their country of service. Also, because the agency had not yet developed all of its SARRR policies and procedures at the time of OIG's first evaluation, it had not provided applicants with information about Sexual Assault Response Liaisons, or restricted and unrestricted reporting options. Additionally, because the agency was at the time still piloting a sexual assault hotline it had not provided information about a 24-hour sexual assault hotline to all applicants or Volunteers. OIG made three recommendations to improve information and training to Volunteers on this topic, and one remains open.

In its 2013 report to Congress about the agency's sexual assault policy, OIG found that many elements of the Peace Corps' sexual assault policy were in place, but full compliance with the Kate Puzey Act remained a work in progress. The agency had not yet developed a centralized sexual assault policy, and some significant elements of the policy, including restricted reporting and SARLs, were put into effect in September 2013, after the 2013 evaluation was completed. Because the agency implemented several sexual assault policies after the 2013 evaluation fieldwork was completed, OIG was unable to assess their implementation and effectiveness.

Our 2013 evaluation assessed that the Peace Corps had trained some, but not all, overseas staff on the sexual assault policies. Agency management could not meet this requirement until it had finalized its comprehensive sexual assault policy. However, the agency had made efforts to improve its approach to responding to victims of sexual assault and had trained some staff as sexual assault policies and procedural changes were implemented. The agency intended to train all overseas staff on the relevant policies after September 1, 2013. To summarize the results of our 2013 review of sexual assault cases, OIG found that Volunteers who were victims of a sexual assault were generally offered all applicable services that were available, although Volunteers frequently declined some of the support options available to them. Some services, specifically the creation of a safety plan and presenting legal and prosecutorial options to Volunteers, were hard to verify due to a lack of documentation.

OIG made eight recommendations in its 2013 final evaluation report on the sexual assault policy, two of which remain open. The recommendations from OIG's 2013 reports are provided below.

**Recommendations from OIG's Final Evaluation Report: Peace Corps Sexual Assault Risk-Reduction and Response Training (IG-14-01-E):**

1. That the associate director for the Office of Safety and Security put procedures in place to ensure that at the time applicants receive their invitation for service, all have received the most recent information on crimes and risks specific to their country of service.
  - o Status: closed.
2. That the associate director for safety and security and the director of Peace Corps Response establish minimum sexual assault training requirements that conform to the Kate Puzey Act for all Volunteers placed through Peace Corps Response.
  - o Status: closed.
3. That the Director ensure that the agency has in place the systems and support required to evaluate the effectiveness of sexual assault training.
  - o Status: closed.

**Recommendations from OIG's Final Evaluation Report: Peace Corps Volunteer Sexual Assault Policy (IG-14-02-E):**

1. That the agency clarify the procedures for obtaining a sexual assault forensic exam for a Volunteer who has filed a restricted report if the forensic exam does not trigger an official investigation, and revise policies accordingly.
  - o Status: closed.
2. That the associate director for Safety and Security revise agency policy to provide clear guidance on when a safety plan is needed, the essential elements of such a plan, and how the plan should be documented and distributed.
  - a. Status: closed.
3. That the agency revise all relevant procedures to direct staff to provide a choice of medical providers to victims of sexual assault who are medically evacuated to the United States.
  - a. Status: closed.
4. That the agency train all overseas staff on the sexual assault policy per the Kate Puzey Act.
  - a. Status: closed.
5. That the agency develop and communicate expectations for training newly hired overseas staff, including training methods and deadlines.
  - a. Status: open.
6. That the agency develop and implement a method to track training records to verify that it is meeting the requirements of the Kate Puzey Act.
  - a. Status: open.

7. That the agency clarify what documents constitute its official comprehensive sexual assault policy and make those documents easily identifiable and accessible to staff.
  - a. Status: closed.
  
8. That the agency develop a process for the systematic review of all sexual assault advisory council recommendations, clearly outlining the offices responsible for implementing each recommendation with which the agency concurs.
  - a. Status: closed.

## APPENDIX C: LIST OF ACRONYMS AND GLOSSARY OF TERMS

---

CD	Country Director
CIRS	Consolidated Incident Reporting System
CME	Continuing Medical Education
ICD&I	Intercultural Diversity and Inclusion
IPS	Interim Policy Statement
IST	In service training
LGBTQ	Lesbian, Gay, Bisexual, Transgender, or Queer
MS	Peace Corps Manual Section
OCRD	Office of Civil Rights and Diversity
OGC	Office of General Counsel
OHS	Office of Health Services
OIG	Office of Inspector General
OSS	Office of Safety and Security
OVA	Office of Victim Advocacy
PCMO	Peace Corps Medical Officer
PCSSO	Peace Corps Safety and Security Officer
PII	Personally Identifiable Information
PST	Preservice Training
SAAC	Sexual Assault Advisory Council
SAFE	Sexual Assault Forensic Examination
SARL	Sexual Assault Response Liaison
SSM	Safety and Security Manager
TG	Medical Technical Guideline

## Glossary<sup>31</sup>

**Aggravated Sexual Assault.** Another person, without the consent of the Volunteer, intentionally or knowingly:

- a. touches or contacts, either directly or through clothing, the Volunteer's genitalia, anus, groin, breast, inner thigh, or buttocks;
- b. kisses the Volunteer;
- c. disrobes the Volunteer;
- d. causes the Volunteer to touch or contact, either directly or through clothing, another person's genitalia, anus, groin, breast, inner thigh, or buttocks; or
- e. attempts to carry out any of those acts.

AND

- a. The offender uses, or threatens to use, a weapon, or
- b. The offender uses, or threatens to use, force or other intimidating actions, or
- c. The Volunteer is incapacitated or otherwise incapable of giving consent.

**Sexual Assault.** Another person, without the consent of the Volunteer, intentionally or knowingly:

- a. touches or contacts, either directly or through clothing, the Volunteer's genitalia, anus, groin, breast, inner thigh, or buttocks;
- b. kisses the Volunteer on the mouth; or
- c. attempts to carry out any of those acts.

**Rape.** The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the Volunteer.

**Consent.** Words or actions that show a knowing and voluntary agreement to engage in mutually agreed-upon activity. Consent is absent if force has been used against the Volunteer, the Volunteer has been threatened or placed in fear, or the Volunteer is incapable of appraising the nature of the conduct. Consent is absent if the Volunteer is physically incapable of declining participation in, or physically incapable of communicating unwillingness to engage in (e.g., Volunteer is intoxicated), that conduct.

---

<sup>31</sup> Definitions taken from MS 243 *Procedures for Responding to Sexual Assault*.

## APPENDIX D: INTERVIEWS CONDUCTED

As part of this evaluation, interviews were conducted with 58 representatives from Peace Corps headquarters in Washington DC, 69 post staff, 4 officials from U.S. Embassies, and 72 other stakeholders and experts.

**Table 2: Interviews Conducted with Headquarters Staff**

Position	Office
Programming, Training and Evaluation Expert	Africa Operations
Expert	Europe, Mediterranean, and Asia Operations
Programming and Training Specialist	Europe, Mediterranean, and Asia Operations
Chief of Programming and Training	Inter-America and the Pacific Operations
Regional Security Advisor (3)	Inter-America and the Pacific Operations
Equal Employment Opportunity Manager	Office of Civil Rights and Diversity
Director of Communications	Office of Communications
Peace Corps Director	Office of the Director
Expert	Office of the Director
Senior Advisor	Office of the Director
Associate General Counsel	Office of General Counsel
Attorney Advisor	Office of General Counsel
Deputy General Counsel	Office of General Counsel
General Counsel	Office of General Counsel
Associate Director	Office of Global Operations
Chief of Operations Support	Office of Health Services
Director of the Office of Medical Services	Office of Health Services
Expert	Office of Health Services
Former Director of the Counseling and Outreach Unit	Office of Health Services
Former Psychologist	Office of Health Services
Investigative Security Specialist	Office of Health Services
Peace Corps Medical Officer Support Unit Manager	Office of Health Services
Psychologist (2)	Office of Health Services
Quality Improvement Nurse	Office of Health Services
Supervisory Education Specialist	Office of Health Services
Associate Director for the Office of Safety and Security	Office of Safety and Security
Peace Corps Safety and Security Officer (10)	Office of Safety and Security
Program Analyst	Office of Safety and Security
Supervisory Security Specialist	Office of Safety and Security
Training Administrator	Office of Safety and Security
Administrative Specialist	Office of the Victim Advocate
Associate Victim Advocate (2)	Office of the Victim Advocate
Director of the Office of the Victim Advocate	Office of the Victim Advocate
Former Director of the Office of Victim Advocacy	Office of the Victim Advocate

PEACE CORPS OFFICE OF INSPECTOR GENERAL

Overseas Development Specialist	Office of Staff Learning and Development
Chief of Knowledge and Learning	Overseas Programming and Training Support
Director of the Overseas Programming and Training Support	Overseas Programming and Training Support
Intercultural and Diversity Training Specialist (2)	Overseas Programming and Training Support
Lead Technical Training Specialist	Overseas Programming and Training Support
Technical Training Specialist	Overseas Programming and Training Support
Training Specialist	Overseas Programming and Training Support
Chief of Operations	Peace Corps Response
Programming Specialist	Peace Corps Response
Acting Associate Director	Office of Volunteer Recruitment and Support

**Table 3: Interviews Conducted with Post Staff**

Position	Office
Country Director	Africa Operations
Director of Management and Operations	Africa Operations
Director of Programming and Training (2)	Africa Operations
Driver/SARL	Africa Operations
Medical Assistant/ Former SARL	Africa Operations
Peace Corps Medical Officer (4)	Africa Operations
Receptionist/ SARL	Africa Operations
Regional Medical Officer	Africa Operations
Regional Medical Officer- Psychologist	Africa Operations
Safety and Security Assistant	Africa Operations
Safety and Security Manager	Africa Operations
Training Manager	Africa Operations
Volunteer Support Specialist/ SARL	Africa Operations
Regional Advisor	Africa Operations
Country Director	Europe, Mediterranean, and Asia Operations
Director of Management and Operations	Europe, Mediterranean, and Asia Operations
General Service Officer/ SARL	Europe, Mediterranean, and Asia Operations
Language and Cross Culture Coordinator/ Back-Up SSM	Europe, Mediterranean, and Asia Operations
Medical Administrative Assistant	Europe, Mediterranean, and Asia Operations
Medical Services Assistant	Europe, Mediterranean, and Asia Operations

PEACE CORPS OFFICE OF INSPECTOR GENERAL

Peace Corps Medical Officer	Europe, Mediterranean, and Asia Operations
Regional Manager/ SARL	Europe, Mediterranean, and Asia Operations
Regional Medical Officer	Europe, Mediterranean, and Asia Operations
Regional Medical Officer- Psychologist	Europe, Mediterranean, and Asia Operations
Safety and Security Assistant	Europe, Mediterranean, and Asia Operations
Safety and Security Manager	Europe, Mediterranean, and Asia Operations
Training Manager	Europe, Mediterranean, and Asia Operations
Administrative Specialist	Inter-America and the Pacific Operations
Backup Peace Corps Medical Officer	Inter-America and the Pacific Operations
Counselor	Inter-America and the Pacific Operations
Country Director (3)	Inter-America and the Pacific Operations
Deputy Director of Management and Operations	Inter-America and the Pacific Operations
Director of Management and Operations	Inter-America and the Pacific Operations
Director of Programming and Training (3)	Inter-America and the Pacific Operations
General Services Administrative Coordinator/SARL	Inter-America and the Pacific Operations
IT Trainer/SARL	Inter-America and the Pacific Operations
Master Trainer (2)	Inter-America and the Pacific Operations
Medical Secretary	Inter-America and the Pacific Operations
Peace Corps Medical Officer (8)	Inter-America and the Pacific Operations
Safety and Security Assistant (2)	Inter-America and the Pacific Operations
Safety and Security Assistant/ SARL	Inter-America and the Pacific Operations
Safety and Security Manager (3)	Inter-America and the Pacific Operations
Training Manager (2)	Inter-America and the Pacific Operations
Volunteer Support Manager/ SARL (3)	Inter-America and the Pacific Operations

**Table 4. Interviews Conducted with U.S. Embassy Officials**

Position	Organization
Regional Security Officer	U.S. Embassy, Guatemala
Regional Security Officer	U.S. Embassy, Morocco
Regional Security Officer	U.S. Embassy, Paraguay
Regional Security Officer	U.S. Embassy, Peru

**Table 5. Interviews Conducted with External Experts**

Position	Organization
Independent Consultant	Not applicable
Returned Peace Corps Volunteer	Not applicable
Executive Director	Crisis Response Center
Senior Prevention Advisor	Department of Defense

PEACE CORPS OFFICE OF INSPECTOR GENERAL

Executive Director	End Violence Against Women International
Chair	First Response Action
Director of Public Policy	National Center for Victims of Crime
Advocacy Director	National Peace Corps Association
Government Relations Officer	National Peace Corps Association
President	National Peace Corps Association
Director of Special Projects	National Sexual Violence Resource Center
Vice President	Rape, Abuse and Incest National Network
Senior Advisor for Reproductive Health	Unity Health Care, Inc.

## APPENDIX E: DESCRIPTION OF SARRR SESSIONS

---

**Personal Safety and Risk Reduction:** This session establishes the foundation for other safety and security sessions presented during pre-service training as well as the Volunteer service. During this session, Volunteers review country specific crime statistics, discuss personal security strategies, and learn about RADAR<sup>32</sup>—an acronym for the series of steps to help Volunteers manage the risks they might face.

*Sequencing:* Week 1

*Allotted Time:* 70 minutes

**Coping with Unwanted Attention:** The purpose of this session is to help Volunteers understand that being the focus of attention can be a manageable part of Peace Corps life. During this session, Volunteers practice strategies and coping mechanisms for dealing with unwanted attention.

*Sequencing:* Any time during weeks 1-4

*Allotted Time:* 1 hour, 45 minutes

**Sexual Assault: Awareness and Impact:** The purpose of this session is to educate Volunteers about sexual assault and the associated risk factors. During this session, Volunteers review sexual assault myths and facts; discuss the impact of sexual assault on victims; learn about the cultural differences in how men and women indicate to each other that they are interested in having sex (referred to as the ‘sex signals’ activity); and discuss the characteristics of a sexual assault.

*Sequencing:* Any time during weeks 2-4

*Allotted Time:* 2 hours

**Sexual Assault: Reporting and Response:** The purpose of this session is to educate Volunteers on Peace Corps’ reporting options and services available to Volunteers who become victims of sexual assault. During this session, Volunteers discuss why someone may or may not choose to report a sexual assault; review Peace Corps’ commitment to sexual assault victims; learn about how to report a sexual assault; and Peace Corps’ immediate and ongoing response protocols. In addition, Volunteers typically meet the designated staff and hear about the immunity policy.

*Sequencing:* No later than 7 days after Sexual Assault Awareness and Impact

*Allotted Time:* 2 hours

**Bystander Intervention:** The purpose of this session is to provide Volunteers with the skills they need to disrupt situations in which they are possibly at risk of a sexual or physical assault. During this session, Volunteers discuss and practice ways to safely intervene in a risky situation.

*Sequencing:* Any time during the last two weeks of pre-service training

*Allotted Time:* 95 minutes

---

<sup>32</sup> RADAR stands for: **R**ecognize the danger; **A**ssess your options; **D**ecide what’s best for you; **A**ct when the timing is right; and **R**eassess the situation changes.

## APPENDIX F: FEEDBACK ON SARRR SESSIONS

*The following is a summary of the feedback OIG gathered from focus group discussions with Volunteers and interviews with staff about each of the five SARRR sessions.*

**Personal Safety and Risk Reduction:** In the Volunteer focus group interviews, few Volunteers recalled what the RADAR acronym stood for, but most agreed that they remembered the acronym’s basic principles. Volunteers and staff indicated that the *Personal Security and Risk Reduction* session was one of the most effective and useful sessions. One Volunteer explained, “We talked about trusting your instinct. Oftentimes we are so focused on not offending someone that we put ourselves in danger. We talked about trusting our instincts and not caring about being offensive when it comes to our safety. That was helpful.” Another said, “The session helped give me some confidence I knew I needed to stay alert.” While many Volunteers stated that the content was often common sense, most said that it was an important and useful session.

**Unwanted Attention:** In general, Volunteers and staff felt that the training did not adequately prepare Volunteers to deal with and respond to unwanted attention. Many felt that the training stopped short of providing Volunteers with strategies on how to respond to unwanted attention.

Staff and Volunteers had several suggestions on how to improve the trainings, including:

1. Involving currently-serving Volunteers in the training<sup>33</sup>
2. Integrating the training content throughout training and the Volunteer learning continuum
3. Addressing different types of unwanted attention Volunteers might face

**Sexual Assault: Awareness and Impact:** During discussions with headquarters, posts, and Volunteers, OIG heard diverse opinions on the effectiveness of the *Sexual Assault: Awareness and Impact* training. Many staff members commented that the session was very impactful and that Volunteers were able to recall a number of lessons that they learned on the differences in how Americans signal sexual interest versus the host community. Several comments that Volunteers made included:

“There are all these subtle cues [post staff] get about what is going on that we don’t get.”

“It is good to have host country nationals in this session, because it’s all about [post country]. Their opinions and experience are relevant. This session felt more real.”

“I remember thinking that if a guy invites me over, people will think I am sleeping with him. That is a fact, and not something I would have known if it hadn’t been clearly explained to me. That is not something I want to learn in site. I want that laid out for me.”

“I think staff made it very clear to women—‘you do not go into your [counterpart’s] house or room by yourself. These are things that as women... we

<sup>33</sup> The session plan does provide staff with the option of inviting Volunteer leaders or other veteran Volunteers to participate in the session and provide insight in the small group activities.

have to think about. We aren't children. We have to think about the situation—what we are putting ourselves into.”

While many Volunteers reported that they responded positively to the session, at multiple posts seemingly small facilitation missteps had “derailed” the training and caused many trainees to stop paying attention during the session. Due to the sensitive nature of the training, Volunteers could be easily offended, often by facilitators who were delivering a session in a second language. Multiple Volunteers interpreted facilitators’ discussions on how to stay safe as potential victim blaming. One Volunteer explained: “In the trainings, it seems that because they warn us not to drink with people we don’t know or to do things [alone] with people of the opposite sex...if something happens the Volunteer can be blamed.”

**Sexual Assault: Reporting and Response:** Although some Volunteers appreciated the session on sexual assault reporting and response, many Volunteers and staff reported that the session was particularly long, covered a lot of material, and had decreased engagement. One Safety and Security Manager commented that when victims reported a sexual assault, they rarely remembered the information taught to them in this session.

*Immunity Policy:* The *Sexual Assault: Reporting and Response* session addressed the Peace Corps’ immunity policy in its ‘Networking for Knowledge’ activity.<sup>34</sup> While Volunteers we spoke to reported that they had heard about the immunity policy, many admitted that they didn’t trust or fully understand the policy. Several Volunteers remarked that by the end of the *Sexual Assault: Reporting and Response* session they did not know how to report a sexual assault (one of the session’s learning objectives). Some Volunteers expressed confusion regarding whether or not the immunity policy would cover other Volunteers who were present during a sexual assault, while others wondered whether the policy extended to non-sexual assault crimes. Many Volunteers explained that while someone may not get into trouble immediately for reporting a sexual assault that occurred while breaking a rule, there would be unspoken consequences because staff would then know that the person was a rule breaker. As one Volunteer stated, “If a Volunteer does something wrong and it is protected by the immunity policy, that incident still informs staff [of the Volunteer’s] bad behavior patterns.”

**Bystander Intervention:** Many Volunteers and staff reported that the bystander training was the most engaging session. One staff member stated, “Bystander training is more effective because it has more practical exercises and more class participation. It is more relevant to what they are going to be doing in country.” Other staff members believed that Volunteers tended to be more receptive to the training because while they didn’t expect to be victims of sexual assault themselves, they were willing to learn how to protect their friends.

However, Volunteers and staff had mixed opinions on the appropriateness of the scenarios and whether or not Volunteers were using the skills that they learned in the training.

---

<sup>34</sup> MS 240 *Immunity from Disciplinary Action in Sexual Assault Incidents* states that “The Peace Corps will provide the Volunteer who is a victim of a sexual assault, as well as any witnesses who provide information or assistance in relation to the sexual assault of a Volunteer, with immunity for policy violations related to the incident.”

*Scenarios:* The *Bystander Intervention* training had Volunteers work in small groups and act out a role play depicting how they would respond to a certain scenario. Volunteers and staff had mixed opinions about the appropriateness of the scenarios. Some Volunteers felt the scenarios were relevant and helpful. However, others felt the scenarios were inappropriate or too generic.

*Skill Use:* Multiple Volunteers and staff indicated that Volunteers were using the skills they learned in the *Bystander Intervention* training. One Volunteer explained, “We have used the skills [Peace Corps] taught us. When we go out, we stick together. We all go back to the hostel at the same time. No one stays behind. We try to keep an eye on each other. Those are things we got out of the bystander training.” Despite the positive comments from Volunteers and staff, when we spoke to first responders, several noted instances in which Volunteers were sexually assaulted even though other Volunteers were present and could have intervened. A PCMO stated, “Volunteers haven’t told me that they haven’t learned anything from the bystander intervention training—it is what I am seeing when incidents are reported.”

## APPENDIX G: AGENCY RESPONSE

---

The Peace Corps' response to our recommendations are summarized in the body of the report, and contained in full within this appendix. OIG's replies to the agency's responses are contained within the body of the report.



**MEMORANDUM**

**To:** Kathy Buller, Inspector General

**Through:** Anne Hughes, Chief Compliance Officer *Anne Hughes*

**From:** Carrie Hessler-Radelet, Director *Carrie Hessler-Radelet*  
Ken Yamashita, Associate Director, Global Operations  
Shawn Bardwell, Associate Director for Safety and Security *Shawn Bardwell*  
Paul Jung, Associate Director, Office of Health Services *Paul Jung*  
Kathy Stroker, Acting General Counsel *Kathy Stroker*  
Da Shawanna Townsend, Director of the Office of Victim Advocacy *Da Shawanna Townsend*  
Peter Redmond, Acting SARRR Team Lead *Peter Redmond*

**Date:** November 10, 2016

**CC:** Laura Chambers, Chief of Staff  
Carlos Torres, Deputy Director  
Kate Raftery, Former SARRR Team Lead  
Jeremy Haldeman, Director of External Affairs  
Joaquin Ferrao, Deputy Inspector General  
Jerry Black, Assistant Inspector General for Evaluations  
Angela Kissel, Compliance Officer

**Subject:** Preliminary Report on the Evaluation of the Peace Corps' Implementation of the Kate Puzey Peace Corps Volunteer Protection Act of 2011

---

Enclosed please find the agency's response to the recommendations made by the Inspector General for the Peace Corps as outlined in the Evaluation of the Peace Corps' Implementation of the Kate Puzey Peace Corps Volunteer Protection Act of 2011 (Kate Puzey Act) sent to the agency on September 26, 2016.

The agency appreciates the Office of the Inspector General's (OIG) evaluation of our implementation of the Kate Puzey Act. The agency has devoted significant resources and effort to establish an exemplary Sexual Assault Risk Reduction and Response Program built around the statutory requirements of the Kate Puzey Act. We have consulted with outside experts on best

practices in the field and labored intensively to create a policy framework involving more than 30 new or revised policies on sexual assault. Senior management has maintained unwavering focus to ensure the success of our Sexual Assault Risk Reduction and Response Program, and we are deeply proud of our accomplishments.

The OIG's evaluation is another asset to assist the agency as we continue to improve our support and care of Peace Corps Volunteers. We have given very careful consideration to the 36 recommendations in this report and have concurred with all 36 recommendations. The agency has addressed and provided supporting documentation for three of the 36 recommendations and will work to address the remaining recommendations by the set target dates. We look forward to our continued collaboration with the OIG, as we seek to ever improve our Sexual Assault Risk Reduction and Response Program operations.

### **Recommendation 1**

**That the Director prioritize closing Recommendation 1 in the Office of Inspector General's 2013 evaluation report (IG-14-01-E) related to ensuring that all applicants have received the most recent information on crimes and risks specific to their country of service.**

#### **Concur**

**Response:** Peacecorps.gov is the agency's public-facing website, functioning as a recruitment tool, an application portal, an instrument to market the Peace Corps and raise public awareness, and a way to disseminate federally-mandated information (Budget Justifications, OIG reports, Performance and Accountability Reports, etc.). The Office of Communications completely overhauled this website, re-launching it on June 1, 2016 with the key goals: 1) to organize information in a more intuitive way that recognizes the needs of primary audiences, notably, prospective Volunteers; and 2) to integrate the post websites into the same website platform and content management system. As a result, the new website dramatically improves the ability of applicants and other interested parties to easily access and understand information about the Peace Corps.

As of October 2016, the website includes information related to country-specific crime and other risks, which provides potential applicants with the information they need to make a well-informed decision on where they may want to apply to serve in the Peace Corps.

#### **Documents Submitted:**

- Documentation showing closure of Recommendation 1 from IG-14-01-E

**Status and Timeline for Completion:** Completed, October 2016

### **Recommendation 2**

**That the Director improve the presentation of crimes and risks information (including qualitative information on the risk of sexual harassment) for applicants by making this information more accessible to all applicants and easier to understand.**

#### **Concur**

**Response:** The Office of Safety and Security (OSS) will work with the Office of Global Operations (OGO) and the Office of Volunteer Recruitment and Selection (VRS) to improve the presentation of crimes and risks information, which will include qualitative information concerning the nature and magnitude of sexual harassment against Volunteers at post, and incorporate this information into the post-specific Country Profile Pages.

#### **Documents to be Submitted:**

- Updated Post-Specific Country Profile Pages

**Status and Timeline for Completion:** July 2017

### **Recommendation 3**

**That the Director clarify and support the process of tailoring training to the country of service, with a particular emphasis on incorporating culturally-specific information and expertise on gender and interpersonal relationships.**

#### **Concur**

**Response:** The Office of Safety and Security (OSS) global core sexual assault sessions will be updated and re-issued in 2017. The revised sessions will include specific instructions on how posts are to customize Sexual Assault Risk Reduction and Response (SARRR) sessions to incorporate country and culturally-specific information on gender and interpersonal relationships. OSS will consult with experts in the field of gender-based violence to explore relevant resources. Training guides will include examples of culturally-specific information on gender and interpersonal relationships as well as guidance on how posts can source this information for inclusion in their own sessions.

To ensure that posts understand that Peace Corps leadership is supportive of cultural contextualization, the agency will develop a multi-layered communications strategy to reinforce that message. The strategy will include written instructions, as well as webinars, phone calls and guidance, culminating in a Training of Trainers (ToT) for SARRR training facilitators set to take place during the fourth quarter of fiscal year (FY) 2017.

#### **Documents to be Submitted:**

- Guidance to posts on how to tailor training to include relevant information on gender and interpersonal relationships for inclusion in their own sessions
- SARRR Training of Trainers Agenda

**Status and Timeline for Completion:** October 2017

### **Recommendation 4**

**That the Director develop guidance for posts on integrating sexual assault risk reduction and response training into the pre-service training curriculum and 27-month Volunteer learning continuum.**

#### **Concur**

**Response:** SARRR training is already part of Pre-Service Training (PST), which is being improved and strengthened as per several other recommendations in this document. In addition, supplemental SARRR content will be integrated into training at other key points throughout the 27-month Volunteer learning continuum. Since October 2016, OSS has reconvened and led the SARRR inter-office training team through monthly meetings to discuss and plan for updating the SARRR PST training and to incorporate these trainings into the 27-month Volunteer learning continuum. This team is composed of staff from OSS, the Office of Victim Advocacy (OVA), the Counseling and Outreach

Unit (COU), the Office of Health Services (OHS), the Office of Global Operations and the Regions. The team has already begun to develop coordinated strategies and deliverables related to expanding and integrating SARRR program training across the 27-month learning continuum and will message this guidance in coordination with the 2017 release of the new SARRR curriculum.

SARRR training will be addressed beyond the confines of PST through new safety planning exercises. Volunteers will complete safety planning exercises prior to In-Service Training (IST) to further demonstrate their SARRR skills and competency, and identify areas that require additional training and skill building.

**Documents to be Submitted:**

- Guidance to posts on integration of SARRR curriculum into PST and the 27-month Volunteer learning continuum

**Status and Timeline for Completion:** August 2017

**Recommendation 5**

**That the Director clarify and support the process of customizing training specifically to address sexual assault risks for male and LGBTQ Volunteers.**

**Concur**

**Response:** The agency will review the SARRR program to customize and strengthen training and support services related to sexual assault risks, including sexual harassment. The training will be designed for all Volunteers, including male and LGBTQ Volunteers, as well as measures and efforts that fall outside of the SARRR program that will help to reduce exposure to risk.

To that end, OSS will work with the Office of Overseas Programming and Training Support (OPATS), OHS, and OGO in FY 2017, to further strengthen our training for Volunteers to address post-specific cultural and social issues related to sexual assault and harassment mitigation. This training will include response strategies for all Volunteers, including male and LGBTQ Volunteers. Furthermore, guidance will be developed for staff that outlines response and support procedures for when male and LGBTQ Volunteers report being the victim of sexual assault or harassment at site or in the workplace.

**Documents to be Submitted:**

- Relevant updated SARRR sessions with sexual assault and harassment content for male and LGBTQ Volunteers identified
- Sexual Harassment Response Procedures (Safety and Security Instruction)

**Status and Timeline for Completion:** August 2017

**Recommendation 6**

**That the Director define how the agency should address the problem of sexual harassment in relation to the sexual assault risk reduction and response program.**

**Concur**

**Response:** Sexual Harassment is not a specific component of the SARRR program, in accordance with the Kate Puzey Act. However, the agency recognizes that sexual harassment may have a direct impact on Volunteer security, hinder the ability to serve effectively, and even be a precursor to sexual assault. As a result, the agency will review the SARRR program to identify ways in which it can strengthen training and support services, as well as measures and efforts that fall outside of the SARRR program that will also help to reduce exposure and assist Volunteers with effectively addressing sexual harassment.

To that end, the OSS will work with Overseas Programming and Training Support (OPATS), the Office of Health Services (OHS), and the Office of Global Operations (OGO) in FY 2017, to develop training materials that address post specific, cultural and social issues surrounding sexual harassment to include mitigating and response strategies. Furthermore, guidance will be developed for staff that outlines response and support procedures for when Volunteers report being the victim of sexual harassment at site or in the workplace.

**Documents to be Submitted:**

- Sexual Harassment Training Materials (Trainer's Guide and PowerPoint)
- Sexual Harassment Response Procedures (Safety and Security Instruction)

**Status and Timeline for Completion:** August 2017

**Recommendation 7**

**That the Director provide guidance and support to posts to integrate culturally appropriate training on sexual harassment into the Volunteer 27-month learning continuum.**

**Concur**

**Response:** In 2017, Peace Corps will release an update to its SARRR training guidance for posts and provide additional support to individual posts, as necessary, to ensure that each country is able to integrate culturally appropriate training on sexual harassment into the Volunteer 27-month learning continuum. This will include the addition of country-specific Pre-Service Training (PST) sessions on sexual harassment as well as additional sessions for In-Service Training (IST), Mid-Service Training (MST) and individual support for Volunteers, as needed. Examples of specific interventions may include:

- Adding a scenario to the 'Unwanted Attention' PST session on sexual harassment in the workplace and community.

- Providing a list of recommended methods for staff to address sexual harassment at post, i.e., communications, awareness raising and support protocol communications from staff, sharing of articles on the topic for post staff to share with Volunteers as they see fit.
- Providing a language role play on sexual harassment in the workplace and community during PST, IST, MST, and as needed, to support Volunteers in the development of strategies for dealing with sexual harassment.

**Documents to be Submitted:**

- Guidance to posts on how to integrate training on sexual harassment into the 27-month Volunteer learning continuum
- Relevant Updated SARRR Sessions

**Status and Timeline for Completion:** August 2017

**Recommendation 8**

**That the Director provide Volunteers with clear guidance on how and when to report sexual harassment to the Peace Corps.**

**Concur**

**Response:** The 2017 updated SARRR training guidance will provide clear guidance to Volunteers on how and when to report sexual harassment to the Peace Corps. This information will be added to the appropriate OSS global core sexual assault sessions as well as in the safety and security resource guide being released as a pilot in 2017.

**Documents to be Submitted:**

- Updated SARRR training materials that address how and when to report sexual harassment to the Peace Corps
- Relevant section(s) of Safety and Security resource guide
- Sexual Harassment Response Procedures (Safety and Security Instruction)

**Status and Timeline for Completion:** August 2017

**Recommendation 9**

**That the Director develop a plan to provide professional development opportunities to staff, including sexual assault response liaisons, to improve staff capacity in the delivery of sexual assault risk reduction and response training.**

**Concur**

**Response:** In FY 2017, the SARRR training team will develop a SARRR Professional Development Plan that will define professional development opportunities for all Designated Staff, including Sexual Assault Response Liaisons (SARLs), as well as other staff who deliver SARRR training. As part of that plan, the SARRR training team will clarify who is designated to deliver SARRR training and will provide new and additional

training on the delivery of the revised sessions through regional Training of Trainers (ToT) events.

The SARRR training team will build a compendium of sexual assault professional development opportunities to share with SARRR staff through an online community of practice. Resources, such as links to online trainings on sexual assault, Peace Corps specific discussion forums on SARRR issues, Peace Corps specific SARRR webinars, etc., will all be housed on the online SARRR Community of Practice. The online SARRR Community of Practice will also be the forum for the SARRR team to share quarterly Questions and Answers (Q&As) for Designated Staff, Country Directors (CDs) and Peace Corps Safety and Security Officers (PCSSOs).

The first quarterly Q&A is scheduled to take place in Q2 of FY 2017. Topics for the quarterly Q&As will be sourced from current issues Headquarters staff identify throughout the response process that need clarification.

**Documents to be Submitted:**

- SARRR Professional Development Plan
- SARRR ToT agenda
- Quarterly Q&A examples

**Status and Timeline for Completion:** October 2017

**Recommendation 10**

**That the Director consider incorporating intercultural diversity and inclusion training in the agency's plan to improve staff capacity to deliver sexual assault risk reduction and response training.**

**Concur**

**Response:** The SARRR training team will collaborate with the agency's Intercultural Competence, Diversity and Inclusion (ICD&I) team to determine the best training methods and curricula for building ICD&I skills among staff who deliver SARRR training and support Volunteers. The SARRR training team will adapt the ICD&I Developmental Model of Intercultural Sensitivity as part of its updated SARRR training to ensure that staff who deliver training and support Volunteers in the field have the ICD&I skills needed to do their jobs effectively. The SARRR training team will also reference the Overseas Programming and Training Support (OPATS) guidance on "Managing Risk Level in ICD&I Training" continuum when developing the ICD&I training for SARRR staff, due to the sensitivity and complexity of the subject matter.

**Documents to be Submitted:**

- Updated SARRR ToT content that addresses ICD&I as it relates to sexual assault
- Adapted Developmental Model of Intercultural Sensitivity

**Status and Timeline for Completion:** August 2017

### **Recommendation 11**

**That the Director develop guidance to clarify the role of other programming and training staff at post in supporting the planning and delivery of sexual assault risk reduction and response training throughout the 27-month Volunteer learning continuum.**

#### **Concur**

**Response:** In order to ensure the staff with the best facilitation skills at post are delivering SARRR sessions, staff who are able to deliver SARRR training will be re-identified in 2017. Post staff responsible for delivering SARRR training may either self-select from amongst the Designated Staff team or be nominated by leadership at post. Newly identified SARRR trainers will participate in a ToT event that will leverage the agency's significant training resources, such as involving programming and training staff in the planning and feedback process, as well as the incorporation of SARRR topics throughout the 27-month learning continuum.

In addition to providing guidance to the SARRR trainers at a ToT event, this guidance will also be provided in writing to SARRR trainers, Designated Staff, Country Directors, Directors of Programming and Training and all Programming and Training (P&T) staff. If not determined to be a primary facilitator of SARRR sessions, Designated Staff will be expected to, at a minimum, be present during the SARRR training in order to portray to Volunteers the team effort of the SARRR program at post.

#### **Documents to be Submitted:**

- Guidance on the role of P&T staff in the delivery, planning and feedback process for SARRR training throughout the 27-month learning continuum
- Relevant SARRR ToT training materials

**Status and Timeline for Completion:** August 2017

### **Recommendation 12**

**That the Director provide posts with alternative training guidance for Volunteers who do not attend sexual assault risk reduction and response sessions with their training group.**

#### **Concur**

**Response:** In the 2017 release of the updated curriculum, the SARRR training team will provide specific guidance on how to meet all SARRR training learning objectives for individual Trainees who are not able to attend SARRR group sessions. The guidance will provide specific examples of activities for staff to conduct with these Volunteers, as well as an assessment activity to ensure Volunteers who do not attend the sessions are able to demonstrate an understanding of and competence in the key content.

#### **Documents to be Submitted:**

- Guidance for posts on how to meet SARRR learning objectives for individual Trainees who do not to attend SARRR group sessions
- Assessment activity for Volunteers who are absent

**Status and Timeline for Completion:** August 2017

**Recommendation 13**

**That the Director revise the terminal learning objective assessment to provide posts with a better understanding of Volunteers' comprehension of the content of the training.**

**Concur**

**Response:** The SARRR training team will revise the Terminal Learning Objectives (TLO) assessment to better measure Trainees' comprehension of SARRR training and better inform future post-level SARRR trainings throughout the 27-month Volunteer learning continuum. The revised assessment will be released with the 2017 updated SARRR sessions and will be in the form of an expanded quiz. The assessment may also include safety planning exercises that each Volunteer will complete prior to their In-Service Training (IST) to further demonstrate their SARRR skills and competency.

**Documents to be Submitted:**

- Updated TLO assessment

**Status and Timeline for Completion:** August 2017

**Recommendation 14**

**That the Director implement and communicate a process that tracks Volunteer completion of specified learning events (both in person and online) and comprehension of the sexual assault risk reduction and response training on the agency's Learning Management System.**

**Concur**

**Response:** The Office of Safety and Security (OSS) will implement a phased approach to more effectively track Volunteer completion and comprehension of SARRR training. Trainees will still have the option to complete the TLO assessment online or in-person. However, beginning in January 2017, OSS will require that post staff enter scores for Trainees who complete the TLO assessment in-person into the Learning Management System (LMS). This will allow the agency to more accurately capture all Trainee scores in one system, particularly those who complete the assessment in-person. OSS will provide instructions to post staff on how to enter these scores via a screencast tutorial in December 2017.

OSS will update the TLO assessment to more comprehensively assess Volunteers' learning of SARRR training and will release the new assessment with the updated SARRR curriculum in August 2017. The new assessment will be located in the new LMS scheduled for release to the agency in September 2017. Trainees will be encouraged to complete the new assessment in the new LMS, however, posts will still have the option of manually entering scores into the LMS for Trainees who complete the assessment in-person.

**Documents to be Submitted:**

- Acquisition timeline for new LMS
- Updated TLO assessment
- Instructions to staff on how to enter in-person assessment scores into the LMS
- Memorandum announcing roll-out of LMS

**Status and Timeline for Completion:** October 2017

**Recommendation 15**

**That the Director establish a process to utilize feedback from Volunteers and staff on how to improve the training.**

**Concur**

**Response:** The SARRR training team will periodically collect feedback from Volunteers and Trainees on ways to improve the SARRR training through a variety of data collection methods. Data collection methods include Pre-Service Training (PST) expanded SARRR quiz results, periodic surveys, queries to Volunteer Advisory Councils (VACs), requests for feedback through Peace Corps Volunteer Leaders (PCVLs) and staff, and direct feedback through focus groups during field visits.

The SARRR training team will formally collect feedback from a sampling of Volunteers and Trainees at least two times during each two-year SARRR training review cycle. The first feedback collection cycle on the 2017 updated sessions will be completed by the end of calendar year 2018 in order to allow time to incorporate feedback into the 2019 updated SARRR curriculum.

**Documents to be Submitted:**

- Expanded SARRR quiz results
- Summary of feedback collection methods and summary findings

**Status and Timeline for Completion:** December 2018

**Recommendation 16**

**That the Director establish a process to gather information on Volunteers' use of risk reduction and response skills taught in the training, and use it to make improvements to the training.**

**Concur**

**Response:** The SARRR training team will periodically gather information on Volunteers' use of risk reduction and response skills taught in the training through a variety of data collection methods. Possible data collection methods will include periodic surveys, Response Quality Survey (RQS) analysis, queries to VACs, requests for feedback through PCVLs and direct feedback through focus groups during field visits.

The SARRR training team will formally collect feedback from a sampling of Volunteers and Trainees at least two times during each two-year SARRR training review cycle. The first feedback collection cycle on the 2017 updated sessions will be completed by the end of calendar year 2018 in order to allow time to incorporate feedback into the 2019 updated SARRR curriculum.

**Documents to be Submitted:**

- Summary of data collection methods
- Sample survey sent to select Volunteers to gather information on use of SARRR training
- Description of the plan for using this data to improve future versions of SARRR training

**Status and Timeline for Completion:** December 2018

**Recommendation 17**

**That the Director pursue a change in the language of the immediate notification requirement in Sec 8B (a)(3), of the Kate Puzey Act to allow any designated staff person to perform the immediate notification of the Victim's Advocate.**

**Concur**

**Response:** Staff members of the Senate Foreign Relations Committee and the House Foreign Affairs Committee have been contacted and asked to consider this legislative proposal. The Peace Corps recommended to the respective staffs that 22 U.S.C. §2507b(a)(3) be amended to clarify the provision stating that the SARLs notify the Victim's Advocate of a sexual assault and replace it with a provision that explicitly permits the Peace Corps to designate any staff at post, responsible for providing services specified in Section 8B(c), to immediately contact a Victim Advocate upon receiving a report of sexual assault in accordance with the restricted and unrestricted reporting guidelines promulgated by the Peace Corps.

**Documents Submitted:**

- Email from the Director of Congressional Relations to Senate Foreign Relations Committee staff
- Email from the Director of Congressional Relations to House Foreign Affairs Committee staff

**Status and Timeline for Completion:** Completed

**Recommendation 18**

**That the Director develop and implement mental health access to care timeliness standards for victims of sexual assault with a mechanism to notify management when these standards are not met.**

**Concur**

**Response:** Many factors impact a Volunteer victim’s timely access to mental health care. These factors include, but are not limited to: victims initially electing to engage in counseling and later changing their mind (for a variety of reasons); Volunteer travel away from site or out of country; and how and where counseling is delivered (i.e., at post, Headquarters, or home of record).

The Peace Corps counseling model for sexual assault victims is Volunteer-centric. Victims have the choice to engage in counseling with a Counseling and Outreach Unit (COU) provider, an in-country provider (if one is available), or a provider at home of record via medical evacuation. Because the Office of Health Services (OHS) empowers victims to choose when, how, and with whom to engage in counseling, the agency cannot consistently control access to care timelines.

OHS currently adheres to clinical standards with regard to the timeliness of care delivery. In addition, OHS is working to ensure the following access to care standards become policy in Medical Technical Guideline 540 “A Resource Guide for the Clinical Management of Sexual Violence”:

- Volunteer/Trainee travel will occur within three to five days from the date of a decision to leave country for the purpose of a medical evacuation.
- Volunteers/Trainees will receive care from COU or an in-country provider within 72-hours of a consult from a PCMO for that care.

Sexual assault victims who are dissatisfied with any medical services received, including timely access to mental health care can contact the Quality Improvement team within OHS, or record their dissatisfaction on the Response Quality Survey (RQS), both of which are analyzed for continuous quality improvement.

**Documents to be Submitted:**

- Updated Access to Care Standards and Guidance
- Annual report of compliance to access to care standards

**Status and Timeline for Completion:** December 2017

### **Recommendation 19**

**That the Director designate a full-time program manager for the sexual assault risk reduction and response program.**

#### **Concur**

**Response:** The Peace Corps has already established a position description and begun the recruitment of a full-time SARRR Program Director. The new SARRR Program Director is expected to arrive by March 2017. In the meantime, the Director has selected a senior advisor who has been part of the SARRR team for the last five years to act as the interim Program Director.

#### **Documents Submitted:**

- Scope of Work for SARRR Program Director

**Status and Timeline for Completion:** Complete

### **Recommendation 20**

**That the Director assess and redefine, if necessary, the roles and responsibilities of sexual assault response liaisons to make more effective use of existing staff capacity.**

#### **Concur**

**Response:** The Office of Victim Advocacy (OVA) will review the role of the Sexual Assault Response Liaison (SARL), their responsibilities and training. The review will be focused on areas of improvement related to building SARL capacity to carry out their role and enhancing the quality of victim support. Upon completion of this assessment, the 40-hour training curriculum for SARLs will be revised to reflect the identified areas of improvement. The updates and revised curriculum will be communicated at a mandatory week-long training event for all SARLs in March 2017.

#### **Documents to be Submitted:**

- Agenda for the revised 40-hour Initial SARL Training
- Detailed Curriculum Overview for the revised 40-hour Initial SARL Training

**Status and Timeline for Completion:** March 2017

### **Recommendation 21**

**That the Director continue to explore ways to better engage sexual assault response liaisons with Volunteers during pre-service training and as needed during service.**

#### **Concur**

**Response:** The 40-hour SARL training curriculum will be revised to increase the capacity of the SARLs to support both Volunteer training and sexual assault response. This revision will include an in-depth training facilitation session that will properly prepare the SARLs to assist with delivering relevant training sessions during pre-service

training and at other points during the Volunteer 27-month learning continuum. Other opportunities to encourage SARL interaction with Volunteers will also be explored, including a communications plan to increase SARL visibility among Volunteers and Trainees.

**Documents to be Submitted:**

- Agenda for the revised 40-hour Initial SARL Training
- Detailed Curriculum Overview for the revised 40-hour Initial SARL Training
- Standardized SARL Posters
- SARL Communications Plan

**Status and Timeline for Completion:** August 2017

**Recommendation 22**

**That the Director assess and redefine, if necessary, the role and responsibilities of Peace Corps safety and security officers to make more effective use of existing staff capacity.**

**Concur**

**Response:** On November 5, 2015, the Peace Corps issued Manual Section (MS) 243 *Responding to Sexual Assault* (formerly Interim Policy Statement (IPS) 3-13 *Responding to Sexual Assault*) as well as the MS 243 *Procedures for Responding to Sexual Assault*. Under the updated procedures, the agency outlined the circumstances under which a Designated Security Specialist (DSS) is permitted to share information about a restricted report with a Peace Corps Safety and Security Officer (PCSSO) and allow the PCSSO to participate as a member of the Consolidated Agency Response System (CARS) Team. Under certain circumstances, the DSS may consult with the PCSSO if the DSS has difficulty determining whether or not there is a serious or imminent threat to Volunteers or Trainees. The circumstances under which the DSS may discuss a restricted report with the PCSSO are as follows:

- If there are cultural norms that the DSS is unfamiliar with that directly pertain to the safety of the Volunteer/Trainee;
- If there are concerns about a specific geographic location where the incident took place; and/or
- If the PCSSO's analysis would be advantageous in determining that a serious or imminent threat exists in the event that the DSS and the SSM are unable to do so.

**Documents Submitted:**

- MS 243 *Responding to Sexual Assault*, Section 4.4 (a)
- MS 243 *Procedures for Responding to Sexual Assault*, Restricted Reporting, Designated Security Specialist; and
- MS 243 *Procedures for Responding to Sexual Assault*, Restricted Reporting, Peace Corps Safety and Security Officer

**Status and Timeline for Completion:** Completed, November 5, 2015

**Recommendation 23**

**That the Director define and communicate the role of the Office of Civil Rights and Diversity in responding to sexual assaults.**

**Concur**

**Response:** The Office of Civil Rights and Diversity (OCRD) will continue to work with OSS, Office of Staff Learning and Development (OSLD), and OGO to ensure staff are appropriately trained on Volunteer and Trainee rights with regard to OCRD led sexual assault investigations. Further, information related to an OCRD led sexual assault investigation will be added to the new Safety and Security Resource Guide. MS 243 *Procedures for Responding to Sexual Assault* will be updated to include more information about this type of investigation, including the process for requesting an OCRD-led investigation and a description of the investigation process.

**Documents to be Submitted:**

- Revised MS 243 *Procedures for Responding to Sexual Assault*
- OCRD information in the new Safety & Security Resource Guide

**Status and Timeline for Completion:** August 2017

**Recommendation 24**

**That the Director develop and communicate guidance for overseas staff on documenting site-specific security incidents in site history files while maintaining Volunteers' confidentiality, and on using the information in site history files as part of post's site vetting process.**

**Concur**

**Response:** The Associate Director for Safety and Security, the Associate Director of Global Operations and the Regional Directors will be working to issue baseline interim guidance on the development, maintenance and use of site history files during the first quarter of FY 2017. Each post will be expected to ensure compliance with the interim guidance by the end of the second quarter of FY 2017.

Once the interim guidance is developed and issued, this same group will work to develop clear, easily accessible and explicit agency-wide guidance to posts on the processes and procedures for maintaining site history files and the confidentiality of sexual assault victims. This guidance will include oversight mechanisms that improve the completeness, organization and use of site history files for site development and selection.

**Documents to be Submitted:**

- Final Guidance on Site History Files

**Status and Timeline for Completion:** September 2017

### **Recommendation 25**

**That the Director provide implementation guidance and training to improve overseas staff capacity to talk sensitively and candidly to Volunteers about sexual assault risk identification and reduction strategies tailored to their country of service, and about known risks to personal safety such as alcohol abuse.**

#### **Concur**

**Response:** Building staff capacity to speak sensitively and candidly to Volunteers about sexual assault risk identification and reduction strategies, including personal safety risks such as alcohol abuse, will be addressed at the summer 2017 Training of Trainers (ToT) for SARRR facilitators. ToT participants will engage in role plays to practice these difficult conversations with Volunteers and Trainees as well as work in country teams to identify the country-specific risks and mitigation strategies they may need to address with Volunteers.

In addition, one of the learning objectives of the online training, *Sexual Assault Awareness and Victim Sensitivity*, will be “to build staff capacity to talk sensitively and candidly to Volunteers about sexual assault risk identification and reduction strategies including risks to personal safety such as alcohol abuse”. This online training is currently being revised and is scheduled for re-release in the summer of 2017. All overseas staff will be required to complete this course.

#### **Documents to be Submitted:**

- Relevant SARRR ToT training materials
- Revised Sexual Assault Awareness and Victim Sensitivity course outline

**Status and Timeline for Completion:** October 2017

### **Recommendation 26**

**That the Director expand the monitoring and evaluation plan for the sexual assault risk reduction and response program to include sexual assault risk reduction measures.**

#### **Concur**

**Response:** The agency has completed the vast majority of the monitoring and evaluation activities originally included in the MS 243 *Procedures for Responding to Sexual Assault*. Since the relaunch of the inter-office case review process in August 2016, all of the activities listed in the current procedures (revision April 19, 2016) have been initiated. Specific indicators are dependent upon complete adoption and implementation of a new agency Learning Management System (LMS) and Case Management System (CMS). The adoption and implementation of this latter system is underway. The agency’s Coordinated Agency Response System (CARS) CMS was first piloted in February 2016 and rolled out globally in March 2016. The first two phases of CARS CMS have been implemented and the remaining phases will be implemented in 2017.

With the exception of training, risk reduction strategies have not been systematically planned and integrated with the agency's response efforts. In fiscal year 2016, the Peace Corps conducted additional research related to sexual assault risk reduction and initiated new analyses of reported and unreported crimes against Volunteers to examine contextual factors related to the crimes. This information will be used to revise and enhance our risk reduction efforts. The SARRR team will leverage the results of the study collaboratively conducted with the Centers for Disease Control and Prevention (CDC) on alcohol use in the Volunteer community to determine if a monitoring and evaluation indicator related to sexual assault risk reduction and alcohol abuse is appropriate. When the program identifies which current risk reduction elements (e.g., site identification and development) and new initiatives (risk mitigation planning) it wishes to include under the umbrella of sexual assault, indicators will be developed and included in the SARRR Monitoring and Evaluation Plan.

**Documents to be Submitted:**

- Revised SARRR Monitoring and Evaluation Plan

**Status and Timeline for Completion:** December 2017

**Recommendation 27**

**That the Director conduct individual and systemic sexual assault case reviews, and involve monitoring and evaluation staff in the process.**

**Concur**

**Response:** Since August 2016, the agency has implemented a monthly Case Management Review Board (CMRB) to review all open cases that require a coordinated response, including standard reports of sexual assault. The goals of the CMRB are to support Peace Corps' coordinated response protocols, identify areas for process improvement to ensure system accountability and victim access to support services, and improve reporting. Additionally, relevant information generated in the CMRB meetings is used by the Office Victim Advocacy (OVA) to facilitate monthly victim updates.

A quarterly System Issue Review Board (SIRB) is also being established. This board is a collaborative forum to assist Peace Corps in ensuring that the agency's response approach is consistent by finding solutions for the service gaps and procedural concerns identified during the CMRB. The first SIRB will convene in January 2017.

**Documents to be Submitted:**

- Case Management Review Board Overview
- Minutes from August 4, 2016 CMRB Meeting
- Calendar of CMRB meetings

**Status and Timeline for Completion:** January 2017

**Recommendation 28**

**That the Director develop a plan to improve the collection of feedback from Volunteers, post, and headquarters staff on the effectiveness of the sexual assault risk reduction and response program.**

**Concur**

**Response:** Volunteers currently provide feedback on the SARRR program through the completion of the Response Quality Survey (RQS). This survey is sent to all Volunteers who report a sexual assault to the Peace Corps. To gather a more comprehensive picture of the SARRR program, Peace Corps will develop a plan to collect additional feedback from Volunteers, irrespective of victim status. This plan will include periodically gathering information on Volunteers' experience with risk reduction and response processes, including training (see Recommendation 16). Possible data collection methods may include periodic surveys; a review of expanded SARRR quiz results; queries to Volunteer Advisory Councils (VAC); requests for feedback through Peace Corps Volunteer Leaders (PCVLs); and direct feedback through interviews or focus groups during field visits. The SARRR team will formally collect feedback from Volunteers and Trainees at least two times during each two-year SARRR training review cycle.

The SARRR monitoring and evaluation plan includes qualitative discussions with staff at post and Headquarters, but does not exclude other efforts. Two monitoring and evaluation reports prepared by OSS included recommendations to conduct a survey to quantify information provided by staff via interview and group phone discussions. In 2016, approval was received for a SARRR staff survey. This survey was developed, cognitively tested, and subsequently launched on August 15, 2016.

It is the intention of SARRR monitoring and evaluation staff to conduct the SARRR staff survey every other year to gather input from post staff. On off years, the monitoring and evaluation staff will gather data from interviews and group phone calls with post and Headquarters staff as done previously in 2015.

In the MS 243 *Responding to Sexual Assault* Frequently Asked Questions (FAQ), staff are invited to provide feedback on the SARRR program by emailing the monitoring and evaluation team. This is a direct way staff member can provide feedback on the program without passing a comment through chains of command.

**Documents to be Submitted:**

- SARRR staff survey instrument
- Response Quality Survey instrument
- Revised SARRR Monitoring and Evaluation Plan
- Summary of data collection methods and topics of inquiry

**Status and Timeline for Completion:** December 2017

### **Recommendation 29**

**That the Director dedicate additional administrative support to maintain accurate, up-to-date, centralized, and easily accessible overseas staff sexual assault risk reduction and response training records.**

#### **Concur**

**Response:** The responsibility for tracking SARRR training will shift to Office of Staff Learning and Development (OSLD) in Q4, FY 2017 upon the release of a new mandatory all-staff SARRR online training. OSLD will determine additional administrative resources needed at that time to track the new online training depending on the status of the planned new Learning Management System (LMS) and OSLD staff resources at that time. The Office of Safety and Security (OSS) will continue to track SARRR training during Quarters 1-3 of FY 2017 with the help of temporary staff and will send out updated SARRR training reports during that time.

#### **Documents to be Submitted:**

- Position description for new OSLD staff person responsible for tracking SARRR training

**Status and Timeline for Completion:** October 2017

### **Recommendation 30**

**That the Director develop a formal onboarding and continuing education training program for all designated staff positions.**

#### **Concur**

**Response:** The SARRR training team will develop a formal onboarding and continuing education training program for all Designated Staff positions. The onboarding information and training as well as continuing education will be mapped to competencies connected to the different Designated Staff roles. The SARRR training team will ensure communication related to onboarding and professional development is sent out in a timely and consistent manner to all Designated Staff according to their role.

#### **Documents to be Submitted:**

- Description of formal onboarding plan for Designated Staff
- Listing of professional development opportunities available to Designated Staff

**Status and Timeline for Completion:** August 2017

**Recommendation 31**

**That the Director define and communicate the expectations related to sexual assault trainings for all Peace Corps staff, to include training for staff temporarily filling an overseas position.**

**Concur**

**Response:** The Director will continue to define and communicate to all staff agency expectations related to sexual assault trainings.

The Memorandum from the Associate Director for Global Operations to Peace Corps Global titled *Ensuring Sexual Assault Awareness Training for Staff* defines and communicates the sexual assault awareness training requirements for all staff. The memorandum also requires that Regional Directors ensure all that all Headquarters staff selected for overseas post senior staff temporary duty assignments (TDYs) are in compliance with sexual assault awareness training requirements.

Additionally, the revised Standard Operating Procedures for TDYs includes a requirement to ensure sexual assault awareness compliance for TDYs. Before leaving on travel, all Peace Corps staff serving temporarily in a senior leadership position overseas are required to take the same on-line SARRR training courses and tests that all permanent overseas staff are required to take within 30 days of entering on duty.

Peace Corps communicated sexual assault training requirements to all staff during the FY 2016 SARRR refresher sessions that were delivered at every post. Staff were informed of the annual training plan via email as well as during the actual sessions of the following trainings:

- Safety and Security Instruction (SSI) 101: Within 30 days of their start date, all staff are required to take two on-line sexual assault trainings that can be found at Peace Corps University.
- Sexual Assault Awareness and Victim Sensitivity: The training plan is outlined below:
  - In-person refresher training for all overseas staff and Designated Staff in FY 2016.
  - Revision of on-line trainings – Sexual Assault Awareness & Victim Sensitivity and Sexual Assault Policies and Procedures in FY 2017.

The agency considers these trainings central to the ongoing organizational culture change around sexual assault awareness and effective and compassionate response to Volunteers who experience sexual assault.

**Documents to be Submitted:**

- Relevant Annual Training Plan from SARRR FY 2016 refresher sessions
- Memorandum from the Associate Director for Global Operations to Peace Corps Global titled *Ensuring Sexual Assault Awareness Training for Staff*
- Revised regional Standard Operating Procedures for TDYs

**Status and Timeline for Completion:** November 2016

**Recommendation 32**

**That the Director assess sexual assault staff training needs, to include interpersonal skills and teamwork, and modify training programs accordingly.**

**Concur**

**Response:** The Office of Safety and Security (OSS) included questions in the Designated Staff survey, sent out in August 2016, on training needs related to interpersonal skills such as communication and teamwork. The Designated Staff session in the FY 2016 SARRR refresher included a team building activity in which Designated Staff teams were asked to identify the qualities they would like bring to their team to improve team performance. The SARRR training team will modify training and professional development opportunities offered to Designated Staff based on the results of this survey. Specifically, the SARRR training team will work with the e-learning specialist in the Office of Staff Learning and Development (OSLD) to update the Sexual Assault Awareness and Victim Sensitivity course to build interpersonal skills and team work as well as incorporate these learning outcomes into the SARRR Training of Trainers (ToT) event.

**Documents to be Submitted:**

- FY 2016 Refresher Training Designated Staff session
- Excerpt from Summer 2016 Staff Survey Results
- SARRR ToT agenda
- Revised online sexual assault policy and victim sensitivity courses

**Status and Timeline for Completion:** August 2017

**Recommendation 33**

**That the Director identify an appropriate staff position to provide oversight and coordination of sexual assault training for staff.**

**Concur**

**Response:** Agency SARRR staff training will be coordinated by the Headquarters SARRR training team. This team will be an inter-office team consisting of OSS, the Office of Victim Advocacy, the Office of Health Services, the Counseling and Outreach Unit and Regions representatives. The SARRR Program Director will be a member of the SARRR training team and provide overall oversight. The SARRR training team will meet at least monthly to design and review deliverables and make decisions about SARRR training related issues and initiatives. The Headquarters SARRR training team will be in frequent communication with post-level SARRR training staff to ensure consistency and rigor in training at each post.

**Documents to be Submitted:**

- SARRR Training Team Meeting Notes
- SARRR Training Team Member list

**Status and Timeline for Completion:** August 2017

**Recommendation 34**

**That the Director create and make available an overarching policy roadmap that encompasses all policies and procedures that support the sexual assault risk reduction and response program.**

**Concur**

**Response:** On the Peace Corps intranet, the agency currently displays a document that lists all the policies and procedures with provisions relating to the Sexual Assault Risk Reduction and Response Program. This listing will be revised and expanded into a policy roadmap that (i) outlines the major SARRR-related policies and procedures, including Technical Guidelines and Safety and Security Instructions and (ii) indicates how SARRR policies or procedures are related to other policies or procedures.

**Documents to be Submitted:**

- Policy Roadmap for SARRR related policies

**Status and Timeline for Completion:** July 2017

**Recommendation 35**

**That the Director develop specific guidance to Peace Corps medical officers to clarify the standards and expectations for the provision of counseling services, and communicate that guidance to Volunteers.**

**Concur**

**Response:** On March 22, 2016, the Associate Director of the Office of Health Services (OHS) sent a Memorandum to Country Directors and Peace Corps Medical Officers (PCMOs) regarding the standards and expectations for the provision of counseling services. On October 27, 2016, OHS and Office of Global Operations (OGO) disseminated this memo more widely and made it available to Volunteers.

During onboarding, PCMOs are trained in the counseling services available to Volunteers and how these services may be accessed. PCMOs learn how to explain to a Volunteer what support services are available, how to refer a Volunteer for counseling, how to carry out an assessment for Respite Leave, and how to discuss with Volunteers the expectations for engaging in counseling. This information is provided to PCMOs formally during medical trainings, including Overseas Staff Training (OST), at OHS annual Continuing Medical Education (CME) conferences, and informally during ad-hoc consultation and communication with Counseling and Outreach Unit staff. The PCMO Support Unit within OHS is also available to support new PCMOs and answer questions they may have about services available.

Further, Volunteers are made aware of their access to counseling many times throughout service, including, but not limited to, at Pre-Service Training during SARRR sessions and during conversations with the PCMO during service. The new Safety and Security Resource Guide will include specific information on counseling services available to Volunteers. Additionally, the SARRR team will develop a poster on counseling services for posts to display in a visible area in main offices and regional hubs as appropriate. Finally, COU staff is readily available to answer any questions PCMOs and Volunteers have regarding counseling standards and expectations.

**Documents to be Submitted:**

- Memorandum from Associate Director of OHS to CDs and PCMOs, dated March 22, 2016
- Updated Safety and Security Resource Guide
- Relevant Updated SARRR Sessions

**Status and Timeline for Completion:** August 2017

**Recommendation 36**

**That the Director develop an internal communication plan to notify staff in a more timely and consistent manner regarding policy changes, especially those affecting the job responsibilities of staff in sexual assault risk reduction and response program designated positions.**

**Concur**

**Response:** The new SARRR Director will work with the Office of Chief Information Officer, OGO, and the Office of the General Counsel to develop and launch a new intranet page to highlight the SARRR program. The new intranet page will be a comprehensive resource for staff responsible for sexual assault cases. It will include a compilation of all Peace Corps Manual Sections and accompanying Procedures, Medical Technical Guidelines, Safety and Security Instructions and additional guidance documents related to sexual assault, announcements and explanations of any changes to the forgoing, answers to FAQs, case reviews with lessons learned, and general SARRR program information. The SARRR Program Director will also develop a plan to effectively communicate substantive changes in policies or procedures to relevant offices and staff.

**Documents to be Submitted:**

- Internal Communication Plan
- Screenshots of the SARRR Intranet Page

**Status and Timeline for Completion:** July 2017

## APPENDIX H: EVALUATION COMPLETION AND OIG CONTACT

---

### *Evaluation Completion*

This evaluation was conducted under the direction of Assistant Inspector General for Evaluations Jerry Black. Evaluation team members included: Kris Hoffer, Kaitlyn Large, Paul Romeo, Bruce Shahbaz, Rebecca Underhill, and Evaluation Apprentice A'Daris McNeese. Additional contributions were made by Greg Yeich, Erin Balch, Kate Pote, Kelsey Griffiths, and Evaluation Apprentice Alexandra Miller.



Jerry Black  
Assistant Inspector General for Evaluations

### *OIG Contact*

Following issuance of the final report, a stakeholder satisfaction survey will be distributed. If you wish to comment on the quality or usefulness of this report to help us improve our products, please contact Assistant Inspector General for Evaluations Jerry Black at [jblack@peacecorpsoig.gov](mailto:jblack@peacecorpsoig.gov) or 202.692.2912.