

# **DHS Does Not Have Comprehensive Policies or Training for Off-duty Conduct of Employees Traveling and Working Abroad**





# DHS OIG HIGHLIGHTS

## *DHS Does Not Have Comprehensive Policies or Training for Off-duty Conduct of Employees Traveling and Working Abroad*

May 27, 2016

### Why We Did This Inspection

The Department of Homeland Security has a substantial number of employees who travel and work abroad. Off-duty misconduct can undermine the Department's credibility and integrity and hinder its ability to achieve its mission. Our objective was to determine whether DHS has adequate policies and training governing off-duty conduct while abroad.

### What We Recommend

We recommend that DHS develop and disseminate a department-wide policy governing off-duty conduct abroad and ensure employees receive and understand the policy.

#### **For Further Information:**

Contact our Office of Public Affairs at (202) 254-4100, or email us at [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov)

### What We Found

Neither DHS nor the six DHS components with the largest international presence have comprehensive policies and training to govern employees' off-duty conduct while abroad. DHS has some limited, department-wide policies for off-duty conduct in general, but they do not specifically address employee conduct abroad; the six components' policies do not cover some aspects of conduct, such as drinking excessive amounts of alcohol and using drugs. DHS as a whole does not offer training in off-duty conduct for employees traveling and working abroad. One component offers training to those working abroad, but only one of the six offers training to both travelers and those working abroad. As of August 2015, DHS had nearly 1,500 employees working in 80 countries, and DHS employees make thousands of trips abroad. To minimize the risk of misconduct and its potential negative effect on the Department's ability to accomplish its mission, DHS should ensure it has comprehensive policies specifically addressing off-duty conduct abroad and make certain all employees traveling and working abroad are adequately trained and acknowledge and understand these policies.

### DHS Response

The Department concurred with our recommendation, but disagreed with the premise that to ensure proper behavior, conduct policy must specify that it also applies to employees traveling or working abroad.



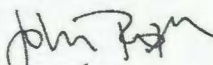
## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

May 27, 2016

MEMORANDUM FOR: The Honorable Russell C. Deyo  
Under Secretary for Management  
Department of Homeland Security

FROM: John Roth   
Inspector General

SUBJECT: *DHS Does Not Have Comprehensive Policies or Training  
for Off-duty Conduct of Employees Traveling and  
Working Abroad*

For your action is our final report, *DHS Does Not Have Comprehensive Policies or Training for Off-duty Conduct of Employees Traveling and Working Abroad*. We incorporated the formal comments provided by your office.

The report contains one recommendation aimed at improving off-duty conduct policies and training for DHS employees working and traveling abroad. Your office concurred with the recommendation. Based on information provided in your response to the draft report, we consider the recommendation open and resolved. Once your office has fully implemented the recommendation, please submit a formal closeout letter to us within 30 days so that we may close the recommendation. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions. Please send your response or closure request to [OIGInspectionsFollowup@oig.dhs.gov](mailto:OIGInspectionsFollowup@oig.dhs.gov).

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility for DHS. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Anne L. Richards, Assistant Inspector General, Office of Inspections and Evaluations, at (202) 254-4100.





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## Abbreviations

CBP	U.S. Customs and Border Protection
DHS	Department of Homeland Security
FAM	U.S. Department of State Foreign Affairs Manual
ICE	U.S. Immigration and Customs Enforcement
OIG	Office of Inspector General
TOP	table of offenses and penalties
TSA	Transportation Security Administration
USCIS	U.S. Citizenship and Immigration Services



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### Background

The Department of Homeland Security works closely with international partners, including foreign governments and global businesses, to strengthen the security of global trade and travel networks that the U.S. economy and communities rely on. According to the DHS Secretary, strengthening and unifying the Department's international engagement are key to creating a safe, secure, and resilient Nation.

As of August 2015, DHS had 1,467 representatives from 11 components and offices stationed in 308 cities in 80 countries. U.S. Customs and Border Protection (CBP), the United States Coast Guard, and U.S. Immigration and Customs Enforcement (ICE) have the largest permanent international presence. U.S. Citizenship and Immigration Services (USCIS), the United States Secret Service, and the Transportation Security Administration (TSA) each have about 60 staff members stationed abroad.

**Table 1: Components' Presence in Other Countries**

Component	Permanent Positions (as of August 2015)	Percentage (rounded to nearest whole number)*
<b>CBP</b>	704	48%
<b>Coast Guard</b>	390	27%
<b>ICE</b>	180	12%
<b>TSA</b>	64	4%
<b>Secret Service</b>	62	4%
<b>USCIS</b>	60	4%
<b>Other</b>	7	0%
<b>Total</b>	<b>1,467</b>	<b>99%</b>

Source: DHS Office of Inspector General (OIG) analysis of DHS Overseas Personnel & Activities Locator

\* Percentage do not total 100 percent due to rounding

According to DHS Management Directive 0480.1, *Ethics/Standards of Conduct*, "All employees will maintain especially high standards of honesty, impartiality, character, and conduct to ensure the proper performance of Government business and the continual trust and confidence of the citizens of the United States. ... These principles apply to official conduct as well as private conduct that affect in any way the ability of employees or the Department to effectively accomplish the work of the DHS."

To support its relations with other countries and international organizations, the United States maintains diplomatic and consular posts around the world.



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The Secretary of State is responsible for the overall coordination and supervision of U.S. Government activities abroad. Missions to countries and international organizations are headed by Chiefs of Mission. Employees from any U.S. Government agency are members of the mission and serve under Chief of Mission authority. Chiefs of Mission have the authority to declare a loss of confidence in any member of the mission. If a Chief of Mission loses confidence and determines that a member's continued assignment at the post no longer serves the post's best interest, DHS or one of its components may be asked to involuntarily curtail an employee's tour of duty.

Our objective was to determine whether DHS has adequate policies and training governing off-duty conduct while abroad. We reviewed policies related to four types of off-duty conduct; information on this conduct is included in the *U.S. Department of State Foreign Affairs Manual (FAM)*.

### *Drinking Excessive Amounts of Alcohol*

All Federal agencies prohibit their employees from drinking alcohol while on duty and on government property, but agencies differ in how they address off-duty alcohol consumption and work-related risks associated with excessive alcohol consumption. The moderate use of alcohol is generally accepted and legal in most jurisdictions, but excessive use may be a suitability or security problem.

### *Using Drugs*

Drug use is not generally an accepted form of behavior and in most jurisdictions is illegal. Consequently, employment may be denied or terminated for those who illegally use drugs, narcotics, or other controlled substances.

### *Soliciting Prostitutes*

Federal agencies recognize there are considerable differences of opinion in matters of sexual conduct and some matters are of no concern to the U.S. Government. However, sexual activity by an individual raises concerns when the conduct could threaten the mission of the employing agency or the individual's effectiveness, for example, through the possibility of blackmail, coercion, or improper influence.

According to the Department of Justice's Office of the Attorney General, regardless of whether prostitution is legal or tolerated in a particular jurisdiction, "soliciting prostitutes creates a greater demand for human



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trafficking victims and a consequent increase in the number of minor and adult persons trafficked into commercial sex slavery.”<sup>1</sup>

### *Engaging in Notoriously Disgraceful Conduct*

According to the FAM, “Notoriously disgraceful conduct is that which, were it to become widely known, would embarrass, discredit, or subject to opprobrium the perpetrator, the Foreign Service, and the U.S.” The FAM includes examples of this type of conduct, such as “frequenting of prostitutes, engaging in public or promiscuous sexual relations, spousal abuse, neglect or abuse of children, manufacturing or distributing pornography, entering into debts that cannot be paid, or using one’s position or immunity to profit or favor another or create the impression of gaining or giving improper favor.”

## Results of Inspection

Although DHS has employees working in 80 countries and its employees make thousands of trips abroad on official business annually, neither DHS nor the 6 components with the largest international presence have comprehensive policies and training to govern employees’ off-duty conduct while abroad. Specifically, the policies do not cover all the aspects of conduct, such as excessive consumption of alcohol or use of drugs. DHS as a whole does not offer training in off-duty conduct for employees traveling and working abroad. ICE offers training to those working abroad, but only USCIS offers training to both travelers and those working abroad. To minimize the risk of misconduct and its potential negative impact on the DHS mission, the Department should ensure it has comprehensive policies and training for employees traveling and working abroad, and that they acknowledge and understand these policies.

### **DHS Policies Do Not Cover Some Key Aspects of Off-duty Conduct**

The Department has some limited, department-wide policies governing off-duty conduct in general, but the policies do not specifically address employees’ conduct in other countries. Further, the policies only address some aspects of drinking alcoholic beverages and using drugs; they do not address solicitation of prostitutes or engaging in notoriously disgraceful conduct.

The Department’s only policy regarding drinking alcohol while off duty, *Use of Alcohol and the Operation of Government Vehicles*, dated April 20, 2015, specifies that DHS employees may not operate a government-owned, leased, or rented vehicle a minimum of 8 hours after consuming an alcoholic beverage.

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<sup>1</sup> Department of Justice, Office of the Attorney General, Memorandum for all Department Personnel, Prohibition on the Solicitation of Prostitution, April 10, 2015



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The policy also prohibits transporting alcohol in a government-owned, leased, or rented vehicle.

Under the Department's July 2012 *Drug-Free Workplace Plan*, which references Executive Order 12564 of 1986, *Drug-Free Federal Workplace*, refraining from using illegal drugs on and off duty is a condition of employment. The plan does not include information on using drugs abroad. For example, it does not state that employees remain subject to the Department's requirements regardless of the legality of drug use in the foreign jurisdiction where the employee is working.

All six DHS components with the largest international presence have policies that include guidance about off-duty conduct. Three of the policies point out that DHS' and the component's policies apply regardless of locale; two policies mention Chief of Mission authority. These policies share some common themes, such as directing employees to maintain standards that reflect positively on the component and report violations of the standards. They warn that employees may face consequences if they violate the standards. In addition, they advise employees not to engage in off-duty behavior that affects or impedes their professional responsibilities or adversely affects the reputation or mission of the component.

Three of the six components have policies that encompass off-duty conduct while abroad or on official travel and include some aspects of the conduct we reviewed, but they are missing information about one or more specific prohibitions against drinking excessive amounts of alcohol, using drugs, soliciting prostitutes, and engaging in notoriously disgraceful conduct.

In addition to these policies, all six components have tables of offenses and penalties (TOP), but the TOPs only contain information about corrective, disciplinary, or adverse actions for common offenses after the misconduct occurs. The TOPs are not intended to cover every possible offense, but generally describe certain types of misconduct, whether committed while on or off duty, for which employees may be disciplined. The TOPs also point out that the absence of a specific offense code covering an act does not mean the act is condoned, permissible, or would not result in disciplinary or adverse action. In the Coast Guard, civilians follow a commandant instruction, which includes a TOP; active duty personnel are guided by the Uniform Code of Military Justice, which also focuses on disciplinary actions for misconduct.

#### *Drinking Excessive Amounts of Alcohol*

All six components have policies with guidance on alcohol consumption, but with the exception of the Secret Service, they are missing certain provisions.





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For example, CBP's and USCIS' policies do not include guidance related to alcohol consumption while on official travel outside the United States. Some components' policies fail to address when employees should limit alcohol consumption, such as for specified time periods prior to duty hours. Some policies include prohibitions, but they are not specific. For example, according to CBP's policy, employees should limit their alcohol consumption for a "reasonable" period of time, rather than a specific number of hours, before operating a government-owned vehicle. Table 2 shows the information that is both included and missing from the components' policies.

**Table 2: DHS Component Policies on Alcohol Consumption**

	Term Off-duty	Provisions about Consumption While on Official Travel	For Specified Time Period Prior to Duty Hours	While Carrying Firearms	Before Driving Government Vehicles
	Contains		Restricts Consumption		
<b>CBP</b>	✓			✓	✓
<b>ICE</b>	✓	✓		✓	✓
<b>TSA</b>	✓	✓	✓	✓	✓
<b>Coast Guard</b>	✓	✓	✓		✓
<b>USCIS</b>	✓			Not Applicable*	
<b>Secret Service</b>	✓	✓	✓	✓	✓

Legend: ✓ Policy contains language or provision listed.

\* USCIS personnel do not carry firearms.

Source: OIG analysis of component policies

### Using Drugs

All components fall under DHS' policy, which prohibits the use of illegal drugs on and off duty. According to ICE's, TSA's, and the Secret Service's policies, this prohibition applies regardless of local laws and while abroad, even in locales where consumption is legal. According to the Coast Guard's policy, employees are expected to comply with the law and not use illegal drugs; they are also expected to neither condone substance abuse by others nor expose themselves to accidental intake of illegal drugs. USCIS' policies do not contain specific language prohibiting the consumption of illegal drugs while off duty or where consumption is legal. CBP's policy clearly depicts how consuming drugs can affect the integrity and effectiveness of the component, but does not include language prohibiting consumption of drugs in locales where using the drugs is legal.



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#### *Soliciting Prostitutes*

Five of the six components do not have any policies prohibiting solicitation of prostitutes. USCIS has a policy, *Prohibition on the Solicitation and Procurement of Commercial Sex*, which went into effect in June 2015. The policy specifically prohibits soliciting prostitutes while on official international travel, while off duty, and where prostitution is legal.

#### *Notoriously Disgraceful Conduct*

All six components' policies have gaps in defining and providing examples of notoriously disgraceful conduct. Only CBP's, TSA's, and USCIS' policies include the term notoriously disgraceful conduct, but none of the three defines it. The other three components' policies neither include nor define the term. CBP's policy includes examples of notoriously disgraceful conduct. According to USCIS' policy, *Solicitation and Procurement of Commercial Sex*, commercial sex is notoriously disgraceful conduct, but the policy only refers to it when discussing prostitution. CBP's and TSA's policies direct employees not to engage in activities that conflict with official government duties and responsibilities or negatively impact the component's ability to discharge its mission, cause embarrassment to the component, or cause the public to question the employee's reliability, judgment, or trustworthiness. Although ICE and the Secret Service do not include the term in their policies, both prohibit behaviors similar to those described in the term's definition. Table 3 shows which information is included and which is missing from these policies.



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**Table 3: DHS Component Policies on Notoriously Disgraceful Conduct**

	Contains			Defines Notoriously Disgraceful Conduct	Provides Examples of Notoriously Disgraceful Conduct
	Term “Notoriously Disgraceful Conduct”	Term “Off- duty”	Provisions for Behavior on Official Travel		
<b>CBP</b>	✓	✓			✓
<b>ICE</b>		✓	✓		
<b>TSA</b>	✓	✓	✓		
<b>Coast Guard</b>					
<b>USCIS</b>	✓				✓
<b>Secret Service</b>					

Legend: ✓ Policy contains language or provision listed.

Source: OIG analysis of component policies

Establishing comprehensive policies is critical to guiding employees’ off-duty conduct abroad. DHS and its components must effectively communicate policies and reiterate that off-duty conduct abroad affects the reputation and the mission of the Department and the United States. Incidents involving misconduct while off duty continue to occur, which underscores the need to implement and ensure compliance with comprehensive policies to guide employees representing the United States while traveling or working in other countries.

### **Training on Off-duty Conduct Abroad Is Inadequate**

The Department as a whole does not provide training on off-duty conduct for employees traveling or working abroad. At its Federal Law Enforcement Training Center, DHS offers Department of State-required pre-deployment training for employees traveling overseas for 30 days or longer or going to work at an embassy or consulate, but the training does not include instruction on off-duty conduct. Meeting the Department of State’s training requirements may create a false sense that those traveling or working abroad for 30 days or longer are well prepared.

Five of six components touch on personal conduct in training for new employees and ICE offers training to employees working abroad for 30 days or longer, but none of the five offers training on off-duty conduct to those traveling abroad for shorter terms. Only USCIS offers training on off-duty conduct to all employees working abroad for 30 or more days, as well as the majority of employees traveling abroad for fewer than 30 days. As shown in table 4, ICE, TSA, the Coast Guard, USCIS, and the Secret Service offer training on personal conduct, including formal presentations, to new personnel



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and emphasize employees' responsibility for their conduct. CBP's training for new personnel does not include such presentations or emphasize this responsibility. Only USCIS offers training on off-duty conduct to all personnel assigned abroad for 30 days or longer and to the majority of employees going abroad for fewer than 30 days.

**Table 4: Component Conduct Training for New Personnel and Employees Going Abroad**

	Training for New Personnel			Off-duty Conduct Training for Those Going Abroad for 30 or More Days	Off-duty Conduct Training for Those Going Abroad for Fewer than 30 Days
	Offers Formal Presentations on Personal Conduct	Training Material Includes Discussion of Off-duty Conduct	Emphasizes Employee Responsibility for Personal Conduct		
<b>CBP</b>					
<b>ICE</b>	✓		✓	✓	
<b>TSA</b>	✓	✓	✓		
<b>Coast Guard</b>	✓	✓	✓		
<b>USCIS</b>	✓	✓	✓	✓	✓
<b>Secret Service</b>	✓	✓	✓		

Legend: ✓ Policy contains language or provision listed.

Source: OIG analysis of component training

TSA and Secret Service training for new employees covers the components' standards and includes guidance on off-duty conduct in and outside the United States. USCIS training focuses on ethics and integrity. The Coast Guard offers a series of training courses comprising various aspects of off-duty conduct. Training materials from TSA, the Coast Guard, USCIS, and the Secret Service include discussion of on- and off-duty conduct, but the materials vary and do not discuss all four types of behavior. CBP's training materials do not mention off-duty conduct. Although ICE's training materials for new employees do not mention off-duty conduct, ICE provides training in off-duty conduct to employees working abroad for 30 days or longer.

Coast Guard attachés who work abroad go through the Joint Military Academy, which adequately instructs them on off-duty conduct. However, since fiscal year 2013, only 24 Coast Guard employees have attended the Joint Military Academy, which represents 6 percent of all Coast Guard employees currently working abroad.





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USCIS training for employees going abroad for 30 days or longer includes references to the FAM. Employees are reminded they are under Chief of Mission authority and that the Chief of Mission may ask a component to involuntarily curtail an employee's tour of duty. Employees are instructed to maintain the highest standards of conduct, including an especially high degree of integrity, reliability, and prudence during and after working hours, when on leave, and when traveling. The training also includes examples of notoriously disgraceful conduct. According to USCIS, the majority of personnel on short-term temporary assignments abroad receive training on off-duty conduct. USCIS employees traveling overseas for less than 30 days receive basic ethics training, including discussions about off-duty conduct and personal responsibility. However, the training is very general and not specific to any of the types of behavior in our review.

Fully training longer term travelers and those working outside the United States in off-duty conduct helps instill a sense of responsibility for personal behavior in general and when abroad. The absence of such training can lead to a lack of knowledge and misunderstanding about expectations regarding conduct. Further, although the U.S. Government does not require training of Federal employees traveling for less than 30 days, these travelers should at least receive information about and acknowledge they understand off-duty conduct expectations.

### **Conclusion**

Because they represent the U.S. Government, DHS employees who engage in off-duty misconduct while abroad can present unique concerns. Moreover, off-duty misconduct abroad can have an especially damaging effect on the U.S. Government's reputation. This has been demonstrated by allegations that during President Obama's visit to Cartagena, Colombia, for the Summit of the Americas conference, Secret Service agents solicited prostitutes and engaged in other misconduct. Since then, there have been other incidents involving misconduct, such as the excessive consumption of alcohol by off-duty DHS employees and allegations of recording a sexual encounter with prostitutes overseas using a government-issued device.

The Department's establishment of comprehensive policy and training requiring personnel to refrain from off-duty misconduct that can interfere with DHS' mission would better safeguard against incidents of misconduct. Employees need to understand that poor decisions about off-duty conduct can have serious ramifications for their careers and DHS' ability to carry out its mission. Comprehensive policies reinforced by training create a consistent message about proper behavior.



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### Recommendation

We recommend that the DHS Under Secretary for Management develop and disseminate a comprehensive department-wide policy that communicates DHS' authority and expectations for off-duty conduct while abroad and ensure all employees, whether traveling or working abroad, receive and understand this policy.

### OIG Analysis of DHS Comments

#### DHS Comments

The Department concurred with our recommendation. A summary of DHS' response and our analysis follows. We have included a copy of the management comments in their entirety in appendix A. DHS also provided technical comments, which we incorporated as appropriate.

#### Management Comments:

DHS response: The Department concurred with the recommendation, but disagreed with the underlying premise that any conduct policy covering DHS employees must specifically state it applies to off-duty conduct while traveling or working abroad. Nevertheless, Department leadership recognizes the potential benefits of providing additional information to employees to help ensure appropriate conduct. According to the Department, the Office of the Chief Human Capital Officer will provide information on the four types of behavior to employees traveling outside the United States. Although the Department has not yet determined how it will provide this information, the expected completion date is May 31, 2017.

OIG analysis: The Department's proposed actions are responsive to the recommendation. We stand by the underlying premise of our recommendation that the Department needs to clarify off-duty conduct policies for employees representing the U.S. Government in other countries. Without such clarification, employees may fail to fully understand the policy and be less able to make sound decisions, especially regarding behavior that may be acceptable or legal in other countries, but conflict with DHS' core values. We consider the recommendation open and resolved pending completion of the proposed corrective action and submission of adequate supporting documentation.



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## Appendix A

### Objective, Scope, and Methodology

DHS OIG was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

We conducted this inspection to determine whether DHS has adequate policies and training for DHS employees to govern off-duty conduct while abroad. We compiled data about DHS positions abroad and employees' trips to other countries using data as of August 2015 from DHS' Overseas Personnel and Activities Locator. (The Department compiles data in the database monthly using component data.) We focused our review on four types of off-duty, unprofessional behavior: drinking excessive amounts of alcohol, using drugs, soliciting prostitutes, and engaging in notoriously disgraceful conduct.

We researched government-wide policies governing employees' off-duty conduct and while abroad. We examined policies and guidance, along with new employee, and other training, on conduct while on foreign travel and while off duty. We collected component TOPs and reviewed DHS' standards for misconduct and associated penalties. Because the TOPs only contain information about corrective, disciplinary, or adverse actions for common offenses after the misconduct occurs, we did not consider them misconduct policies proscribing off-duty conduct or requiring components to take proactive measures to ensure employees traveling or working abroad are aware of any limitations on their off-duty conduct. We also researched Federal Government policies and reports related to off-duty conduct and foreign travel. We reviewed various OIG reports including, the Department of Justice OIG's *Review of Policies and Training Governing Off-Duty Conduct by Department Employees Working in Foreign Countries*, Evaluation and Inspections Division 15-2, January 2015.

Our review included discussions with officials from the Department's Office of the Chief Human Capital Officer, Office of Policy, and Office of the Chief Financial Officer; component officials from CBP, ICE, TSA, the Coast Guard, USCIS, and the Secret Service; and Defense Intelligence Agency personnel. We also reviewed the FAM and training provided prior to foreign travel.

We conducted this inspection between June and October 2015 under the authority of the *Inspector General Act of 1978*, as amended, and according to the Quality Standards for Inspection and Evaluation issued by the Council of the Inspectors General on Integrity and Efficiency.



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**Appendix B**  
**DHS Comments to the Draft Report**


U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

April 25, 2016

MEMORANDUM FOR: John Roth  
Inspector General

FROM: Jim H. Crumacker, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office 

SUBJECT: OIG Draft Report: "DHS Does Not Have Comprehensive  
Policies or Training for Off-Duty Conduct of Employees  
Traveling and Working Abroad"  
(Project No. 15-119-ISP-DHS)

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the Office of Inspector General's (OIG) work in planning and conducting its review and issuing this report.

The vast majority of the thousands of DHS employees who travel and work abroad do so in a professional and honorable manner. Current agency and component ethics guidelines, standards of conduct, and overseas deployment briefings are working as expected for these employees who generally represent the Department very well. DHS is committed to holding employees accountable when they deviate from acceptable standards of conduct.

The OIG report contained one recommendation with which the Department concurs. Specifically, OIG recommended that the DHS Under Secretary for Management:

**Recommendation:** Develop and disseminate a comprehensive department-wide policy that communicates DHS's authority and expectations for off-duty conduct while abroad and ensure all employees, whether traveling or working abroad, receive and understand this policy.

**Response:** Concur. DHS disagrees with OIG's apparent underlying premise that any conduct policy covering DHS employees must specifically state it applies off-duty and while traveling or working abroad, in order to be applicable. Leadership does however, recognize the potential benefits of providing additional information to employees to help





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ensure appropriate conduct. It is important to recognize though that it is not possible to entirely eliminate the potential risk of employee wrongdoing.

More specifically, the DHS Office of the Human Capital Officer will provide information regarding drinking excessive amounts of alcohol, using illegal drugs, solicitation of commercial sex, and engaging in notoriously disgraceful conduct to employees who travel outside the United States. The exact manner in which this will be done has not yet been determined. Estimated Completion Date: May 31, 2017

Again, thank you for the opportunity to review and comment on the draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.



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### **Appendix C**

#### **Office of Inspections and Evaluations Major Contributors to This Report**

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Kelly Herberger, Communications Analyst  
Natalie Fussell Enclade, Independent Referencer



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## **Appendix D**

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