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**Management Assistance Report:  
Although Progress Has Been Made,  
Challenges Remain in Monitoring and  
Overseeing Antiterrorism Assistance  
Program Activities in Afghanistan**

**MANAGEMENT ASSISTANCE REPORT**

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## Summary of Review

The Office of Inspector General (OIG) initiated this compliance follow-up review to determine whether the closed recommendations from OIG's April 2012 audit report on the Antiterrorism Assistance (ATA) program had improved management and oversight of that program.<sup>1</sup> The 2012 report identified several deficiencies that limited the ability of Department of State officials to determine the ATA program's effectiveness, and it contained seven recommendations intended to improve management and oversight of the ATA program worldwide. The recommendations were addressed to the two Department of State bureaus that have overlapping responsibilities for the ATA program: the Bureau of Diplomatic Security (DS) and the Bureau of Counterterrorism (see Appendix B).

This Management Assistance Report is the second product resulting from OIG's follow-up review and focuses on the ATA program in Afghanistan. In an earlier report, issued in May 2017, OIG reviewed the ATA program in Pakistan and found, among other conclusions, that the actions taken to address the April 2012 report's recommendations had not fully achieved the desired effect of improving the management and oversight of the Pakistan ATA program. To address the ongoing deficiencies in the Pakistan program, OIG modified and reissued one recommendation from the April 2012 report and made four new recommendations.<sup>2</sup>

In this review of the ATA program in Afghanistan, OIG examined the six recommendations from its April 2012 report that applied to the Afghanistan program and found that the actions taken to address those recommendations had incrementally improved the management and oversight of the Afghanistan program. Specifically, OIG found that ATA program sustainment by the Afghan Government had progressed; consultation with the Bureau of Democracy, Human Rights, and Labor on Afghanistan's eligibility for participation in the ATA program had increased; the database for tracking equipment was current and was being periodically validated; and a process for ensuring equipment compatibility had been implemented. However, because of competing priorities, a robust ATA program monitoring and evaluation system to assess program progress has not been established and implemented as recommended in 2012. In addition, required reports that are necessary to provide information on program progress were not being prepared, in part, because the Contracting Officer elected to receive weekly phone conferences rather than formal, written reports. Finally, in-country oversight was lacking because the individual assigned to oversee ATA activities in Afghanistan was not formally designated to report to the Contracting Officer on the quality of contractor performance; however, this issue was corrected in September 2016.

OIG made one recommendation to DS to address the deficiencies identified in this report. In addition, OIG previously offered recommendations that will benefit the ATA program in Afghanistan. Specifically, four of the five recommendations made in OIG's May 2017 report regarding the ATA program in Pakistan, when fully implemented, will also address deficiencies

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<sup>1</sup> OIG, *Evaluation of the Antiterrorism Assistance Program for Countries Under the Bureaus of Near Eastern Affairs and South and Central Asian Affairs* (AUD/MERO-12-29, April 2012).

<sup>2</sup> OIG, *Management Assistance Report: Challenges Remain in Monitoring and Overseeing Antiterrorism Assistance Program Activities in Pakistan* (AUD-MERO-17-37, May 2017).

identified with the the ATA program in Afghanistan. Those recommendations called on the relevant bureaus to (1) implement a monitoring and evaluation system, (2) develop and implement procedures to verify compliance with reporting requirements, (3) develop and implement procedures to verify that the Contracting Officer's Representative has appropriate documentation to support the receipt and payment of goods or services prior to approving invoices for payment, and (4) develop and implement procedures to verify that the ATA program Contracting Officer prepares and issues written contract modifications when necessary. As of October 16, 2017, three of the four recommendations remained open and are considered resolved pending further action.

DS concurred with the recommendation offered in this report and has taken steps to implement it. Specifically, DS has developed and implemented an internal Office Policy Directive 001-FY2018, which requires "Contracting Officer's Representatives overseeing ATA programs to document and maintain an archive of program progress obtained through meetings and phone conferences held in lieu of contractor-submitted formal written program and financial reports, contract status reports, and annual reports." On the basis of actions taken by DS, OIG considers this recommendation closed, and no further action is required. However, the three open recommendations relating to the ATA program in Pakistan that also apply to the ATA program in Afghanistan will continue to be monitored through OIG's audit compliance process until fully implemented (see Appendix C). DS's response to a draft of this report is reprinted in Appendix D.

## BACKGROUND

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In its April 2012 audit report titled *Evaluation of the Antiterrorism Assistance Program for Countries Under the Bureaus of Near Eastern Affairs and South and Central Asian Affairs* (AUD/MERO-12-29), the Office of Inspector General (OIG) reported that the Bureau of Diplomatic Security's Office of Antiterrorism Assistance (DS/T/ATA) and the Bureau of Counterterrorism (CT) had not developed specific, measurable, and outcome-oriented objectives for the Antiterrorism Assistance (ATA) program and had not established a means for evaluating progress against those objectives. The report also found that DS/T/ATA and CT had not assessed the ability of the host countries to further develop and build on the ATA training provided without U.S. Government support. As a result, the report concluded that DS/T/ATA could not determine the ATA program's effectiveness. The report made seven recommendations to improve management and oversight of the ATA program worldwide.

In June 2016, OIG initiated a compliance follow-up review to determine whether the recommendations from OIG's April 2012 audit report had improved ATA program management and oversight. This follow-up review revisited the ATA program in Pakistan and Afghanistan.<sup>3</sup>

In the first report, issued in May 2017, resulting from this follow-up review, OIG identified several ongoing deficiencies in the ATA program in Pakistan. To address those deficiencies, OIG modified and reissued one recommendation from the April 2012 report and made four new recommendations.<sup>4</sup>

The objective of this compliance follow-up review is to determine whether the corrective actions taken in response to the six recommendations that apply to the ATA program in Afghanistan have improved management and oversight of the ATA program specific to Afghanistan. The scope of this review covers FYs 2014–2016.

### Antiterrorism Assistance Program

In 1983, Congress amended the Foreign Assistance Act of 1961 through the International Security and Development Assistance Authorizations Act. These amendments authorized the President to provide assistance to foreign countries to enhance the abilities of law enforcement personnel to deter terrorists and terrorist groups from engaging in international terrorist acts.<sup>5</sup> The amendment led to the establishment of the ATA program, which has the following three objectives:

- To enhance the antiterrorism skills of friendly countries by providing training and equipment to deter and counter terrorism.

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<sup>3</sup> AUD/MERO-12-29 reported on the ATA program in 22 countries. OIG initiated a follow-up review of the ATA programs in Pakistan and Afghanistan because these countries are key partners in the two ongoing overseas contingency operations: Operation Freedom's Sentinel and Operation Inherent Resolve.

<sup>4</sup> AUD-MERO-17-37, May 2017.

<sup>5</sup> Pub. L. No. 87-195, pt. II, § 571, as amended by Pub. L. No. 98-151 § 101(b)(2), 97 Stat. 972 (1983) (codified at 22 U.S.C. § 2349aa).

- To strengthen the bilateral ties of the United States with friendly governments by offering concrete assistance in deterring terrorism.
- To increase respect for human rights by sharing with foreign civil authorities modern, humane, and effective antiterrorism techniques.<sup>6</sup>

The ATA program achieves its objectives by securing the cooperation of the partner nation to conduct training with its law enforcement agencies and then awarding contracts to organizations with the skills to deliver antiterrorism-related training classes and manage training and equipment programs identified by capabilities assessments. DS/T/ATA currently conducts ATA training worldwide through its Global Antiterrorism Assistance contract. The contract is an indefinite-delivery, indefinite-quantity contract, and DS/T/ATA issues task orders for the required training in each partner country. The contract has been in effect since June 22, 2011, and has been extended several times.

### ATA Program Management and Oversight

CT and DS/T/ATA have overlapping responsibilities for managing and overseeing the worldwide ATA program, which requires both offices to work together in matching strategy and policy to implementation and resources. The Foreign Affairs Manual (FAM) contains specific requirements for worldwide ATA program management and oversight. The FAM designates CT as responsible for policy formulation, strategic guidance, and oversight of the ATA program, although DS/T/ATA, as the program’s primary implementer, is responsible for program administration and implementation.<sup>7</sup> In May 2015, CT and DS/T/ATA entered into a memorandum of agreement (MOA) which detailed CT and DS/T/ATA respective and joint responsibilities as summarized in Table 1.

**Table 1: CT and DS Responsibilities for the Antiterrorism Assistance Program**

CT Responsibilities	Joint Responsibilities	DS Responsibilities
<ul style="list-style-type: none"> <li>• Choosing eligible partner nations</li> <li>• Providing strategic regional and country-specific goals to DS</li> <li>• Coordinating decision-making on ATA budget allocations</li> <li>• Overseeing the ATA program</li> <li>• Developing multi-year country and regional strategies</li> </ul>	<ul style="list-style-type: none"> <li>• Creating a performance monitoring plan to measure progress toward desired results on the basis of established performance standards</li> </ul>	<ul style="list-style-type: none"> <li>• Implementing the ATA program</li> <li>• Evaluating ATA training</li> <li>• Developing courses and curriculum</li> <li>• Providing full-time training staff</li> <li>• Using country and regional strategies to create country implementation plans</li> <li>• Collecting relevant monitoring and evaluation data; drafting quarterly and annual reports</li> </ul>

**Source:** OIG prepared from an analysis of the MOA pertaining to the ATA program, which was executed by CT and DS/T/ATA in May 2015.

<sup>6</sup> 22 U.S.C. § 2349aa-1, “Purposes.”

<sup>7</sup> 1 FAM 262.5-1, “Office of Antiterrorism Assistance (DS/T/ATA).”

In addition to CT and DS/T/ATA, the Bureau of Democracy, Human Rights, and Labor (DRL) provides input to CT to ensure that countries selected for assistance do not have a record of human rights violations. For a more complete description of the responsibilities of these three bureaus relative to the ATA program, see Appendix A.

## **ATA Program in Afghanistan**

According to DS, since the inception of the ATA program in Afghanistan in 2002, it has evolved into the largest ATA program globally. The ATA Afghanistan program was allocated a total of \$39 million in FYs 2014 and 2015 to conduct training classes but no funds had been allocated in FY 2016. During FYs 2014–2016, DS/T/ATA conducted 323 classes and trained 4,069 students using the funds allocated through FY 2015. Examples of classes provided include response to explosive incidents, emergency medicine, police investigations, and forensic examination and analysis. Afghanistan ATA program funds are generally used to pay for (1) costs associated with conducting the ATA training classes and (2) DS/T/ATA operational costs, such as travel and administrative costs for ATA staff assigned to Afghanistan, equipment purchased to support the conduct of training, and training facility maintenance and operations. During FY 2014 through FY 2016, \$5.9 million was used to pay for ATA training costs and \$16.1 million was used to pay for DS/T/ATA operational costs.

## **Recommendations From OIG's 2012 Report To Address ATA Program Deficiencies**

In its April 2012 audit report, OIG reported that DS/T/ATA could not determine the effectiveness of its ATA program activities because it had not developed specific, measureable, and outcome-oriented program objectives or implemented a mechanism for program evaluation. To address the deficiencies, OIG made the seven recommendations that are listed in Appendix B. As of June 2015, OIG determined that the agreed-upon corrective actions for six of those recommendations had been completed, and therefore the recommendations were closed. OIG closed the final recommendation—to establish a monitoring and evaluation system (Recommendation 1)—when it modified and reissued the recommendation in its May 2017 report involving the ATA program in Pakistan.

Six of the seven April 2012 recommendations applied to the ATA program in Afghanistan, and this report reviews the effect of the implementation of those recommendations on the Afghanistan program. Table 2 presents the six recommendations applicable to the ATA program in Afghanistan.

**Table 2: AUD/MERO-12-29 Recommendations Applicable to the Afghanistan ATA Program**

<b>Rec. #</b>	<b>Recommendation</b>
1	DS, in coordination with CT, should establish a monitoring and evaluation system that includes clearly defined and measurable outcome-oriented strategic goals and program objectives; measureable performance indicators that clearly link to strategic goals and program objectives; baseline data and annual performance targets for each indicator; and descriptions of how, when, and by whom performance data will be collected, analyzed, and reported.
2	DS, in coordination with CT, should develop a definition for what constitutes a developmental ATA program, consistently apply that definition to country programs, and ensure that partner country sustainability timelines are established for developmental ATA programs.
3	DS and CT, in coordination with DRL, should establish and implement a process that ensures effective consultation with DRL on the designation of foreign countries that are eligible for assistance through the ATA program as well as the training and equipment each designated country is to receive.
4	DS should implement a standardized reporting process for in-country oversight of contracts for ATA program training in partner countries.
5	DS should periodically validate its End Use Monitor database to ensure that the database includes records of all weapon transfers.
6	DS should establish a process, before equipment is provided to partner countries, to determine whether the equipment will be used and whether the equipment is compatible with and at an appropriate level for the partner country.

**Source:** *Evaluation of the Antiterrorism Assistance Program for Countries under the Bureaus of Near Eastern Affairs and South and Central Asian Affairs*, AUD/MERO-12-29, April 2012.

## RESULTS

### Challenges Remain in Monitoring and Overseeing Antiterrorism Assistance Program Activities in Afghanistan

OIG found that the actions taken to address the recommendations made in OIG's April 2012 report relating to the ATA program incrementally improved the management and oversight of the program in Afghanistan. However, several areas require additional corrective action to ensure that the ATA program is fully achieving its objectives and is effectively using taxpayer funds.

#### *CT and DS/T/ATA Have Partially Improved Their Monitoring and Evaluation of ATA Activities in Afghanistan*

In its April 2012 report, OIG reported that DS/T/ATA could not determine the effectiveness of its ATA activities because it had not established a monitoring and evaluation system with specific,



measurable, and outcome-oriented program objectives or a mechanism for program evaluation. Recommendation 1 in that report called on DS and CT to “establish a monitoring and evaluation system that includes clearly defined and measurable outcome-oriented strategic goals and program objectives; measurable performance indicators that clearly link to strategic goals and program objectives; baseline data and annual performance targets for each indicator; and descriptions of how, when, and by whom performance data will be collected, analyzed, and reported.” DS partially concurred with the recommendation and also identified actions it would take.

During this follow-up review, OIG found that CT and DS/T/ATA had not fully established a monitoring and evaluation system as recommended in April 2012 but were in the process of doing so. In September 2015, the Department awarded a contract for a comprehensive evaluation of the ATA program. The contractor submitted the evaluation on June 15, 2016, and work commenced on the monitoring and evaluation system on September 23, 2016. During field work, CT officials stated that “competing priorities” delayed system development, but, at that time, they expected to complete the system by the end of September 2017.<sup>8</sup> DS/T/ATA officials explained that the monitoring and evaluation system is a generic system that will be used in all countries with ongoing ATA activities, including those in Afghanistan.

OIG also identified this deficiency in its May 2017 report on the ATA program in Pakistan. In that report, OIG concluded that DS and CT were making progress in establishing a monitoring and evaluation system as recommended. Therefore, Recommendation 1 in the April 2012 report was closed and the recommendation was modified and reissued in OIG’s May 2017 report on the ATA program in Pakistan to reflect current conditions.<sup>9</sup>

### *Some Contractual Requirements Are Not Being Met*

Although DS/T/ATA continues to develop the monitoring and evaluation system recommended in the April 2012 report, OIG found that DS/T/ATA has not been collecting other monitoring and evaluation information required by the Global Antiterrorism Assistance contract that would be useful in evaluating program progress in Afghanistan. For example, the contract requires contractors to submit annual reports with a detailed narrative summary of the results of contractor performance, including a summary of contract and financial activity and specific examples of progress in strengthening avenues of cooperation for sustaining partner nation

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<sup>8</sup> As of October 10, 2017, however, CT officials stated that they have not completed the monitoring and evaluation system. OIG will continue to monitor CT’s progress on this front.

<sup>9</sup> The recommendation in OIG’s May 2017 report that was modified and reissued calls for “the Bureau of Counterterrorism, in coordination with the Bureau of Diplomatic Security, to implement a monitoring and evaluation system to include measuring performance in accordance with the requirements outlined in the Department’s Performance Management Guidebook and the Memorandum of Agreement executed between the Bureau of Counterterrorism and the Bureau of Diplomatic Security’s Office of Antiterrorism Assistance.” On the basis of DS and CT’s concurrence with the recommendation, OIG considers the recommendation resolved pending further action. The recommendation will be closed “when OIG receives and accepts documentation demonstrating that a monitoring and evaluation system has been implemented that includes measuring performance, in accordance with the requirements outlined in the Department’s Performance Management Guidebook and the MOA executed between CT and DS/T/ATA.”



engagement in combating terrorism. However, in reviewing annual reports that the contractors had submitted for their activities in Afghanistan, OIG found that the reports did not contain required information on program progress.

The ATA program contractors in Afghanistan also did not submit other contractually required reports—including monthly program and financial reports detailing outstanding training requests; the status of performance and deliverables; prices of services delivered; and summaries of invoices submitted, outstanding, and paid. These reports are key to ensuring that the contractors are complying with the terms of the contract and that the ATA program is meeting its intended objectives. DS/T/ATA officials explained that the previous Contracting Officer (CO) and Contracting Officer's Representative (COR) waived the monthly program and financial reports because the CO elected to conduct weekly phone conferences with the in-country program manager instead. The CO is authorized to waive reporting requirements on the basis of authorities defined in the Federal Acquisition Regulation (FAR). Specifically, the FAR states that the CO is responsible for awarding, negotiating, administering, modifying, terminating, and making related contract determinations and findings on behalf of the U.S. Government.<sup>10</sup>

According to the previous CO, the COR verified that work was completed and then approved contractor invoices on the basis of weekly phone conferences. The COR also reviewed end-of-course reports. The previous CO also stated that he believed this approach was sufficient to verify that contract services are delivered. Although the CO acted within his discretion to modify the reporting processes, OIG found no requirement or effort had been made to document the phone conferences—including the participants, the topics discussed, and the decisions made. Consequently, no records exist to ensure the transfer of institutional knowledge. In addition, it is important to note that the reports requirement was waived without the CO adjusting the total value of the contract to reflect a reduction in work for the contractors involved.

The contractors did submit contractually required after-action reports throughout the entire 3-year period. OIG found that contractors sent the after-action reports to DS/T/ATA, which then entered the reports on a SharePoint site shared with CT. ATA program contractors must draft these reports within 10 days of course completion and send them as part of the end-of-course report to DS/T/ATA to review and share with CT. The MOA states that the purpose of monitoring data is to determine whether progress is being made against programmatic objectives and to make adjustments as needed. According to a DS/T/ATA official, information in the reports might include a description of equipment problems, instructional and translation feedback, or issues with the facility. DS/T/ATA stated that this information is invaluable and filters feedback to the appropriate team member for corrections, as necessary.

One problem OIG noted in the after-action reports, however, is that some problems identified in the reports persisted during several fiscal years. For example, an after-action report from October 2013 stated that the course handouts were in English and none of the students could read English. A subsequent report in March 2014 from the same course stated that the course handouts had been translated but the translation was poor. In February 2015, another after-

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<sup>10</sup> FAR 1.602-1(a), "Authority."

action report requested a further review of the course handouts and a possible rewrite as materials were outdated and poorly translated. As recently as July 2016, an after-action report documented that the first-day course materials were again in a language that 11 students could not read. Although DS/T/ATA collected all the after-action reports, for these reports to be useful, concerns and deficiencies identified in them must be addressed. The repeated feedback regarding translation and language instruction suggests that DS/T/ATA was not addressing the concerns and deficiencies reported, thereby affecting the effectiveness of the training program.

In addition to the after-action reports, the contractors also submitted weekly site reports during the entire period of OIG's review. Although the weekly site reports are not required by the contract, they are helpful in assessing the program by including course deliveries; mentoring activities; security status updates; general operations; and recommendations for improvements, greater efficiency in operations, and cost savings. The reports do not include information on progress toward goals.

In its May 2017 report on the ATA Pakistan program, OIG found that the CO had waived the requirement for submitting monthly program and financial management reports but did not modify the contract to reflect the waiver. Accordingly, OIG recommended that the Bureau of Administration, in coordination with DS, develop and implement procedures to verify that the CO prepares and issues contract modifications when necessary to alter the terms of a contract.<sup>11</sup> In a July 2017 letter to OIG, DS/T/ATA stated that it had modified the contract to eliminate the requirement to provide monthly program and financial reports and monthly task order activity reports. As a result, OIG closed the recommendation.

Even though the CO acted under his authority and modified the contract to waive the requirement for submitting these reports, documentation of the management and oversight—whether in the form of monthly reports or weekly phone calls—is needed. Such documentation ensures that future COs and CORs have the necessary information to perform adequately their oversight duties. Accordingly, OIG is making the following recommendation.

**Recommendation 1:** OIG recommends that the Bureau of Diplomatic Security develop and implement a policy to require that Contracting Officers and Contracting Officer's Representatives overseeing Antiterrorism Assistance programs document program progress obtained from meetings and phone conferences held in lieu of contractor-submitted formal written program and financial reports, contract status reports, and annual reports.

**Management Response:** On October 4, 2017, the Bureau of Diplomatic Security issued Office Policy Directive 001-FY2018, which states "Contracting Officer's Representatives overseeing ATA programs will document and maintain an archive of program progress obtained through meetings and phone conferences held in lieu of contractor-submitted formal written program and financial reports, contract status reports, and annual reports." The

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<sup>11</sup> Appendix C shows that the recommendation (Recommendation 4) in the May 2017 report on the ATA program in Pakistan is closed.

Bureau included a copy of Office Policy Directive 001-FY2018 with its response to a draft of this report.

**OIG Reply:** OIG reviewed Bureau of Diplomatic Security Office Policy Directive 001-FY2018 and accepts the directive as evidence that action has been taken to implement the intent of this recommendation. Therefore, OIG considers this recommendation closed, and no further action is required. However, the three open recommendations relating to the ATA program in Pakistan that also apply to the ATA program in Afghanistan will continue to be monitored through OIG's audit compliance process until fully implemented (see Appendix C).

### *Some Memorandum of Agreement Requirements Are Not Being Met*

Because CT and DS/T/ATA have overlapping responsibilities for managing and overseeing the worldwide ATA program, these offices must work together in matching strategy and policy to implementation and resources. This requires DS/T/ATA to regularly report on progress against goals and indicators of performance, whether desired results are occurring, and whether implementation is on track. However, as shown in Table 4, OIG's analysis found that DS/T/ATA either did not prepare many key reports required by the MOA or did not include sufficient information on progress to keep CT informed.

**Table 4: Key ATA Reporting Requirements in the Memorandum of Agreement**

Requirement	Fully Implemented	Partially Implemented	Not Implemented
DS/T/ATA developed a web-based platform to capture student data	<input checked="" type="checkbox"/>		
DA/T/ATA developed a SharePoint platform for sharing monitoring data	<input checked="" type="checkbox"/>		
DS/T/ATA conducted assessments of ATA program every 2 to 3 years	<input checked="" type="checkbox"/>		
End-of-course Reports collected and shared with CT	<input checked="" type="checkbox"/>		
Student survey data captured		<input checked="" type="checkbox"/>	
Country Implementation Plans updated annually		<input checked="" type="checkbox"/>	
Quarterly Reports included required narrative		<input checked="" type="checkbox"/>	
Annual Reports prepared			<input checked="" type="checkbox"/>
Performance monitoring plans with performance indicators developed			<input checked="" type="checkbox"/>
Evaluations conducted to assess program outcomes and progress			<input checked="" type="checkbox"/>

**Source:** OIG prepared from an analysis of the MOA executed between CT and DS/T/ATA and additional documents provided by DS/T/ATA.

Table 4 shows that DS/T/ATA fully implemented requirements for developing a web-based platform to capture student data, developing a SharePoint platform to share monitoring data,

conducting assessments of ATA program every 2 years, and collecting end-of-course reports and sharing them with CT.

Table 4 also shows that DS/T/ATA partially implemented the requirements to prepare and provide student survey data, country implementation plans, and quarterly reports. Most student surveys and end-of-course summaries were submitted along with country implementation plans. Student surveys included results of pre- and post-course testing. The post-course testing shows that students retained the information taught in the courses. However, the testing did not address whether the students use the information in their careers. As a result, the overall effectiveness of the ATA program in Afghanistan cannot be determined based on available information.

The Afghanistan country implementation plans were based on policy guidance and strategic goals provided by CT, input from U.S. Embassy Kabul and regional bureaus, performance monitoring plan results, and budgetary considerations. The plans, however, were not updated annually as required. DS/T/ATA officials explained that the plans were updated, as needed, rather than annually. These documents contain information on program outputs but do not elaborate on outcomes that show the ATA program is making progress.

According to the MOA, quarterly reports should identify classes implemented during the reporting period, the classes scheduled for the next 3 months, progress made on indicators in the performance monitoring plan with accompanying narrative explanations, classes canceled and the reason, success stories, noteworthy photos, and course and student feedback. DS/T/ATA did submit quarterly reports; however, the reports only listed outputs and activities such as the classes provided and the number of students in attendance. Although these requirements were partially implemented, they are not sufficient to show progress toward program goals and lack the detail needed to facilitate effective decision-making.

Lastly, Table 4 shows that DS/T/ATA did not implement the requirements to prepare annual reports, develop performance monitoring plans with performance indicators, and conduct evaluations to assess program outcomes and progress. For example, according to the MOA, DS/T/ATA should submit annual reports that contain a one- to two-page summary of results of the prior year's work. However, DS/T/ATA did not submit annual reports because DS/T/ATA officials were not fully attentive to the requirements and believed that providing other forms of monitoring and evaluation (such as assessments, weekly site reports, and after-action reports) was sufficient to capture progress toward goals. However, as OIG noted above, these reports focus primarily on the activities carried out rather than on whether the program was making progress against its overarching goals. Only the pre- and post-testing data in the after-action report directly indicate that progress is being made. Without this information, DS/T/ATA lacks any basis for determining whether its ATA program training in Afghanistan is effective.

Although the absence of a monitoring and evaluation system continues to affect the ATA program, OIG is not making a recommendation in this report because a related recommendation was made in its May 2017 report involving the ATA program in Pakistan. That

recommendation is currently being monitored for implementation through OIG's audit compliance process.

***CT and DS/T/ATA Have Developed a Definition and Timelines for a Developmental ATA Program***

In its April 2012 report, OIG reported that CT and DS/T/ATA had not developed a definition for what constitutes a developmental ATA program, in which partner country sustainability is a primary goal, and had not ensured that timeframes for creating self-sufficient training units were established for developmental ATA programs in partner countries. Recommendation 2 in that report called on DS and CT to "develop a definition for what constitutes a developmental ATA program, consistently apply that definition to country programs, and ensure that partner country sustainability timelines are established for developmental ATA programs."

In a July 2012 memorandum to OIG, DS/T/ATA and CT partially addressed OIG's concerns by providing a definition of a developmental ATA program. Specifically, they defined a developmental program as a bilateral program with the following features:

- The duration of the program is anticipated to extend by a minimum of 3 years.
- The partner nation is willing and able to dedicate the trainer and support resources to establish an ongoing internal capability to maintain instructor-level expertise and skill in a particular subject.
- The partner nation and the U.S. embassy agree to establish an in-country resident program manager position with the appropriate staff.
- Sustainment (of both the training program and the institution receiving the training) is a planned and expected outcome in the partner nation's country implementation plan.
- Once a sustainment objective is planned and training delivered, staff members from DS/T/ATA and CT will formally evaluate, in terms of policy, strategy, and technical capability, the degree to which the capacity-building and sustainment initiative was successful and will advise on any related additional support that may be required.

Three years later, in June 2015, OIG closed recommendation 2 because DS/T/ATA and CT submitted a country implementation plan for Afghanistan that included capability and sustainability timelines as well as a summary explaining that DS/T/ATA had consistently applied its definition for what constitutes a developmental ATA program.

To determine whether the timeframes and plan collectively resulted in improvements in the sustainment of Afghanistan units, OIG interviewed DS/T/ATA officials. These officials explained that they developed and generally followed the 3-year training schedule shown in Table 5.

**Table 5: Afghanistan ATA Program Timeline for Achieving a Sustainable Program**

Year 1	Year 2	Year 3
<ul style="list-style-type: none"> <li>ATA students attend a basic ATA hard skills (tactical) course.</li> <li>The students' home agencies identify candidates for a basic ATA instructor development course.</li> <li>After successful completion of the course, the students are stationed at the training camp to monitor on a daily basis course modules taught by ATA U.S. instructors or other certified Afghan instructors.</li> </ul>	<ul style="list-style-type: none"> <li>The students attend specialized areas of instruction.</li> <li>The students are engaged in instructing appropriate modules and are critiqued by an ATA mentor.</li> <li>As the students become more proficient, they will begin the certification process.</li> </ul>	<ul style="list-style-type: none"> <li>The students continue the certification process for each ATA module they will instruct.</li> <li>Once students successfully complete the certification process for a module, they will be assigned to teach the module during the next course delivery.</li> </ul>

**Source:** Generated by OIG from sustainment data provided by DS/T/ATA in May 2017.

This approach resulted in advancements in achieving sustainable units. For example, ATA instructors and participants in the instructor development program stated that the Presidential Protective Service—the sole focus of the ATA Afghanistan program when it started in 2002—became capable of conducting its own training in 2016. However, it continues to rely on U.S. Government funding. The Presidential Protective Service comprises 700 agents from all ethnic groups and exclusively serves as the protective detail for the Afghan president. ATA instructors and participants explained that, from year 1 to year 3, quality candidates were identified from basic skills classes and participated in the ATA program's instructor development program. A team of deployed advisors provided the candidates continuous training and ongoing mentorship aimed at ensuring the candidates retained lessons learned and were able independently to deliver antiterrorism-related training. As the candidates successfully progressed through the 3-year training period, they worked side by side and were integrated with ATA instructors.

Another unit, the Afghan Security Service, is nearing self-sustainment. The Afghan Security Service consists of more than 5,000 agents responsible for the protection of Afghan vice-presidents, visiting foreign dignitaries, and ministers of government. Three additional units—the Afghan Border Patrol, the Kabul Police crisis Response Team Units, and the General Command Special Police Unit—have begun training toward sustainment.<sup>12</sup>

In addition to interviewing DS/T/ATA officials, OIG reviewed DS/T/ATA's process for tracking student class completions in the instructor development program. The documentation showed 36 instructor candidates as of July 2017, and DS/T/ATA tracked each student's progress until the

<sup>12</sup> General Command Special Police Unit and Crisis Response Units are Ministry of Interior Police and security units assigned to respond to high-profile attacks within Kabul, including incidents involving U.S. diplomatic personnel and facilities. General Command Special Police Unit personnel have been deployed to other parts of Afghanistan in support of the Afghan National Army.

student achieved trainer status. OIG's review of the process found that it allows ATA, partner nation department leads, and instructors to track the progression of individual instructor candidates throughout the program from their initial monitoring of courses to independent instruction.

OIG also found that DS/T/ATA was in full compliance with the assessment guidelines in the MOA, which state that assessments should occur with each partner nation every 2 to 3 years. DS/T/ATA's Assessment and Monitoring Unit conducted capability assessments in 2012 and 2015 using the Performance Measures of Effectiveness system. The Performance Measures of Effectiveness scale (on which 1 means little to no capability and 5 indicates complete self-sufficiency) provides an objective, quantitative method for identifying and prioritizing assistance needs and measuring progress of partner nations toward self-sustaining proficiency. During the 2015 assessment, the Assessment and Monitoring Unit was able to document improvement in six capability ratings for programmatic objectives, compared with the 2012 assessment, and assessed two new programmatic objectives. However, according to a DS/T/ATA's assessment, two programmatic objectives could not be evaluated because of security concerns, and one capability rating remained the same from 2012 to 2015. Because of the tracking of students in the instructor development program and the positive ratings on the sustainability assessment, OIG concluded that DS/T/ATA and CT have greatly improved Afghanistan's ability to sustain its own ATA program without U.S. support.

### ***CT and DS/T/ATA's Consultation With DRL***

In the April 2012 report, OIG found that CT and DS/T/ATA did not consult with DRL when selecting partner nations or when determining the assistance to be provided to those countries. Recommendation 3 in that report called on CT and DS to "establish and implement a process that ensures effective consultation with DRL on the designation of foreign countries that are eligible for assistance through the ATA program as well as the training and equipment each designated country is to receive." CT and DS issued a policy directive in June 2012 directing the manner in which CT and DS/T/ATA should consult with DRL on the ATA program, and OIG accordingly closed the recommendation in November 2012.

During this follow-up review, OIG found that the policy directive had resulted in consultations between DRL and CT on selecting partner countries and determining the assistance to be provided. For example, the policy directive requires DS/T/ATA to solicit DRL input on all revisions made to human rights modules presented within each training course. OIG reviewed the training curriculums for the 50 training classes conducted in Afghanistan from FY 2014 through FY 2016 and found that, in response to the consultation requirement, a human rights module was included in 49 of the 50 classes. For one training course, DS/T/ATA was unable to provide a training curriculum that included a human rights module. Although DS/T/ATA provided a memo from the contractor explaining that human rights principles were woven throughout the course, OIG could not confirm this. In November 2016, OIG observed several training classes in Kabul and confirmed they all included human rights modules that addressed best practices and lessons learned in protecting human rights.



OIG also verified that CT, DS/T/ATA, and DRL coordinated to establish and implement a process for vetting students for each of the 50 ATA training classes conducted in Afghanistan. OIG obtained student rosters and Leahy vetting batch numbers from DS/T/ATA and verified that DRL had cleared the students in each course through its Leahy vetting process, using the International Vetting and Security Tracking system.

### *In-country Oversight of ATA Contracts*

In its April 2012 report, OIG found that no U.S. Government officials were overseeing ATA training in the field and providing feedback to the CO. Although DS/T/ATA had appointed a COR and a Government Technical Monitor (GTM) to administer the ATA contracts, both individuals were stationed in the Washington, DC, area and not at the locations where training was taking place. DS/T/ATA believed that it was cost prohibitive and impractical to have one of these appointed individuals attend all overseas classes. OIG agreed that it would be impractical for the COR or the GTM to travel to all the ATA training sites. Therefore, Recommendation 4 in the 2012 report called on DS to "implement a standardized reporting process for in-country oversight of contracts for ATA program training in partner countries." OIG closed Recommendation 4 in July 2013 because DS/T/ATA issued a policy directive requiring oversight by officials involved with the ATA program in the field. When a full-time ATA employee is not in-country, the policy directive instructs the ATA program manager to request that the regional security officer complete and return a checklist evaluating the field training to the COR for review and approval.

During this follow-up review, OIG found results similar to those in the April 2012 report. Specifically, OIG found that, until September 2016, only third-party contractors were in Afghanistan coordinating the ATA program, and the regional security officer was never asked to provide the COR with written confirmation of contractor compliance with the contract. The in-country deputy program manager, who was a third-party contractor, was overseeing training in the field, but could not be designated as a COR or GTM because contractors (other than personal services contractors) are not eligible to fill those roles.<sup>13</sup> Such a designation is important because the Foreign Affairs Handbook (FAH) states that the review and approval of invoices must include supporting documentation that shows the goods were actually received or services actually performed in accordance with the terms of the contract.<sup>14</sup> The FAH further states that acceptance of goods and services on behalf of the U.S. Government is an inherently governmental function.<sup>15</sup> A U.S. Government employee receiving official (or authorized personal services contractor) must review and acknowledge that the supplies or services conform to applicable contract quality and quantity requirements.<sup>16</sup> By not performing required oversight

<sup>13</sup> Federal Acquisition Regulation (FAR) 1.602-2(d)(1) and 14 FAH-2 H-113 b, "Qualifying as a COR Federal Acquisition Certification: Contracting Officer's Representative (FAC-COR)." Under 14 FAH-2 H-113 b, personal services contractors hired under domestic personal services contracts or post-issued personal services agreements are eligible to perform COR duties. As noted in 14 FAH-2 H-114b(1), the duties that CORs may perform include accepting deliverables during contract performance.

<sup>14</sup> 4 FAH-3 H-423.5-1a, "Documentation Requirements."

<sup>15</sup> According to FAR 7.503(a), contracts shall not be used for the performance of inherently governmental functions. As noted in FAR 7.502, this prohibition does not apply to personal services contracts.

<sup>16</sup> FAR 46.501, "Acceptance, General."

and properly documenting contractor performance, DS/T/ATA increases the risk that it might pay for work that does not comply with the relevant contract.

However, as noted above, DS/T/ATA changed the status of the in-country deputy program manager from third-party contractor to personal services contractor in September 2016. DS hopes that this will improve oversight because personal services contractors have the authority to oversee contract activities, whereas third-party contractors do not. This action addressed the oversight issues previously identified and OIG is therefore not making a recommendation in this report.

### ***DS/T/ATA's Corrective Actions Have Improved the Process To Validate the End Use Monitor Database***

The Arms Export Control Act requires U.S. Government agencies to maintain control over any imported or transferred defense articles for foreign assistance that are included on the U.S. munitions list, such as rifles and handguns.<sup>17</sup> The act also requires that the Department establish an end-use monitoring program that provides reasonable assurance that articles and services are being used for the purposes for which they were provided.<sup>18</sup> In the April 2012 report on the ATA program, OIG found that DS/T/ATA was conducting end-use monitoring as required but that its records were not accurate. For example, OIG found that 814 weapons that have been provided by ATA to local law enforcement agencies were not in the end-use monitor database even though more than 98 percent of those weapons had been given to Afghanistan law enforcement agencies. As a result, Recommendation 5 in that report called for DS to “periodically validate its End Use Monitor database to ensure that the database includes records of all weapon transfers.”

During this follow-up review, OIG found that DS has taken steps to address this recommendation and has periodically validated its End Use Monitor database in Afghanistan. OIG reviewed end-use monitoring and inventory reports from Camp Mihan—the primary ATA training facility in Kabul—and visited the equipment storage facilities in Afghanistan and Northern Virginia. OIG confirmed that DS/T/ATA has kept its End Use Monitor database current by reviewing DS/T/ATA inventory records that verify who is in possession of equipment and that the intended recipients or organizations are using the equipment for its intended purpose.

### ***DS/T/ATA's Corrective Actions Have Improved the Equipment Assignment and Delivery Process***

OIG's April 2012 report found that, although DS/T/ATA's end-use inspections ensured compliance with the Arms Export Control Act, those inspections did not determine whether the equipment was being used, was appropriate for the needs of the partner country, or was supplied in sufficient amounts. Accordingly, Recommendation 6 in that report recommended that “DS/T/ATA establish a process, before equipment is provided to partner countries, to

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<sup>17</sup> 22 U.S.C. §§ 2778-2780.

<sup>18</sup> 22 U.S.C. § 2785(a)(2).

determine whether the equipment will be used and whether the equipment is compatible with and at an appropriate level for the partner country.”

During this follow-up review, OIG determined that DS/T/ATA has implemented a process that assigns equipment to a country and training class upon arrival at the Northern Virginia warehouse. DS/T/ATA officials explained that individual course needs, which are based on the country assessment report and strategic goals, determine the assignment of weapons and equipment. DS/T/ATA and Afghan officials and instructors told OIG that the equipment and weapons are appropriate and useful for the Afghanistan program.

## RECOMMENDATIONS

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**Recommendation 1:** OIG recommends that the Bureau of Diplomatic Security develop and implement a policy to require that Contracting Officers and Contracting Officer's Representatives overseeing Antiterrorism Assistance programs document program progress obtained from meetings and phone conferences held in lieu of contractor-submitted formal written program and financial reports, contract status reports, and annual reports.

OIG made one recommendation in this report. In addition, four of the five recommendations made in OIG's May 2017 report regarding the ATA program in Pakistan, when fully implemented, will also improve the ATA program in Afghanistan. Those four recommendations called on the relevant bureaus to do the following (see Appendix C for a list of the recommendations made in OIG's May 2017 report regarding the ATA program in Pakistan):

- Implement a monitoring and evaluation system.
- Develop and implement procedures to verify compliance with reporting requirements.
- Develop and implement procedures to verify that the COR has appropriate documentation to support the receipt and payment of goods or services prior to approving invoices for payment.
- Develop and implement procedures to verify that the ATA program CO is preparing and issuing written contract modifications, when necessary.

As of October 16, 2017, three of the four open recommendations made in OIG's May 2017 report on the ATA program in Pakistan are considered resolved pending further action; the fourth has been closed. OIG considers a recommendation resolved when the action entity agrees to implement the recommendation but implementation has not yet been completed. Currently, these three recommendations are being monitored for implementation through OIG's audit compliance process.

## APPENDIX A: ATA PROGRAM MANAGEMENT AND OVERSIGHT RESPONSIBILITIES

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The Bureau of Counterterrorism (CT) and the Bureau of Diplomatic Security's Office of Antiterrorism Assistance (DS/T/ATA) have overlapping responsibilities for managing and overseeing the worldwide Antiterrorism Assistance (ATA) program, which requires both offices to work together in matching strategy and policy to implementation and resources. The Foreign Affairs Manual (FAM) contains specific requirements for worldwide ATA program management and oversight.<sup>19</sup> The FAM designates CT responsible for policy formulation, strategic guidance, and oversight of the ATA program, although DS/T/ATA is the program's primary implementer, responsible for program administration and implementation. Detailed responsibilities are outlined in the memorandum of agreement (MOA) executed in May 2015 between CT and DS/T/ATA. In addition to CT and DS/T/ATA, the Bureau of Democracy, Human Rights, and Labor (DRL) provides input to CT to ensure that countries selected for assistance do not have a record of human rights violations.

### CT Management and Oversight Responsibilities

CT is responsible for overseeing policy for all Department of State (Department) counterterrorism programs, including ATA training, and coordinating counterterrorism activities among U.S. Government agencies.<sup>20</sup> CT is also responsible for recommending to the Department's Office of the Director of U.S. Foreign Assistance which countries should receive ATA program assistance.

The MOA between CT and DS/T/ATA identifies a number of CT management and oversight responsibilities. For example, CT is responsible for providing DS/T/ATA with specific strategic objectives for the ATA program in partner countries, working with DS/T/ATA to draft a performance monitoring plan with performance indicators,<sup>21</sup> collecting data related to the performance indicators for which it is responsible, and conducting ATA program evaluations.<sup>22</sup> The MOA also requires CT and DS/T/ATA to examine the counterterrorism capabilities of partner nations' law enforcement agencies to inform the design and review of projects.<sup>23</sup>

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<sup>19</sup> 1 FAM 262.5-1, "Office of Antiterrorism Assistance (DS/T/ATA)."

<sup>20</sup> 1 FAM 481.1a, "Coordinator for Counterterrorism (CT)."

<sup>21</sup> According to the Department's *Performance Management Guidebook*, a performance indicator is a specific qualitative or quantitative metric that is meaningful, objective, adequate, direct, practical, and timely.

<sup>22</sup> The Department's 2015 Evaluation Policy and 18 FAM 301 require CT and DS/T/ATA to undertake at least one evaluation per fiscal year that analyzes the cost and benefits of ATA activities, determines whether the activities have been successful or have failed, and identifies the reasons each activity succeeded or failed.

<sup>23</sup> Teams composed of CT and DS/T/ATA personnel conduct these assessments every 2 or 3 years.

## DS/T/ATA Management and Oversight Responsibilities

As the primary implementer of ATA program training, DS/T/ATA is required to develop, in conjunction with CT, an annual country implementation plan for each partner country. Country implementation plans identify program objectives, planned ATA training classes, and equipment allocations. DS/T/ATA is responsible for drafting the country implementation plan, which is based on policy guidance and strategic goals provided by CT, input from posts and regional bureaus, performance monitoring plan results, and budgetary considerations.

DS/T/ATA currently conducts ATA training worldwide through its Global Antiterrorism Assistance contract.<sup>24</sup> The contract is an indefinite-delivery, indefinite-quantity contract, and DS/T/ATA issues task orders for the required training in each partner country. The contract has been in effect since June 22, 2011, and has been extended several times.

DS/T/ATA is required to evaluate the effectiveness of the training and assess whether a partner country's antiterrorism capabilities are sustainable. DS/T/ATA is expected to collect data that are based on specific performance indicators and is responsible for reporting the results to CT on a quarterly and yearly basis. According to the MOA, DS/T/ATA's quarterly reports must identify the classes implemented in the reporting period, the classes scheduled for the next 3 months, progress made on its performance monitoring plan indicators with accompanying narrative explanations, classes canceled and the reason, success stories, noteworthy photos, and course and student feedback. Finally, DS/T/ATA is responsible for collecting student names, unit affiliations, and genders and sharing that information with CT on a web-based platform; developing a SharePoint platform for monitoring data; and preparing annual reports that summarize the prior year's work.

## DRL Management and Oversight Responsibilities

DRL is responsible for working with CT and DS to ensure that the countries selected for antiterrorism assistance and the specific units and personnel selected for training do not have a record of human rights violations. If a record of such violations exists, DRL is expected to advise CT not to select the country as an ATA program recipient. DRL and other Department offices and bureaus also vet foreign security forces and participants of certain Department of Defense training programs to ensure that they have not committed gross human rights abuses. The obligation to conduct this type of vetting is contained in Section 620m (also known as the Leahy Amendment) of the Foreign Assistance Act of 1961, as amended, and a comparable provision in the annual Department of Defense appropriations act. If the vetting process uncovers credible information that an individual or unit has committed a gross violation of human rights, U.S. assistance must be withheld, and the student or unit is not allowed to participate in the training.

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<sup>24</sup> According to DS/T/ATA, ATA training in Afghanistan is conducted by two contractors: DECO and Alutiiq Technical Services.

**APPENDIX B: RECOMMENDATIONS FROM *EVALUATION OF THE ANTITERRORISM ASSISTANCE PROGRAM FOR COUNTRIES UNDER THE BUREAUS OF NEAR EASTERN AFFAIRS AND SOUTH AND CENTRAL ASIAN AFFAIRS* (AUD/MERO-12-29, APRIL 2012)**

<b>Rec #</b>	<b>Recommendation</b>	<b>Status</b>
1	OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, establish a monitoring and evaluation system that includes clearly defined and measurable outcome-oriented strategic goals and program objectives; measurable performance indicators that clearly link to strategic goals and program objectives; baseline data and annual performance targets for each indicator; and descriptions of how, when, and by whom performance data will be collected, analyzed, and reported.	Closed.  In June 2017, OIG closed Recommendation 1 but modified and reissued the recommendation in its May 2017 report on the [Antiterrorism Assistance] program in Pakistan (AUD-MERO-17-37). OIG closed the recommendation not on the basis of corrective action taken by the Bureau of Diplomatic Security or the Bureau of Counterterrorism but rather on the fact that it was reintroducing the recommendation in a subsequent report.
2	OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, develop a definition for what constitutes a developmental ATA program, consistently apply that definition to country programs, and ensure that partner country sustainability timelines are established for developmental ATA programs.	Closed.  In June 2015, OIG closed Recommendation 2 in response to a memorandum dated February 2015 that confirmed the Bureau of Diplomatic Security had shown evidence of its application of the definition of a developmental ATA program to Afghanistan and had established sustainability timelines for developmental ATA programs.
3	OIG recommends that the Bureau of Diplomatic Security and the Bureau of Counterterrorism, in coordination with the Bureau of Democracy, Human Rights and Labor (DRL), establish and implement a process that ensures effective consultation with DRL on the designation of foreign countries that are eligible for assistance through the Antiterrorism Assistance program as well as the training and equipment each designated country is to receive.	Closed.  In November 2012, OIG closed Recommendation 3 in response to a memorandum dated August 2012 that confirmed the publication of Bureau of Diplomatic Security, Office Policy Directive 09-2012, Modification 1. The Directive established and implemented a process to ensure effective consultation with DRL on the designation of foreign countries that are eligible for assistance, as well as the training and equipment each designated country is to receive. The Bureau of Diplomatic Security, the Bureau of Counterterrorism, and DRL mutually agreed to the recommendation.



4	OIG recommends that the Bureau of Diplomatic Security implement a standardized reporting process for in-country oversight of contracts for ATA program training in partner countries.	<p>Closed.</p> <p>In July 2013, OIG closed Recommendation 4 in response to a memorandum dated June 2013 that confirmed an office policy directive on the coordination required, when applicable, by the Training Management Division Program Managers with the Regional Security Officer of a post receiving an ATA training course. The Bureau of Diplomatic Security also provided memos to two Regional Security Officers with ATA programs and a Regional Security Officer ATA Evaluation Checklist as support.</p>
5	OIG recommends that the Bureau of Diplomatic Security periodically validate its End Use Monitor database to ensure that the database includes records of all weapon transfers.	<p>Closed.</p> <p>In March 2014, OIG closed Recommendation 5 in response to a memorandum dated September 2013 that described a Bureau of Diplomatic Security process of quarterly inventory validations and bi-annual inspections of items transferred to partner countries. The documentation noted that in alternating years, the Regional Security Officer reviews the host government's inventory certification.</p>
6	OIG recommends that the Bureau of Diplomatic Security establish a process, before equipment is provided to partner countries, to determine whether the equipment will be used and whether the equipment is compatible with and at an appropriate level for the partner country.	<p>Closed.</p> <p>In November 2012, OIG closed Recommendation 6 in response to a memorandum dated August 2012 that confirmed the publication of Bureau of Diplomatic Security, Office Policy Directive 08-2012. The Policy Directive established a process of coordination between the Training Management Division, the Training Delivery Division, the Training Curriculum Division, and the concerned Regional Security Officer relating to the determination of a partner nation's specific equipment requirement associated with specific training prior to authorizing the equipment provided to the partner country.</p>
7	OIG recommends that the Bureau of Diplomatic Security review the types of the remaining equipment for the Iraq program stored in the Northern Virginia warehouse, evaluate the equipment's utility, and determine an appropriate disposition.	<p>Closed.</p> <p>In March 2014, OIG closed Recommendation 7 in response to a Bureau of Diplomatic Security memorandum dated September 2013 that described the planned disposition of all remaining Iraq equipment to the partner nation.</p>

**APPENDIX C: RECOMMENDATIONS FROM *MANAGEMENT ASSISTANCE REPORT: CHALLENGES REMAIN IN MONITORING AND OVERSEEING ANTITERRORISM ASSISTANCE PROGRAM ACTIVITIES IN PAKISTAN* (AUD-MERO-17-37, MAY 2017)**

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<b>Rec #</b>	<b>Recommendation</b>	<b>Status, as of October 16, 2017</b>
1	OIG recommends that the Bureau of Counterterrorism, in coordination with the Bureau of Diplomatic Security, implement a monitoring and evaluation system to include measuring performance in accordance with the requirements outlined in the Department's Performance Management Guidebook and the Memorandum of Agreement executed between the Bureau of Counterterrorism and the Bureau of Diplomatic Security's Office of Antiterrorism Assistance.	Resolved pending further action.
2	OIG recommends that the Bureau of Diplomatic Security develop and implement procedures to verify compliance with contract reporting requirements in the Global Antiterrorism Training Assistance contract and reporting requirements in the Memorandum of Agreement executed between the Bureau of Counterterrorism and the Bureau of Diplomatic Security's Office of Antiterrorism Assistance.	Resolved pending further action.
3	OIG recommends that the Bureau of Diplomatic Security develop and implement procedures to verify that the Contracting Officer's Representative has appropriate documentation to support the receipt and payment of goods or services prior to approving invoices for payment in accordance with the Foreign Affairs Handbook.	Resolved pending further action.
4	OIG recommends that the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management, in coordination with the Bureau of Diplomatic Security, develop and implement procedures to verify that the Antiterrorism Assistance program Contracting Officer is preparing and issuing written contract modifications when necessary to alter the terms of a contract in accordance with the Foreign Affairs Handbook.	Closed.  In September 2017, OIG closed Recommendation 4 on the basis of the Bureau of Administration's reminder to its Bureau of Diplomatic Security contracts division to follow policies and procedures and a memorandum dated July 2017 that provided evidence of two recent modifications that formally documented changes made by the previous Contracting Officer.

Rec #	Recommendation	Status, as of October 16, 2017
5	OIG recommends that the Bureau of Diplomatic Security complete a review of the \$4.2 million in weapons and equipment currently being stored for the Pakistan Antiterrorism Assistance program within 90 days and determine if the weapons and equipment can be used in other Antiterrorism Assistance programs.	Resolved pending further action.

## APPENDIX D: RESPONSE FROM BUREAU OF DIPLOMATIC SECURITY

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United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

October 26, 2017

**INFORMATION MEMO TO INSPECTOR GENERAL LINICK – OIG**

**FROM:** DS – Christian J. Schurman 

**SUBJECT:** Bureau of Diplomatic Security response to the Office of Inspector General Draft Management Assistance Report: Challenges Remain in Monitoring and Overseeing Antiterrorism Assistance Program Activities in Afghanistan (AUD-MERO-18-XX), October 2017

Below is the Bureau of Diplomatic Security's response to recommendation 1 of the subject report.

**Recommendation # 1:** OIG recommends that the Bureau of Diplomatic Security develop and implement a policy to require that Contracting Officers and Contracting Officer's Representatives overseeing Antiterrorism Assistance programs document program progress obtained from meetings and phone conferences held in lieu of contractor-submitted formal written program and financial reports, contract status reports, and annual reports.

**DS Response (10/25/2017):** DS concurs with this recommendation. The Office of Antiterrorism Assistance (DS/T/ATA) developed and implemented internal Office Policy Directive 001-FY18, which requires:

"Regular contractor program progress reporting must be in full compliance with the formal reporting required by contractual requirements. However, whenever by exception such information is obtained only through meetings and phone conferences, the COR [Contracting Officer's Representative] must document and maintain an archive of such reporting."

Under "Implementation," the policy states: "CORs for all contracts affecting the operation of the ATA program shall document verbal program progress for the record. This record shall be maintained by the COR, archived in the COR file, and readily accessible for ATA management and OIG review." Additionally, a copy of the directive distributed to the staff on October 4, 2017, is provided. DS requests this recommendation be closed.

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Cleared: M – JBucha (ok)  
M/PRI – MSchild (ok)  
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DS/DSS – WASHBERY (ok)  
DS/EX – WTERRINI (ok)  
DS/EX/MGT – JSCHOOLS (ok)  
DS/MGT/PPD – LLONG (ok)  
DS/MGT/PPD/Policy – LLONG (ok)  
DS/T – SMORETTI (ok)  
DS/T/ATA – PDAVIES (ok)

## ABBREVIATIONS

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ATA	Antiterrorism Assistance
CO	Contracting Officer
COR	Contracting Officer's Representative
CT	Bureau of Counterterrorism
DRL	Bureau of Democracy, Human Rights, and Labor
DS	Bureau of Diplomatic Security
DS/T/ATA	Bureau of Diplomatic Security, Office of Antiterrorism Assistance
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAR	Federal Acquisition Regulation
GTM	Government Technical Monitor
MOA	Memorandum of Agreement

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