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Office of Inspector General
United States Department of State

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Evaluation of the Antiterrorism Assistance Explosive Detection Canine Program – Health and Welfare

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HIGHLIGHTS

Office of Inspector General
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What OIG Evaluated

The Office of Inspector General (OIG) conducted this evaluation in response to an OIG hotline complaint. The complaint alleged that the Department was providing Explosive Detection Canines (EDCs) to foreign partner nations without the proper follow-up to ensure they were receiving adequate healthcare. These allegations also included reports that dogs were dying due to various medical conditions, lack of veterinary care, and poor working conditions. As a result, OIG initiated this evaluation to determine whether the Department effectively managed the health and welfare of dogs in the Explosive Detection Canine Program (EDCP).

What OIG Recommends

OIG made five recommendations to the Department: to develop and implement a strategic plan that addresses the health and welfare of canines in the Kingdom of Jordan; conduct follow-up health and welfare checks more frequently; develop and implement a plan to address canine retirement and adoption; develop and negotiate written agreements related to the canine program with partner nations; and develop and implement policies and procedures for all aspects of the canine program, including health and welfare. As part of the first recommendation, OIG also recommends that the Department cease providing canines to Jordan until there is a sustainability plan in place to ensure canine health and welfare. The Department concurred with four recommendations in their entirety and partially concurred with another. It did not agree with the portion of the recommendation that advised ceasing to provide dogs to Jordan until a sustainability plan is in place.

SEPTEMBER 2019

OFFICE OF EVALUATIONS AND SPECIAL PROJECTS

Evaluation of the Antiterrorism Assistance Explosive Detection Canine Program – Health and Welfare

What OIG Found

Pursuant to the Foreign Assistance Act of 1961, as amended, the Department's antiterrorism assistance program provides EDCs to foreign countries to enhance the ability of their law enforcement to deter and counter terrorism. The Bureau of Diplomatic Security's Office of Antiterrorism Assistance (DS/ATA) is the primary implementer of foreign assistance training and partners with the Bureau of Counterterrorism to manage the program. Although the Department previously relied on the Bureau of Alcohol, Tobacco, and Firearms to provide both dogs and training, the Department recently established its own canine training program at the Canine Validation Center (CVC). As of September 30, 2018, 100 active EDCs trained at CVC had been provided under the antiterrorism program to 6 partner nations; in addition, approximately 70 dogs from the ATF program remained active in 7 nations.

OIG identified a range of problems in the EDCP. First, OIG found an overall lack of policies and standards governing the program. The Department routinely provides dogs to foreign partners without signed written agreements that outline standards for minimum care, retirement, and use of the canines, and the Department conducts health and welfare follow-ups infrequently and inconsistently. Second, OIG confirmed ongoing concerns regarding the program in Jordan, where health and welfare problems have persisted for years. Nonetheless, the Department provided EDCs to this nation before those concerns were resolved. Additionally, the Department did not adequately plan to ensure that Jordan's canine program could become self-sustaining or that funding will be consistently available to protect the dogs already provided. Finally, the Department could not provide detailed information about dogs in programs other than Jordan.

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OBJECTIVE

The Bureau of Diplomatic Security's Office of Antiterrorism Assistance (DS/ATA) provides trained Explosive Detection Canines (EDCs) to foreign partner nations to enhance their law enforcement capabilities. In July 2017, the Office of Inspector General (OIG) received a hotline complaint alleging that the Department provided EDCs to foreign countries without proper oversight to ensure they were cared for after deployment. The complaint also alleged that canines were dying due to various medical conditions, lack of veterinary care, and poor working conditions. As a result, OIG formally initiated this evaluation in May 2018 to determine whether the Department effectively managed the health and welfare of canines in the Explosive Detection Canine Program (EDCP).

BACKGROUND

Antiterrorism Assistance Program

The Department's antiterrorism assistance program provides training and equipment to foreign countries under the Foreign Assistance Act of 1961, as amended, to enhance the ability of their law enforcement personnel to deter and counter terrorism.¹ Congress established the antiterrorism assistance program in 1983 to provide training to foreign law enforcement personnel and supply equipment and other commodities related to bomb detection and disposal, management of hostage situations, physical security, and other matters related to the detection, deterrence, and prevention of acts of terrorism. In addition to enhancing the skills of foreign law enforcement personnel, the antiterrorism assistance program is meant to strengthen bilateral ties between the U.S. and friendly governments and increase respect for human rights by sharing modern, humane, and effective antiterrorism techniques.²

The Foreign Assistance Manual (FAM) outlines the Department's responsibilities for foreign assistance training under the antiterrorism assistance program. DS/ATA partners with the Bureau of Counterterrorism and Countering Violent Extremism (CT) in managing the antiterrorism assistance program. DS/ATA is responsible for program administration and implementation of the foreign assistance training. CT controls the funding for antiterrorism assistance and is also responsible for policy formulation, strategic guidance, and oversight of the program.

According to the FAM, DS/ATA works jointly with CT to conduct initial capabilities assessments of the partner nation's law enforcement and security organizations. These assessments are used to formulate a country implementation plan. CT and DS/ATA also jointly conduct periodic program reviews of partner nations' law enforcement and security organizations to assess changes in capabilities and evaluate the effectiveness of training assistance provided by the antiterrorism assistance program. Also jointly, CT and DS/ATA assess the level of partner nation

¹ 22 U.S.C. § 2349aa.

² 22 U.S.C. § 2349aa-1.

law enforcement and security organizations' success in internalizing and sustaining counterterrorism capabilities developed through the antiterrorism assistance program and make recommendations on the types of training and sustainment activities needed in the country implementation plans.³ Additionally, DS/ATA's Training Management Division manages the antiterrorism assistance program operations, budgeting, activity scheduling, coordination, planning and reporting, and country consultations and visits. It also monitors both training results and resource accountability. The Training Management Division works jointly with CT to design and guide the progress of DS/ATA program assistance to each partner nation after a memorandum of intent or other agreement is reached.⁴

The Explosive Detection Canine Program

The Explosive Detection Canine Program is one component of the overall antiterrorism program. Through the EDCP, the Department has provided specially trained dogs to foreign partner nations for over 20 years. Once a country is chosen for inclusion in this aspect of the antiterrorism program, DS or its representatives perform a country canine assessment that includes a site visit and evaluation of the partner nation's abilities to operate a canine program.

DS/ATA embeds mentors in partner nations' law enforcement units to reinforce training. In 2017, as part of a mentorship program for several police units in the partner nation of Jordan, DS/ATA sent two mentors with expertise working with dogs to enhance the Jordanian EDCP.⁵ The two mentors cost the Department approximately \$500,000 annually and are expected to remain in Jordan for a total of 3 years. In 2018, DS/ATA also funded a veterinarian and a veterinary technician to work with the Jordanian EDCP for 1 year at a cost of approximately \$540,000.⁶ DS/ATA funded two mentors and a veterinarian in Morocco for 4 months in 2018.

The Foreign Assistance Act of 1961, as amended, requires that resources provided by the U.S. to foreign nations be used effectively and efficiently.⁷ The Department explained in its 2017 *Antiterrorism Assistance Year In Review* that "[t]he U.S. priority of building sustainable counterterrorism capabilities of our international law enforcement partners not only safeguards the security of critical U.S. allies, it also helps to contain transnational threats before they reach the U.S. homeland or challenge regional or global stability." Both DS/ATA and CT officials told OIG that the goal of the Explosive Detection Canine Program, as with all antiterrorism assistance programs, is to reach self-sustainment within the foreign law enforcement partners. The antiterrorism assistance program is most effective in countries whose governments have the willingness to partner with the U.S. to fight terrorism, along with the basic law-enforcement capabilities to utilize the programs that DS/ATA provides.

³ 1 FAM 262.5-1(A) (June 30, 2015).

⁴ 1 FAM 262.5-1(E) (June 30, 2015).

⁵ Overall, the purpose of the mentors is to reinforce the training curriculum, provide real-time knowledge, and share professional expertise.

⁶ In 2018, the Department also spent an additional \$500,000 on medical supplies, containerized kennels, training aids, and kennel improvements for Jordan's EDCP.

⁷ 22 U.S.C. § 2151.

Sources of Canines and Training for the Explosive Detection Canine Program

For many years, the Department relied heavily on the Bureau of Alcohol, Tobacco, and Firearms (ATF) to provide canines and training for the antiterrorism assistance EDCP. In 1995, ATF and DS/ATA signed an Interagency Acquisition Agreement (IAA) wherein ATF would train foreign handler and canine teams under the antiterrorism assistance program. Under the IAA, ATF was required to provide all the canines to be trained, in addition to instructors, training sites, facilities, technical expertise, training curriculum, explosives, kenneling, consumable supplies, veterinary services, transportation, and lodging. Training courses were to be structured to address the explosives threat on a country-by-country basis.

In 2016, DS/ATA discontinued using ATF because the Bureau of Diplomatic Security's Office of Overseas Protective Operations (DS/OPO) established its own canine training program at a facility in Winchester, VA, known as the Canine Validation Center (CVC). The Department contracted with MSA Security (MSA) to provide supporting personnel and resources to operate and manage the CVC.⁸ DS/ATA relies heavily on the CVC for its expertise in canines for any necessary policies and procedures.

DS/ATA told OIG that when it began using CVC as its sole provider for canine services, ATF provided a list of canines that ATF had trained that were still active around the world. ATF had a health and welfare responsibility to the vendor from which the dogs were procured, and DS/ATA assumed that responsibility for all remaining active ATF canines.⁹

In March 2016, DS/ATA signed a Memorandum of Agreement (MOA) with CVC. Under the MOA, CVC is responsible for procuring dogs and holding EDC handler courses for foreign students. A DS/ATA official estimated that a 30-day foreign handler course that includes the provision of 15 trained dogs costs approximately \$450,000. CVC is also responsible for conducting initial country assessments to determine a country's ability to care for the dogs and operate a canine program. Further, as part of the training requirements under the MOA, CVC visits the designated country with the foreign handlers for 2 weeks after the completion of the training course in the United States.¹⁰ During this visit, CVC personnel conduct health and welfare

⁸ MSA Security is also known as Michael Stapleton Associates, LTD and the contract was issued on September 30, 2014.

⁹ DS/ATA told OIG that a private contractor, Hill Country, briefly provided canines and training for the EDCP in late 2015 after its agreement with ATF ended and before CVC began training canines in 2016. Under Hill Country, dogs were provided to Afghanistan and the Dominican Republic, but no data was given to OIG regarding the number of dogs at issue. CVC assessed the canine program in the Dominican Republic in October 2016, but that assessment report does not discuss the current status of DS/ATA canines. DS/ATA told OIG that it does not maintain documents related to the welfare of dogs in Afghanistan but had unofficially heard that one dog had died of natural causes and the others were in good condition.

¹⁰ CVC instructors accompany the canine teams back to their home countries in order to conduct in-country testing and validation in areas where the canines will be operating. Generally, these are the instructors who taught the course at the Canine Validation Center. They accompany the trainees and dogs to ensure that both are able to operate in a real environment. In-country training was not done for Nepal or Egypt.

inspections of all dogs delivered by DS/ATA. According to the MOA, CVC leadership is required to provide an After Action Report (AAR) to DS/ATA within 10 business days of a site visit.

In July 2016, representatives from Jordan became the first class under the antiterrorism assistance program to receive an explosive detection canine handler training course at the CVC.

Today, the EDCP includes working dogs that have been provided through both ATF and CVC. As of September 30, 2018, 100 EDCs had been trained at CVC and were active in six foreign partner nations. To date, Jordan is by far the largest recipient of CVC-provided EDCs and currently has 61 active CVC-trained canines. Jordan has also participated in six training courses at CVC. In addition, 66-89 dogs trained by ATF remain active in seven partner nations. When DS/ATA assumed control of this program, it accepted the responsibility of ensuring the health and welfare of the “legacy dogs” provided by ATF. As part of this responsibility, on behalf of DS/ATA, CVC representatives have periodically provided information on the welfare of some of the ATF dogs as part of a country canine assessment. Table 1 summarizes the sources and locations of ATF and CVC-trained dogs identified as active as of September 30, 2018.

Table 1: Partner Nations and Documented Number of Active Canines

Country	ATF ^a	CVC	Total
Bahrain	8-10	-	8-10
Egypt	-	10	10
Indonesia	13-15	-	13-15
Jordan	28	61	89
Lebanon	5	10	15
Mexico	3	-	3
Morocco	1-18	10	11-28
Nepal	-	4	4
Oman	-	5	5
Thailand	8-10	-	8-10

^a The table provided is an estimate because OIG was unable to determine the exact number of canines due to insufficient and contradictory documentation. For example, an undated spreadsheet provided by DS/ATA shows 15 active ATF canines in Indonesia, but a report from a follow-up in 2015 notes that only 13 ATF canines remain active at that time. DS/ATA separately told OIG, however, that most canines in Indonesia have been retired due to age. Additionally, the same undated spreadsheet of active ATF-trained canines listed 10 dogs in Thailand. An August 2018 Thailand assessment notes eight active ATF dogs. It is unclear if the spreadsheet is incorrect or if two dogs have died or retired since their deployment to Thailand in 2012.

Source: Generated by OIG based on information obtained from DS/ATA as of September 30, 2018.

EVALUATION RESULTS

The Bureau of Counterterrorism and the Bureau of Diplomatic Security Do Not Have Mechanisms in Place to Ensure Effective Management of the Health and Welfare of Canines in the Explosive Detection Canine Program

For several decades, the Department has provided trained EDCs to friendly foreign nations to enhance the capability of their law enforcement agencies to combat terrorism. Canines are one of the best means of detecting explosives and deterring terrorism. Aside from the humanitarian need to treat these animals properly, basic standards of health and welfare are critical to ensuring that EDCs can perform these important functions. However, the Department does not sufficiently monitor the EDCs it provides, and, despite repeated requests by OIG in the course of its fieldwork, the Department did not produce any written policies, procedures, or written standards of care until after a draft of the report was provided in June 2019.

The Department Lacks Policies, Procedures, or Written Standards to Ensure the Health and Welfare for Its Canines in the EDCP

During our evaluation, CVC was in the process of developing standards of care procedures for dogs at the training facility. As an unofficial policy, however, CVC veterinarians told OIG that they generally rely on the Department of the Army's military working dog standards for the dogs under their care. One CVC veterinarian described the Army standards as the "bible" for care of working dogs.¹¹ However, the Department does not impose standards of care on the foreign nations receiving canines trained at CVC. As a result, the Department lacks any assurances that partner nations are maintaining at least a minimum level of care necessary for the dogs to perform the explosive detection tasks assigned. There is accordingly a significant risk that the EDCP will be ineffective.¹²

During the course of this evaluation, DS/ATA did not provide OIG with policies for the retirement of canines when they reach the end of their workable years. Although CVC drafted a Standard Operating Procedure (SOP) for EDC adoption, the SOP does not explicitly address canine retirement.¹³ The SOP also fails to provide guidance for the adoption or retirement of dogs overseas. Instead, this SOP outlines the procedures for the adoption of canines at the CVC and DS/ATA canines returned to the U.S. from a foreign nation. In commenting on a draft of this

¹¹ Throughout this report, OIG references standards of care for military working dogs from Army Regulation 190-12 (Mar. 11, 2013), Army Pamphlet 190-12 (Sept. 30, 1993) and Army Field Manual, FM 3-19.17 (July 6, 2005) as a best practice but acknowledges that other guidance or standards may be sufficient and appropriate to guide care and welfare of canines in the DS/ATA program.

¹² To provide one specific example of these concerns, OIG was told by a CVC veterinarian that the conditions for the dogs in Jordan were so bad that the success rate of a canine (i.e., successfully detecting an explosive) was less than 50 percent. Additionally, OIG was told that dogs leaving training at CVC are approximately 90 percent proficient in detecting explosives, but insufficient reinforcement training and poor health and welfare can cause this proficiency to rapidly diminish.

¹³ CVC provided OIG with the EDC Adoption policy on July 25, 2018; however, no effective date was identified.

report, DS/ATA provided an SOP on Managing Canine Programs, dated November 11, 2018, that outlines the Department's canine retirement policy, criteria for retirement, and the retirement process. DS/ATA did not provide evidence that this SOP is operational or has been made applicable to partner nations. However, OIG believes this is a positive step to ensuring that canines provided to foreign nations are properly retired and adopted after their years of work.¹⁴

On March 5, and again on July 2, 2018, DS/ATA provided OIG with an undated SOP drafted by the DS/ATA mentors in Jordan for canine health and welfare that requires dogs to be retired and adopted at 9 years of age. It is unclear whether the Jordan canine unit agreed to or implemented this policy.¹⁵ OIG acknowledges that the CVC-trained canines provided to Jordan since 2016 have not reached retirement age, and any dogs with health or workability issues have been returned to CVC and adopted. However, as described previously, Jordan also has several ATF-trained canines. According to a list from DS/ATA, Jordan received 34 canines under the agreement with ATF; as of August 2018, 28 of those canines were still listed as active, with birth years ranging from 2007 to 2013. Nearly 70 percent of those ATF dogs are age 9 or older and according to the SOP should be retired. As stated above, ATF had a health and welfare responsibility to the vendor from which it procured canines, and DS/ATA assumed this responsibility. One of the DS/ATA mentors in Jordan noted that the retirement process is lengthy and usually takes 2 to 4 months to get through the bureaucracy in Jordan. He told OIG that the mentors have helped the Jordanians to retire and adopt the ATF dogs that have reached the end of their working lives. He said the process is to retire the dogs and then have the dogs adopted by their handlers or sent back to the U.S. for adoption. A CVC veterinarian also stated that the older ATF canines did not appear to be working but were essentially retired-in-place at the kennels. OIG was unable to verify the status of these canines.

At least six other countries received canines under the legacy ATF training program, but there are no Department developed or approved SOPs regarding retirement in any of these countries.¹⁶ Because canine retirement may take some time, it is important to start the process before the canines actually reach retirement age so they do not have to live out their remaining years in a kennel.

¹⁴ The United States military is required by law to make military canines available for adoption when there is no longer a need or the canine is at the end of its useful life unless the animal is unsuitable. 10 U.S.C. § 2583. Prior to the passage of this law in 2000, the Department of Defense routinely euthanized military canines upon retirement.

¹⁵ Along with this draft SOP for canine health and welfare, DS/ATA forwarded SOPs drafted by the DS/ATA mentors in Jordan for K9 feeding and sanitation of feed equipment; explosives storage, handling, and safety; K9 kennel sanitation; and kennel safety. None of the SOPs are signed or dated. The mentors told OIG that many Jordanian canine handlers cannot read the SOPs in English and must be shown the proper steps for caring for the dogs. The mentors, however, shared with OIG an example of a poster board on kennel sanitation that was written in Arabic. It is unclear if and how the other SOPs beyond those reflected on the poster board have been shared with Jordanian handlers.

¹⁶ CVC's initial country assessment report for Egypt noted that Egypt does not adopt out retired canines. Instead, when the dogs are taken out of service, they remain for the rest of their lives at Egypt's training center.

The Bureau of Counterterrorism and the Bureau of Diplomatic Security Lack Written Agreements With Partner Nations That Could Help Ensure the Health and Welfare of Dogs

The Department uses bilateral agreements when providing financial assistance, whether monetary or in-kind, to other nations. The Department does not have written agreements with foreign partners specifically related to the explosive detection canine program. In response to OIG's request for such agreements with foreign partners that received canines under the antiterrorism assistance program, DS/ATA was only able to provide unsigned draft Letters of Agreement (LOA) with Jordan, Egypt, and Morocco that are specific to an aviation antiterrorism assistance program.¹⁷ LOAs are agreements between the U.S. Government and a foreign government that set forth the terms through which a specific project is carried out and that reflect commitments made by both parties to accomplish the project objectives.¹⁸ An LOA generally contains language regarding performance measures and evaluation, as well as standard provisions covering proper use of items furnished, monitoring, and disposition of property. These draft LOAs with Jordan, Morocco, and Egypt did not incorporate standards of care for working dogs but simply stated that countries accept responsibility for the health and welfare of the dogs, including veterinary services, life requirements, and kennels.

The Bureau of International Narcotics and Law Enforcement Affairs, which provides foreign assistance in the areas of law enforcement, justice, and counter-narcotics, requires signed LOAs before a foreign assistance program can be implemented. The Department of Justice, which also provides assistance to foreign law enforcement partners, endorses the use of LOAs to ensure that other nations agree to tangible, long-term commitments of resources for training, equipment maintenance, and other indicators of political will.¹⁹ DS/ATA told OIG that it expected the host country both to provide adequate care for the EDCs and to use them for their intended purpose. Additionally, while this intent is not formalized in writing, DS/ATA stated it believes this intent would generally have been discussed by embassy officials with the host government to ensure mutual understanding. Without a written agreement, however, it would be difficult or impossible for the Department to enforce any particular terms related to this "mutual understanding," especially those related to the health, welfare, and retirement of dogs.

OIG notes that military working dog standards, relied on by veterinarians at CVC, provide guidance for issues such as feeding and food storage, parasite control, and kennel sanitation procedures.²⁰ A signed written agreement with foreign partners could, at a minimum, outline standards, such as those articulated for military working dogs in Army Pamphlet 190-12 and the Army Field Manual, governing adequate kenneling and sanitary living, medical care, prevention of hyperthermia and disease, and necessary nutrition, so that if these standards were not being met at a health and welfare check, the U.S. would have a more definitive and readily enforceable basis

¹⁷ The Aviation Security Enhancement Program is a joint effort by the Departments of State and Homeland Security to enhance screening at certain airports.

¹⁸ 4 FAH-3 H-612.3(31).

¹⁹ Government Accountability Office, *FOREIGN ASSISTANCE: U.S. Democracy Programs in Six Latin American Countries Have Yielded Modest Results* (GAO-03-358, March 2003).

²⁰ Army Pamphlet 190-12, ch. 6 & 7; Army Field Manual 3-19.17, ch. 8.

to repossess the dogs. In addition, signed written agreements could also outline the intended use of the canines.²¹ As discussed above, one foreign handler course that includes the procurement of dogs may cost approximately \$450,000, so the Department makes a substantial investment in preparing these dogs for explosive detection work. Written agreements would help ensure that this investment is not lost or diminished. In addition, while dogs in the EDCP are tools used to combat terrorism, they are also living creatures that deserve appropriate attention to their safety and well-being. Clear, straightforward expressions of the expected standards for their care can help ensure that their safety and well-being will be protected.

The Bureau of Diplomatic Security Does Not Have Clear Standards for Performing Adequate Health and Welfare Checks on Explosive Detection Canines Provided Under the Antiterrorism Assistance Program, and It Does Not Consistently Ensure That Such Checks Occur

DS/ATA and CVC signed an MOA in March 2016 that set forth requirements for the explosive detection canine program. As part of these requirements, CVC must conduct initial assessments of a proposed participant country's capability to care for canines and operate a canine program. Once the Department determines that the country is suitable to have an explosive detection canine program, DS/ATA funds the training courses. Following the course, CVC is responsible for making a visit to the designated country and conducting a health and welfare inspection of all canines delivered by DS/ATA. Additionally, DS/ATA told OIG that, when it began using CVC as its sole provider for canine services, ATF provided a list of canines previously trained for the Department that were still active around the world. As noted previously, according to DS/ATA, ATF had a health and welfare responsibility for the dogs ATF procured and trained for the explosive detection canine program. DS/ATA represented to OIG that it assumed these same responsibilities, although it did not provide any detail regarding how it fulfilled these responsibilities.

Notwithstanding DS/ATA's assumption of this specific obligation as to the ATF dogs and the more general requirements of the MOA, DS/ATA lacks a formal, written plan to implement these obligations. OIG was told that CVC is developing standards of care procedures and generally follows the Army standards for military working dogs for the canines in its care in the facility. However, it is unclear how or if these standards will be used as criteria to evaluate the health and welfare of dogs during follow-ups in other countries. There are likewise no criteria defining when it is necessary to have a veterinarian perform a health and welfare check on the canines.

Moreover, according to DS/ATA officials, there is no standardized timeline for health and welfare follow-up visits even for the ATF-trained dogs as to which DS/ATA accepted specific responsibilities to ensure such checks. DS/ATA stated that a follow-up generally occurs about every 3 years for both ATF-trained and CVC-trained dogs, but DS/ATA does not have a defined schedule for follow-up visits for either group of dogs. For example, DS/ATA has no records showing that it conducted a health and welfare follow-up on canines provided by ATF to

²¹ The Department provided canines to both Morocco and Egypt, but based on information OIG received, it is not clear that either country is using them for the Department's intended purpose. This assessment, however, is beyond the scope of this report.

Mexico. Additionally, the last health and welfare follow-up conducted on the canines provided by ATF in Indonesia was May 2015.²² The MOA between DS/ATA and CVC places responsibility for care requirements of dogs provided to foreign countries with CVC. However, two MSA veterinarians told OIG they thought responsibility for canine health and welfare ends once the canine is deployed to the partner nation. They also expressed the belief that CVC performs follow-up assessments, normally with an initial country assessment, only if explicitly requested and funded by DS/ATA.²³ As a result, the Department lacks assurance that canine health and welfare is being sufficiently monitored overseas to ensure that partner nations are maintaining at least a minimum level of care. Table 2 below provides available information on follow-up visits of ATF-trained dogs. To date, there have been no formal health and welfare follow-up visits on CVC-trained dogs outside of Jordan, although some of the canines are, or have been, monitored by DS/ATA in-country mentors. A fuller discussion of CVC-trained canines, including the dogs in Jordan, follows the table.

Table 2: Health and Welfare Follow-up Visits of ATF-Trained Canines

Country Visited	Date of Follow-up	Visit by
Morocco^a	April 2015	ATF & DS/ATA
Observations from Assessment		
One dog died and one retired since deployment in 2007; concluded that some dogs were overweight but appeared to have been taken care of and treated humanely		
Indonesia	May 2015	ATF
Observations from Assessment		
Two dogs had died since deployment in 2007 and eight retired; concluded that all ATA dogs were overweight and had skin issues		
Lebanon	May 2015	ATF
Observations from Assessment		
One dog had died since deployment in 2013 but the cause was not stated; concluded that canines were well cared for and treated humanely		
Bahrain	September 2015	ATF
Observations from Assessment		
One dog died and 19 retired since deployment in 2005; concluded that canines appeared well cared for and treated humanely		

²² DS/ATA officials told OIG that there was no active EDCP in Indonesia, but the last welfare check in May 2015 identified 13 active ATF canines with possible health concerns.

²³ Most of the follow-ups since 2016 have been conducted by MSA employees, the contractor that runs CVC's operations. Any follow-up visit on ATF-trained dogs was done in conjunction with a country canine assessment, which was the main objective for the visit. Country assessments are done to determine the current status, condition, capabilities, and mission of the country's canine program to determine if additional antiterrorism assistance was needed.

Country Visited	Date of Follow-up	Visit by
Jordan^b	April 2016 & August 2017	DS/ATA Mentors & CVC
Information provided to OIG; observations from Post Consultation		
Mentors identified 25 dogs in 2017, and 3 additional ATF dogs later, and said that “most are at the age of retirement but they all look in good health”; however, an April 2016 CVC visit observed dogs dying of disease and heat-related illness, dogs with hip dysplasia, inadequate kennels, overworked dogs, and “barely existent” kennel sanitation		
Lebanon	December 2017	CVC
Observations from Post Consultation		
Concluded that dogs appeared to be well maintained and in good working condition; two dogs appeared overweight; kennels had standing water		
Thailand	August 2018	CVC
Observations from Post Consultation		
One ATF dog was diagnosed with a ruptured ligament; ^c other EDCs appeared healthy; kennel facilities varied in age, with older facilities being inadequate; veterinary care met minimum standards		
Mexico	None	N/A
Information provided to OIG		
There are no records of health and welfare checks for ATF-trained dogs in Mexico; information provided by DS/ATA lists 23 dogs provided to Mexico in the late 2000s; same list shows 6 dogs have died and 14 have been retired		

^a CVC conducted a Morocco canine program assessment in August 2017, but the report does not list the status of the ATF canines.

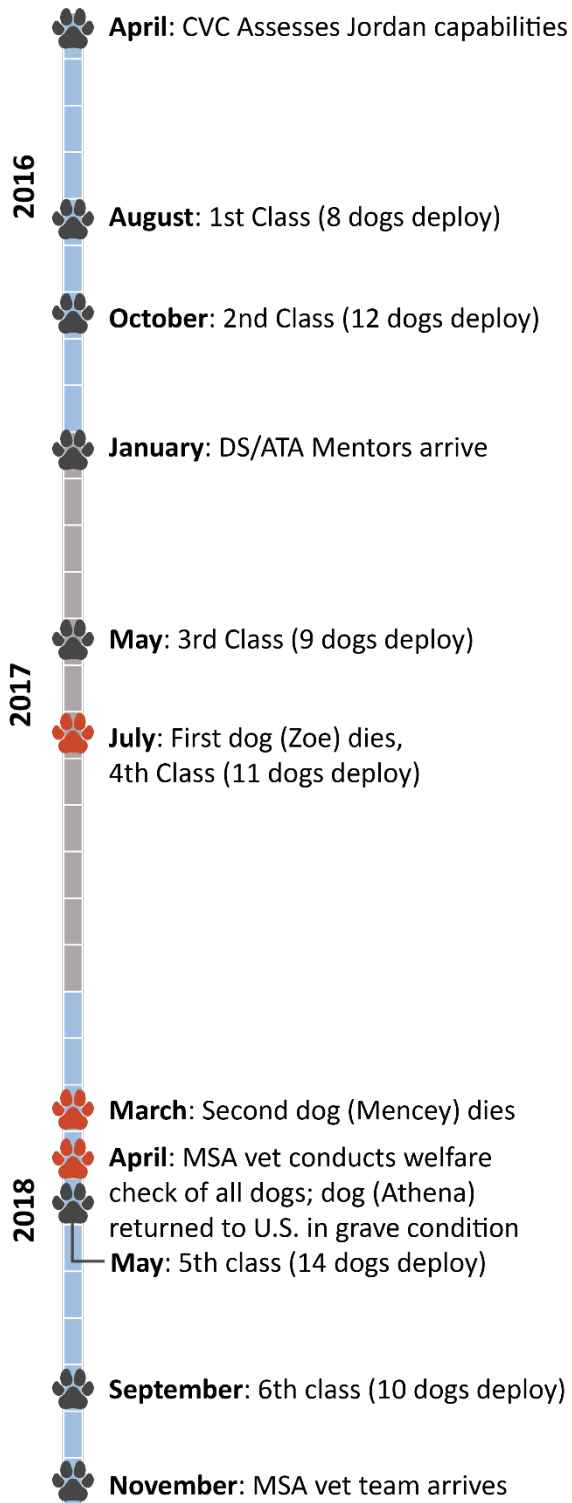
^b The Jordan EDCP is discussed in detail below. Dogs in Jordan have been monitored by two DS/ATA mentors since January 2017 and a veterinary team since November 2018. As OIG notes in the subsequent section, the evidence related to the canine program in Jordan describes poor living conditions and a general lack of attention to the dogs’ health and welfare.

^c OIG was told that this dog was receiving physical therapy for the injury and would undergo surgery if necessary.

Canine Health and Welfare are a Continuing Concern in Jordan

DS/ATA has provided at least 100 trained EDCs to the Kingdom of Jordan since 2008. These canines supplement an EDC program already established within the nation. Problems, however, have been reported with the Jordanian EDCP for some time; indeed, DS/ATA mentors acknowledged to OIG that the Jordanian canine program had been in “dire straits” when the mentors arrived in Jordan in January 2017. At least 10 canines had died from various medical problems from 2008 through 2016 while others were living in unhealthy conditions. Figure 1 contains a timeline of relevant events involving the EDCP in Jordan.

Figure 1: Timeline of Relevant Events in Jordan Since 2016



In April 2016, CVC staff visited Jordan on behalf of DS/ATA to assess the health and welfare of the dogs provided to Jordan. The team listed the following observations of the Jordan canine program in the site visit report:

The K9 facility at Police Headquarters was below standard. The kennels are not properly maintained to inhibit the spread [of] K9 diseases. Parvo is rampant within the facility and the main cause for the canine deaths to date. The Police are losing canines frequently to the disease and do not have the medical care required to treat it, or even maintain healthy canines. The training observed was well below the needed methods to maintain a minimal standard. The majority of the K9 Teams observed were well beyond their working years. They have a minimum of twenty (20) canines that need to be retired and replaced immediately. Several canines were observed to have hip dysplasia and obvious arthritis, and have lost the will to work.

The situation at [another location] is not much better. The teams are additionally over worked, and required to search large numbers of vehicles without proper shelter, sanitation, and care. No motivational training is provided to support the canines. The kennel facility is very basic with temporary kennels being used as full time housing for the canines. The canines observed were well beyond their working years, and in need of medical care. [An official] gave several instances of canines dying from heat exhaustion within the past year.

The CVC team reported that they identified a plan for resurrecting the Jordan canine program. This plan included frequent training trips to assist Jordan with proper maintenance of the program. CVC staff also recommended that DS/ATA provide medical training to the existing Jordanian veterinarians and

have U.S. veterinarians conduct assistance visits, noting that the program would not become self-sustaining without ensuring that the dogs received proper medical care.

Notwithstanding the recommendations and the conditions described in the report, CT and DS/ATA continued to fund the EDCP in Jordan. In fact, only 3 months after the April 2016 visit, representatives from Jordan became the first DS/ATA funded students to receive explosive detection canine courses at CVC. Other courses followed over the next several months.

CVC trainers traveled to Jordan for 2 weeks immediately following each course to provide the in-country operational training portion of the courses.²⁴ Subsequently, trainers drafted AARs detailing their observations, conclusions, and recommendations. There were two visits and corresponding AARs in 2016. Each AAR completed for Jordan in 2016 recommended the presence of an in-country mentor, stating that such a mentor “will be critical to the success of the program to ensure the Jordanians are following pre-established DS/ATA and CVC requirements for both training and medical treatment.”²⁵ Based on these consistent recommendations, DS/ATA sent two mentors to Jordan in January 2017. Although Department officials asserted that health and welfare in Jordan have improved since the mentors arrived, concerns persisted even with their presence in Jordan. Such concerns ultimately prompted a spring 2018 visit by CVC veterinary personnel who were on a preventative healthcare mission.

Since 2016, little progress has been made regarding the ability of Jordan to care for EDCs; in that time, however, DS/ATA has provided 66 dogs to Jordan. The DS/ATA mentors performed an inventory of ATF-trained dogs in 2017 and noted that the remaining canines appeared in good health.²⁶ During the April 2018 visit, a CVC veterinarian and veterinary technician assessed all the dogs in the Jordan canine unit and similarly reported that most appeared in good health. However, the veterinary team found multiple Jordanian canines that were not provided by DS/ATA that appeared to be malnourished, as shown in figure 2 below. The Army’s standards for working dogs note that working dogs “require a diet that is significantly different from that of pet dogs” and that “their work demands much higher levels of energy and larger quantities of essential nutrients.”²⁷ The Army Field Manual also requires that the dogs’ weights be recorded monthly to help detect possible illness.²⁸ According to the DS/ATA mentors in Jordan, dogs have been weighed weekly since December 2017 and have been provided higher quality food since February 2018. However, OIG remains concerned that this practice is not routinely followed because a CVC veterinary team observed multiple dogs that appeared to be emaciated many months after these supposed improvements began. In addition, according to the

²⁴ The purpose of these visits was to hold training in the environment in which the teams would be assigned and establish training protocols.

²⁵ It is unclear to what “pre-established DS/ATA and CVC requirements” refers, because there were, in fact, no pre-established requirements for training and medical treatment for canines in partner nations.

²⁶ The DS/ATA mentors’ assertion that the remaining ATF canines “look in good health” are, at best, inconsistent with other reports, including from the mentors themselves, that outlined concerning conditions in the Jordan canine program.

²⁷ Army Pamphlet, 190-12, § 6-24; Army Field Manual, FM 3-19.17, § 8-11.

²⁸ Army Field Manual, FM 3-19.17, § 8-8.

veterinary team, many of the canines suffered from engorged ticks, which means the ticks were likely on the dogs for several days. See figure 3 below. The Army Field Manual notes that the military working dogs are at risk of becoming infested with external parasites (fleas, ticks, and mange), which may transmit infectious diseases to the dogs. Dogs housed in kennel settings with poor tick control are at a higher risk for developing parasite-transmitted diseases. The manual states that all canines “must be on a routine parasite prevention program supervised by the responsible veterinarian.”²⁹ The Army Pamphlet notes that “grooming and inspection are essential to the dog’s health and well-being, and must be done daily.”³⁰ One of the DS/ATA mentors in Jordan told OIG that after the veterinary team visit in April 2018, the handlers are more consistently performing daily checks for ticks.



Figure 2: Underweight Jordan canine.
Source: CVC photo taken in Jordan in April 2018.



Figure 3: Engorged ticks on Jordan canine ear.
Source: CVC photo taken in Jordan in April 2018.

OIG spoke to five veterinarians who currently work or previously worked for CVC during the time period of this review, and all of them expressed concern with the health and welfare of the canines in Jordan. For example, one veterinarian stated that on-the-ground oversight should be required for Jordan or the canines would not receive proper care. Another veterinarian told OIG that the program in Jordan should have been shut down because of how badly the dogs were treated, but that the next best thing was to put U.S. veterinarians in the country to try to improve their care. In November 2018, a full-time, Department-funded veterinary team arrived in Jordan.

Several Dogs in the Jordan EDC Program Suffered Severe Health Problems

OIG also received reports of health and welfare concerns experienced by specific dogs in Jordan since the April 2016 site visit and report. In particular, one of the canines provided by DS/ATA died while working in Jordan in July 2017 and two others were returned to the U.S. in critically ill condition.³¹ CVC veterinarians ultimately had to euthanize one of those canines in March 2018 and had to nourish the other back to health in April 2018 because it was severely

²⁹ Army Field Manual, FM 3-19.17, § 8-15.

³⁰ Army Pamphlet, 190-12, § 6-23.

³¹ In addition, two other canines were returned to the U.S. due to workability issues in Jordan.

underweight. The situations surrounding these three canines are described in more detail below. OIG has focused on these three cases because there was clear evidence of both the health concerns of the individual dogs and the consequences.



Figure 4: Zoe prior to her deployment to Jordan.

Source: CVC photo taken in the U.S. in 2016.

Zoe

Zoe was a 2-year-old female Belgian Malinois that arrived in Jordan in October 2016 and died of hyperthermia (heat stroke) in July 2017 while working at the Syrian border. According to one of the DS/ATA mentors in Jordan, Zoe's death was at least partly due to the canine being reassigned to a handler who had not been trained at CVC. A CVC veterinarian told OIG that heat injuries are cases of negligence and improper care and are not accidental. Additionally, the veterinarian told OIG that canines with hyperthermia suffer a terrible death and that heat-related injuries are a significant concern for any canines going to the Middle East. The death of Zoe led to additional training on heat-related injuries in the Jordan handler courses held at CVC. The DS/ATA mentors in Jordan also developed a presentation on the signs of hyperthermia and preventative measures following Zoe's death. The Army's military working dog standards caution that canines are especially vulnerable to hyperthermia during hot or humid weather.³² The Army standards list symptoms of hyperthermia and the guidelines to follow at the onset of symptoms, but as noted above, the military working dog or similar standards were not employed once the canines were provided to Jordan.



Figure 5: Mencey back from Jordan.

Source: CVC photo taken in the U.S. in March 2018.

Mencey

Mencey was a 3-year-old male Belgian Malinois that arrived in Jordan in July 2017. Mencey became severely ill less than 1 year after his arrival. In February 2018, CVC was notified that Mencey had been diagnosed with a tick-borne disease. CVC sent a veterinarian to Jordan in March 2018 to evaluate him and determine whether he could return to the U.S. for treatment. After his return to the U.S., he was diagnosed with a second vector-borne disease that caused renal failure.³³ Due to his grave prognosis, Mencey was euthanized at the CVC on March 29, 2018.

³² Army Pamphlet 190-12, § 6-20; Army Field Manual, FM 3-19.17, §§ 8-49 and 8-51.

³³ Vectors are insects such as mosquitoes, ticks, and fleas that spread pathogens. Mencey was diagnosed with Leishmaniasis, a deadly vector-borne disease transmitted by sandflies, and Babesiosis, an incurable but treatable condition that is transmitted by ticks.

As a result of the situation with Mencey, CVC sent an MSA veterinarian and veterinary technician to Jordan in April 2018 to apply preventive medicines and flea and tick collars to all canines to help stop the spread of vector-borne diseases. Additionally, this team provided 10 test kits so other canines that appeared to have the same diseases as Mencey could be tested and any potential outbreak in Jordan could be contained. This team told OIG that CVC took this approach because Jordan does not have the ability to test for certain vector-borne diseases, including Leishmaniasis. The test kits would have allowed Jordanian personnel to test the most at-risk canines; however, the kits have gone unused or are missing, and no further action was taken once the team left Jordan. OIG was told that CVC veterinarians now test all canines for these diseases before they are deployed.

Athena



Figure 6: Athena appears severely emaciated after less than 1 year in Jordan (left); Athena’s kennel with dirt and feces on the floor and no water in her bowl (right).

Source: CVC photos taken in Jordan in April 2018.

Athena was a 2-year-old female Belgian Malinois that arrived in Jordan in May 2017. Less than a year after her arrival, the CVC veterinary team conducting the “preventative healthcare mission” in April 2018 reported that Athena appeared to be severely emaciated and that her kennel was covered in dirt and feces, as shown in figure 6 above. The Army Field Manual standards for working dogs notes that “cleanliness is one of the most important factors for the good health” of a canine.³⁴

As a result of her condition, Athena was returned to the U.S. in April 2018. Athena tested negative for any vector-borne diseases or major medical conditions. CVC assessed her condition was due to inadequate feeding and she ultimately made a full recovery after receiving the proper nourishment. During the entire time Athena was in Jordan, DS/ATA had two full-time mentors on the ground monitoring the dogs, yet Athena’s health went unnoticed until the CVC

³⁴ Army Field Manual, FM 3-19.17, § 8-25.

veterinary team raised concerns.³⁵ The AAR dated April 2018 recommended that DS/ATA fund a veterinary team (veterinarian and technician) for a minimum of 2 years to ensure proper healthcare for DS/ATA-provided canines. This veterinary team arrived in Jordan in November 2018, more than 6 months later.

The Jordan EDC Program is Unlikely to Reach Self-Sustainment

As described previously, the Department documented disturbing conditions in the canine unit in Jordan in April 2016. The Department asserts that health and welfare of the dogs in Jordan has improved since January 2017 when the DS/ATA mentors arrived, but the stories detailed above show that the dogs are still at risk. The Department continues to mitigate problems with the canine program as they arise but has no systematic approach to helping Jordan's EDCP reach self-sustainment.

The April 2018 AAR for the preventative health mission stated that both DS/ATA and the Jordanians' own dogs (i.e., those that the Department had not provided) were not receiving the appropriate level of preventative health and that handlers were not performing daily, routine hands-on physical assessments of their canines.³⁶ During this visit, the CVC veterinary team evaluated and provided preventatives to all dogs in Jordan's EDCP regardless of the source because of concerns that poor health practices and lack of preventatives among Jordan's own dogs could affect the Department-provided canines in the program. The AAR stated that, although the Jordanians are "interested" in providing their canines the best care, the commanders and veterinary staff are not financially committed to providing or enforcing a dedicated, long-term preventative program. It also concluded that Jordanian officials believe that DS/ATA will continue to provide free preventative care products; therefore, they appear reluctant to dedicate their own funds to a preventative care program. As an example, the Jordanian Royal Guard requested that CVC bring supplies to cover all their military dogs, accounting for more than 80 dogs. According to the AAR, the Jordanians were "upset" when CVC personnel told them that DS/ATA was not responsible for providing continuous long-term preventative care for the Jordanians' own dogs that were not provided by the United States.

After reviewing the April 2018 AAR and interviewing many CVC personnel who had seen the canine conditions in Jordan, OIG had serious concerns regarding the health and welfare of these dogs, as well as any others which the Department may send to Jordan as part of the DS/ATA program. To address these concerns, OIG issued a memo to DS in June 2018, stating that DS should take immediate steps to ensure the health and safety of the canines in Jordan. In response, OIG received an information memo from the two DS/ATA mentors in Jordan that outlined the improvements that had been made from January 2017 to June 2018. Separately,

³⁵ The AAR from the veterinary team notes that the mentors are working beyond the scope of their mission in Jordan because a significant portion of time is spent ensuring health, welfare, and preventative care of the dogs in the K9 unit instead of working on training.

³⁶ According to the CVC veterinary team, daily physical assessments are needed to identify and remove any vectors (tick, flea, or sand fly) that may harbor and transmit infectious diseases such as Babesiosis and Leishmaniasis to the EDCs.

though, the memo also included disturbing photos of canines that belonged to Jordan, as shown in Figure 7 below. Although OIG acknowledges that these dogs were not provided by DS/ATA and are not part of the Department's EDC program, the conditions of these animals contribute to OIG's concerns regarding the overall treatment of canines in Jordan.

There is evidence that some of the poor conditions outlined in both the 2016 post consultation report and 2018 AAR have improved. At the main kennel facility in Amman, Jordan, which currently houses most of the canines, the Jordanians added sun screens for shade and vector control, replaced broken and sharp floor tiles, replaced drain covers, repainted, and installed a new hot water heater. The mentors also told OIG that Jordan upgraded the quality of dog food, purchased dog bowls (as opposed to throwing food on the ground, as was the previous practice), and trimmed foliage around the kennels to help with tick prevention. The DS/ATA mentors also drafted SOPs for kennel sanitation and canine health and welfare that require daily grooming and hands-on examination of the dogs by the handlers. However, OIG received no information suggesting that any of these improvements are likely to be sustained. For example, DS/ATA and CVC were not able to provide documentation or other assurance that the Jordanian canine unit was consistently following procedures.



Figure 7: Underweight canine in Jordan (left); Jordan canine needing nail trim (right).

Source: DS/ATA mentor photos taken in Jordan in 2017.

Therefore, OIG remains concerned that Jordan is not able or willing to provide adequate care for working dogs without the Department's intervention and that any improvements that have been made were simply a reaction to pressure from DS/ATA. This concern is compounded by the fact that the Department does not have a plan in place to ensure that the Jordan program can reach self-sustainment. In both July 2016 and August 2018, the Department provided *more* canines to Jordan, even though concerns had recently been raised as to whether its officials could sufficiently care for them. Moreover, rather than taking a systemic approach toward the concerns identified, the Department has instead attempted to address situations on what appears to be an ad hoc basis. There is no guarantee that the Department's substantial assistance to address specific incidents will continue, yet the Department has conducted minimal planning to ensure that Jordanian officials can maintain the health and welfare of the dogs for the duration of their lives.

The Department Does Not Have Current Information About Canines Provided to Other Partner Nations

DS/ATA funded canine handler training and provided canines to five other foreign partner nations: Egypt, Lebanon, Morocco, Nepal, and Oman. Although Jordan is by far the largest DS/ATA EDC recipient, OIG reviewed the initial canine program assessments and any AARs developed by CVC for each of the five other participating countries. OIG also interviewed CVC personnel regarding canine health and welfare in these other countries. OIG is not aware of any planned follow-up visits to assess DS/ATA canine health and welfare in any of the five countries. As in Jordan, DS/ATA does not have signed LOAs that require any specific standards of care for dogs in these nations. The information obtained regarding each of these partner nations is described in more detail below.

Egypt – CVC personnel, along with a DS Assistant Regional Security Officer (ARSO) and the Transportation Security Administration (TSA) Attaché at the Embassy, conducted the initial post consultation for Egypt in October 2017. The CVC assessment team made the following observations related to care and welfare of the Egyptian canines: canines were fed high-quality food; they appeared well-fed, alert, and healthy; kennels were both indoor and outdoor; and canines are transported in large vans with no air conditioning but vented for air flow. The assessment team did not visit the veterinary clinic or meet any of the veterinary staff, and the team was not given permission to visit the Cairo Airport—where the DS/ATA-provided canines would work. Without visiting the airport, the team could not make any determination regarding the capabilities and use of canines at the airport or see the kennels where the canines are housed while working. Egyptian canine handlers attended training at CVC and, in August 2018, were provided 10 EDCs to enhance their program. CVC had planned to send mentors to Egypt, but Egypt would not allow the mentors to accompany the dogs. According to a DS/ATA official, U.S. Embassy Cairo personnel are working with the Egyptians to allow mentors entry to the country to ensure the canines are being used for their intended purpose.

Lebanon – CVC personnel, along with a DS ARSO, conducted an initial post consultation for Lebanon in December 2017. They concluded that the current kennel facilities and transport vehicles were adequate but needed some improvements; they also concluded that the veterinary care provided to the canine program was adequate in both services offered and available equipment. Lebanese canine handlers attended training at CVC and, in August 2018, DS/ATA provided 10 EDCs to enhance their program. OIG also interviewed CVC personnel who visited Lebanon to conduct the 2-week follow-up training in September 2018, who stated that the kennels appeared clean. DS/ATA did not provide a plan to follow up on the health and welfare of the dogs provided to Lebanon.

Morocco – CVC personnel, along with a DS Regional Security Officer and a TSA Attaché, conducted the initial post consultation for Morocco in August 2017. The assessment team concluded that the Moroccan canine program provided satisfactory kenneling and high-quality food but also determined that the veterinary care appeared to be lacking in advanced treatment, care, and pain management capabilities. Moroccan canine handlers attended

training at CVC, and the Department provided 10 EDCs to Morocco in January 2018 to enhance their program. The Department also provided two full-time training mentors and a veterinarian in Morocco from February to June 2018. After the dogs deployed, DS/ATA and CT officials told OIG that embassy officials were continuing to work with the Moroccan government to come to an agreement on the use of the EDCs.

Nepal – CVC personnel conducted the initial post consultation for Nepal in May 2016 and concluded the Nepalese canines appeared to be healthy and well cared for, with adequate space to exercise and play. Nepalese canine handlers attended training at CVC and, in February 2017, the Department provided 4 EDCs to enhance their program. A CVC veterinarian told OIG that the Nepalese generally treat their dogs as they would be treated in the U.S., and the veterinarian from Nepal seemed well versed in canine care. In August 2018, DS/ATA said it would likely conduct a health and welfare check on the canines provided to Nepal sometime in fiscal year 2019 but did not have any specific plan for this follow-up visit. Another DS/ATA representative said that Nepal is no longer a partner nation for antiterrorism assistance and the Bureau of Counterterrorism will have to approve funds for a follow-up visit.

Oman – One CVC instructor conducted the initial post consultation for Oman in January 2017 and observed that some kennels were new with tiled floors, proper drainage, and air conditioning, while others were old with rough concrete, standing water, and fans for cooling. Some of the canines in the older kennel suffered from sores but were being treated. The instructor concluded that the medical care seemed to be lacking in advanced treatment and care capabilities, but Oman did provide canines with preventatives for fleas and ticks. Oman canine handlers attended training at CVC and in September 2017, the Department provided 5 EDCs. As of August 2018, DS/ATA had no formal plans to check on the health and welfare of the dogs provided to Oman.

CONCLUSION

The Department has expended millions of dollars in antiterrorism assistance funds for the EDCP, but it does not ensure the health and welfare of the dogs after deployment. This threatens the dogs' ability to properly perform detection work and also creates risks to their well-being. There continue to be ongoing concerns regarding the EDCP in Jordan, where health and welfare problems have persisted for years. Nonetheless, the Department provided EDCs to this nation before those concerns were resolved. Also, the Department did not adequately plan to ensure that Jordan's canine program could become self-sustaining or that funding will be available to protect the dogs already provided. Furthermore, the Department could not provide detailed information about dogs in programs other than Jordan. Overall, the Department lacks policies and standards governing the program. The Department routinely provides dogs to foreign partners without signed written agreements that outline standards for minimum care, retirement, and use of the canines, and the Department conducts health and welfare follow-ups infrequently and inconsistently.

RECOMMENDATIONS

To ensure that canines provided to foreign nations by the Department under the Antiterrorism Assistance Program are provided proper care and treatment, OIG issued the following recommendations to the Bureau of Diplomatic Security and Bureau of Counterterrorism and Countering Violent Extremism in a draft report on June 18, 2019. Their complete response, sent on August 14, 2019, can be found in Appendix B. The bureaus also provided technical comments that OIG incorporated, as appropriate, in this report.

Recommendation 1: OIG recommends that the Bureau of Counterterrorism, in coordination with the Bureau of Diplomatic Security, develop a written strategic plan that addresses canine health and welfare concerns in Jordan, specifically planning for future funding needs in order to maintain the program, along with steps to aid the Jordanians in becoming self-sustaining. OIG further recommends that the Bureau of Counterterrorism and the Bureau of Diplomatic Security cease providing additional canines to Jordan until there is a sufficient sustainability plan in place to ensure their health and welfare.

Management Response: The Bureau of Diplomatic Security and Bureau of Counterterrorism concurred in part with this recommendation. They stated that a written strategic plan (ATA Country Implementation Plan) for the Kingdom of Jordan already exists and that they have funds budgeted to support the Jordan canine program through at least 2021. CT and DS also outlined steps the bureaus have taken to address health and welfare concerns and ensure the Jordan canine program is more self-sustaining. The bureaus did not, however, concur with the recommendation to cease providing additional canines to Jordan because of “national security related efforts focused on protecting American interests” and because “assisting Jordan in combatting active terrorist threats would be negatively impacted by such a move.” The Department also asserted that complying with the recommendation would contradict a National Security Council directive regarding “specific threats to border security” and preventing “explosives from reaching the United States.”

OIG Reply: OIG considers this recommendation unresolved. Although CT and DS assert that they have developed a written strategic plan for the Kingdom of Jordan, they never provided a copy to OIG. Thus, OIG cannot confirm whether this plan addresses canine health and welfare or steps to aid Jordan’s canine program in reaching self-sustainment. As to the national security and related matters, OIG reiterates that it found serious health and welfare concerns and again emphasizes that, aside from any other consideration, canines lose their effectiveness when their quality of life is poor. Accordingly, regardless of the motivations for the program, OIG believes it would be remiss to provide additional canines to Jordan without actionable plans for their sustainment.

Recommendation 2: OIG recommends that the Bureau of Diplomatic Security develop and implement written policies and procedures related to the health and welfare of all canines provided under the Department’s foreign assistance program, which should include policies to

address the criteria used to evaluate a foreign partner's ability to care for canines, health and welfare follow-up timelines based on the initial evaluation, and care for a canine with medical needs after deployment.

Management Response: The Bureau of Diplomatic Security concurred with this recommendation and stated that DS/ATA issued a standard operating procedure, approved November 19, 2018, that addresses the criteria used to evaluate a foreign partner's ability to care for canines, procedures for CVC in conducting health and welfare reviews on canines provided to partner nations annually, and assurances that healthcare will be provided by the Department for the working life of the canine. The Department provided a copy of this document to OIG in July 2019.

OIG Reply: OIG considers this recommendation resolved. This recommendation can be closed when DS provides documentation that it has fully implemented the standard operating procedure that it provided to OIG with its comments.

Recommendation 3: OIG recommends that the Bureau of Diplomatic Security develop and implement a written plan to address canine retirement and adoption in all countries.

Management Response: The Bureau of Diplomatic Security concurred with this recommendation and stated that DS/ATA issued a standard operating procedure, approved November 19, 2018, that addresses the retirement of all DS/ATA-provided canines.

OIG Reply: OIG considers this recommendation resolved. This recommendation can be closed when DS provides documentation that it has fully implemented the standard operating procedure that it provided to OIG with its comments.

Recommendation 4: OIG recommends that the Bureau of Counterterrorism, in coordination with the Bureau of Diplomatic Security, develop and negotiate written agreements related to the canine program with partner nations that ensure there is a mutual understanding regarding the health, welfare, and retirement of the provided canines.

Management Response: The Bureau of Diplomatic Security and Bureau of Counterterrorism concurred with this recommendation. DS/ATA provided a draft concept paper on the canine program and the standard operating procedure on managing the canine program. Both documents assert that DS/ATA will develop bilateral agreements with partner nations that govern the conditions of receiving and maintaining a canine program. However, the bureaus noted that these types of agreements can take "many months and often a year" to negotiate. According to the bureaus, DS and CT recently implemented a policy that will require foreign nations receiving canines to sign a Department non-transfer and use certificate (DSP-83) acknowledging review and receipt of canine health and welfare guidelines that are to be attached.

OIG Reply: OIG considers this recommendation resolved and will close the recommendation when DS/ATA provide copies of negotiated, written agreements with partner nations.

Recommendation 5: OIG recommends that the Bureau of Diplomatic Security prepare and implement a written timeline for conducting follow-up health and welfare checks on a regular basis to ensure provided canines are receiving the proper care, which should include documenting the status and condition of each canine provided under the program.

Management Response: The Bureau of Diplomatic Security concurred with this recommendation and noted that it is currently working with the Canine Validation Center to develop an initiative that entails a separately funded program of broader sustainment efforts for canine health and welfare across all DS/ATA country programs. DS/ATA also provided a draft concept paper on the canine program that proposes biannual health, welfare, and validation assessments for every country with a DS/ATA canine program. The paper also proposes providing veterinary medical equipment to support DS/ATA-provided canines and establishing mobile veterinary teams to travel to partner nations for assessments and training.

OIG Reply: OIG considers this recommendation resolved. OIG will close the recommendation when DS/ATA submits final plans for canine assessments.

APPENDIX A: OBJECTIVE, SCOPE, AND METHODOLOGY

In July 2017, the Office of Inspector General (OIG) received a hotline complaint alleging that the Department provided Explosive Detection Canines (EDCs) to foreign countries without proper oversight to ensure they were cared for after deployment. The complaint also alleged that canines were dying due to various medical conditions, lack of veterinary care, and poor working conditions. As a result, OIG formally initiated this evaluation in May 2018 to determine whether the Department effectively managed the health and welfare of canines in the Explosive Detection Canine Program (EDCP).

To conduct its work, OIG reviewed applicable laws and the requirements in Department directives issued in the Foreign Affairs Manual (FAM) and Foreign Affairs Handbook (FAH). OIG also considered the standards for military working dogs, which is a source of guidance for treatment of dogs at the Department's own facility, which Canine Validation Center (CVC) officials told OIG is considered an authoritative guide for explosive detection canines. OIG interviewed more than 30 Department and contractor personnel involved with the EDCP. OIG traveled to the CVC in Winchester, VA, to interview personnel and conduct a site visit. OIG also reviewed and analyzed documents and reports created and maintained by the Department related to the EDCP. Additionally, OIG participated in a virtual tour of the main kennel in Jordan with Bureau of Diplomatic Security's Office of Antiterrorism Assistance (DS/ATA) personnel in July 2018. OIG conducted this work in accordance with the Quality Standards for Inspection and Evaluation as set forth by the Council of the Inspectors General on Integrity and Efficiency.

APPENDIX B: DS AND CT RESPONSE




United States Department of State

Washington, D.C. 20520

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August 14, 2019

INFORMATION MEMO TO INSPECTOR GENERAL LINICK - OIG

FROM: DS – Michael T. Evanoff
CT – Nathan A. Sales 

SUBJECT: Bureau of Diplomatic Security response to the Office of Inspector General (OIG) Evaluation of the Antiterrorism Assistance Explosive Detection Canine Program – Health and Welfare (ESP-19-XX), June 2019

Diplomatic Security (DS) and the Bureau of Counterterrorism (CT) jointly provide the responses below to the recommendations made in the OIG's draft report.

Recommendation #1: OIG recommends that the Bureau of Counterterrorism, in coordination with the Bureau of Diplomatic Security, develop a written strategic plan that addresses canine health and welfare concerns in Jordan, specifically planning for future funding needs in order to maintain the program, along with steps to aid the Jordanians in becoming self-sustaining. OIG further recommends that the Bureau of Counterterrorism and the Bureau of Diplomatic Security cease providing additional canines to Jordan until there is a sufficient sustainability plan in place to ensure their health and welfare.

DS and CT Response (08/14/2019): DS and CT concur in part with Recommendation 1, but do not concur with the recommendation to cease providing additional canines to Jordan.

CT, in coordination with DS, has a written strategic country implementation plan for Jordan and have planned and budgeted to support the canine program via the annual ATA Jordan Bilateral program through at least FY 2021 dependent on the Department's budgeting planning processes. Nonproliferation, Anti-terrorism, Demining, and Related Programs (NADR) allocations are contingent on the Department budget planning cycles as approved by the President and Congress each fiscal year.

CT and DS have taken recent steps to address health and welfare, implement improved procedures, and ensure sustainability to aid the Jordanians in becoming more self-sustaining. In the fall of 2018, CT and DS deployed a veterinary mentor team to work with the K-9 unit full-time on health and welfare, provided and is continuing to provide enhanced medical equipment and capabilities. Additionally, CT and DS deployed a U.S. Strategic Planning Advisor mentor to Ministry of Interior's Public Security Directorate's Headquarters, which oversees the K-9 unit to assist in development of budgets for all PSD divisions, realigning the K-9 unit from under the oversight of the Forensics Lab to the Operations Division to ensure increased budget, and assist in improving sustainability planning.

CT and DS disagree with the recommendation to cease providing additional canines to Jordan at this time as national security related efforts focused on protecting American interests and

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assisting Jordan in combatting active terrorist threats would be negatively impacted by such a move. Furthermore, OIG's recommendation regarding ceasing deployment of explosive detection canines contradicts a directive from the NSC in 2017 to address specific threats to border security and prevent explosives from reaching the United States homeland.

Recommendation #2: OIG recommends that the Bureau of Diplomatic Security develop and implement written policies and procedures related to the health and welfare of all canines provided under the Department's foreign assistance program, which should include policies to address the criteria used to evaluate a foreign partner's ability to care for canines, health and welfare follow-up timelines based on the initial evaluation, and care for a canine with medical needs after deployment.

DS Response (08/14/2019): DS concurs with the recommendation. In November 2018, DS/T/ATA issued standard operating procedures to address the criteria used to evaluate a foreign partner's ability to care for canines as part of our broader "Managing Canine Programs" standard operating procedures (SOP) (See Tab 1).

Recommendation #3: OIG recommends that the Bureau of Diplomatic Security develop and implement a written plan to address canine retirement and adoption in all countries.

DS Response (08/14/2019): DS concurs with the recommendation. In November 2018, DS issued standard operating procedures for canine retirement as part of our broader "Managing Canine Programs" SOP.

Recommendation #4: OIG recommends that the Bureau of Counterterrorism, in coordination with the Bureau of Diplomatic Security, develop and negotiate written agreements related to the canine program with partner nations that ensure there is a mutual understanding regarding the health, welfare, and retirement of the provided canines.

DS and CT Response (08/14/2019): DS and CT concur with the recommendation. However, because these types of agreements take many months and often a year or more to negotiate, DS and CT recently developed and implemented a policy that will require attaching guidelines for the management of a canine program to the DSP-83 form that a partner nation must sign to receive a grant of explosive detection canines. See Tab 2 for an example of the DSP-83 and proposed attachment to the DSP-83.

Recommendation #5: OIG recommends that the Bureau of Diplomatic Security prepare and implement a written timeline for conducting follow-up health and welfare checks on a regular basis to ensure provided canines are receiving the proper care, which should include documenting the status and condition of each canine provided under the program.

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DS Response (08/14/2019): DS concurs with the recommendation. DS/T/ATA is currently working with the Canine Validation Center (CVC) to develop an initiative that entails a separately funded program of broader sustainment efforts for canine health and welfare across in all ATA country programs. See Tab 3 for ATA's draft Concept Paper.

Attachments:

Tab 1 – SOP “Managing Canine Programs”

Tab 2 – DSP-83

Tab 3 – Concept Paper

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ABBREVIATIONS

AAR	After Action Report
ARSO	Assistant Regional Security Officer
ATF	Bureau of Alcohol, Tobacco, and Firearms
CT	Bureau of Counterterrorism
DS	Bureau of Diplomatic Security
DS/OPO	Bureau of Diplomatic Security's Office of International Programs, Office of Overseas Protective Operations
DS/ATA	Bureau of Diplomatic Security's Office of Training, Office of Antiterrorism Assistance
CVC	Canine Validation Center
DEPARTMENT	Department of State
EDCP	Explosive Detection Canine Program
EDC	Explosive Detection Canines
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
IAA	Interagency Acquisition Agreement
LOA	Letters of Agreement
MOA	Memorandum of Agreement
MSA	MSA Security
OIG	Office of Inspector General
SOP	Standard Operating Procedures
TSA	Transportation Security Administration

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