

UNCLASSIFIED



Office of Inspector General
United States Department of State

ISP-I-21-04

Office of Inspections

November 2020

Inspection of the Libya External Office

BUREAU OF NEAR EASTERN AFFAIRS

UNCLASSIFIED

Summary of Review

Ongoing political instability and internal conflict in Libya led the Department of State (Department) to suspend operations at Embassy Tripoli in July 2014. As of July 2015, the Department temporarily relocated operations to a Libya External Office (LEO) in Tunisia, headed by an Ambassador and co-located with Embassy Tunis. The Department and the LEO have continued to lease the former embassy property in Tripoli, although it is vacant and outside Department control. The LEO has also continued to maintain locally employed (LE) staff members in Libya.

OIG found that the Ambassador and the LEO staff employed innovative approaches to promote policy and public diplomacy goals, despite the absence of an official U.S. diplomatic presence in Libya. In addition, the LEO's inability to account for property located in Tripoli or provide sufficient oversight of staff in Libya was not reported in the mission's Annual Statement of Assurance.

The lack of diplomatic presence in Libya created serious and special challenges for the LEO, especially with a deteriorating security situation due to a renewed outbreak of fighting in 2019 and the involvement of Turkey and Russia in Libyan affairs. Specifically, OIG found:

- The disposition of the vacant embassy compound remained unresolved, with no cost-benefit analysis conducted to review the retention of the site.
- The disposition of more than \$9 million in vehicles, information technology equipment, and other embassy property left behind in Tripoli in 2014 remained unresolved, with the Department granting the LEO annual waivers from conducting an inventory of the property.
- A full analysis of LE staffing within Libya had not taken place, although retention of the LE staff was reauthorized by the Department through 2020.
- The LEO did not regularly assess the effectiveness of its foreign assistance programs and had inconsistent approaches to monitoring and risk management of these programs.

OIG made 8 recommendations in this report to address these issues, among others. Furthermore, as more fully discussed in a companion classified report,¹ OIG found there was a lack of agreed roles and responsibilities between the LEO, Embassy Tunis, and other agencies that created security and coordination issues. In its comments on the draft report, the Department concurred with all 8 recommendations. OIG considers all 8 recommendations resolved. The Department's response to each recommendation and OIG's reply can be found in the Recommendations section of this report. The Department's formal written responses are reprinted in their entirety in Appendix B.

¹ OIG, *Classified Inspection of the Libya External Office* (ISP-S-21-04, October 2020).

BACKGROUND

Since the overthrow of Muammar al-Qadhafi in 2011, Libya has experienced political instability and internal conflict. A political agreement in 2015 created the internationally recognized Government of National Accord (GNA), headed by Prime Minister Fayeze al-Sarraj. The GNA maintains influence in western Libya but has been unsuccessful in unifying the country. Meanwhile, the Libyan National Army (LNA), under Khalifa Haftar, does not recognize the authority of the GNA and controls territory in the east and parts of southern Libya, notably where many oil resources and facilities are located. Extralegal armed groups fill security vacuums across the country. In 2019, the LNA launched a military campaign to capture Tripoli but its efforts stalled.



Figure 1: Smoke rises from a port after an attack in Tripoli, Libya, February 18, 2020 (Source: Voice of America/Reuters).

Since the LNA's military campaign in 2019, the conflict and worsening humanitarian crisis has spread to other parts of Libya, jeopardizing Libya's ability to supply oil to world markets and contributing to a marked deterioration in security conditions on the ground. Russia, Turkey, and a number of European and Middle Eastern nations have aligned with either GNA or LNA forces and are providing political and military support. The renewed conflict has prolonged instability and risks contributing to ambitions of terrorist groups such as the Islamic State of Iraq and the Levant (ISIS)-Libya and al-Qaida in the Islamic Maghreb (AQIM). GNA's limited geographic reach and lack of control exerted over national forces constrained its ability to govern effectively or counter the spread of terrorist groups.



Figure 2: The Libya External Office is located at Embassy Tunis, while the site of the suspended Embassy Tripoli is vacant. (Source: CIA World Factbook. OIG modified the map to label Libya and Tunisia and to note the location of the LEO at Embassy Tunis.)

Libya's political stability and internal conflict has also affected the American diplomatic presence in Libya. In July 2014, Embassy Tripoli suspended operations due to security concerns and moved to Embassy Valetta in Malta. In July 2015,

embassy operations moved to Embassy Tunis as the LEO, headed by an Ambassador. Inside Libya, the U.S. Government continues to lease an interim embassy compound (IEC) but has not had operational control over the leased property since the suspension of Embassy Tripoli's operations in 2014.² Due to the security situation in Libya and the LEO's lack of operational control over the IEC, it was not able to maintain a local guard force to protect the property. In October 2018, armed intruders broke into the IEC, stealing vehicles, looting, and vandalizing property. In July 2019, the IEC was damaged by a fire.

At the time of the inspection, the LEO had 20 Department and other Federal agency U.S. direct hire personnel, 6 fewer positions than the authorized complement of 26.³ The other Federal agencies represented at the office were the Department of Defense and the U.S. Agency for International Development (USAID). The LEO staff in Tunis also included two eligible family member employees and one Libyan LE staff. Additionally, the LEO had 52 LE staff in Libya.⁴ The LEO's U.S. direct-hire personnel are located at Embassy Tunis and are eligible to receive Tunis danger and hardship differential pay.

The LEO's strategic objectives, as outlined in its 2018 Integrated Country Strategy (ICS) are as follows:

- Establish a unified, internationally recognized government capable of securing its territory, controlling its resources, and providing services to its citizens.
- Support Libya's democratic transition.
- Maintain a unified and inclusive government that can provide security and meet economic and humanitarian needs.
- Develop unified, national, civilian-led security and justice institutions.

Bilateral foreign assistance administered through the LEO totaled \$65.5 million in FY 2018. Since FY 2016, Libya has received approximately \$360 million in bilateral foreign assistance funding, which supported programs addressing democracy and governance, public health, child protection, health service delivery, and security sector priorities. Of the total foreign assistance funding allocated for Libya in FY 2018, the Department implemented programs that comprised about 18 percent of the total and USAID-implemented programs accounted for the remainder. USAID and Department employees generally are unable to travel to Libya to monitor foreign assistance programs because of the unstable security situation.

² The 18.4-acre IEC consists of 11 contiguous leased properties. Despite not having operational control over the properties, the Department renewed the leases for the IEC in 2016 and 2017 for a period of 5 years. See "Challenges Related to Property in Libya" section in this report.

³ The Bureau of Near Eastern Affairs had a staffing cap for the LEO of 26 U.S. direct-hire personnel and 60 LE staff. Most of the LE staff are still located in Tripoli. The cap requires annual authorization from the Under Secretary for Management.

⁴ At the time of the inspection, LE staff in Tripoli consisted of 21 bodyguards, 13 management staff, 8 drivers, 2 investigators, 2 public diplomacy staff, 1 economic staff, 1 protocol staff, 1 translator, 1 border security assistant, 1 consular staff, and 1 USAID staff. When Embassy Tripoli suspended operations in July 2014, it had over 300 LE staff. Because it was outside the scope of the inspection, OIG did not evaluate how the LEO determined which LE staff to retain.

Because the LEO is co-located with Embassy Tunis, which provides International Cooperative Administrative Support Services (ICASS)⁵ including information technology and some security support, OIG's inspection was limited to the LEO's executive direction; policy implementation; security; management of property, staff, and foreign assistance programs; and its relations with Embassy Tunis. A companion classified report discusses OIG's security and coordination findings related to the LEO that are classified or Sensitive But Unclassified.

EXECUTIVE DIRECTION

OIG assessed the LEO's leadership on the basis of on-site interviews that included comments on Front Office performance, staff responses to OIG questionnaires, and OIG's review of documents and observations of meetings and activities during the course of the on-site portion of the inspection.

Libya External Office Leadership and Activities

The Ambassador arrived at the LEO in August 2019. He is a career member of the Senior Foreign Service and served most recently as the Foreign Policy Advisor to the Chairman of the Joint Chiefs of Staff. Previously, he served as Ambassador to Georgia and as Ambassador to Uzbekistan. The Deputy Chief of Mission (DCM) arrived at the LEO in July 2019, having previously served as acting Deputy Assistant Secretary for North Africa and as the Director of the Office of Maghreb Affairs.

OIG found the Ambassador and DCM provided effective leadership for the LEO in accordance with the Department's leadership principles outlined in 3 Foreign Affairs Manual (FAM) 1214. OIG observed the Front Office team of the Ambassador and DCM setting a professional, collaborative, and positive tone in their conduct of daily business. The Front Office engaged with Tunis-based LEO staff daily in formal and informal meetings. The Ambassador shared the public version of his calendar with the Political-Economic Section and distributed unclassified notes from Country Team meetings to keep all staff members informed of his activities. OIG observed the Ambassador and DCM in regular communication with Tripoli-based LE staff through weekly video conferences.

The Ambassador also provided strategic vision and effectively implemented expeditionary diplomacy.⁶ Stakeholders praised the LEO's analysis, reporting, and strategic approach regarding diplomatic engagement on Libya issues with bilateral, regional, and international

⁵ ICASS, established in 1997, is the principal means by which U.S. Government agencies share the cost of common administrative support services at more than 250 diplomatic and consular posts overseas. Through the ICASS working capital fund, service providers recover the cost of delivering administrative support services to other agencies at overseas missions, in accordance with 6 Foreign Affairs Manual (FAM) 911 and 6 Foreign Affairs Handbook (FAH)-5 H-013.2.

⁶ Guidance in 3 FAM 4831.2-3 describes expeditionary diplomacy as a mission conducting diplomacy in wartime or in an extreme hardship environment. This type of diplomacy advances the United States' foremost foreign policy objectives while enhancing the safety and well-being of mission employees.

audiences. The Ambassador's ongoing diplomacy with other countries working in Libya and on Libya issues required him to travel approximately 50 percent of the time. During his travel, the DCM served as interim Chargé d'Affaires.

While in Tunis, OIG observed the LEO's leaders and staff conducting diplomatic activities and public diplomacy programs in several locations—Tunis, Libya, and regionally—to advance the LEO's ICS goals. For example, in December 2019, the Ambassador convened an economic dialogue⁷ in Tunis that attracted senior-level Libyan and international participants representing interests from both sides of the Libyan conflict. Also, during the inspection, the Ambassador met in Tunis with a senior Libyan official and used the occasion to inform Libyan audiences through Facebook and Twitter of U.S. policy respecting the importance of Libyan energy resources. Likewise, the LEO established Tunis as a hub for political and public diplomacy assistance and advocacy programs, despite the difficulties associated with travel for Libyan participants. OIG found the level and pace of diplomacy reflected the resilience and creativity of this expeditionary mission.

Strategic Objectives Were Under Review

At the time of the inspection, the LEO was reviewing and updating its 2018 ICS following the renewed outbreak of fighting in April 2019 and the subsequent military involvement of Turkey and Russia in Libya. The LEO staff told OIG that they intended to propose changes to the National Security Council to the ICS' sub-objectives and activities to reflect the current environment. However, LEO staff did not plan to propose changes to the ICS objectives as the objectives continued to represent U.S. policy. Mission leadership noted two additional strategic priorities they were advancing but were not in the current ICS: pressing external actors and internal parties to support a lasting ceasefire and return to political negotiations and preparing the LEO to operate effectively from inside Libya. OIG found consensus at the LEO and in Washington that ongoing diplomacy is the best option to bring an end to the civil conflict and establish the conditions for stability in the country. This approach was outlined in an interagency-approved Stabilization Annex to the ICS in 2019.⁸

⁷ The United States initiated an economic dialogue with Libya in 2015 to advance the objective of economic and financial stability in Libya. The tenth meeting in December 2019 was significant because despite the ongoing conflict between the GNA and LNA, the LEO convinced both sides to participate for the first time.

⁸ In an email to OIG, the Office of Foreign Assistance explained that, in 2019, the Department required 11 missions, including Libya, to complete Stabilization Annexes to their respective ICS documents. The annexes operationalized the 2018 Department of State-Department of Defense-USAID Stabilization Assistance Review, a framework for maximizing the effectiveness of U.S. Government efforts to stabilize conflict-affected areas. The annexes also served as implementing mechanisms for stabilization-specific policies and priorities in the ICS, but the annexes did not replace each mission's ICS. See also cable 19 STATE 8280, "Request to Develop Interagency Plans for Stabilizing and Resolving Armed Conflicts," February 4, 2019, and cable 19 STATE 131870, "Next Steps to Implement and Support Stabilization Annexes and Advance the Stabilization Assistance Review (SAR)," December 18, 2019.

Annual Statement of Assurance Did Not Comply With Department Standards

OIG found that the LEO's FY 2019 Annual Chief of Mission Management Control Statement of Assurance (SOA) did not identify two significant deficiencies: the U.S. Government's inability to maintain effective internal controls over U.S.-leased property in Tripoli, and its inability to appropriately supervise the LE staff still in Libya. Guidance in 2 FAM 022.7(1) requires chiefs of mission to develop and maintain appropriate systems of management control in their organizations. During the inspection, OIG found the LEO staff were aware of reports of looting and damage at the U.S.-leased property in Tripoli. In fact, the LEO sent two diplomatic notes to the Government of Libya requesting that it provide diplomatic protection of the property, but the Libyans did not take action on the requests. In addition, although LEO management took steps to promote accountability and assign tasks to Libya-based LE staff, managers had limited means of exercising oversight. The LEO staff told OIG they did not include the management control deficiencies in the FY 2019 SOA because they received guidance from the Office of the Executive Director in the Bureau of Near Eastern Affairs (NEA) that the SOA only needed to include significant deficiencies related to the LEO's operations in Tunisia. The regional bureau acknowledged to OIG that the U.S. Government's property and LE staff in Libya needed to be included as significant deficiencies in an SOA, and it was consulting with the Bureau of the Comptroller and Global Financial Services on how to address this issue for future SOAs. By not reporting the LEO's lack of control over property and employees in Libya in the SOA, the mission omitted serious management and control issues.

Recommendation 1: The Libya External Office, in coordination with the Bureau of Near Eastern Affairs, should review Libya-based management controls and include any noted deficiencies in its FY 2020 Annual Chief of Mission Management Control Statement of Assurance. (Action: LEO, in coordination with NEA)

POLICY IMPLEMENTATION

The Political-Economic and Public Diplomacy Sections Advanced U.S. Policy Objectives

The LEO advanced U.S. policy objectives despite the absence of a regular U.S. diplomatic presence in Libya. Washington offices and agencies praised the LEO's successful effort to convince both the GNA and LNA to participate in the economic dialogue it organized in Tunisia in December 2019. In addition, the Political-Economic Section met with Libyan government, business, civil society, and political leaders as they transited Tunisia, which contributed to the section's contact base and depth of reporting on key goals, including efforts to end the civil conflict, encourage political reconciliation, and promote economic reform and stability.

The Public Diplomacy Section advanced the LEO's objective of creating an inclusive political process through implementation of a plan to protect Libya's cultural property, an issue that had broad support across Libya. The Public Diplomacy Section also cosponsored, with the Libyan Ministry of Education, English language seminars for teacher-trainers from all regions of Libya. By the end of the inspection, the 81 teacher-trainers were preparing to train English teachers in their districts. The section administered a small number of grants in Libya to support

a virtual music program, a conference on women and politics, and activities at Libyan cultural heritage sites.⁹ However, for security reasons, the American Grants Officers were prohibited from traveling to Libya and had to conduct oversight from Tunis. To minimize risk in managing these grants from outside Libya, the Grants Officers required regular reports from the grantees (including photographic evidence and social media posts) and they had LE staff in Tripoli, as well as other contacts drawn from the large number of exchange program alumni in Libya, conduct site visits. OIG found these actions enabled the section to minimize the risk, to the extent possible given the operating environment, in continuing its programs in Libya.

CHALLENGES RELATED TO PROPERTY IN LIBYA

The Department Did Not Conduct Cost-Benefit Analysis on Retaining the Interim Embassy Compound

OIG found that the Department continued to pay \$3.5 million annually to lease the IEC in Tripoli despite not being able to use or control the compound. The Department renewed the leases for the compound, which consisted of 11 leased properties, in 2016 and 2017 for a period of 5 years without a prior process to determine whether the leases aligned with foreign policy or operational needs. Guidance in 1 FAM 284.2(9) and (10) requires the Bureau of Overseas Buildings Operations' Office of Acquisitions and Disposals to identify property that is surplus or uneconomic to retain and to make recommendations on replacement or other disposition. In addition, 15 FAM Exhibit 512.1 provides guidelines for overseas posts to consider when reviewing property for potential disposal, among them whether a property is wholly or partly in excess of needs and whether security, political, or public relations considerations outweigh the other guidelines.¹⁰ At \$3.5 million in annual lease costs and 2 years remaining on the leases, the Department could spend up to \$7 million before the leases expire. At the time of the inspection, the Department was discussing whether to retain the IEC but had not conducted a cost-benefit analysis to help inform its decision as to whether it would be in the U.S. Government's best interest to continue to lease the IEC. A cost-benefit analysis is a systematic approach to estimating the strengths and weaknesses of alternatives and is used to identify desired results based on cost. Without a formal cost-benefit analysis, the Department does not know whether it is in the U.S. Government's best interest to continue to lease the IEC.

Recommendation 2: The Bureau of Near Eastern Affairs, in coordination with the Bureau of Overseas Buildings Operations and the Libya External Office, should conduct a cost-benefit analysis to determine whether the Department should continue to lease the interim embassy compound in Tripoli and put up to \$7 million to better use if the decision is to terminate the lease. (Action: NEA, in coordination with OBO and LEO)

⁹ At the time of the inspection, the Public Diplomacy Section had three open grants in Libya totaling \$98,000.

¹⁰ Although 15 FAM Exhibit 512.1, "Guidelines for Reviewing Real Property for Disposal," pertains to capital and not operating leases, it provides criteria for the LEO to consider that may be of use in reviewing the IEC operating leases. See 15 FAM 512.1a.

Department Was Unable to Account for Property in Libya Valued at More Than \$9 Million

The LEO could not account for \$9.2 million in vehicles, IT equipment, and other property left at the IEC in 2014 and had not conducted the required annual inventory¹¹ of the property in Tripoli since the 2014 evacuation due to lack of access to the compound. Although the Bureau of Administration's Office of Logistics Management granted the LEO annual waivers from conducting the inventory, there were credible reports, as described in OIG's companion classified inspection report, that vehicles, IT equipment and, other property listed on this and previous inventories had been stolen or destroyed. The Department provides guidance on disposal of personal property¹² overseas, including abandonment, in 14 FAM 417. OIG determined that the Department needed to review the reports about the status of property in Tripoli and identify any property requiring abandonment. Maintaining this unaccounted-for property on the inventory places the U.S. Government at risk if any of it is misused.¹³

Recommendation 3: The Bureau of Near Eastern Affairs, in coordination with the Bureau of Administration and the Libya External Office, should review the status of U.S. Government property in Tripoli and, if warranted, direct the abandonment of the property. (Action: NEA, in coordination with A and LEO).

STAFFING CHALLENGES

The Department Did Not Review Staffing in Libya Despite Deteriorating Security

Despite a renewed outbreak of fighting in Tripoli which began in April 2019, neither the LEO nor the Department, including the Office of Management Strategy and Solutions which has right-sizing responsibilities, had systematically reassessed the LEO's staffing.¹⁴ Guidance in 18 FAM 301.1-2 through 18 FAM 301.1-4 encourages Department bureaus to conduct periodic evaluations of ongoing activities to examine performance and outcomes and determine if adjustments are needed to improve efficiency or effectiveness. In 2017, the Department conducted an Overseas Presence Review of Embassy Tunis, which included the LEO,¹⁵ but with the significantly changed circumstances since 2017, the LEO and Department staff told OIG the

¹¹ According to 14 FAM 416.1a, a physical inventory of property must be taken annually.

¹² According to 14 FAM 411.4, personal property "refers to all property not otherwise classified as land, land improvement, buildings, and structures that are normally referred to as real property."

¹³ In 2015, OIG issued a classified management alert about the risks of misuse of unaccounted for U.S. Government property in Libya (MA-15-02, July 2015).

¹⁴ In December 2019, the Under Secretary for Management authorized NEA to retain 60 LE staff positions in Tripoli through December 2020, extending the status quo for another year. In February 2018, the acting Director General of the Foreign Service and Director of Human Resources approved the current U.S. direct-hire staffing cap of 26. Neither of these actions were accompanied by a staffing review.

¹⁵ According to 1 FAM 013.2j, each chief of mission is required to review, not less than once every 5 years, every staff element under chief of mission authority, including staff from other departments or agencies of the United States, and recommend approval or disapproval of each staff element. See also 22 U.S.C. § 3927(a).

assumptions in the 2017 review were outdated. For other remote missions¹⁶ including Embassy Mogadishu and the Yemen Affairs Unit, the Department conducted a standalone review, but it had not conducted one for the LEO. Furthermore, although the LEO's Management Officer was conducting a narrow review of existing LE staff positions in Tripoli at the time of the inspection, OIG found that it did not cover the LEO staff in Tunis. LEO staff told OIG they had not worked with the Department to conduct a comprehensive review because Department officials had not yet reached a consensus on a plan to return to Libya. The Department pays an estimated \$1.5 million annually to retain the 52 LE staff in Libya. Continuing with the LEO's current staffing profile, without an assessment that considers the LEO's current and future circumstances and operational requirements, risks the misallocation of U.S. Government resources.

Recommendation 4: The Bureau of Near Eastern Affairs, in coordination with the Office of Management Strategy and Solutions and the Libya External Office, should conduct a review of the Libya External Office's staffing in Tunis and Libya. (Action: NEA, in coordination with M/SS and LEO)

Spotlight on Success: Innovative Approaches to Remotely Manage Locally Employed Staff in Tripoli

The LEO used innovative approaches to remotely manage and better protect the 52 Tripoli-based LE staff. The absence of a diplomatic presence in Libya presented the LEO with management and program challenges in supervising LE staff. Furthermore, weak security structures and the growing power of militias also limited LE staff's ability to move freely in Libya. To overcome these limitations, in late 2019, the Regional Security Officer implemented an accountability process by which he received daily updates on the safety of each employee and shared them with the LEO supervisors. Regional Security Office LE staff also accompanied Public Diplomacy LE staff to project sites and meetings to ensure their security. The LE staff communicated results of these visits to supervisors through WhatsApp.

The Management Officer organized virtual town hall meetings for Tripoli-based LE staff with the Ambassador, DCM, and other LEO and Embassy Tunis officers. For weekly Management Section staff meetings, the Management Officer used videoconferencing to connect staff in Tripoli and Tunis. The Public Diplomacy Section also used videoconferencing to include Tripoli-based staff in staff meetings and to organize sessions between public diplomacy specialists and program participants in Libya and the Tunis-based officers. In addition, the Management Officer led an effort whereby American supervisors helped LE staff keep their skills up-to-date by providing online and other training opportunities and by bringing them to Tunis periodically, despite the challenging travel conditions, to work on specific projects at the LEO or assist Embassy Tunis sections.

¹⁶ Following a decision to suspend operations, some overseas missions have established operations in a second location, often in another country, where mission essential functions can continue and the embassy effectively operates as a "remote mission." According to the Department, missions that currently fit this definition include Libya, Somalia, Venezuela, and Yemen.

REMOTE OVERSIGHT OF FOREIGN ASSISTANCE PROGRAMS

Foreign Assistance Programming Lacked Sufficient Coordination

The LEO's foreign assistance programming lacked sufficient coordination among Federal agencies implementing programs in Libya, as well as between Washington and the LEO. OIG found that the LEO had implemented some activities to coordinate foreign assistance. For example, in 2019, it developed an inventory of all U.S. Government foreign assistance programs in Libya. It also convened a monthly meeting of the working group, the Libya External Office Assistance Coordination Committee, to review programs and facilitate communication among agencies. Nonetheless, LEO staff told OIG that a 6-month staffing gap in the LEO foreign assistance coordinator position, responsible for coordination and communicating foreign assistance priorities to interagency stakeholders, and a change in NEA's desk officer that led to a lapse in monthly conference calls with Washington bureaus, hindered efforts to coordinate foreign assistance planning. Department staff told OIG the NEA-led monthly conference calls were useful and increased visibility because most of the Department's foreign assistance for Libya is managed from Washington-based bureaus.¹⁷ At the time of the inspection, the LEO was taking steps to fill the foreign assistance coordinator vacancy, which should increase communication with Washington-based stakeholders and provide interagency leadership. As a result, OIG did not make a recommendation to address this issue.

The Libya External Office Did Not Assess the Progress of Foreign Assistance Programs

OIG found that the LEO had not developed a process to review the progress of its foreign assistance programs against mission-specific strategic objectives to ensure alignment of policy, planning, and programs, as required by 18 FAM 301.2-4(C)(c). Department staff told OIG that the renewed outbreak of fighting in Tripoli in April 2019 caused a significant deterioration in the security situation, which, in turn, affected the viability of foreign assistance programs developed under more permissive security conditions. For example, the Bureau of International Security and Nonproliferation's Export Control and Related Border Security Program experienced delays in conducting training because of the inability of participants to travel outside the country. In another case, a technical advisor had to be evacuated due to the fighting and subsequently resigned, leaving the program without a project manager on the ground. Although the LEO had paused and resumed programming in response to events in Libya, OIG found that the LEO had not reassessed the viability of programs in Libya under changed circumstances. The *FY 2019 Full Performance Plan Report*¹⁸ for Libya reported that the programs did not achieve their targets for 14 of 21 performance indicators. In addition, 10 performance indicator targets for FY 2020 to FY 2021 were not adjusted to account for the effect of the ongoing conflict.

¹⁷ Although the LEO does not administer any Department of State foreign assistance programs from Tunis, the Chief of Mission through the Libya External Office Assistance Coordination Committee provides final oversight for all U.S.-funded foreign assistance, whether managed in Washington or in the field.

¹⁸ Office of U.S. Foreign Assistance Resources, *Libya: FY 2019 Full Performance Plan Report (PPR)*, submitted December 20, 2019.

According to LEO employees, the staffing gap in the foreign assistance coordinator position hampered the ability of the LEO to monitor and report program performance to the Ambassador, as did the lapse in the NEA-led monthly conference calls, which reduced interagency visibility to monitor program progress. In the absence of effective coordination of multiple foreign assistance programs, the U.S. Government risked wasting funds on programming that could not be effectively implemented in the current environment.

Recommendation 5: The Libya External Office should assess the progress of U.S. Government foreign assistance programs operating in Libya to ensure alignment with current policy and planning requirements. (Action: LEO)

The Libya External Office Had Insufficient Processes for Foreign Assistance Monitoring and Risk Management

OIG found that the LEO did not have in place a mission-wide risk management policy and up-to-date guidance for monitoring and evaluation of Department foreign assistance programs operating in Libya. The lack of an overall risk management policy resulted in inconsistencies in how the U.S. Government administered foreign assistance. Conditions in Libya, including political instability and the deteriorating security situation, created a high-risk environment for waste, fraud, and mismanagement, as well as security risks that affected the ability of programs to meet their objectives. For example, the Department did not recommend travel to Libya due to heightened risk of crime, terrorism, civil unrest, kidnapping, and armed conflict. Moreover, the Department rated Libya as high risk for U.S. Government contracting activities, placing it on the Critical Environment Contracting List. In addition, efforts to mitigate risks to U.S. assistance programs through enhanced monitoring were complicated by outdated and unclear guidance on monitoring and evaluation and the lack of a U.S. Government presence in Libya. Examples of the inconsistencies OIG observed include:

- **Out of Date Risk Assessments:** OIG found that NEA's risk assessment for assistance to Libya had not been updated since conflict conditions changed in April 2019. Moreover, 9 of 19 risk assessments¹⁹ for Department Federal assistance awards in Libya that OIG reviewed were not updated, as required by Department standards.
- **Vetting Not Required for Libya Programs:** At the time of the inspection, the LEO had not explored whether enhanced risk mitigation, such as Risk Analysis and Management (RAM) vetting,²⁰ was necessary for Libya programs. Although the Department conducted RAM vetting in other high-risk contracting environments

¹⁹ The Federal Assistance Directive requires that a risk assessment be performed annually for Federal assistance awards with a period of performance longer than 12 months. The annual risk assessment must be documented, and monitoring plans must be modified to reflect any changes to the level of risk for the agreement.

²⁰ RAM is a name-check vetting capability located within the Bureau of Administration's Office of Logistics Management Critical Environment Contracting Analytics Staff. It conducts vetting for Department bureaus, offices, and missions.

such as Afghanistan, Iraq, Lebanon, and Syria, the Department had not taken steps to assess the need for increased risk mitigation for Department-managed awards involving Libya.

- **Unclear Guidance on Third-Country Monitors:** The LEO issued guidance in July 2017 that prohibited third-country nationals from traveling to Libya to implement or monitor Department foreign assistance programs. The guidance expired in August 2018 and had not been updated.²¹ Furthermore, the guidance did not indicate whether the limitation applied to USAID programs. As a result, Department-managed foreign assistance programs could not employ third-country nationals to assist with monitoring and site visits even though USAID sometimes used third-country nationals to ensure oversight of its programs. Department staff told OIG that the guidance unnecessarily restricted the ability of Department program managers to oversee their programs on the ground in Libya.

As described in 2 FAM 031a, Department employees are required to identify, evaluate, integrate, and mitigate any substantial risks to their objectives, and chiefs of mission must incorporate risk assessment into their decision-making. The inconsistencies described above occurred, in part, because the LEO had not put in place a risk management policy and had not updated its monitoring guidance. Without a formal risk management policy and monitoring guidance, the Department was at risk of funding programs vulnerable to diversion in Libya, and of not accomplishing key foreign assistance objectives because of changed security and operating conditions.

Recommendation 6: The Libya External Office should update its guidance for monitoring foreign assistance programs that benefit Libya. (Action: LEO)

Recommendation 7: The Libya External Office, in coordination with the Bureau of Near Eastern Affairs and the Bureau of Administration, should develop and publish a formal risk management policy for foreign assistance programs operating in Libya, including updating current risks and outlining the process for identifying and managing risk. (Action: LEO, in coordination with NEA and A)

RELATIONS WITH EMBASSY TUNIS

Lack of Agreed Roles and Responsibilities Between the Libya External Office and Embassy Tunis Created Management and Security Issues

OIG found that unclear roles and responsibilities between the LEO and Embassy Tunis created management and security problems for the LEO. For example, the LEO had an annual subscription for ICASS services from Embassy Tunis through which it received most of its administrative support. However, that mechanism did not account for the LEO as a separate

²¹ Although this guidance expired in 2018, OIG found that the LEO continued to abide by it.

diplomatic entity apart from Embassy Tunis. Consequently, the LEO did not reassess its overall staffing levels and, instead, made staffing decisions based on space availability as determined by Embassy Tunis. Combined with the outdated Overseas Presence Review described above, OIG found that the LEO staffing was not optimized. In addition, the lack of clearly delineated responsibilities between the two entities exacerbated a security issue, as discussed in OIG's companion classified report.

To clarify roles and responsibilities, in 2017, the LEO and Embassy Tunis drafted a memorandum of understanding, which was signed by both chiefs of mission. However, the NEA senior bureau official at that time, in the absence of a confirmed Assistant Secretary, chose not to sign it, which was required for it to be finalized. OIG advised the LEO and NEA that an agreement detailing the roles and responsibilities of the Chiefs of Mission of the LEO and Embassy Tunis, as well as for their respective staffs, would help strengthen relations and improve operations. Although a memorandum of understanding would not preclude a review of LEO staffing or affect the LEO's ICASS subscription, OIG determined that an updated memorandum of understanding would clarify the roles and responsibilities between the two entities. Without a clear delineation of responsibilities between the two missions, the LEO's operations are at risk of further management problems.

Recommendation 8: The Libya External Office, in coordination with Embassy Tunis and the Bureau of Near Eastern Affairs, should execute a memorandum of agreement between the Libya External Office and Embassy Tunis. (Action: LEO, in coordination with Embassy Tunis and NEA)

The Libya External Office Did Not Implement a Records Management Program

OIG determined that the LEO staff were not archiving records as required by Department standards. Specifically, the LEO was archiving only some of its WhatsApp, Facebook Live, and other electronic messages which it used to conduct official business. The LEO had not retired any records since it was created in 2015. Department standards in 5 FAM 414.5a require missions to implement and administer Department records policies, standards, systems, and procedures. In addition, cable 19 STATE 72880²² requires missions to capture Federal records onto Department systems by forwarding them to Department email accounts within 20 days, and guidance in 5 FAM 414.8(1) requires the embassy to preserve or dispose of documentary materials in accordance with the Federal Records Act. Although the LEO leadership had disseminated Department guidance and conducted training for officers, OIG found only partial compliance with records management requirements. Without an effective records management program, the LEO risks not archiving important data for research and historical insights into policy analysis and decision-making. OIG advised LEO staff to fully implement Department guidance on records management, and LEO staff committed to take steps to comply. Because OIG was currently conducting an audit that included a review of records management for remote missions, OIG did not make a recommendation to address this issue.

²² Cable 19 STATE 72880, "A Message from the Under Secretary for Management on Electronic Messaging Applications and other Records Management Responsibilities," July 9, 2019.

RECOMMENDATIONS

OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to the Libya External Office and the Bureau of Near Eastern Affairs. The Department's complete responses can be found in Appendix B.¹ The Department also provided technical comments that were incorporated into this report, as appropriate.

Recommendation 1: The Libya External Office, in coordination with the Bureau of Near Eastern Affairs, should review Libya-based management controls and include any noted deficiencies in its FY 2020 Annual Chief of Mission Management Control Statement of Assurance. (Action: LEO, in coordination with NEA)

Management Response: In its October 7, 2020, response, the Libya External Office concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Libya External Office reviewed Libya-based management controls and included any noted deficiencies in its FY 2020 Annual Chief of Mission Management Control Statement of Assurance.

Recommendation 2: The Bureau of Near Eastern Affairs, in coordination with the Bureau of Overseas Buildings Operations and the Libya External Office, should conduct a cost-benefit analysis to determine whether the Department should continue to lease the interim embassy compound in Tripoli and put up to \$7 million to better use if the decision is to terminate the lease. (Action: NEA, in coordination with OBO and LEO)

Management Response: In its October 20, 2020, response, the Bureau of Near Eastern Affairs concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Near Eastern Affairs conducted a cost-benefit analysis to determine whether the Department should continue to lease the interim embassy compound in Tripoli and put up to \$7 million to better use if the Department decides to terminate the lease.

Recommendation 3: The Bureau of Near Eastern Affairs, in coordination with the Bureau of Administration and the Libya External Office, should review the status of U.S. Government property in Tripoli and, if warranted, direct the abandonment of the property. (Action: NEA, in coordination with A and LEO).

¹ OIG faced delays in completing this work because of the COVID-19 pandemic and resulting operational challenges. These challenges included the inability to conduct most in-person meetings, limitations on our presence at the workplace, difficulty accessing certain information, prohibitions on travel, and related difficulties within the agencies we oversee, which also affected their ability to respond to our requests.

Management Response: In its October 20, 2020, response, the Bureau of Near Eastern Affairs concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Near Eastern Affairs reviewed the status of U.S. Government property in Tripoli and, if warranted, directed the abandonment of the property.

Recommendation 4: The Bureau of Near Eastern Affairs, in coordination with the Office of Management Strategy and Solutions and the Libya External Office, should conduct a review of the Libya External Office's staffing in Tunis and Libya. (Action: NEA, in coordination with M/SS and LEO)

Management Response: In its October 20, 2020, response, the Bureau of Near Eastern Affairs concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Near Eastern Affairs conducted a review of the Libya External Office's staffing in Tunis and Libya.

Recommendation 5: The Libya External Office should assess the progress of U.S. Government foreign assistance programs operating in Libya to ensure alignment with current policy and planning requirements. (Action: LEO)

Management Response: In its October 7, 2020, response, the Libya External Office concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Libya External Office assessed the progress of U.S. Government foreign assistance programs operating in Libya to ensure alignment with current policy and planning requirements.

Recommendation 6: The Libya External Office should update its guidance for monitoring foreign assistance programs that benefit Libya. (Action: LEO)

Management Response: In its October 7, 2020, response, the Libya External Office concurred with this recommendation. The office noted expected completion by the end of 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Libya External Office updated its guidance for monitoring foreign assistance programs that benefit Libya.

Recommendation 7: The Libya External Office, in coordination with the Bureau of Near Eastern Affairs and the Bureau of Administration, should develop and publish a formal risk management

policy for foreign assistance programs operating in Libya, including updating current risks and outlining the process for identifying and managing risk. (Action: LEO, in coordination with NEA and A)

Management Response: In its October 7, 2020, response, the Libya External Office concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Libya External Office developed and published a formal risk management policy for foreign assistance programs operating in Libya.

Recommendation 8: The Libya External Office, in coordination with Embassy Tunis and the Bureau of Near Eastern Affairs, should execute a memorandum of agreement between the Libya External Office and Embassy Tunis. (Action: LEO, in coordination with Embassy Tunis and NEA)

Management Response: In its October 7, 2020, response, the Libya External Office concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Libya External Office executed a memorandum of agreement between the Libya External Office and Embassy Tunis.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Richard Norland	08/2019
Deputy Chief of Mission	Joshua Harris	07/2019
Chiefs of Sections:		
Management	Sarah Padula	06/2018
Political-Economic	Leslie Ordeman	08/2019
Public Affairs	Erica Thibault	07/2018
Regional Security	Robert Holbrook	11/2019
Other Agencies:		
Department of Defense	Karsten Spies	08/2019
U.S. Agency for International Development	John Pennell	09/2019

Source: Generated by OIG from data provided by the LEO.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from January 2 to May 18, 2020, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspections Handbook, as issued by the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM).

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and Congress with systematic and independent evaluations of the operations of the Department and USAGM. Inspections cover three broad areas, consistent with Section 209 of the Foreign Service Act of 1980:

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved and U.S. interests are accurately and effectively represented; and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy; and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; and whether instances of fraud, waste, or abuse exist and whether adequate steps for detection, correction, and prevention have been taken.

In conducting inspections, OIG uses a risk-based approach to prepare for each inspection; reviews pertinent records; circulates surveys and compiles the results, as appropriate; conducts interviews with Department and on-site personnel; observes daily operations; and reviews the substance of the report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG uses professional judgment, along with physical, documentary, testimonial, and analytical evidence collected or generated, to develop findings, conclusions, and actionable recommendations.

Joseph Macmanus (Team Leader), Eleanor Nagy (Team Manager), Paul Gilmer, Barry Langevin, John Lightner, Thomas Mesa, Anthony Sanganetti, and Lian von Wontach conducted this review. Other contributors include Barbara Keller, Diana McCormick, Timothy McQuay, and Rebecca Sawyer.

APPENDIX B: MANAGEMENT RESPONSES



*Embassy of the United States of America
U.S. Embassy Tripoli
Libya External Office (LEO), Tunis*

October 7, 2020

UNCLASSIFIED

THRU: NEA – David Schenker, Assistant Secretary

TO: OIG – Sandra Lewis, Assistant Inspector General for Inspections

FROM: Libya External Office – Richard B. Norland, U.S. Ambassador to Libya

SUBJECT: Response to Draft OIG Report – Inspection of the Libya External Office

The Libya External Office (LEO) has reviewed the draft OIG inspection report and appreciates the constructive engagement between OIG personnel and the LEO throughout the inspection process.

Since the United States suspended diplomatic operations in Tripoli in 2014, the LEO serves as a unique and expeditionary platform, currently located in Tunis as a distinct mission and charged with conducting U.S. diplomacy under the leadership of its Chief of Mission (COM) with both Libyan and international actors. Ultimately, the LEO's mission is to put itself out of business through the resumption of regular diplomatic activities inside Libya. Thus, the transitional and non-traditional nature of the LEO platform will continue to require flexibility and creativity from Post and the Department, as well as strong interagency collaboration. The LEO particularly appreciates the ongoing support of Ambassador Blome and U.S. Embassy Tunis, which provides the management and security backbone for the conduct of its mission.

We provide the following comments in response to the recommendations provided by OIG:

OIG Recommendation 1: The Libya External Office, in coordination with the Bureau of Near Eastern Affairs, should review Libya-based management controls and include any noted deficiencies in its FY 2020 Annual Chief of Mission Management Control Statement of Assurance. (Action: LEO, in coordination with NEA)

Management Response: The LEO concurs with this recommendation and has noted deficiencies in Libya-based management controls in the FY 2020 Annual COM management control Statement of Assurance (SOA). Following an evaluation of management controls, the LEO determined that, with three documented exceptions, the COM was able to provide reasonable assurance that management control objectives were achieved. These exceptions, which stemmed from the suspension of diplomatic operations in Tripoli in 2014 and the inability of LEO personnel to operate inside Libya as a result of the ongoing conflict, were potential significant deficiencies regarding the (1) oversight of Tripoli-based locally engaged staff; (2) leased facilities and property inventories in Libya; and (3) security for Libya-based facilities. The SOA was certified by the COM and submitted to the Department in August 2020.

OIG Recommendation 2: The Bureau of Near Eastern Affairs, in coordination with the Bureau of Overseas Buildings Operations and the Libya External Office, should conduct a cost-benefit analysis to determine whether the Department should continue to lease the interim embassy compound in Tripoli and put up to \$7 million to better use if the decision is to terminate the lease. (Action: NEA, in coordination with OBO and LEO)

Management Response: LEO acknowledges the recommendation and is prepared to support NEA and OBO, as appropriate, in its implementation.

OIG Recommendation 3: The Bureau of Near Eastern Affairs, in coordination with the Bureau of Administration and the Libya External Office, should review the status of U.S. Government property in Tripoli and, if warranted, direct the abandonment of the property. (Action: NEA, in coordination with A and LEO)

Management Response: LEO acknowledges the recommendation and is prepared to support NEA and A, as appropriate, in its implementation.

OIG Recommendation 4: The Bureau of Near Eastern Affairs, in coordination with the Office of Management Strategy and Solutions and the Libya External Office, should conduct a review of the Libya External Office's staffing in Tunis and Libya. (Action: NEA, in coordination with M/SS and LEO)

Management Response: LEO acknowledges the recommendation and is prepared to support NEA and M/SS, as appropriate, in its implementation.

OIG Recommendation 5: The Libya External Office should assess the progress of U.S. Government foreign assistance programs operating in Libya to ensure alignment with current policy and planning requirements. (Action: LEO)

Management Response: The LEO concurs with this recommendation and is initiating steps through its Libya Assistance Coordination Committee (LACC) to review implementation of foreign assistance programs against LEO specific strategic objectives. Security considerations currently preclude the ability of U.S. direct-hire personnel to monitor program activities on

the ground in Libya. In addition, the vacancy in the foreign assistance coordinator position continues to hamper the LEO's ability to assess progress of assistance programs, a complex process that involves numerous Department of State and interagency partners that administer programs focused on Libya. (The LEO itself does not administer any Department of State assistance programs from Post.) While the LEO has hired an eligible family member and reallocated portfolios within the Political-Economic section to mitigate this staffing shortfall, the LEO will likely continue to face challenges on this busy portfolio until the full-time position is filled.

OIG Recommendation 6: The Libya External Office should update its guidance for monitoring foreign assistance programs that benefit Libya. (Action: LEO)

Management Response: The LEO concurs with this recommendation. In November 2019, the LEO began the process of revising guidance on monitoring foreign assistance programs that benefit Libya, including procedures for travel by third-country nationals (TCNs). Subject to policy and legal review by Washington departments and agencies, we anticipate that a revised LEO policy on monitoring foreign assistance programs will be completed by the end of 2020. In addition, USAID routinely updates the LACC on its independent, third-party monitoring and evaluation (M&E) contract, which involves regular M&E of U.S. programs in Libya administered by USAID.

OIG Recommendation 7: The Libya External Office, in coordination with the Bureau of Near Eastern Affairs and the Bureau of Administration, should develop and publish a formal risk management policy for foreign assistance programs operating in Libya, including updating current risks and outlining the process for identifying and managing risk. (Action: LEO, in coordination with NEA and A)

Management Response: The LEO concurs with this recommendation and will initiate work with NEA and A to develop a formal risk management policy for foreign assistance programs operating in Libya. The LEO is aware of COM responsibilities to incorporate risk assessment into decision-making.

OIG Recommendation 8: The Libya External Office, in coordination with Embassy Tunis and the Bureau of Near Eastern Affairs, should execute a memorandum of agreement between the Libya External Office and Embassy Tunis. (Action: LEO, in coordination with Embassy Tunis and NEA)

Management Response: The LEO concurs with this recommendation and reiterates its appreciation for the ongoing management and security support provided by Embassy Tunis for its activities, which will be reinforced through execution of a memorandum of understanding (MOU). In consultation with Embassy Tunis, NEA, the Office of the Under Secretary for Management, and the Office of the Legal Advisor, the LEO prepared a draft update to the 2017 LEO-Embassy Tunis memorandum and initiated discussions with Embassy Tunis on this document on July 2, 2020. The MOU aims to describe the roles and responsibilities of the

respective COMs and their staffs at the LEO and Embassy Tunis and establish procedures for the effective functioning of both missions, based on the principle that hosted and hosting COMs should have full visibility and concurrence on LEO operations in Tunisia consistent with the President's Letters of Instruction to Chiefs of Mission, as well as relevant presidential directives, legislation, statutes, and policies. The LEO and Embassy Tunis do not agree with the report's characterization that the absence of such an MOU has or would preclude a review of LEO staffing or affect the LEO's subscription for common administrative support (ICASS) services provided by Embassy Tunis.

The point of contact for this memorandum is Deputy Chief of Mission Joshua Harris.



United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

October 20, 2020

FROM: NEA – Assistant Secretary Joey Hood, Acting
TO: OIG – Sandra Lewis, Assistant Inspector General for Inspections
SUBJECT: Response to Draft OIG Report – Inspection of the Libya External Office

NEA reviewed the draft initial report and has provided its response below. NEA concurs with Ambassador Norland’s observation that the transitional and nontraditional nature of the LEO platform will continue to require flexibility and creativity from Post and the Department, as well as strong interagency collaboration

We provide the following comments in response to the recommendations 2-4 provided by OIG:

OIG Recommendation 2: The Bureau of Near Eastern Affairs, in coordination with the Bureau of Overseas Buildings Operations and the Libya External Office, should conduct a cost-benefit analysis to determine whether the Department should continue to lease the interim embassy compound in Tripoli and put up to \$7 million to better use if the decision is to terminate the lease. (Action: NEA, in coordination with OBO and LEO)

NEA Response: NEA acknowledges the recommendation and will coordinate with LEO and OBO, as appropriate, in its implementation.

OIG Recommendation 3: The Bureau of Near Eastern Affairs, in coordination with the Bureau of Administration and the Libya External Office, should review the status of U.S. Government property in Tripoli and, if warranted, direct the abandonment of the property. (Action: NEA, in coordination with A and LEO)

NEA Response: NEA acknowledges the recommendation. A/LM has approved disposal of this property and post is finalizing disposal. NEA is prepared to support LEO and A, as appropriate, in the final stages of implementation.

OIG Recommendation 4: The Bureau of Near Eastern Affairs, in coordination with the Office of Management Strategy and Solutions and the Libya External Office, should conduct a review of the Libya External Office’s staffing in Tunis and Libya. (Action: NEA, in coordination with M/SS and LEO)

NEA Response: NEA acknowledges the recommendation and is prepared to support LEO and M/SS, as appropriate, in its implementation.

The point of contact for this memorandum is NEA/EX PMO Edie Backman.

ABBREVIATIONS

AQIM	al-Qaida in the Islamic Maghreb
DCM	Deputy Chief of Mission
FAM	Foreign Affairs Manual
GNA	Government of National Accord
ICASS	International Cooperative Administrative Support Services
ICS	Integrated Country Strategy
IEC	Interim Embassy Compound
ISIS	Islamic State of Iraq and the Levant
LE	Locally Employed
LEO	Libya External Office
LNA	Libyan National Army
NEA	Bureau of Near Eastern Affairs
RAM	Risk Analysis and Management
SOA	Statement of Assurance
USAID	U.S. Agency for International Development



HELP FIGHT
FRAUD, WASTE, AND ABUSE

1-800-409-9926

www.stateoig.gov/HOTLINE

If you fear reprisal, contact the
OIG Whistleblower Coordinator to learn more about your rights.

WPEAOmbuds@stateoig.gov