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Office of Inspector General
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Office of Inspections

January 2021

Inspection of the Bureau of Diplomatic Security's Special Program for Embassy Augmentation and Response

DOMESTIC OPERATIONS

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HIGHLIGHTS

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What OIG Inspected

OIG inspected the Special Program for Embassy Augmentation and Response, which is located under the Office of Antiterrorism Assistance in the Bureau of Diplomatic Security.

What OIG Recommends

OIG made 9 recommendations: 8 to the Bureau of Diplomatic Security and 1 to the Bureau of Administration.

In its comments on the draft report, the Department concurred with all 9 recommendations. OIG considers all 9 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.

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OFFICE OF INSPECTIONS
DOMESTIC OPERATIONS

Inspection of the Bureau of Diplomatic Security's Special Program for Embassy Augmentation and Response

What OIG Found

- The Special Program for Embassy Augmentation and Response was succeeding in its mission to enhance protection of overseas U.S. facilities and personnel.
- The Bureau of Diplomatic Security's Specialized Programs Division did not provide clear, updated guidance or sufficient training to overseas staff on the use of the Integrated Logistics Management System for management of property assigned to the Special Program for Embassy Augmentation and Response.
- The program's motor vehicle operations did not comply with all Department of State guidelines and processes.
- The contracts supporting the program lacked quality assurance surveillance plans and formal contractor performance assessment reports.
- Third-party contractors performed inherently governmental functions while providing support to the Special Program for Embassy Augmentation and Response.
- Program management guidance contained unrealistic goals for the transition of Special Program for Embassy Augmentation and Response units to embassy control.

CONTENTS

CONTEXT	1
OPERATIONAL EFFECTIVENESS	2
RESOURCE MANAGEMENT AND MANAGEMENT CONTROLS	4
Property Management	4
Contract Management	7
PROGRAM MANAGEMENT	10
RECOMMENDATIONS	14
APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY.....	17
APPENDIX B: MANAGEMENT RESPONSES	20
APPENDIX C: ORGANIZATIONAL CHART	24
ABBREVIATIONS	25
OIG INSPECTION TEAM MEMBERS	26

CONTEXT

The Bureau of Diplomatic Security (DS) established the Special Program for Embassy Augmentation and Response (SPEAR) in 2014 to address post-Benghazi Accountability Review Board-identified weaknesses in host nation capacity to protect U.S. personnel and facilities at high-threat posts. SPEAR falls under the Specialized Programs Division (SPD) of the DS Training Directorate, Office of Antiterrorism Assistance (DS/T/ATA).

SPEAR is designed to enhance the security of high-threat, high-risk posts by providing training and loaning equipment to host nation law enforcement security units assigned to respond to emergencies at U.S. diplomatic facilities. Without this training and equipment, host nation security forces may be inadequately prepared to perform their emergency response mission effectively. In addition, DS supplies a full-time U.S. expert “mentor” to work exclusively with each SPEAR unit to strengthen its operational capacity and readiness.

All 12 countries¹ with SPEAR units signed agreement letters with the relevant U.S. embassies (see Table 1). The agreements commit the host nation to assign dedicated security forces to SPEAR units, without other collateral duties. This allows the units to focus on developing their capabilities and building cooperative relationships with U.S. security personnel to protect American facilities and staff.² In all but one country, SPEAR units serve as a quick response force trained to respond to emergencies while also providing additional security for embassy events or travel. In the Democratic Republic of the Congo, the SPEAR unit only provides dedicated bodyguards for U.S. diplomatic personnel in the capital, Kinshasa, and throughout the country.

¹ Nigeria has two SPEAR posts: Embassy Abuja and Consulate General Lagos.

² SPEAR units interact with the Regional Security Office, local guard force, Marine Security Guard detachment, and U.S. combatant commands, among others.

Table 1: SPEAR Units, as of May 2020

Current Operations^a	Planned Future Operations
Ouagadougou, Burkina Faso	Dhaka, Bangladesh
Bangui, Central African Republic	Cotonou, Benin
N'Djamena, Chad	Yaoundé, Cameroon ^b
Kinshasa, Democratic Republic of the Congo	Addis Ababa, Ethiopia
Erbil, Iraq	Monrovia, Liberia
Nairobi, Kenya	Khartoum, Sudan
Bamako, Mali	
Nouakchott, Mauritania	
Niamey, Niger	
Abuja, Nigeria	
Lagos, Nigeria	
Juba, South Sudan	
Tunis, Tunisia	

^a The Department suspended efforts to develop SPEAR units in Algeria and Burundi because limited host government cooperation made the model unworkable.

^b Embassy Yaoundé requested that DS defer the program's expansion to Cameroon for the time being.

Source: DS Specialized Programs Division.

The annual SPEAR budget is approximately \$33 million.³ The SPEAR Office has 20 domestic personnel (5 U.S. direct-hire staff and 15 third-party contractors) in Dunn Loring, VA, that support broader SPEAR operations as well as 13 third-party contractors who serve as SPEAR mentors overseas.⁴ Regional Security Officers (RSOs) at post supervise the overseas contract mentors.

OIG inspected the operational effectiveness, resource management and management controls, and program management of the SPEAR program consistent with Section 209 of the Foreign Service Act of 1980.⁵

OPERATIONAL EFFECTIVENESS

OIG evaluated the operational effectiveness of the SPEAR program based on interviews with, and questionnaires completed by, domestic and overseas Department staff involved in the program, as well as OIG's review of pertinent documents. As discussed below, OIG found that 12 of 13 SPEAR units enhanced the capabilities of the host nation to respond to emergencies and protect staff at U.S. diplomatic facilities. In addition, SPEAR units have responded to several high-profile terrorist attacks and increased security at more than 500 embassy-related events. Furthermore, SPEAR domestic and overseas operations staff told OIG that apart from Embassy

³ SPEAR is funded through the Worldwide Security Programs-Overseas Contingency Operations account.

⁴ There are 29 Department employees and contractors supporting SPEAR; 20 work solely on SPEAR while the remaining 9 also handle other SPD-supported programs. See Appendix C for an organizational chart for SPEAR.

⁵ See Appendix A.

Nouakchott, Mauritania, they found SPEAR to be an effective program that strengthened the security of U.S. facilities and personnel.

Department Staff Had Favorable View of SPEAR

For 12 of the 13 posts with SPEAR units,⁶ overseas operations staff supporting SPEAR told OIG the units protected U.S. facilities and personnel in accordance with the operational requirements outlined in 12 Foreign Affairs Handbook (FAH)-13 H-040. The operations staff also reported that the performance of the SPEAR units facilitated the ability of embassy Regional Security Offices to secure U.S. facilities and personnel as required.⁷ For example, more than half of the posts with SPEAR units reported that their employees were better able to carry out diplomatic and foreign assistance activities in otherwise nonpermissive environments because SPEAR units escorted their travel. In addition, DS officials told OIG they viewed posts with SPEAR units as having an enhanced level of security and that the presence of a SPEAR unit increased DS confidence in a post's ability to handle a crisis. Furthermore, at 12 of the 13 of the posts with SPEAR units, staff told OIG they thought the units demonstrated greater response capability than would be possible if the posts had to rely solely on regular host nation security forces.

SPEAR Units Achieved Significant Security Successes

OIG found that SPEAR units achieved significant security successes. Since the program's inception in 2014, SPEAR units have augmented security for more than 500 events, including 4th of July celebrations, public affairs outreach events, and high-profile visits. The units also have supported more than 100 chief of mission movements, including those to high-risk locations in northern Mali and Niger for critical chief of mission engagement. For instance, the Mali SPEAR unit provided frequent coverage for the Ambassador's trips outside of the capital, Bamako, and for U.S. Agency for International Development meetings with tribal leaders, politicians, and nongovernmental organizations in the field. Although assigned to provide security support to U.S. embassies, SPEAR unit members retain their authorities and responsibilities as local law enforcement officers, which RSOs viewed as a benefit. SPEAR units have arrested more than 30 individuals for violent crimes—including murder, robbery, and burglary—near U.S. Government facilities or properties.

In their capacity as law enforcement officers, members of SPEAR units have also responded to emergencies and terrorist attacks. For example, in March 2017, assailants with assault rifles and grenades attacked a European Union site located two blocks from the U.S. Embassy in Bamako, Mali. According to witness accounts, eight SPEAR unit members responded within 10 minutes to secure the location, assisted with the search for the terrorists, and provided life-saving medical attention to a shooting victim. SPEAR units also responded to a November 2015 attack on the Radisson Blu hotel in Bamako and a suicide bombing in front of U.S. Embassy Tunis,

⁶ OIG found that the SPEAR unit in Mauritania did not align with the operational requirements outlined in 12 FAH-13, as discussed in the Program Management section of this report.

⁷ 22 U.S. Code § 4802(a) Responsibility of Secretary of State, Security Functions, April 30, 1994.

Tunisia, in March 2020. In addition, on January 15, 2019, a group of al-Shabaab terrorists carried out a deadly attack against an office complex and luxury hotel in Nairobi, Kenya. The attack included a suicide bomber as well as other attackers armed with assault rifles and wearing vests containing grenades and ammunition. The Nairobi SPEAR unit responded to the attack, coordinated with other tactical units, conducted clearing operations, and engaged and killed at least two of the terrorists. Two SPEAR unit members were seriously injured by grenades during the firefight with the attackers. A third SPEAR unit member used his DS-provided tactical medical training and equipment to render first aid to his wounded team members until they could be evacuated from the attack site, helping to save their lives.

RESOURCE MANAGEMENT AND MANAGEMENT CONTROLS

OIG reviewed management controls related to SPEAR operations in property management, contract management, and financial management. With respect to financial management, OIG reviewed SPEAR's unliquidated obligations and its stipend program⁸ and determined they generally complied with Department standards and policies. With respect to property and contract management, OIG found that SPEAR managers generally implemented applicable processes and procedures in accordance with applicable laws and Department guidance, with the exceptions described below.

Property Management

To support the program, the Department purchased and loaned equipment, primarily personal protective equipment (such as helmets and vests) and vehicles, to each SPEAR unit overseas. Because the equipment still belongs to the Department, SPEAR managers must follow Department property management standards, including conducting an annual inventory. In addition, DS issued a cable in FY 2016 outlining the management responsibilities for SPEAR property.⁹ However, as described below, OIG found issues with inventory processes, accountability of vehicles loaned to host nation police forces for use by SPEAR units, and compliance with Department vehicle safety standards.

SPEAR Property Inventory Processes Were Deficient

OIG found SPEAR operations staff did not properly record and inventory the U.S. Government property loaned to SPEAR units. Department guidance in 14 Foreign Affairs Manual (FAM) 125d

⁸ Under SPEAR, SPD gives stipends to participating host nation security personnel to strengthen the significant commitment required to develop and sustain the program. The Department calculates the stipends based on local economic conditions such as inflation, long-term economic issues, and transportation costs. The SPEAR stipend policy states the RSO or designated direct-hire staff must have accountability procedures in place to account for the disbursement of stipends to the host nation personnel dedicated to the program. For example, the RSO is required to provide a memo to the post's financial management officer authorizing payment to each member of the SPEAR unit for work performed. See cable 19 STATE 89224, "Guidance on DS Provided Stipends in Support of Host Nation Personnel," August 19, 2019.

⁹ Cable 16 STATE 93592, "Management Guidelines—Special Program for Embassy Augmentation and Response Property," August 22, 2016.

requires use of the Asset Management module in the Integrated Logistics Management System (ILMS) to track accountable property through its life cycle.¹⁰ Department guidance in 12 FAM 473.7d(2) and (3) also requires the RSO to conduct the annual inventory of all loaned assets each fiscal year, using the Detailed Global Inventory Report, and to submit it to SPD for review. However, instead of directly entering and updating overseas property inventory information electronically in ILMS, SPEAR operations staff employed a cumbersome, hybrid inventory process involving paper documents for some steps.¹¹ This process required SPD, with its small staff, to manage elements of the inventories that normally would be handled by embassy employees.

In addition, OIG found that cooperation between the RSOs and General Services Officers (GSO) at embassies with SPEAR units did not comply with Department guidance. According to 12 FAM 473.8, the RSO is required to coordinate with the GSO, and the GSO is required to assist the RSO in ensuring property loaned to SPEAR units is properly tracked and inventoried. However, both Department and overseas staff involved with the inventories told OIG that a lack of cooperation between RSOs and GSOs exacerbated the property management issues. Additionally, 14 FAM 411.2-5 requires a direct-hire employee to be the designated custodial officer,¹² while 12 FAM 473.7d states the RSO is the designated custodial officer for all SPEAR property at post.¹³ OIG found that some embassy staff supporting the SPEAR program were still unclear on who could be designated as the custodial officer for SPEAR property at post. DS and Bureau of Administration employees told OIG that staffing limitations and a lack of training on the use of ILMS for locally employed staff working in Regional Security Offices contributed to these issues.

Furthermore, OIG learned that SPD drafted, but DS never published, updated FAH guidance on SPEAR property management, including information contained in its August 2016 cable,¹⁴ to clarify Department standards and FAM guidance. As a result, some Regional Security Offices were unclear about using ILMS and the required property management forms. Without appropriate training on ILMS and updated property management guidance for Regional Security Office staff at posts with SPEAR units, inefficient inventory processes could cause

¹⁰ In accordance with 12 FAM 473.10a(1), the Bureau of Administration's Property Management Division established a separate SPEAR business unit in ILMS for all SPEAR property overseas.

¹¹ SPEAR operations staff in the Department transfer ILMS data to a hard copy Detailed Global Inventory Report and send it to the embassy's Regional Security Office to perform the physical inventory. The office then updates and returns the hard copy Detailed Global Inventory Report to SPD, where staff review it and reenter the updated data into ILMS.

¹² 14 FAM 411.2-5 states that the custodial officer must be a U.S. Government direct-hire employee, designated in writing by the property management officer, and is responsible for the physical control and record keeping of U.S. Government personal property. In compliance with this citation, DS delegated the Assistant RSO as the custodial officer at two SPEAR posts.

¹³ 12 FAM 473.7d states that the RSO is designated in writing by the DS accountable property officer as the custodial officer for all SPEAR property at post. The FAM guidance does not provide for delegation of the custodial officer responsibilities to any other employee.

¹⁴ 16 STATE 93592.

internal control vulnerabilities, which, in turn, increase the risk of waste, fraud, or abuse of resources.

Recommendation 1: The Bureau of Diplomatic Security, in coordination with the Bureau of Administration, should provide training for Regional Security Office staff who support Special Program for Embassy Augmentation and Response units on the Integrated Logistics Management System. (Action: DS, in coordination with A)

Recommendation 2: The Bureau of Diplomatic Security, in coordination with the Bureau of Administration, should publish and disseminate updated guidance for the management and inventory of Special Program for Embassy Augmentation and Response property overseas, including the respective responsibilities of General Services Officers and Regional Security Officers. (Action: DS, in coordination with A)

Program Managers Did Not Properly Account for Loaned Vehicles

OIG found that SPEAR operations staff did not account for the vehicles the Department loaned to the host nation police force for use by SPEAR units as required. As a result, SPD did not have an accurate inventory of its vehicles. Department guidance requires these vehicles be entered into and tracked through the ILMS Asset Management module and inventoried annually.¹⁵ Based on documentation provided by SPD and interviews with overseas SPEAR operations staff, OIG estimated the Department loaned a total of approximately 47 vehicles to SPEAR units at 12 posts.¹⁶ However, OIG found only 16 vehicles correctly recorded in ILMS. The remaining SPEAR vehicles identified during interviews either were entered incorrectly or not at all into ILMS. The lack of accurate recording, tracking, and inventories of SPEAR vehicles prevented both OIG and SPEAR operations staff from determining the actual number of vehicles assigned overseas.

These issues occurred primarily due to unfamiliarity by overseas and domestic staff with required vehicle inventory procedures. Specifically, guidance on SPEAR property management contained in the 2016 cable states that the vehicles must be entered into the SPEAR business unit in ILMS and inventoried on an annual basis.¹⁷ However, as mentioned previously, that information had yet to be incorporated into the FAM or FAH. The bureau's failure to widely disseminate and enforce proper vehicle accountability procedures has resulted in an inaccurate inventory of SPEAR vehicles and an internal control vulnerability.

Recommendation 3: The Bureau of Diplomatic Security, in coordination with the Bureau of Administration, should properly account for Special Program for Embassy Augmentation and Response loaned vehicles. (Action: DS, in coordination with A)

¹⁵ See 14 FAM 436.5a, 14 FAM 414.1-2, and 12 FAM 473.7d.

¹⁶ The SPEAR unit in Kinshasa, Democratic Republic of the Congo, did not have any vehicles purchased by the Department.

¹⁷ 16 STATE 93592.

SPEAR Motor Vehicle Drivers Did Not Comply With Department Safety Requirements

OIG found that SPEAR units did not comply with Department vehicle safety standards regarding safe driver training and vehicle mishap reporting.¹⁸ Although SPEAR units have 253 drivers worldwide, none had taken the required safe driver training approved by the Bureau of Overseas Buildings Operations' Office of Safety, Health, and Environmental Management.¹⁹ In addition, OIG found instances at three overseas posts where SPEAR vehicle mishaps were not reported to the Post Occupational Safety and Health Officer, as required by 14 FAM 433.10.²⁰ Furthermore, SPD leadership told OIG that most SPEAR vehicle mishaps were not reported to post officials.

OIG found that multiple embassies did not know that the safe driver training and vehicle mishap reporting requirements applied to SPEAR units. For example, some embassy staff thought the safe driver training requirements did not apply because vehicles did not have diplomatic plates. Another embassy official told OIG that its Post Occupational Safety and Health Officer had said that SPEAR vehicles did not fall under the FAM requirements. Failure to properly establish and follow driver safety requirements, and to report vehicle mishaps, creates a potential hazard to U.S. Government-owned property and to the safety of drivers, passengers, and pedestrians.

Recommendation 4: The Bureau of Diplomatic Security, in coordination with the Bureau of Overseas Buildings Operations, should bring Special Program for Embassy Augmentation and Response motor vehicle operations into compliance with Department motor vehicle safety requirements. (Action: DS, in coordination with OBO)

Contract Management

To meet SPEAR's mission, SPD relied on third-party contracts to provide management support, execute and manage in-country programs, and conduct training exercises. As of April 2020, SPEAR had five active contracts with an estimated total value of \$148.8 million.²¹ Contract

¹⁸ According to 15 FAM 964, "Mishap Investigation and Reporting Abroad," a mishap is any unplanned, unexpected, or undesirable event causing injury, disease or illness, death, material loss or property damage, or incident causing environmental contamination. The term includes motor vehicle collisions.

¹⁹ Guidance in 14 FAM 433.5 requires posts to provide a driver training program using instructors who have been trained through a Department-approved safe driving course, with provisions for refresher training and additional DS-approved armored vehicle training for any driver operating an armored vehicle.

²⁰ According to 14 FAM 433.10, all collisions/mishaps involving official vehicles shall be investigated according to the requirements of 15 FAM 964. Following a mishap, 15 FAM 964 requires the post occupational safety and health officer either to perform an in-house investigation or appoint a Mishap Board, depending on the seriousness of the mishap. In addition, 14 FAM 431.6-2b(2) requires the vehicle accountable officer to submit mishap reports, in coordination with the Post Occupational Safety and Health Officer.

²¹ Four of the five contracts support both the Antiterrorism Assistance Program, using Nonproliferation, Antiterrorism, Demining, and Related Programs funds, and SPEAR, using Worldwide Security Protection funds. As a result, total contract funding for SPEAR operations represents only a portion of the total contract value. See Appendix A for more information on the contracts supporting SPEAR.

management staff²² told OIG they generally were satisfied with contractor performance. OIG found that DS had sufficient controls in place to ensure that foreign assistance funds did not pay for SPEAR activities.²³ OIG also found that the contracting officer's representatives (CORs) and assistant CORs performed their duties in accordance with Department guidance²⁴ and their designation letters. However, as described below, OIG found issues with the preparation of quality assurance surveillance plans, the finalization of annual contractor performance assessment reports, and instances of third-party contractors performing inherently governmental functions.

Quality Assurance Surveillance Plans Not Prepared

OIG found that CORs for the contracts supporting SPEAR activities did not prepare quality assurance surveillance plans as required by the Federal Acquisition Regulation Subpart 46.401(a).²⁵ These plans identify the type of contract monitoring activities to be used, such as regular meetings, on-site inspections of products or services, or a performance feedback structure. The plans also include guidelines for assessing the contractor's annual performance. CORs for the contracts supporting SPEAR told OIG that the contracts were straightforward and did not require a written quality assurance surveillance plan. Instead, the CORs said they met regularly with U.S.-based contract staff and were generally knowledgeable about contract activities and vendor performance. OIG notes that such activities, while similar to those that might be included in a quality assurance surveillance plan, are not a substitute for producing a written plan. Moreover, some CORs told OIG they faced challenges overseeing contractor performance in the field. Such challenges could be addressed through the development and implementation of a quality assurance surveillance plan. As SPEAR programming expands to additional countries, contract oversight responsibilities and tasks will also expand. Failure to complete required quality assurance surveillance plans and ensure effective oversight of contractor performance in the field limits the ability of the CORs and assistant CORs to properly judge whether the contractor performed the work as required and whether it is appropriate to engage the vendor for future projects.

²² Contract management staff encompasses the contracting officers, located in the Bureau of Administration, Office of Acquisition Management, and the contracting officer's representatives (CORs) and assistant CORs, located in SPD.

²³ Only Worldwide Security Protection funds have been authorized for expenditure in support of SPEAR. Nonproliferation, Antiterrorism, Demining, and Related Program funds are foreign assistance funds and may not be used to support SPEAR. Any host nation military forces receiving foreign assistance funds must undergo "Leahy vetting" prior to receiving those funds to ensure that funding is not provided to a unit or individual which committed human rights violations. In addition, foreign assistance funds may require Congressional notification prior to being expended. Worldwide Security Protection funds do not include these requirements.

²⁴ 14 FAH-2 H-100, "Contracting Officer's Representative Handbook," and 14 FAH-2 H-500, "Post-Award Contract Administration."

²⁵ According to the regulation, quality assurance surveillance plans should outline required performance metrics and how the contractor will be evaluated against those metrics. In addition, the standard contract terms and conditions outline that the quality assurance surveillance plan is to provide U.S. Government surveillance of the contractor's quality control efforts to assure that they are timely, effective, and are delivering the results specified in the contract.

Recommendation 5: The Bureau of Diplomatic Security should implement quality assurance surveillance plans for each contract that supports the Special Program for Embassy Augmentation and Response, in accordance with Federal regulations. (Action: DS)

Annual Contractor Performance Assessment Reports Not Finalized for All SPEAR Contracts

OIG found that CORs assigned to the SPEAR contracts, in coordination with Department contracting officers and the assistant CORs, did not prepare and finalize all contract performance data in the Contractor Performance Assessment Report System as required. Federal Acquisition Regulation Subpart 42.1502 (a) and (b) *Contractor Performance Information*, requires agencies to evaluate a contractor's performance at least annually and upon completion of any contract or order valued over the simplified acquisition threshold.²⁶ This performance information should then be entered into the Contractor Performance Assessment Report System for use in contractor selection for future awards.²⁷ However, OIG found that one SPEAR contract had two annual contractor performance assessment reports while the other four contracts did not have any annual assessment reports in the system. The contracting officers told OIG they were behind in completing and entering the reports into the system and that the CORs had not developed draft contractor performance assessment reports for contracting officer review and approval. Without completed annual performance assessment reports, SPEAR operations staff may not have an accurate assessment of the contractor's performance, and future contract source selection panels may lack access to recent contractor performance data when making contract award decisions.

Recommendation 6: The Bureau of Administration, in coordination with the Bureau of Diplomatic Security, should prepare all required annual contractor performance assessment reports and finalize assessments in the Contractor Performance Assessment Report System for contracts supporting the Special Program for Embassy Augmentation and Response. (Action: A, in coordination with DS)

Third-Party Contractors Performed Inherently Governmental Functions

OIG found instances where third-party contractors performed inherently governmental functions²⁸ contrary to Federal regulations. According to the SPD organizational chart, 5 direct-

²⁶ The simplified acquisition threshold, defined in Federal Acquisition Regulation (FAR) Subpart 2.101, *Definitions*, is \$250,000, except for acquisitions of supplies or services that support contingency operations; facilitate defense against or recovery from cyber, nuclear, biological, chemical, or radiological attack; facilitate provision of international disaster assistance; support an emergency or major disaster; and support a humanitarian or peacekeeping operation.

²⁷ The Office of Federal Procurement Policy has issued multiple directives to improve contract documentation and to make better award decisions based upon accurately documented contractor performance, including a memorandum titled, *Making Better Use of Contractor Performance Information*, issued on July 10, 2014.

²⁸ As defined in FAR Subpart 2.101, *Definitions*, inherently governmental functions include activities that require either the exercise of discretion in applying Government authority, or the making of value judgments in making decisions for the Government. Governmental functions normally fall into two categories: (1) the act of governing, i.e., the discretionary exercise of Government authority, and (2) monetary transactions and entitlements.

hire employees and 28 third-party contractors²⁹ (15 domestic and 13 overseas) support SPEAR operations as program managers, mentors, training delivery coordinators, operations coordinators, and logistics support staff. OIG determined that one of these third-party contractors, serving as a mentor, approved travel expenditures without consulting the COR or other U.S. direct-hire staff supporting SPEAR. In this instance, OIG concluded that the activities performed by the third-party contractor were inherently governmental functions because, in contravention of the requirements outlined in the Federal Acquisition Regulation Subpart 2.101, they required value judgments in making decisions on behalf of the Federal Government, particularly with respect to the commitment of funds.

In addition to what OIG found, DS and Department staff managing the SPEAR contracts told OIG that they had concerns that the program's staffing structure—comprised of just a few direct-hire employees partnered with many more third-party contractors—increased the likelihood of third-party contractors performing inherently governmental functions. Federal Acquisition Regulation Subpart 7.5, *Inherently Governmental Functions*, states that inherently governmental functions must not be performed by a third-party contractor. In addition, guidance from the Office of Federal Procurement Policy requires agencies to provide greater attention and an enhanced degree of oversight to ensure that third-party contractors' duties do not expand to include inherently governmental functions.³⁰ Without appropriate controls and oversight of third-party contractors, SPEAR assumes the risks associated with the potential loss of Government control and accountability for program decisions, particularly as the SPEAR program expands.

Recommendation 7: The Bureau of Diplomatic Security should establish controls to ensure that third-party contractors supporting the Special Program for Embassy Augmentation and Response do not perform inherently governmental functions. (Action: DS)

PROGRAM MANAGEMENT

OIG reviewed program management and found that SPEAR operations staff generally implemented its program management processes and procedures in accordance with applicable laws and Department guidance. However, OIG found issues related to the sustainment model for SPEAR activities, transition management, and program termination, as described below.

²⁹ Unlike personal services contractors who have authorities similar to those of direct-hire employees and may perform inherently governmental functions, third-party contractors cannot perform inherently governmental functions. See Appendix C for an organizational chart depicting the breakdown of third-party contractor staff.

³⁰ Office of Federal Procurement Policy, Policy Letter 11-01, *Performance of Inherently Governmental and Critical Functions*, September 12, 2011. The policy letter also states that agencies shall take steps to employ and train an adequate number of Government staff to oversee contracts that have been awarded for the performance of activities closely aligned with inherently governmental functions or those where there is a potential for confusion as to whether the work should be performed by Government employees or third-party contractors.

Monitoring and Evaluation Plan Did Not Align With Sustainment Standards

OIG found that the monitoring and evaluation plan developed by SPEAR managers did not include objectives or subobjectives that measure the program's progress based on the annual milestones and sustainment standards outlined in Department guidance. According to 12 FAH-13 H-045a, SPEAR's primary goal is to create a self-sustaining unit that includes an internal training cell to train both new SPEAR members and host nation security and emergency forces responsible for protecting U.S. diplomatic facilities. Furthermore, the model for sustainment, as described in 12 FAH-13 H-045b, identifies specific milestones to be met annually from the second through the fifth year of each country program.³¹

With respect to monitoring, general program management guidance in 18 FAM 301.4-3b states that monitoring involves regular, ongoing data collection against key performance indicators or milestones to gauge the direct and near-term effects of activities and whether desired results are occurring as expected. Without a monitoring and evaluation plan that contains the correct performance objectives—in this case, SPEAR objectives and subobjectives—the program may miss opportunities to determine if training cell implementation and sustainment progress are on track or if any corrections or adjustments may be needed. For example, according to the sustainment model described in 12 FAH-13 H-045b, 10 SPEAR units should have had training cells in place at the time of the inspection. However, OIG found that only 8 of the 10 units had established training cells within their second year of operation. In addition, for the eight units that established training cells, only six met the training milestones for their country program. When OIG raised this issue with SPEAR senior managers, they acknowledged this discrepancy and committed to aligning objectives and monitoring efforts with the Department's SPEAR sustainment standards. Therefore, OIG did not make a recommendation to address this issue.

SPEAR Unit Transition Standard Unrealistic

OIG found that SPEAR operations staff set an unrealistic goal of transitioning ownership and management of each overseas unit to its respective post after 3 to 4 years of operation. According to 12 FAH-13 H-046, DS/T/ATA will "transition most of the program management and budget responsibility to the post" when a SPEAR unit attains a "proficient level of technical capacity, institutional knowledge, and physical infrastructure." The guidance further states that DS/T/ATA expects to reduce its program support after 3 to 4 years. At the time of the inspection, support for nine SPEAR units³² should have at least started the transition process based on the FAH standards. However, this had yet to occur because the units had not been deemed proficient, the embassy did not have the resources to manage the program, or embassy staff were unaware of the requirement for the unit to transition to their control.

³¹ As a sustainment model, in year two, a training cell will be established at each post where SPEAR operates to provide training to the SPEAR team; in year three, the training cell will provide training to the police assigned to embassy security support; in year four, the cell will begin providing training to the mission local guards; by year five, the goal is an experienced training cell for SPEAR self-sustainment as well as the primary trainer for the police assigned to the embassy, and serve in a training augmentation role for the mission local guards.

³² The following country programs have SPEAR units that have been in place for at least 3 years: Chad, Iraq, Kenya, Mali, Mauritania, Niger, Nigeria (Abuja), South Sudan, and Tunisia.

A January 2020 independent assessment³³ of two SPEAR units in Mali and Niger, commissioned by DS/T/ATA, found that the current SPEAR model of transitioning program management to overseas posts should be revised. Additionally, DS senior leaders, SPEAR operations staff, and embassy officials told OIG the transition goal of 3 to 4 years was incompatible with the program's success and unrealistic in keeping the SPEAR units operationally effective. Without realistic and achievable performance goals, the likelihood that embassies will be able to successfully assume management of the SPEAR units decreases. During the inspection, SPEAR operations staff acknowledged the issues in the 12 FAH-13 H-046 transition structure and began the process of updating the FAH to incorporate new transition standards.

Recommendation 8: The Bureau of Diplomatic Security should complete the revision of the Foreign Affairs Handbook to clarify and define realistic conditions for transitioning a Special Program for Embassy Augmentation and Response unit to embassy management. (Action: DS)

Data for SPEAR Transition Not Tracked and Monitored

OIG found that SPD's monitoring and evaluation plan did not monitor or track the capacity of each post to assume program management and budget responsibilities for its SPEAR unit, as required by 12 FAH-13 H-046. As such, domestic SPEAR operations staff lacked the data necessary to determine whether a mission had reached a proficient level of capacity or whether conditions for transition had been met. OIG determined this issue occurred because SPEAR operations staff drafted and implemented a monitoring and evaluation plan 8 months prior to a November 2019 update of 12 FAH-13 H-046, which established overall goals for transition of SPEAR units to embassies.³⁴ The operations staff did not subsequently update the plan to align with the new transition goals. As a result, SPEAR operations staff collected performance data that did not document a unit's progress against its established transition goals. Without accurate performance indicators that include and assess progress against overall transition goals, the data collected may not be of use to senior leaders about progress made toward the goals and whether any timely corrections or adjustments may be needed to improve efficiency or effectiveness.

Recommendation 9: The Bureau of Diplomatic Security should align its monitoring and evaluation plan with standards in the Foreign Affairs Handbook and include specific metrics for assessing Special Program for Embassy Augmentation and Response units' progress towards transition. (Action: DS)

³³ SPD contracted with Dexis Consulting to complete an independent assessment and evaluation of its program.

³⁴ The SPEAR managers developed a monitoring and evaluation plan using the guidance outlined in 18 FAM 301.4-3b, "Strategic Direction and Management," and the corresponding Department of State Program Design and Performance Management Toolkit, February 2017.

Bureau Lacked a Process for Terminating an Underperforming SPEAR Unit

OIG found that SPD lacked a process to terminate underperforming SPEAR units. SPD determined that the SPEAR program in Nouakchott, Mauritania, established in 2014, was underperforming, despite the expenditure of \$3.6 million. DS and SPD senior leaders and staff at Embassy Nouakchott were aware of the unit's poor performance and had discussed terminating the program. However, the lack of a termination process prevented any action. During the inspection, SPD established a process to terminate underperforming programs and initiated steps to terminate SPEAR operations at Embassy Nouakchott. As a result of the Department's actions, OIG did not make a recommendation to address this issue.

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 Bureau of Diplomatic Security and the Bureau of Administration. 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 Bureau of Diplomatic Security, in coordination with the Bureau of Administration, should provide training for Regional Security Office staff who support Special Program for Embassy Augmentation and Response units on the Integrated Logistics Management System. (Action: DS, in coordination with A)

Management Response: In its January 5, 2021, response, the Bureau of Diplomatic Security 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 Diplomatic Security provided training for Regional Security Office staff who support Special Program for Embassy Augmentation and Response units on the Integrated Logistics Management System.

Recommendation 2: The Bureau of Diplomatic Security, in coordination with the Bureau of Administration, should publish and disseminate updated guidance for the management and inventory of Special Program for Embassy Augmentation and Response property overseas, including the respective responsibilities of General Services Officers and Regional Security Officers. (Action: DS, in coordination with A)

Management Response: In its January 5, 2021, response, the Bureau of Diplomatic Security 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 Diplomatic Security published and disseminated updated guidance for the management and inventory of Special Program for Embassy Augmentation and Response property overseas, including the respective responsibilities of General Services Officers and Regional Security Officers.

Recommendation 3: The Bureau of Diplomatic Security, in coordination with the Bureau of Administration, should properly account for Special Program for Embassy Augmentation and Response loaned vehicles. (Action: DS, in coordination with A).

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 January 5, 2021, response, the Bureau of Diplomatic Security 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 Diplomatic Security properly accounted for Special Program for Embassy Augmentation and Response loaned vehicles.

Recommendation 4: The Bureau of Diplomatic Security, in coordination with the Bureau of Overseas Buildings Operations, should bring Special Program for Embassy Augmentation and Response motor vehicle operations into compliance with Department motor vehicle safety requirements. (Action: DS, in coordination with OBO)

Management Response: In its January 5, 2021, response, the Bureau of Diplomatic Security 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 Diplomatic Security brought the Special Program for Embassy Augmentation and Response motor vehicle operations into compliance with Department motor vehicle safety requirements.

Recommendation 5: The Bureau of Diplomatic Security should implement quality assurance surveillance plans for each contract that supports the Special Program for Embassy Augmentation and Response, in accordance with Federal regulations. (Action: DS)

Management Response: In its January 5, 2021, response, the Bureau of Diplomatic Security 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 Diplomatic Security implemented quality assurance surveillance plans for each contract that supports the Special Program for Embassy Augmentation and Response, in accordance with Federal regulations.

Recommendation 6: The Bureau of Administration, in coordination with the Bureau of Diplomatic Security, should prepare all required annual contractor performance assessment reports and finalize assessments in the Contractor Performance Assessment Report System for contracts supporting the Special Program for Embassy Augmentation and Response. (Action: A, in coordination with DS)

Management Response: In its December 15, 2020, response, the Bureau of Administration concurred with this recommendation. The bureau noted an estimated completion date of July 2021 for outstanding assessments in the Contractor Performance Assessment Report System.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration prepared all

required annual contractor performance assessment reports and finalized assessments in the Contractor Performance Assessment Report System for contracts supporting the Special Program for Embassy Augmentation and Response.

Recommendation 7: The Bureau of Diplomatic Security should establish controls to ensure that third-party contractors supporting the Special Program for Embassy Augmentation and Response do not perform inherently governmental functions. (Action: DS)

Management Response: In its January 5, 2021, response, the Bureau of Diplomatic Security 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 Diplomatic Security established controls to ensure that third-party contractors supporting the Special Program for Embassy Augmentation and Response do not perform inherently governmental functions.

Recommendation 8: The Bureau of Diplomatic Security should complete the revision of the Foreign Affairs Handbook to clarify and define realistic conditions for transitioning a Special Program for Embassy Augmentation and Response unit to embassy management. (Action: DS)

Management Response: In its January 5, 2021, response, the Bureau of Diplomatic Security 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 Diplomatic Security clarified and defined realistic conditions for transitioning a Special Program for Embassy Augmentation and Response unit to embassy management.

Recommendation 9: The Bureau of Diplomatic Security should align its monitoring and evaluation plan with standards in the Foreign Affairs Handbook and include specific metrics for assessing Special Program for Embassy Augmentation and Response units' progress towards transition. (Action: DS)

Management Response: In its January 5, 2021, response, the Bureau of Diplomatic Security 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 Diplomatic Security aligned its monitoring and evaluation plan with standards in the Foreign Affairs Handbook and included specific metrics for assessing Special Program for Embassy Augmentation and Response units' progress towards transition.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from May 4 to September 21, 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 OIG for the Department and the U.S. Agency for Global Media (USAGM).

Objectives and Scope

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 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 instance of fraud, waste, or abuse exist; and whether adequate steps for detection, correction, and prevention have been taken.

OIG's specific inspection objectives were to determine the following related to the Special Program for Embassy Augmentation and Response (SPEAR):

Operational Effectiveness

- Complied with operational requirements in 12 Foreign Affairs Handbook (FAH)-13.
- Enhanced the ability of the U.S. embassy's country team to operate in accordance with 22 U.S. Code § 4802 (Responsibility of Secretary of State for Security of Embassies and Missions).

Resource Management and Management Controls

- Managed its unliquidated obligations and stipend program in compliance with 4 Foreign Affairs Manual (FAM) 225d and 12 FAM 473.3, respectively.
- Had accountability procedures in place and appropriate systems to maintain inventory controls, track property and vehicles as required in accordance with 12 FAM 473.10a3, 14 FAM 125, 14 FAM 414.2-1, 14 FAM 436.5 and 437, among others.
- Had designated Custodial Officers at post as required in 14 FAM 411.2-5, 12 FAM 473.7d.
- Conducted motor vehicle driver training as required in 14 FAM 411.2-5.

- Provided adequate contract management and oversight of its contracts as outlined in 14 FAH-2 H-100, 14 FAH-2 H-500, and the contracting officer's representative designation letter, to ensure the contractors' performance met the terms and conditions of the contract.
- Had controls in place to ensure SPEAR activities were not paid for with foreign assistance funds.

Program Management

- Was meeting the guidance in 12 FAH-13 H-046 regarding the transition of SPEAR programs to post within 3 to 4 years.
- Was meeting the guidance in 12 FAH-13 H-045 regarding the development of host-nation training capacity to sustain the program.

Methodology

In conducting inspections, OIG uses a risk-based approach to prepare for each inspection. Due to the COVID-19 pandemic and taking into consideration relevant guidance, at this time, OIG largely conducts its inspections remotely and relies on audio- and video-conferencing tools in lieu of in-person interviews with Department and other appropriate personnel. OIG also reviews pertinent records; circulates surveys and compiles the results, as appropriate; 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.

For this inspection, OIG circulated questionnaires to both domestic and overseas employees responsible for SPEAR activities; requested a summary memorandum from the director of the domestic SPEAR program office about the program and any areas of concern; and reviewed the contracting officer's representative files for all active contracts supporting the SPEAR program at the time of the inspection. This review included five contracts with an estimated value of \$148.8 million (see Table 1). Four of the five contracts support both the Antiterrorism Assistance Program and SPEAR using Nonproliferation, Antiterrorism, Demining, and Related Programs funds and Worldwide Security Protection funds, respectively.

Table 1: Contracts Supporting the Special Program for Embassy Augmentation and Response

Contract Number	Contractor	Title/Purpose	Total Value^a
19AQMM18D0100	HTC AbilityOne	Equipment	\$35,646,173
19AQMM18F4010	Lumbee Tribe	Warehouse Operations	\$9,158,150
SAQMMA17F2030	Miracle Systems/Alutiiq	Professional Staffing	\$77,912,462
SAQMMA17C0190	Olgoonik Federal, LLC	Overseas Training Facilities Management	\$9,292,585
SAQMMA17D0137	DECO, Inc.	Global Anti-terrorism Assistance II Training	\$16,794,050

^a Total contract value represents an approximate value of contract expenditures specific to SPEAR and does not necessarily reflect the entire contract value.

Source: Department of State, Office of Acquisitions Management, and the Federal Procurement Data System.

APPENDIX B: MANAGEMENT RESPONSES



United States Department of State

Washington, D.C. 20520

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January 5, 2021

INFORMATION MEMO TO ACTING INSPECTOR GENERAL SHAW - OIG

FROM: DS – Todd J. Brown, Acting *TJB*

SUBJECT: Bureau of Diplomatic Security Response to the Office of Inspector General (OIG) Draft Report: Inspection of the Bureau of Diplomatic Security's Special Program for Embassy Augmentation and Response (SPEAR)

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

Recommendation 1: The Bureau of Diplomatic Security, in coordination with the Bureau of Administration, should provide training for Regional Security Office staff who support Special Program for Embassy Augmentation and Response units on the Integrated Logistics Management System. (Action: DS, in coordination with A)

DS Response (1/5/2021): DS concurs with this recommendation and will coordinate with the Bureau of Administration (A) to provide Integrated Logistics Management System training to Regional Security Office staff managing SPEAR teams.

Recommendation 2: The Bureau of Diplomatic Security, in coordination with the Bureau of Administration, should publish and disseminate updated guidance for the management and inventory of Special Program for Embassy Augmentation and Response property overseas, including the respective responsibilities of General Services Officers and Regional Security Officers. (Action: DS, in coordination with A)

DS Response (1/5/2021): DS concurs with this recommendation and will coordinate with the Bureau of Administration (A) to update, publish, and disseminate the required guidelines.

Recommendation 3: The Bureau of Diplomatic Security should properly account for Special Program for Embassy Augmentation and Response loaned vehicles. (Action: DS).

DS Response (1/5/2021): DS concurs with this recommendation to properly account for loaned vehicles. The Specialized Programs Division (DS/ATA/SPD) will issue cable guidance to adhere to Department guidelines, which require government-owned vehicles be entered into and tracked through the Integrated Logistics Management System Asset Management module and inventoried annually.

Recommendation 4: The Bureau of Diplomatic Security, in coordination with the Bureau of Overseas Buildings Operations, should bring Special Program for Embassy Augmentation and Response motor vehicle operations into compliance with Department motor vehicle safety requirements. (Action: DS, in coordination with OBO)

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- 2 -

DS Response (1/5/2021): DS concurs with this recommendation and will coordinate with the Bureau of Overseas Buildings Operations to bring motor vehicle operations into compliance with Department motor vehicle safety requirements.

Recommendation 5: The Bureau of Diplomatic Security should implement quality assurance surveillance plans for each contract that supports the Special Program for Embassy Augmentation and Response, in accordance with Federal regulations. (Action: DS)

DS Response (1/5/2021): DS concurs with this recommendation and will implement quality assurance surveillance plans. DS/ATA/SPD has begun work towards completion of the quality assurance surveillance plans and will engage with other stakeholders within the Office of Antiterrorism Assistance (DS/T/ATA) to formalize those plans and obtain appropriate approvals.

Recommendation 6: The Bureau of Administration, in coordination with the Bureau of Diplomatic Security, should prepare all required annual contractor performance assessment reports and finalize assessments in the Contractor Performance Assessment Report System for contracts supporting the Special Program for Embassy Augmentation and Response. (Action: A, in coordination with DS)

DS Response (1/5/2021): DS concurs with this recommendation and will work with the Bureau of Administration (A) to complete the Contractor Performance Assessment Report System entries.

Recommendation 7: The Bureau of Diplomatic Security should establish controls to ensure that third-party contractors supporting the Special Program for Embassy Augmentation and Response do not perform inherently governmental functions. (Action: DS)

DS Response (1/5/2021): DS concurs with this recommendation to establish controls to ensure that third-party contractors do not perform inherently governmental functions; particularly, with respect to the commitment of funds. DS/ATA/SPD management has modified the organizational staffing structure to provide additional oversight to third party-contractors.

Recommendation 8: The Bureau of Diplomatic Security should complete the revision of the Foreign Affairs Handbook to clarify and define realistic conditions for transitioning a Special Program for Embassy Augmentation and Response unit to embassy management. (Action: DS)

DS Response (1/5/2021): DS concurs with this recommendation to complete the revision of the Foreign Affairs Handbook. DS/ATA/SPD acknowledges the issues associated with the 12 FAH-13, H-046: Transition Structure, and is in the process of updating this section to incorporate clear, realistic transition standards.

Recommendation 9: The Bureau of Diplomatic Security should align its monitoring and evaluation plan with standards in the Foreign Affairs Handbook and include specific metrics for assessing Special Program for Embassy Augmentation and Response units' progress towards transition. (Action: DS)

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- 3 -

DS Response (1/5/2021): DS concurs with this recommendation to align its monitoring and evaluation plan to include specific metrics. DS/ATA/SPD management will develop specific metrics towards transition and has directed mentors in the field to track training records and key performance indicators of their respective units to better determine their progress towards these metrics.



United States Department of State

Washington, D.C. 20520

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December 15, 2020

MEMORANDUM

TO: OIG/ISP – Sandra Lewis

FROM: A/OPE/AQM – Vince J. Chaverini Jr. *VJC*

SUBJECT: Draft Report – Inspection of the Bureau of Diplomatic Security’s Special Program for Embassy Augmentation and Response (ISP-I-21-12)

Thank you for the opportunity to provide a management response on the subject draft report. The point of contact for this report is the OPE Front Office (A-OPEFrontOfficeAssistants@state.gov).

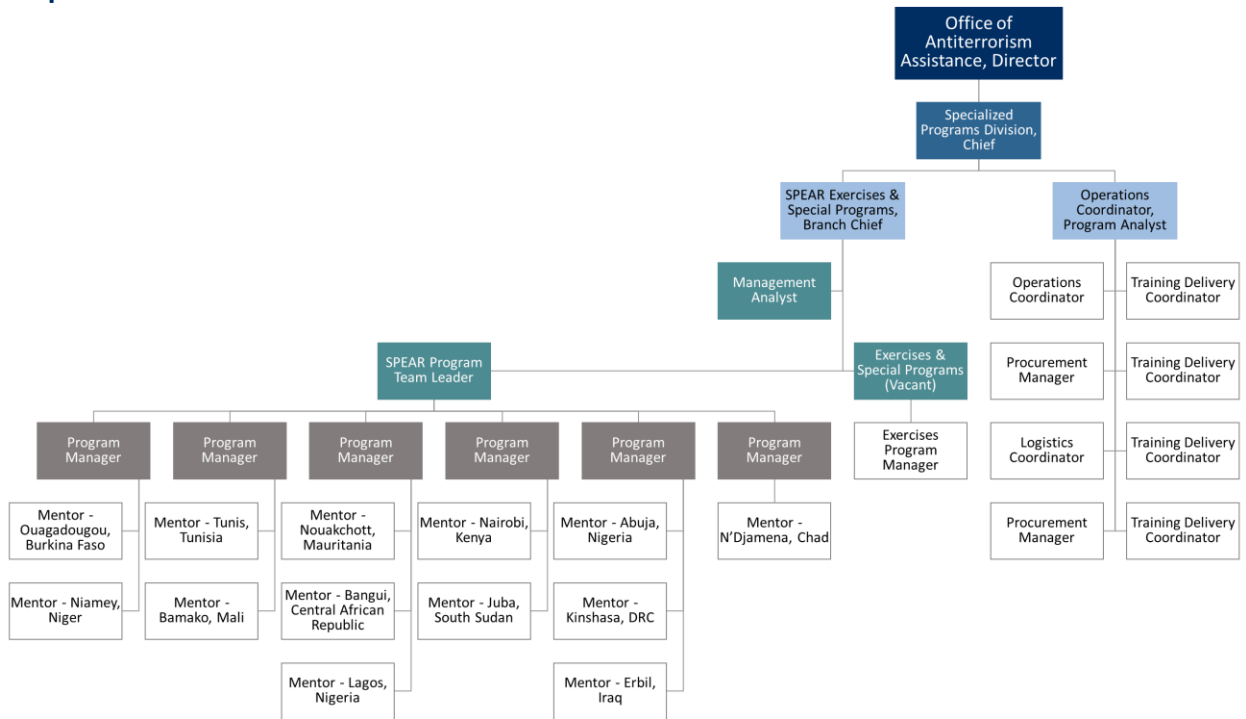
Recommendation 6: The Bureau of Administration, in coordination with the Bureau of Diplomatic Security, should prepare all required annual contractor performance assessment reports and finalize assessments in the Contractor Performance Assessment Report System for contracts supporting the Special Program for Embassy Augmentation and Response.

Management Response to Draft Report (12/15/2020): The Office of Acquisitions Management (AQM) concurs with the recommendation. AQM is working with the Bureau for Diplomatic Security’s Contracting Officer’s Representatives to provide written evaluations for submission in the CPARS system. Once submitted, the evaluation will close when the contractor agrees, or any contractor comments are reconciled. The estimated time for completion of outstanding CPARS is July 2021.

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APPENDIX C: ORGANIZATIONAL CHART

Figure 1: Specialized Programs Division, Special Program for Embassy Augmentation and Response



Note: Blue boxes indicate a position filled by a U.S. direct hire; the gray boxes indicate a position filled by a third-party contractor.

Source: Chart created by OIG from information provided by the Specialized Program Division.

ABBREVIATIONS

COR	Contracting Officer's Representative
DS	Bureau of Diplomatic Security
DS/T/ATA	Bureau of Diplomatic Security, Training Directorate, Office of Antiterrorism Assistance
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
GSO	General Services Officer
ILMS	Integrated Management System
RSO	Regional Security Officer
SPD	Specialized Programs Division
SPEAR	Special Program for Embassy Augmentation and Response

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