

UNCLASSIFIED



Office of Inspector General
United States Department of State

AUD-MERO-20-42

Office of Audits

September 2020

Audit of the Department of State Bureau of African Affairs Monitoring and Coordination of the Trans-Sahara Counterterrorism Partnership Program

MIDDLE EAST REGION OPERATIONS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
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What OIG Audited

The Department of State (Department) established the Trans-Sahara Counterterrorism Partnership (TSCTP) in 2005 as a mechanism to work with willing countries in West and North Africa to build counterterrorism capacity, improve regional coordination, and address the underlying drivers of radicalization. Intended to be a U.S. whole-of-government initiative, the TSCTP is expected to draw on diplomatic, defense, and development tools and programs to build capacity and assist counterterrorism efforts. The Bureau of African Affairs (AF) within the Department is responsible for formulating, managing, and overseeing TSCTP projects.

The Office of Inspector General (OIG) conducted this audit to determine whether AF is monitoring and coordinating TSCTP projects in accordance with Federal and Department requirements. OIG reviewed eight TSCTP awards, consisting of six contracts, one cooperative agreement, and one grant implemented in Africa between FY 2015 and FY 2020. These awards had a combined value of \$209.6 million.

What OIG Recommends

OIG made 13 recommendations to AF that are intended to improve the monitoring and coordination of TSCTP projects. AF concurred with all 13 recommendations. On the basis of AF's response to a draft of this report, OIG considers the 13 recommendations resolved, pending further action. A synopsis of AF's comments regarding the recommendations offered and OIG's reply follow each recommendation in the Results section of this report. AF's response to a draft of this report is reprinted in its entirety in Appendix B.

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OFFICE OF AUDITS

MIDDLE EAST REGION OPERATIONS

*Audit of the Department of State Bureau of African Affairs
Monitoring and Coordination of the Trans-Sahara
Counterterrorism Partnership Program*

What OIG Found

AF is not monitoring TSCTP contracts in accordance with Federal and Department requirements. Specifically, OIG found that contracting officer's representatives (COR) had approved invoices for four contracts without adequate supporting documentation. In addition, they relied on Department of Defense (DoD) partners to monitor contractor performance; however, these DoD partners were not delegated authority to serve in this role, nor were they trained to be government technical monitors or alternate CORs. Furthermore, none of the six TSCTP contracts reviewed had the required monitoring plans, and five contracts were missing Government quality assurance surveillance plans; both plans are essential oversight tools. Lastly, AF was not ensuring that the assistance provided to the host countries was being used to build counterterrorism capacity. AF officials stated that the lack of clear guidance and limited staff contributed to these weaknesses. Because of these weaknesses, OIG considers the \$201.6 million spent on these six contracts as potential wasteful spending due to mismanagement and inadequate oversight. OIG is specifically questioning almost \$109 million because the invoices lacked supporting documentation. With respect to the grant and cooperative agreement reviewed, both had required monitoring plans included in the files.

OIG also found that AF is not effectively coordinating with stakeholders to execute a whole-of-government initiative. Although TSCTP partner agencies meet to formulate strategic priorities, the execution of activities among the partners in the host countries receiving assistance is insufficient. For example, U.S. Air Force officials said they were not consulted on the plans and construction of a C-130 aircraft hangar on a base that they share with the Nigerian military. Government officials stated that undefined roles and responsibilities, the lack of knowledge management, and staffing shortfalls hinder effective coordination.

The deficiencies identified in this audit have occurred, in part, because AF has not adequately attended to longstanding challenges with the execution of foreign assistance, including the TSCTP. AF officials acknowledged the lack of progress made to address these challenges but stated that the Department has not appropriately prioritized the bureau's needs. Until these deficiencies are addressed, the Department will have limited assurance that TSCTP is achieving its goals of building counterterrorism capacity and addressing the underlying drivers of radicalization in West and North Africa.

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OBJECTIVE

The Office of Inspector General (OIG) conducted this audit to determine whether the Bureau of African Affairs (AF) is monitoring and coordinating activities of the Trans-Sahara Counterterrorism Partnership (TSCTP) in accordance with Federal and Department of State (Department) requirements.

BACKGROUND

Approximately 650 million people live in West and North Africa (in regions known as the Sahel and Maghreb), an area that includes many countries with unstable governments. Because of the lack of economic opportunities and weak governments, people living in these regions are vulnerable to radicalization and the influence of terrorist groups. The Department established the TSCTP in 2005 as a mechanism to work with willing governments to build counterterrorism capacity, improve regional coordination, and address the underlying drivers of radicalization. Intended as a U.S. whole-of-government initiative, the TSCTP is expected to draw on diplomatic, defense, and development tools and programs to build capacity and assist counterterrorism efforts. Collectively the Department of Defense (DoD), the U.S. Agency for International Development (USAID), and the Department have spent hundreds of millions of dollars on TSCTP projects in partner countries. The TSCTP program is being implemented in 12 partner countries, as shown in Figure 1.

Figure 1: TSCTP Partner Countries



Source: OIG generated based on TSCTP project information obtained from AF.

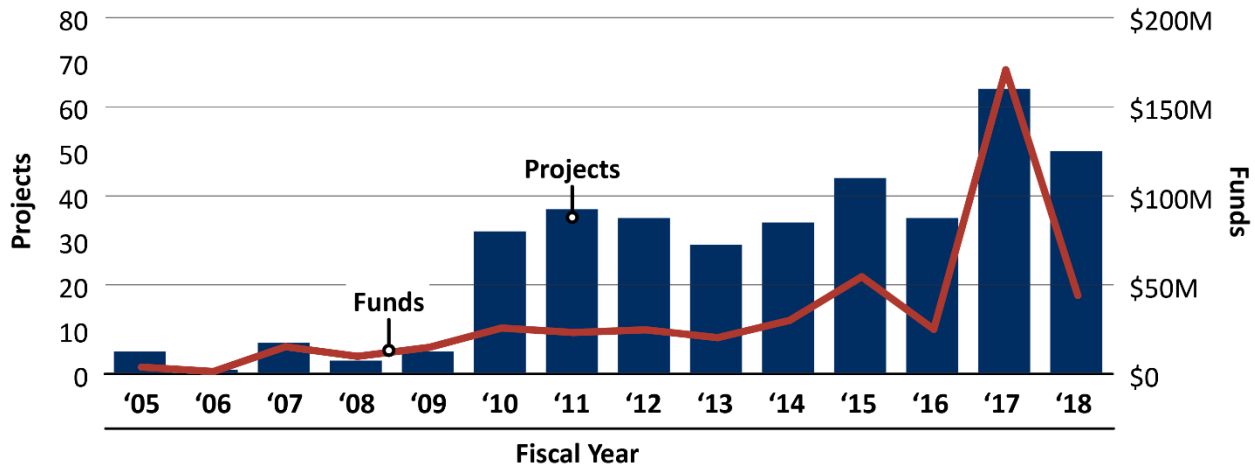
TSCTP Stakeholders Coordination and Project Implementation

AF is responsible for formulating, managing, and overseeing TSCTP projects.¹ AF officials work with the DoD U.S. Africa Command, the Defense Security Cooperation Agency, and the Office of Security Cooperation (OSC) at each embassy to implement TSCTP projects. AF chairs the interagency Sahel-Maghreb Deputy Assistant Secretary Oversight Committee, which includes principals from the Department, DoD, and USAID. According to AF, the Committee reviews program implementation and factors that affect TSCTP activities, including threat levels, U.S. Government strategic priorities, and African partners' priorities and performance. AF implements TSCTP projects with support from

¹ The Office of Regional Peace and Security (formerly known as the Office of Security Affairs) is responsible for managing the TSCTP within the Bureau of African Affairs.

other Department bureaus.² From FY 2005 to FY 2019, AF obligated \$481 million to implement 299 TSCTP projects. Almost 50 percent of that amount, or \$240 million, was obligated from FY 2016 to FY 2018. Figure 2 shows funding AF obligated and the number of TSCTP projects it implemented from FY 2005 to FY 2018.

Figure 2: Funding AF Obligated for TSCTP Projects From FY 2005 to FY 2018^{a, b}



^a TSCTP projects for FY 2019 were not an available entry for these projects when OIG completed its analysis.

^b Some projects may not have begun in the year the funds were obligated. A lag time can occur from obligation of funds up to 2 years before project implementation. In addition, projects are on-going and multiyear.

Source: OIG generated based on TSCTP project information obtained from AF from FY 2005 to FY 2018.

Guidance on Oversight of TSCTP Contracts, Grants, and Cooperative Agreements

AF implements TSCTP projects using contracts, grants, cooperative agreements, and interagency agreements. The Federal Acquisition Regulation (FAR) establishes the uniform acquisition policies and procedures for the Federal Government and describes the roles and responsibilities of Government personnel who are responsible for awarding, administering, and overseeing contracts. The Department supplements the FAR with the Department of State Acquisition Regulation, Foreign Affairs Manual (FAM), and the Foreign Affairs Handbook (FAH). The Federal Assistance Directive (FAD) details the Department’s policies and procedures for implementing grants and cooperative agreements.

The FAH states that contracting officers are responsible for negotiating, awarding, administering, modifying, and terminating contracts. Contracting officers may designate a contracting officer’s representative (COR) to assist them.³ The COR is generally from the program office. AF is the designated program office for AF-implemented TSCTP projects. CORs

² Various Department bureaus and offices are involved in the TSCTP, including the Bureaus of Counterterrorism, Diplomatic Security, Political-Military Affairs, Near Eastern Affairs, International Narcotics and Law Enforcement Affairs, and Office of Foreign Assistance Resources.

³ 14 FAH-2 H-140, “Roles and Responsibilities in the Contracting Process” states that “[i]deally, the contracting officer appoints the COR as soon as a requirement is initiated. That way, the COR assists in the solicitation process, and administers the contract after award.”

are responsible for developing project requirements, monitoring the contractor's progress, resolving technical issues, and accepting work on behalf of the U.S. Government.⁴ COR monitoring duties include: inspecting delivered goods and services to ensure they are in accordance with contract requirements, reviewing invoices, informing the contracting officer of contractor performance issues, and maintaining files that are compliant with agency standards and regulations.⁵ A contracting officer may also designate a government technical monitor (GTM) or alternate COR to support the COR. The Department's grant officers, and grants officer's representatives have similar responsibilities to the contracting officers and CORs, but rather than overseeing contracts, they oversee grants and cooperative agreements. In addition, some embassies have an OSC staffed with DoD personnel who also help oversee security assistance.

The FAR, FAM, and FAH also provide guidance on reviewing invoices submitted under contracts. The FAR states that payment will be based on receipt of a proper invoice and satisfactory contract performance.⁶ The FAM states that "prepayment examination consists of checking for proper, legal, and correct payment, and for proper supporting documentation."⁷ It further states that a "certifying officer may make payment only after having obtained approval of the voucher from an officer having knowledge of the receipt of the goods or services covered by the voucher."⁸ The FAH requires documentation to ensure that all payments are authorized, accurate, legal, and correct and that the goods were received and services were performed. Documentation for voucher processing includes purchase orders and contracts, invoices and vouchers, receiving reports, and approvals.⁹

What OIG Reviewed

For this audit, OIG selected six contracts, one grant, and one cooperative agreement AF had funded and implemented between September 2015 and December 2019 for review. (Appendix A provides the criteria OIG used to select the TSCTP projects). Table 1 provides information about the TSCTP projects selected for review including the award recipient, purpose of the project, and its value. Figure 3 shows members of the Nigerien Armed Forces performing maintenance on a vehicle that was provided under the G5 Force Support contract.

⁴ 14 FAH-2 H-142, "Responsibilities of the Contracting Officer's Representative (COR)."

⁵ 14 FAH-2 H-114, "COR Work Commitments."

⁶ FAR 32.905, "Payment Documentation and Process."

⁷ 4 FAM 425, "Voucher Prepayment Examination."

⁸ 4 FAM 424, "Voucher Approval."

⁹ 4 FAH-3 H-423.5-1, "Supporting Documentation, Purpose and Scope."

Table 1: TSCTP Projects OIG Reviewed for This Audit

Project Name	Recipient	Purpose	Value
Contracts			
G5 Force Support <i>19AQMM18F3925</i>	PAE	To provide training, equipment, and logistical support to militaries in Burkina Faso, Chad, Mauritania, and Niger.	\$113,167,134
Regional Boat Capability Program <i>SAQMMA17F4534</i>	PAE	To provide training and equipment to the Cameroonian and Chadian militaries.	\$10,165,351
Logistical Support for Counter Boko Haram <i>SAQMMA15F3886</i>	AECOM	To provide equipment, training, and logistical and maintenance support to militaries in Benin, Niger, Cameroon, and Chad.	\$64,027,357
Vehicle Maintenance Facility <i>19AQMM18F4237</i>	SkyBridge	To construct a vehicle maintenance facility for the military in Burkina Faso.	\$3,755,511
Salak Air Base Expansion <i>SAQMMA17F3555</i>	PAE	To construct HESCO protection barrier walls and a drainage system at a base in Cameroon.	\$3,302,260
Niger C-130 Hangar <i>19AQMM18F4856</i>	Relyant	To construct a C-130 aircraft hangar at a military base in Niger.	\$7,161,718
Grant			
Sowing the Seeds of Peace <i>SUV70018GR0041</i>	IQRA	To teach students resiliency against extremist ideology and increase knowledge of income-generating opportunities in Burkina Faso.	\$250,000
Cooperative Agreement			
Demobilization, Disassociation, Reintegration and Reconciliation <i>SLMAQM17CA1212</i>	International Organization for Migration	To facilitate the reintegration of former detained or defecting members of extremist groups in Cameroon, Chad, and Niger.	\$7,758,024
Total			\$209,587,355

Source: OIG generated based on TSCTP project information obtained from AF.

Figure 3: Equipment and Services as Part of the G5 Sahel Force Contract



Figure 3: Maintenance on a troop carrier vehicle provided to the Nigerian Armed Forces under the G5 Force Support contract. Each vehicle had cost about \$400,000. (OIG photo, September 2019)

AUDIT RESULTS

Finding A: Monitoring of TSCTP Contracts Needs Improvement

AF is not monitoring TSCTP contracts in accordance with Federal and Department requirements. Specifically, the CORs approved invoices for four contracts without obtaining adequate supporting documentation. In addition, they relied on DoD partners to monitor contractor performance; however, these DoD partners were not delegated authority to serve in this role, nor were they trained to be GTMs or alternate CORs. Furthermore, the six TSCTP contracts OIG reviewed did not have required monitoring plans, and five contracts did not have quality assurance surveillance plans as required. Lastly, AF was not ensuring that the assistance provided to the host countries was being used to build counterterrorism capacity. AF officials stated that the absence of clear guidance and limited staff to oversee the contracts contributed to these weaknesses. Because of these weaknesses, OIG considers the \$201.6 million spent on these six contracts as potential wasteful spending due to mismanagement and inadequate oversight.¹⁰ Of this amount, OIG is specifically questioning almost \$109 million because the invoices did not have adequate supporting documentation. With respect to the grant and

¹⁰ According to the Government Accountability Office's Revised 2018 Government Auditing Standards, waste can include activities that do not include abuse and does not necessary involve a violation of law. Rather, waste relates primarily to mismanagement, inappropriate actions, and inadequate oversight.

cooperative agreement reviewed, both had required monitoring plans and those plans were included in the files.

Invoice Reviews Did Not Ensure Goods and Services Were Received and Supported With Documentation

Before paying invoices, the approving official must verify that the invoiced goods have been received and that adequate supporting documentation has been included with the invoice. The FAR, FAM, and FAH provide guidance for reviewing invoices. The guidance states: (1) adequate invoices and contract performance are required for payment; (2) all payments are authorized, accurate, legal, and correct and that the goods were actually received or services, were actually performed; and (3) the certifying officer makes payments only after receiving approval from an officer with knowledge of the receipt of the goods or services covered by the voucher.¹¹

From the six contracts reviewed for this audit, OIG selected four using risk-based factors, such as dollar value or those that had been previously identified with monitoring risks in OIG’s April 2020 Management Assistance Report¹² to assess whether AF CORs had conducted invoice reviews in accordance with Federal and Department requirements. Specifically, OIG selected the G5 Force Support, Regional Boat Capability Program, Niger C-130 Hangar, and Salak Air Base Expansion contracts for review. OIG reviewed a total of 43 invoices associated with these contracts that had a combined value of \$108,963,457. Of the 43 invoices reviewed, OIG found that all of them lacked adequate supporting documentation to demonstrate that contracted goods and services were received in accordance with the FAR, FAM, or FAH. Table 2 shows the contract, invoice amount, and number of invoices reviewed.

Table 2: Selected TSCTP Contract Invoices OIG Reviewed

Contract	Invoice Amount Reviewed	Number of Invoices Reviewed
G5 Force Support	\$89,511,708	10
Regional Boat Capability Program	\$10,165,351	17
Salak Air Base Expansion	\$3,302,260	6
Niger C-130 Hangar	\$5,984,138	10
Total	\$108,963,457	43

Source: OIG generated based on analyses of contract files and information provided by AF.

¹¹ 4 FAM 425, “Voucher Prepayment Examination,” states, “[P]repayment examination consists of checking for proper, legal, and correct payment, and for proper supporting documentation.” 4 FAM 424, “Voucher Approval,” also states that a certifying officer may make payment only after obtaining approval of the voucher from an officer having knowledge of the receipt of the goods or services covered by the voucher. In addition, 4 FAH-3 H-423.5-1, “Supporting Documentation, Purpose and Scope,” requires documentation to ensure that all payments are authorized, accurate, legal, and correct and that the goods were actually received or services were actually performed. FAR 46.407, “Nonconforming supplies or services,” states that the Contracting Officer should reject supplies or services not conforming in all respects to contract requirements; this FAR provision requires the Contracting Officer to provide for an equitable price reduction or other consideration when supplies or services are accepted with critical deficiencies.

¹² OIG, *Management Assistance Report: The Bureau of African Affairs Should Improve Performance Work Statements and Increase Subject Matter Expertise for Trans-Sahara Counterterrorism Partnership Projects* (AUD-MERO-20-29).

OIG reviewed 10 invoices PAE submitted under the G5 Force Support contract—a contract that provides training, equipment, infrastructure, and logistical support to several host nation militaries—and found that they lacked supporting documentation. In an invoice for \$7,964,554 dated February 1, 2019, PAE did not include supporting documentation for the equipment listed (valued at \$7,760,283) or, for any of the other invoiced expenses, including mobilization, labor, training, and other direct costs. In another invoice dated March 4, 2019, PAE requested payment for equipment and training valued at \$8,110,402, but it only provided supporting documentation for \$266,759 worth of equipment. Other examples of invoices lacking adequate documentation include charges that total in the millions of dollars for freight services. The descriptions of the freight charges state that they were for complex delivery of equipment from overseas to various West and North African capital cities. The items were routed through seaports and then over land. However, there were no receipts or itemization of those costs.¹³

OIG reviewed 17 invoices PAE submitted under the Regional Boat Capability Program contract—a contract that provides training and equipment to the Cameroonian and Chadian militaries—and did not find support for any of the invoices or an itemization of what was provided under the contract. For example, other than the overall descriptor of the contract “Lake Chad Ramps Boats and Truck Training,” one invoice valued at \$843,560.21, dated September 1, 2019, did not have supporting documentation explaining the goods or services received under the contract. In addition, OIG found 10 other invoices that had precisely the same amount, but similarly did not provide details about the goods or services received.

OIG reviewed six invoices PAE submitted under the Salak Air Base Expansion contract—a contract that provides for the construction of HESCO barrier walls and a drainage system at a base in Cameroon—and did not find any supporting documentation for the invoices submitted, or an itemization of what was received under the contract. For example, an invoice for \$660,452, dated November 17, 2017, and an invoice for \$495,339 dated March 19, 2018, were not accompanied by supporting documentation that described the goods or services received.

OIG reviewed 10 invoices Relyant submitted under the Niger C-130 Hangar contract—a contract that provides for the construction of aircraft hangar at a military base in Niger—and did not find supporting documentation for any. For example, other than the general descriptors “Design” and “Construction,” an invoice for \$1,284,403, dated October 2, 2019, did not explain the goods or services received under the contract, nor did another invoice for \$917,400, dated August 1, 2019.

Despite the lack of supporting documentation regarding the goods and services received, OIG found that the COR approved all but one of the 43 invoices OIG reviewed.¹⁴ Moreover, OIG

¹³ In this instance, the contract states that the COR has the option but is not required to request additional documentation regarding costs incurred by location at any time prior to approving invoices. Regardless, a best practice would be for the COR to request documentation to ensure costs are supportable.

¹⁴ The single invoice that the COR rejected was submitted under the G5 Force Support contract. That November 9, 2018, invoice for \$5.1 million was the first invoice submitted under the contract, and it was rejected because the payment schedule had not been approved.

reviewed an invoice status tracker log that AF developed to track the receipt and processing of invoices and did not find evidence that the COR had asked for supplemental information regarding the contract deliverables before authorizing payment for any of the 43 invoices. In lieu of the supporting documentation, the CORs told OIG that they relied on other methods to gauge whether goods and services were provided in accordance with contract terms and conditions—namely, the contractor’s acknowledgement of receipt of equipment, the contractor’s price and technical proposals, receiving and inspection reports (form DS-127s), and the deliverables in the performance work statements. For example, the COR for the G5 Force Support contract told OIG that he primarily relied on PAE’s self-reporting to confirm goods were delivered and PAE’s price proposals to verify that charges were reasonable. He also stated that he relied on documentation of equipment “turnover” receipts for confirmation that the equipment was delivered.¹⁵ These practices do not comply with requirements outlined in the FAR, FAM, or FAH.

AF officials explained that one reason the invoices did not have sufficient support was because of how some contracts were structured. For example, they explained that the contract for the G5 Force Support was structured so that the contractor was paid in equally divided payments regardless of whether or not the contractor delivered goods and services on time. AF officials stated that some of the critical high-dollar equipment was not delivered on time and was delayed into the next contract option year, resulting in payments to the contractor for items that had not yet arrived. AF officials stated that some critical equipment, such as armored vehicles, had still not been delivered as of July 2020, a delay of 9 months. Regardless of contract type, the FAR, FAM, and FAH state that payments should not have been made without confirmation that AF received the equipment.

AF Lacks Standard Operating Procedures and Staffing To Conduct Thorough Invoice Reviews

OIG determined that AF’s insufficient invoice review, and documentation thereof, is partly due to the absence of bureau-wide standard operating procedures and staffing for conducting thorough invoice reviews. Having standard operating procedures for reviewing invoices,¹⁶ especially when oversight personnel periodically rotate over the life of a project, is important to ensure consistency and uniformity. OIG notes that at least four other Department bureaus—Diplomatic Security, International Narcotics and Law Enforcement, Near Eastern Affairs, and South and Central Asian Affairs—have specific standard operating procedures for the COR invoice approval process.¹⁷ These procedures detail the processes by which invoices are to be received, reviewed, and paid; list the documents required for a proper invoice; and describe the responsibilities of the various participants who review invoices. These procedures act as a control to mitigate against the risk of paying contractors for goods and services that were not delivered. In addition, AF officials stated that although the number of invoices AF

¹⁵ OIG notes, however, that one OSC Chief in-country told OIG that she was not sending the equipment turnover-receipts to the COR because the portal to upload receipts was not functioning.

¹⁶ OIG, *Audit of the Bureau of Overseas Buildings Operations Process for Reviewing Invoices for the Construction of the U.S. Embassy in Islamabad, Pakistan* (AUD-MERO-18-46, June 2018), 12.

¹⁷ OIG, *Lessons Learned from Office of Inspector General Audits Concerning the Review and Payment of Contractor Invoices Supporting Overseas Contingency Operations* (AUD-MERO-19-19, April 2019), 3-4.

received has grown exponentially over the last several years, staffing to support that greater volume has not increased. As noted previously, AF obligated \$481 million to implement 299 TSCTP projects from FY 2005 to FY 2019. Almost 50 percent of that amount, or \$240 million, was obligated between FY 2016 and FY 2018.

AF Relies on DoD Officials To Conduct Oversight of Contracts but Did Not Designate Them as GTMs or Alternate CORs

According to the FAH, “The best method for monitoring the contractor's work is through actual inspection.”¹⁸ However, OIG found that all of the AF CORs charged with overseeing the TSCTP projects reviewed for this audit were based in Washington, DC, and traveling to the Sahel and Maghreb regions of Africa to inspect and monitor TSCTP projects is challenging. AF CORs cited remote locations of project sites, security risks, and other factors as hinderances to direct oversight as recommended by the FAH. CORs stated that site visits to physically inspect and monitor TSCTP projects vary depending on hinderances. In fact, during audit fieldwork in September 2019, OIG visited Yaoundé, Cameroon, to observe the TSCTP projects being implemented (the Logistical Support for Counter Boko Haram; Regional Boat Capability Program; Salak Air Base Expansion; and Demobilization, Disassociation, Reintegration, and Reconciliation) and learned from embassy officials that AF CORs had not conducted site visits to TSCTP projects in over a year. The officials added that some TSCTP projects in the region had never been visited. For example, of the three boat houses built with TSCTP funding for the Regional Boat Capability Program in Cameroon, an embassy official told OIG that one boat house had never been visited by any U.S. Government official.

AF CORs stated that because they cannot make regular site visits, they rely on DoD OSC Chiefs to monitor and oversee projects. Specifically, AF CORs stated that they rely on the OSC Chiefs in the country to flag problems, conduct site visits and inspections, and close out projects on their behalf. OSC Chiefs are stationed in some U.S. embassies and are the points of contact for all security assistance provided to host countries. OSC Chiefs engage regularly with host country defense officials regarding the security assistance provided, which includes assistance funded by both the DoD and the Department. The OSC Chiefs from Niger, Burkina Faso, and Cameroon told OIG they spend anywhere from 30 to 60 percent of their time monitoring TSCTP projects.

Despite the significant involvement of OSC Chiefs in monitoring TSCTP projects, OSC Chiefs were not designated by the contracting officer as GTMs or alternate CORs even though that option is available. As stated previously, contracting officers can designate GTMs or alternate CORs to assist with performing oversight responsibilities. Department guidance states that a GTM may be designated “because of physical proximity to the contractor’s work site, or because of special skills or knowledge necessary for monitoring the contractor’s work...or to represent the interests of another requirements office or [embassy] concerned with the contractor’s work.”¹⁹ A Department official stated that OSC Chiefs “unofficially” do the work of GTMs because they do not have time to do the required training to become GTMs and do not have the “bandwidth” to do everything required of a GTM. According to the FAH, GTMs are

¹⁸ 14 FAH-2 H-522.1, “Progress or Status Reports.”

¹⁹ The Department of State Acquisition Regulation 642.271, “Government Technical Monitor (GTM).”

required to take the same training and receive the same certifications as CORs.²⁰ One AF official stated that the Department should offer a training course designed for GTMs because it would be shorter and more applicable to the work GTMs perform in the field. Offering such a course could increase OSC Chiefs' ability to complete needed training while continuing to perform their other responsibilities.

In addition to the lack of formal designation of the OSC Chiefs as GTMs or alternate CORs, AF officials did not establish expectations for OSC Chiefs when they are monitoring the TSCTP projects. Consequently, OIG found that OSC Chiefs performed monitoring activities in an ad hoc and irregular manner and sometimes relied on contractors or others to accept supplies provided to TSCTP project recipients. For example, one OSC Chief said she did not have the time to attend every fuel delivery provided to the Niger Armed Forces under the Logistical Support for Counter Boko Haram contract and moreover, it was not realistic for her to do so. Because she could not be there, she sent a contractor who was hired to assist with a different contract (the G5 Force Support contract) to oversee the fuel delivery on her behalf. The OSC Chief then signed the required forms once the contractor confirmed that fuel disbursement was complete. This is inconsistent with relevant guidance. According to the FAR, accepting supplies is the responsibility of the contracting officer unless the authority is delegated.²¹ This contract delegated the responsibility to the COR. The contract states, "Inspection and acceptance of the services to be provided hereunder shall be made by the Contracting Officer's Representative." In this case, because someone other than the designated COR oversaw the fuel delivery, AF was not compliant with the FAR or the contract requirements.

AF CORs also stated that they use contractors for some monitoring and evaluation services. OIG notes that the services provided by these contractors are different from those provided by contracting officers, CORs, GTMs, or alternate CORs. These contractors examine project outputs, outcomes, and impact. They make site visits, but they do not have the authority to monitor and evaluate the performance of other contractors, accept and inspect supplies and services, or determine whether contract costs are reasonable, allocable, and allowable. AF CORs can and should use the services provided under the monitoring and evaluation contract to support their oversight work, but those services do not replace or fulfill their own responsibilities to monitor contractor performance and accept goods and services in accordance with Federal and Department requirements.

²⁰ 14 FAH-2 H-143.1, "COR Training Requirements" states, "All contracting officer's representatives (CORs) and government technical monitors (GTM) must have their acquisition knowledge certified in order to be eligible for appointment. The Federal Acquisition Certification-Contracting Officer's Representative (FAC-COR) Program certification requirements are issued by the Office of Federal Procurement Policy and consist of the following: (1) competency-based training and assignment specific training to achieve certification; (2) experience requirements for Level II (12 months) and Level III (24 months) certifications; and (3) continuous learning to maintain certification every 2 years consisting of at least 8 hours of continuous learning points (CLP) for level I and 40 hours of CLP for level II or III."

²¹ FAR 46.501, "General," states, "Acceptance constitutes acknowledgment that the supplies or services conform with applicable contract quality and quantity requirements." FAR 46.502, "Responsibility for acceptance," further states that the acceptance of supplies or services is the responsibility of the CO. FAR 1.602-2(d), "Responsibilities," states the contracting officers may designate and authorize a contracting officer's representative.

AF officials recognize the need for formal agreements with DoD OSC Chiefs to clearly communicate expectations and responsibilities for monitoring contractor performance and accepting goods and services. They acknowledged that expectations were often communicated on an individual and ad hoc basis instead of a standardized manner.

AF TSCTP Contract Files Did Not Contain Required Documents

The FAM requires bureaus and offices to conduct monitoring, which it defines as an “ongoing system of gathering information and tracking performance to assess progress against established goals and objectives.”²² OIG reviewed six contracts valued at almost \$201.6 million to determine whether they included monitoring plans, progress reports, quality assurance surveillance plans, and receiving and inspection reports. OIG found that the contract files contained some, but not all, key documents required by the FAR, FAM, and FAH. Table 3 shows the results of OIG’s review of the COR files for the six TSCTP contracts reviewed.

Table 3: Monitoring Requirements for Selected AF TSCTP Contracts

Contract	Contract Value	Monitoring Plan	Government Quality Assurance Surveillance Plan	Progress Reports	Receiving and Inspection
G5 Force Support	\$113,167,134	x	✓	✓	✓
Logistical Support for Counter Boko Haram	\$64,027,357	x	x	✓	✓
Regional Boat Capability Program	\$10,165,351	x	x	✓	✓
Niger C-130 Hangar	\$7,161,718	x	x	✓	✓
Vehicle Maintenance Facility	\$3,755,511	x	x	✓	N/A ^a
Salak Air Base Expansion	\$3,302,260	x	x	✓	✓
Total:	\$201,579,331				

^a This project was not completed when OIG concluded its fieldwork. As a result, the receiving and inspection reports have not yet been placed in the contract files.

Source: OIG generated based on an analysis of TSCTP contract documentation obtained from AF.

Monitoring Plans

AF CORs did not develop monitoring plans for any of the six contracts OIG reviewed. The FAH states that “it is the COR’s responsibility to ensure that the Department gets what it pays for through good contractor performance” and “this responsibility requires the COR to develop a contract monitoring plan commensurate with the complexity and criticality of the contract.”²³ The FAH lists monitoring methods that a COR may use to oversee a contractor’s performance, including progress reports, milestone reviews, site visits, contractor outputs, end-user feedback, and inspections, among others.²⁴ Monitoring plans with documented methods and

²² 18 FAM 301.4-1(B), “Definitions.”

²³ 14 FAH-2 H-521, “Elements of Contract Administration.”

²⁴ 14 FAH-2 H-522, “Monitoring Methods Available to Contracting Officer’s Representative (COR).”

time frames for how and when CORs will oversee contractor performance enable CORs to provide consistent oversight and ensure that a contractor meets its obligations.

CORs said that while they did not have monitoring plans in place, they did conduct monitoring activities, such as making site visits when possible, reviewing contractor-submitted progress reports, and regularly communicating with the contractors. Nevertheless, because they did not document how and when they would oversee contractor performance in monitoring plans, they sometimes missed early warnings of problems. For example, in the G5 Force Support contract, PAE was required to deliver over 600 different pieces of equipment to four countries. The AF COR acknowledged that equipment purchased for the project was not always delivered on time, but, nonetheless, no monitoring plan had been developed to monitor PAE's performance and ensure the equipment was delivered in the timeframe established by the contract. For example, a monitoring plan could have required the COR to develop a contractor validating system to track the equipment delivery by country. In this way, the COR could have compared the PAE stated delivery date versus the actual receipt of the equipment. In another example, for the Salak Air Base Expansion contract, the HESCO barrier walls were built too high and disrupted drone launch operations. Subsequently, the Cameroonians tore down portions of the wall. Had a monitoring plan been developed, the COR may have learned earlier of the issue and avoided the need for remedial actions.

Government Quality Assurance Surveillance Plans

The CORs also did not develop Government quality assurance surveillance plans for five of the six contracts OIG reviewed.²⁵ The FAH states that the COR is responsible for developing quality assurance procedures, verifying whether the supplies or services conform to contract quality requirements, and maintaining quality assurance records.²⁶ This is typically accomplished through developing and implementing a quality assurance surveillance plan, which, according to the FAR, should be prepared in conjunction with the statement of work and should specify all work requiring surveillance, the method of surveillance, and where quality assurance will occur.²⁷ The FAR also requires Government quality inspections to be performed by or under the direction or supervision of Government personnel and to be documented on an inspection and receiving report.²⁸

Notably, the FAR states that the Government can either "prepare the quality assurance surveillance plan or require the [contractor] to submit a proposed quality assurance surveillance plan for the Government's consideration in development of [its] plan."²⁹ AF provided OIG with a contractor-developed quality assurance surveillance plan for the Salak Air Base Expansion contract. The PAE-submitted quality assurance surveillance plan discussed the company's internal quality assurance processes. However, there was no mention of plans for Government personnel to conduct quality assurance surveillance as FAR 46.401 requires.

²⁵ AF provided OIG a quality assurance surveillance plan it developed for the G5 Force Support contract.

²⁶ 14 FAH-2 H-523, "Quality Assurance."

²⁷ FAR 46.401, "General."

²⁸ FAR 46.401, "General."

²⁹ FAR 37.604, "Quality Assurance Surveillance Plans."

Therefore, OIG does not consider this plan to be an adequate quality assurance surveillance plan pursuant to the relevant guidance. Regardless of whether the Government or the contractor develops the quality assurance surveillance plan, the plan must reflect the various functions that will be performed by the Government to determine whether a contractor has fulfilled the contract obligations pertaining to quality and quantity.³⁰

AF officials explained that CORs create and submit required contracting documents based on a contracting officer's checklist. AF officials said that when the contracts for these TSCTP projects were awarded, the checklist did not include monitoring plans and quality assurance surveillance plans. AF officials said that monitoring plans and quality assurance surveillance plans should be included on every contracting officer's checklist. Officials believe this will help CORs to ensure plans are created for all contracts.

Progress Reports

With respect to progress reports, OIG found that "situation reports" were maintained in the COR file for the six contracts reviewed. The FAH states contracts "may require the submission of progress or status reports to assist the COR in gauging progress."³¹ All six contracts required the contractor to submit weekly situation reports to the COR and OSC detailing the status of the tasks being performed under the contract. Several AF CORs told OIG that they consider weekly progress reports to be a quality assurance activity. The situation reports were prepared by contractors and include information such as updates on key events, meetings, and equipment



Figure 4: Site view of the construction of facility for the Burkinabe military under the Vehicle Maintenance Facility contract. (SkyBridge photo, August 2019)

procurement, among other topics. For example, a situation report for the Niger C-130 Hangar project in Niger showed that each construction truck arriving at a Niger customs area was being charged over \$1,000 in taxes and fees. Relyant said it was working with the OSC to address the charges. Relyant also provided updates on major construction activities like "installing wall girts along gridline 7."³² In another example, the situation report for the Vehicle Maintenance Facility contract implemented in Burkina Faso noted that construction resumed on the project in June 2019 (after delays). It also stated that the OSC Chief cancelled a planned site visit and that

housing doors were 100 percent complete. This report included pictures of the construction site and a 3-week schedule. Figure 4 shows the Vehicle Maintenance Facility construction site in August 2019. This site will be provided to the Burkinabe military.

³⁰ FAR 46.101, "Definitions."

³¹ 14 FAH-2 H-522.1, "Progress or Status Reports."

³² Relyant, *Niger C-130, Weekly Situation Report (SITREP) 18-24 July 2019, Contract #19AQMM18F4856* (July 24, 2019).

Inspection and Receiving Reports

OIG also found that AF officials maintained receiving and inspection reports (called Form DS-127) for five of the six contracts OIG reviewed. The lone exception involved the Vehicle Maintenance Facility project implemented by SkyBridge in Burkina Faso. However, this TSCTP project had been delayed and was not complete at the time of audit fieldwork. Therefore, final receiving and inspection reports had not been completed.

According to the FAH, the receiving and inspection report “is used to confirm and record receipt of incoming property acquired by requisition, purchase order, or transfer document, and to document inventory overages.”³³ OIG reviewed 13 reports for the 5 contracts and found they were complete and signed. OSC officials signed for deliverables on four contracts and the COR signed for deliverables on the fifth contract. One report showed that the OSC Chief signed as the “GTM Receiving and Approving Official.” In several other instances, OSC officials signed reports on behalf of the OSC Chief. With their signatures, these personnel vouched for the receipt and inspection of high-value, sensitive equipment, and materials such as armored vehicles and medical supplies. For example, the medical supplies provided under the Logistical Support for Counter Boko Haram contract included dopamine injections, adrenaline, morphine sulphate, and diazepam. However, as previously described, the OSC Chiefs receiving and accepting these sensitive items had not been formally designated as GTMs or alternate CORs and, therefore, did not have the authority to perform this function.

AF Cannot Ensure That Equipment Provided Under the TSCTP Program Is Used for the Intended Purpose

A significant portion of TSCTP activities involve U.S. Government to foreign government assistance; the Consolidated Appropriations Acts of 2016, 2017, and 2018 require continual monitoring both during and after assistance is given to other nations to ensure the assistance is being used “for its intended purposes.”³⁴ AF CORs and OSC officials, however, state that it is difficult to monitor the use of equipment and assistance after they are provided to the host countries. The CORs cited several hinderances to oversight, such as the remote locations of the project sites and security risks. For example, in Burkina Faso, terrorist attacks have prompted travel restrictions for almost all U.S. personnel outside of the capital city. As a result, and according to AF CORs, assets outside of the capital city are rarely monitored. In some countries, traveling to certain areas also requires the approval of local governments. One DoD official told OIG she is not sure how it is possible to protect U.S. investments in some of these challenging locations. AF officials acknowledged monitoring of AF TSCTP security assistance has been a challenge. They explained that monitoring would be resource-intensive because, unlike Afghanistan and Iraq where there are U.S. Government personnel to provide “eyes on the ground,” North and West Africa have very few U.S. Government personnel stationed in those countries to assist with oversight.

³³ 14 FAH-1 H-413.2-1, “Receiving Reports.”

³⁴ H.R. 2029 – 114th Congress (2015-2016): Consolidated Appropriations Act, 2016. Sec. 7031 para (1)(A)(iv); H.R. 224 – 115th Congress (2017-2018): Consolidated Appropriations Act, 2017. Sec. 7031 para (1)(A)(iv); and H.R. 1625 – 115th Congress (2017-2018): Consolidated Appropriations Act, 2018. Sec. 7031 para (1)(A)(iv).

Department officials stated that some equipment is difficult to track because the host nation's military is using them in active operations. An AF official added that it is also generally difficult to track mobile equipment such as armored vehicles. OSC Chiefs similarly stated that they do not track the use of U.S. Government-provided equipment after delivery unless they have been specifically instructed to do so. Because they cannot make regular site visits, OSC Chiefs stated that they sometimes ask U.S. military forces in-country and other U.S. embassy personnel to check on equipment when they are traveling near a project site. Embassy officials also stated that they rely on informal sources and social media to identify the misuse of equipment.



Figure 5: Motorola radios provided to the Nigerien Armed Forces under the Logistical Support for Counter Boko Haram contract. (OIG photo, September 2019)

OSC Chiefs cite a lack of information and records as another hindrance to their ability to monitor the use of equipment. OSC Chiefs stated they are generally not provided a list of all the security assistance they are responsible for overseeing when they begin their tour in a country. For example, the OSC Chiefs in Cameroon and Niger did not have information on the location of equipment awarded through the Logistical Support for Counter Boko Haram project. The equipment included armored vehicles, spare parts, and radio equipment, all of which are high-risk exports in

United States Munitions List.³⁵ They were also not able to confirm if the equipment was being used as intended. Figure 5 shows Motorola radios provided to the Nigerien Armed Forces under the Logistical Support for Counter Boko Haram contract.

OIG recognizes the challenges to monitoring these contracts given the security environment, travel restrictions, staff availability, and accessibility to site locations. To address such challenges, AF should consider monitoring options prescribed in 14 FAH-2 H-520, Monitoring Contractor Performance. Within this FAH provision, 14 FAH-2 H-522.8, Creative Monitoring, suggests the government may use satellite imagery or radio frequency identification to track property, deliveries, and locations. For instance, AF could use radio frequency identification to track armored vehicles and planes in Cameroon to ensure they are used as intended. Additionally, the Bureau of International Narcotics and Law Enforcement Affairs has established processes to monitor the use of defense articles that could serve as a model for AF.

Because of the deficiencies described, OIG considers the approximately \$201.6 million spent on the six contracts OIG reviewed as potential wasteful spending due to mismanagement and inadequate oversight.³⁶ Of this amount, OIG is specifically questioning almost \$109 million

³⁵ The United States Munitions List is a list of articles, services, and related technology designated as defense-related by the United States Federal Government.

³⁶ According to the Government Accountability Office's Revised 2018 Government Auditing Standards, waste can include activities that do not include abuse and does not necessary involve a violation of law. Rather, waste relates primarily to mismanagement, inappropriate actions, and inadequate oversight.

because the invoices submitted in four contracts did not have adequate supporting documentation.³⁷ To correct these deficiencies, OIG offers the following recommendations.

Recommendation 1: OIG recommends that the Bureau of African Affairs develop and implement bureau-wide standard operating procedures for conducting invoice reviews that include (a) steps to independently verify contractor performance is acceptable; (b) methods to ensure payments are authorized, accurate, legal, and correct and that the goods were actually received or services were actually performed; and (c) validation that the certifying officer makes payments only after receiving approval from an officer with knowledge of the receipt of the goods or services covered by the voucher.

Management Response: AF concurred with the recommendation, stating that it will work with its program offices to develop bureau-wide invoice processing and review procedures.

OIG Reply: On the basis of AF's concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF has developed and implemented bureau-wide standard operating procedures for conducting invoice reviews that include (a) steps to independently verify contractor performance is acceptable; (b) methods to ensure payments are authorized, accurate, legal, and correct and that the goods were actually received or services were actually performed; and (c) validation that the certifying officer makes payments only after receiving approval from an officer with knowledge of the receipt of the goods or services covered by the voucher.

In addition to providing comments to the recommendations offered, AF commented that it disagreed with OIG's characterization of the expenditure of \$201.6 million in program funds as "wasteful." In conducting the audit, OIG followed the Government Accountability Office's Revised 2018 Auditing Standards.³⁸ Those Standards state that "waste can include activities that do not include abuse and does not necessary involve a violation of law. Rather, waste relates primarily to mismanagement, inappropriate actions, and inadequate oversight." Because of the mismanagement and inadequate oversight noted in this report, AF cannot be assured that the goods and services provided under the TSCTP program are being used effectively or as intended. Therefore, OIG considers the \$201.6 million spent on these six contracts as potential wasteful spending.

Recommendation 2: OIG recommends that the Bureau of African Affairs develop and implement procedures that ensure personnel charged with monitoring and overseeing the Trans-Sahara Counterterrorism Partnership projects in the countries of performance are formally authorized to perform these functions through designation as a government

³⁷ 2 Code of Federal Regulations § 200.84, "Questioned Cost," defines questioned cost as a cost that is questioned by the auditor because of an audit finding which resulted from a violation or possible violation of a statute, regulation, or terms and conditions of a Federal award, including funds used to match Federal funds; where the costs, at the time of the audit, are not supported by adequate documentation; or where the costs incurred appear unreasonable and do not reflect the actions a prudent person would take in the circumstances.

³⁸ GAO, *Government Auditing Standards 2018 Revision* (GAO-18-568G), July 2018.

technical monitor or alternate contracting officer's representatives in accordance with the Foreign Affairs Handbook Section 14 FAH-2 H-140.

Management Response: AF concurred with the recommendation, stating that it "will work with country teams, the Bureau of Political-Military Affairs, and the relevant parts of the Department of Defense to develop formalized guidance with respect to the roles of field-based personnel in conducting monitoring and oversight of TSCTP programming." AF stated that "this effort will include identifying and designating the most appropriate field-based personnel as government technical monitors or alternate contracting officer's representatives" and that "in cases where sufficient oversight personnel cannot be formally designated," the bureau "will appropriately adjust programming to reflect these limitations."

OIG Reply: On the basis of AF's concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF has developed and implemented procedures that ensure personnel charged with monitoring and overseeing the TSCTP projects in the countries of performance are formally authorized to perform these functions through designation as a government technical monitor or alternate contracting officer's representatives in accordance with the FAH. In cases where sufficient oversight personnel cannot be formally designated, OIG will accept documentation demonstrating that AF has appropriately adjusted programming to reflect limitations.

Recommendation 3: OIG recommends that the Bureau of African Affairs (AF), in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) develop a monitoring plan template that can be tailored to each contract, a quality assurance surveillance plan template that can be tailored to each contract, and include these plans in the contract requirements checklist used by contracting officer's representatives (CORs) overseeing the Trans-Sahara Counterterrorism Partnership projects; and (b) ensure that CORs use these plans and other monitoring methods described in 14 FAH-2 H-520 to perform oversight of contracts.

Management Response: AF concurred with the recommendation, stating that it will work with the Department "to develop a standardized monitoring plan template and update the documentation requirements for solicitation packages to ensure they include these monitoring plans." AF further stated that it already uses quality assurance surveillance plan templates for all FY 2020-initiated task orders. AF stated that it "will develop a standard procedure to ensure that CORs properly make use of monitoring plans and [quality assurance surveillance plans]."

OIG Reply: On the basis of AF's concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF has (a) developed a monitoring plan template that can be tailored to each contract, provided the quality assurance surveillance plan template that can be tailored to each contract, and has

included these plans in the contract requirements checklist used by CORs overseeing the TSCTP projects; and (b) provide documentation that assures CORs use these plans and other monitoring methods described in the FAH to perform oversight of contracts.

Recommendation 4: OIG recommends that the Bureau of African Affairs develop a process to monitor assistance provided to host nations participating in the Trans-Sahara Counterterrorism Partnership. In doing so, the Bureau should consider the methods described in 14 FAH-2 H-522.8, "Creative Monitoring," such as global positioning systems units to track the locations and travel of contractors, badge readers to determine number of individuals served at an event, and the use of radio frequency identification to track property, deliveries, and locations.

Management Response: AF concurred with the recommendation, stating that it will consult both the relevant FAH reference and other bureaus/agencies engaged in similar activities to identify best practices to monitor assistance. AF further stated that it "will seek to identify which of those methods can be most effectively utilized within the TSCTP operating environment, to include the attendant human resourcing constraints, travel restrictions, and security limitations."

OIG Reply: On the basis of AF's concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF has developed and begun implementation of a process to monitor assistance provided to host nations participating in TSCTP.

Recommendation 5: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether \$89,511,708 in questioned costs related to the G5 Force Support Task Order (contract 19AQMM18F3925) were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Management Response: AF concurred with the recommendation, stating that appropriate personnel "will obtain all relevant documentation related to the expenditures, analyze that documentation, and notify the relevant. . .contracting officer of any costs that appear unallowable and/or unsupported" and that "the final decision on whether to disallow/recover those costs will be a Contracting Officer decision."

OIG Reply: On the basis of AF's concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF, in coordination the Bureau of Administration, Office of the Procurement Executive, (a) completed their reviews of the expenditures and made a determination as to whether the expenditures were allowable and/or supportable; and (b) recovered any costs determined to be unallowable and/or unsupported.

Recommendation 6: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether \$10,165,351 in questioned costs related to the Regional Boat Capability Program (contract SAQMMA17F4534) were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Management Response: AF concurred with the recommendation, stating that appropriate personnel “will obtain all relevant documentation related to the expenditures, analyze that documentation, and notify the relevant. . .contracting officer of any costs that appear unallowable and/or unsupported” and that “the final decision on whether to disallow/recover those costs will be a Contracting Officer decision.”

OIG Reply: On the basis of AF’s concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF, in coordination the Bureau of Administration, Office of the Procurement Executive, (a) completed their reviews of the expenditures and made a determination as to whether the expenditures were allowable and/or supportable; and (b) recovered any costs determined to be unallowable and/or unsupported.

Recommendation 7: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether \$3,302,260 in questioned costs related to the Salak Air Base Expansion (contract SAQMMA17F3555) were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Management Response: AF concurred with the recommendation, stating that appropriate personnel “will obtain all relevant documentation related to the expenditures, analyze that documentation, and notify the relevant. . .contracting officer of any costs that appear unallowable and/or unsupported” and that “the final decision on whether to disallow/recover those costs will be a Contracting Officer decision.”

OIG Reply: On the basis of AF’s concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF, in coordination the Bureau of Administration, Office of the Procurement Executive, (a) completed their reviews of the expenditures and made a determination as to whether the expenditures were allowable and/or supportable; and (b) recovered any costs determined to be unallowable and/or unsupported.

Recommendation 8: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether \$5,984,138 in questioned costs related to the Niger C-130 Hangar (contract 19AQMM18F4856), were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Management Response: AF concurred with the recommendation, stating that appropriate personnel “will obtain all relevant documentation related to the expenditures, analyze that documentation, and notify the relevant. . .contracting officer of any costs that appear unallowable and/or unsupported” and that “the final decision on whether to disallow/recover those costs will be a Contracting Officer decision.”

OIG Reply: On the basis of AF’s concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF, in coordination the Bureau of Administration, Office of the Procurement Executive, (a) completed their reviews of the expenditures and made a determination as to whether the expenditures were allowable and/or supportable; and (b) recovered any costs determined to be unallowable and/or unsupported.

The AF TSCTP Cooperative Agreement and Grant Reviewed Had Monitoring Plans and Oversight

In addition to the six contracts reviewed for this audit, OIG reviewed the Seeds for Peace grant awarded to IQRA to implement a literacy program in Burkina Faso, as well as a cooperative agreement awarded to the International Organization for Migration to assist individuals in Niger, Cameroon, and Chad who abandoned terrorist organizations. OIG found that both award instruments for these TSCTP projects had monitoring plans in accordance with the FAD. Specifically, the FAD requires grants and cooperative agreements to have monitoring plans that: (1) account for risk, risk mitigation measures, and the resources available for monitoring, (2) are linked to the award scope, (3) show performance metrics and monitoring mechanisms to be used, and (4) include the assessment of goals and objectives of the award and the outcomes that are expected.³⁹ The monitoring plan for the IQRA grant had three of the four components; it did not have the assessment of goals, objectives, and outcomes. The monitoring plan for the cooperative agreement awarded to the International Organization for Migration had all four components.

OIG also found that a grants officer, grants officer’s representative, and embassy officials made site visits to the two projects. For example, documentation shows that these officials made site visits to monitor the progress of the Seeds for Peace grant in December 2018 and April 2019 and regular visits to IQRA’s headquarters office in the capital city to review activity reports and financial receipts. OIG also accompanied the grant officer’s representative when he made a site visit to observe a training class in Ouagadougou, Burkina Faso, on October 9, 2019. Documentation also shows that AF officials made site visits to monitor the progress of the Demobilization, Disassociation, Reintegration, and Reconciliation cooperative agreement in Niger in November 2017 and October 2019, Cameroon in December 2018, and Chad in June 2019. IQRA and the International Organization for Migration also submitted quarterly reports as required by the terms and conditions of their awards. These reports included, for example, information such as activity summaries, the number of people served, lessons learned, safety and operations updates, and trainings. For instance, IQRA submitted a quarterly report that

³⁹ Federal Assistance Directive, Chapter 2, § O, *Develop a Monitoring Plan*, 78.

showed progress made toward educating students in Burkina Faso to be resilient against extremist ideology. The report noted the number of schools that were opened and the number of new ones that were built. The International Organization for Migration submitted a quarterly report that identified “the care and feeding of those currently in detention facilities” as a lesson learned. The report also noted that the organization planned to recruit senior advisors and program managers to support the project.

Finding B: Coordination of TSCTP Projects Needs Improvement

OIG found that AF is not effectively coordinating with stakeholders to execute the U.S. whole-of-government initiative that the TSCTP was intended to be. Although TSCTP partner agencies meet to formulate strategic priorities, the execution of activities among U.S. partners in the host countries receiving assistance is insufficient. Officials stated that undefined roles and responsibilities, the lack of knowledge management, and staffing shortfalls hinder effective coordination. Until these issues are addressed, the goal of effectually implementing TSCTP projects throughout West and North Africa in a coordinated manner will remain a challenge.

Principals From Partner Agencies Meet To Coordinate TSCTP Government-Wide, but Coordination In-Country Is Not Always Effective

According to a Department website, “[TSCTP] is a multi-faceted, multi-year U.S. strategy aimed at developing resilient institutions that are capable of preventing and responding to terrorism in a holistic, long-term manner.” As stated previously, AF chairs the interagency Sahel-Maghreb Deputy Assistant Secretary Oversight Committee, which includes principals from the Department, DoD, and USAID. AF officials stated the principals discuss “high-level geopolitical decision making and trend lines” affecting TSCTP during their meetings. AF also convenes a monthly officer-level TSCTP interagency working group where members review guidance and share information about programs, policy initiatives, and scheduled events. The working group also plans the Sahel-Maghreb Deputy Assistant Secretary Oversight Committee meetings and annual TSCTP conferences. The annual TSCTP conference brings together stakeholders from the Department, DoD, U.S. Africa Command, and USAID to learn from experts and discuss matters related to TSCTP implementation, including counterterrorism threats to U.S. interests and approaches to managing foreign assistance in an “era of increased strategic competition in Africa.” For these annual conferences, the Department, USAID, and DoD take turns serving as host. AF hosted the 2019 conference. A Department official stated that these conferences have been helpful, but they are difficult to plan and costly to execute.

Despite the high-level coordination of TSCTP that occurs within the Department and with partner agencies, several officials told OIG that coordination was lacking for the execution of TSCTP projects in-country. For example, a senior U.S. Air Force official told OIG that AF officials did not formally contact U.S. Air Force personnel to coordinate the construction of the Niger C-130 aircraft hangar at a base they share with the Nigerian military. Another U.S. Air Force official told OIG that he occasionally visited the project but kept his distance to avoid the appearance that he had formal monitoring and oversight responsibilities. Relyant contractors shared similar views; their monthly reports to AF officials repeatedly noted coordination with

U.S. Air Force personnel as an area of concern. U.S. Air Force officials and Relyant contractors told OIG that problems with the project, such as discrepancies in the grading, remained.⁴⁰

In another example, AF could not coordinate the development of the Regional Boat Capability Program with the Defense Attaché in Cameroon because the position was vacant at that time.⁴¹ As a result, the current Defense Attaché stated that there was no one in-country with subject matter expertise to approve the project. The Defense Attaché also stated that had she been in the position at that time, she would not have approved the project because of maintenance and logistical challenges.⁴² An OSC official similarly questioned the project's functionality, stating that the mud boats provided under the program were unable to outrun smugglers and other criminals who operated faster boats on Lake Chad. In a site visit report, the official also noted that the Cameroonian Navy's communication ability was limited because the boats "use bridge-to-bridge radios, which can hardly be used when boat motors are running because of noise. [The noise] limits coordination efforts for more complex operations." During a site visit to Cameroon, OIG learned that the mud boats had not been used in any terrorist-related operations for which they were intended. OIG accordingly questioned \$10.2 million in wasted funds for this project in its April 2020 *Management Assistance Report: The Bureau of African Affairs Should Improve Performance Work Statements and Increase Subject Matter Expertise for Trans-Sahara Counterterrorism Partnership Projects* (AUD-MERO-20-29). Figure 6 shows mud boats, vehicles, and a boathouse provided to the Cameroonian Navy under the Regional Boat Capability Program award.



Figure 6: Mud boats, vehicles, and a boathouse provided to the Cameroonian Navy under the Lake Chad Regional Boat Capability Program award. (OIG photo, September 2019)

⁴⁰ Grading is the process in civil engineering of shaping the land to direct surface runoff away from structures.

⁴¹ According to DoD, the Defense Attaché is the in-country focal point for planning, coordinating, supporting, and/or executing U.S. defense issues and activities in a host nation.

⁴² According to the Defense Attaché, the U.S. Ambassador to Cameroon initially approved the project in Cameroon.

In a third example, OIG found that AF did not designate staff in Cameroon to manage the Demobilization, Disassociation, Reintegration, and Reconciliation cooperative agreement. AF officials told OIG that the embassy's Political Officer has a role in overseeing this project because of potential policy implications. The Political Officer, however, told OIG that she becomes involved in the project only when such political issues actually arise. She also stated that she was not responsible for more general oversight and did not have access to project documentation. A USAID official told OIG that it was imperative to have someone in-country to manage the project and liaise with the government. According to the official, part of the project was delayed for 3 months because of inadequate coordination between the International Organization for Migration (the implementor), AF officials in Washington, and embassy staff in Cameroon.

Several Obstacles Hinder Effective Coordination

AF, Department, and DoD officials stated that undefined roles and responsibilities, the lack of knowledge management, and staffing shortage hinder effective coordination of TSCTP.

Undefined Roles and Responsibilities

Although AF convenes meetings to coordinate TSCTP policy and strategy with Department bureaus and interagency stakeholders, AF officials stated that they do not have formal authority to direct bureaus or enforce standardization of the program. Officials from other bureaus that implement TSCTP projects told OIG that greater clarity on AF's roles and responsibilities as TSCTP lead is needed. An official in the Bureau of Counterterrorism noted that it would be beneficial if AF were to hold more meetings, provide clarity on roles, declare desired end-states, and ensure that the Department's bureaus are acting in unison.

Officials also stated that there is lack of defined roles and responsibilities for officials assigned with overseeing TSCTP projects in-country. For example, the OSC Chiefs in Cameroon, Niger, and Burkina Faso told OIG that they were not aware of any documented formal responsibility regarding monitoring of TSCTP projects. Although they are the points of contact for security assistance at the embassy, including the TSCTP, their specific responsibilities for monitoring TSCTP contracts are not documented. The OSC Chief in Cameroon also told OIG she was not aware of any specific guidance from AF about whom exactly at the embassy was overseeing TSCTP projects. In another example, the OSC Chief in Niger told OIG that she assisted AF in responding to questions from contractors during the bidding process for the Niger C-130 Hangar construction project. She stated, however, that she did not have any experience with engineering or construction and thought it was unreasonable that she was asked to assist in the development of the contract. As stated previously, the OSC Chiefs were not designated as GTMs or alternate CORs. If they were, the letters of designation would articulate responsibilities with regards to monitoring.

AF CORs in Washington, DC, told OIG that they expect the OSC Chiefs to be able to closely monitor the status of projects. However, one AF COR stated that OSC personnel call into weekly COR meetings with contractors less than 50 percent of the time. The COR told OIG that he has limited control over whether OSC personnel attend weekly calls with the contractor to discuss

the project's progress. The COR added that he has seen varying levels of effort from the OSC offices on AF-implemented TSCTP projects.

Lack of Knowledge Management

AF has not regularly maintained a central repository of information on TSCTP projects that is accessible to personnel in-country, other bureaus, or other agencies. Officials in Cameroon and Niger told OIG that obtaining an understanding of the scope and history of TSCTP projects was challenging, if not impossible. According to an OSC official in Cameroon, there was no tracking system to manage the historical information for TSCTP projects. That OSC Chief stated that she had to hunt down pieces of information to get an understanding of a project's status. Another OSC Chief in Niger said that she was not introduced to any in-country officials involved with the TSCTP and had limited overlap time with her predecessor. She added that there was also a lack of historical information. The OSC Chief in Burkina Faso told OIG that she had overlap with her predecessor and, therefore, had access to historical information and status of TSCTP projects. She added that she benefited from her predecessor having very organized project files.

Participants at the 2019 TSCTP conference also highlighted the need for better knowledge management.⁴³ However, AF officials stated that they have not documented the lessons learned from the 2019 annual TSCTP conference because of other priorities. Participants also stated that AF was unaware of a 2018 conference lessons learned document prepared by USAID. Had AF documented the 2019's conference's findings and used the 2018 lessons learned, AF may have been able to address some critical knowledge management issues.

For several years, AF maintained a TSCTP knowledge management portal to support program coordination. A contractor initially set up this interagency system on the DoD's All Partner Access Network as an information sharing and data collection tool for TSCTP interagency partners.⁴⁴ However, the contractor stopped updating project information in the system in FY 2016 when it began working on developing a new information portal to be hosted on a Department platform. Officials in-country also told OIG they had never used the Department portal. Instead, some officials said they relied on information from their predecessors. OIG obtained access to the portal and was unable to find historical information about any of the TSCTP projects reviewed for this audit. For example, OIG searched the portal's project page for the project file identification numbers of the six contracts reviewed for this audit and only found information on one contract. Regarding this one project, the portal contained only high-level contractual information, such as the funding channel, project status, and obligated amount. It did not contain a detailed description of the project and project documentation needed for implementation. According to the contractor, the new portal went live in FY 2019 with "basic structure and functionality." AF began inviting users to use the new portal in August 2019. The contractor, however, is still working to "build out functionality and data, including adding project files to their respective pages." According to the contractor, a sub-contractor is

⁴³ According to the International Institute for Applied Knowledge Management, *Defining knowledge management: Toward an applied compendium* 14 (Volume 3, Issue 1, 2015), one definition of knowledge management is the "process of creating, sharing and using organizational information and knowledge."

⁴⁴ All Partners Access Network is a DoD social networking website used for information sharing and collaboration.

tracking portal membership and usage. The contractor also noted that the implementation of a communication plan to reach additional stakeholders was delayed by the COVID-19 pandemic.

Another knowledge management challenge is the lack of a comprehensive list of Department TSCTP projects. Instead, each bureau maintains its own lists of projects. When OIG requested a list from the Department for all TSCTP projects, OIG was unable to obtain a complete list and had to coordinate with each bureau to obtain information.

Staffing Shortages and Continual Vacancies

Department officials also cited staffing shortages and continual vacancies at U.S. embassies in the Sahel and Maghreb regions as factors making it difficult to oversee TSCTP projects. AF requested 125 U.S. direct hire positions to address the staffing shortage in its FY 2021 Budget Resource Request. Since 2016, the Department has categorized Tunisia, Libya, Niger, Chad, Cameroon, Nigeria, Burkina Faso, Mali, and Mauritania as “historically difficult to fill” embassies. As a result, there are monetary and other incentives for staff to take positions at these posts. However, despite these incentives, AF officials stated that the bureau has faced constant challenges in filling vacancies for many critical positions throughout the Sahel and Maghreb regions. In its FY 2021 Budget Resource Request, AF stated,

Studies conducted over the past five years document AF’s chronic understaffing – domestically and in our 50 posts. This is not a question of vacant positions (although the lack of incentive programs undeniably disadvantages recruiting for Africa’s extreme hardship posts vis à vis [priority staffing posts]). It is a question of insufficient positions to address the U.S. government’s top priorities in Africa. There is a limit to how much more we can continually ask our personnel to accomplish with fewer resources; and we have reached that limit. Our bureau resource request, therefore, addresses this historic understaffing with a robust slate of positions to augment AF embassies, consulates, and domestic offices. Good stewardship of all resources will be a central tenet, and we have adopted a management objective that focuses on program effectiveness and accountability to the American taxpayer.⁴⁵

An AF Deputy Assistant Secretary told OIG that she has found it more difficult to obtain resources in AF than in other bureaus she previously worked. She further stated that the resources are not commensurate with the very difficult and multifaced mission in the region. A mission which includes combatting terrorism and poverty; addressing the geopolitical competition with China; and communicating, coordinating, and collaborating with multiple embassies and consulates.

Other Department officials told OIG that AF’s vacancies and lack of resources also affected their ability to carry out the Department’s mission. For example, in September 2019, the Ambassador to Niger told OIG that the position of Political Officer was vacant. The Department issued a cable urgently seeking volunteers for the Political Officer position to serve on a 2- or 3-year

⁴⁵ Bureau of African Affairs FY 2021 Bureau Resource Request, 4.

assignment. However, as of July 2020, the position has not been filled. The Ambassador stated that in the interim, he has had to take on some of responsibilities generally belonging to the Political Officer. Another embassy official in Niger said there were not enough staff to adequately manage the funds, projects, and programs. According to the OSC Chief in Cameroon, she was overseeing TSCTP projects in several countries because of staff shortages at those missions. The OSC Chief stated that she conducts “situational” oversight based on the sites she can visit, but limited resources and significant security restrictions limit where she can travel. In addition, embassy officials in Cameroon told OIG that the OSC Chief position and the Defense Attaché position had previously been vacant for several months.

At the 2019 TSCTP annual conference, participants also noted inadequate human resource as a systemic issue and that the Department is not providing embassies the staff necessary to implement the TSCTP. Participants stated that it is difficult to attract qualified and talented staff to the Sahel region. They also stated that the Department was not providing the training needed to properly manage and implement TSCTP projects. According to participants, staff implementing TSCTP projects in the field are ill-equipped to manage programmatic requirements.

A senior AF official told OIG that the Department could encourage staff to work in Africa in the same way it has encouraged placements in Iraq, Afghanistan, and Pakistan. For example, staff in Ouagadougou, Burkina Faso, receive the same hardship pay⁴⁶ as those in Ho Chi Minh City, Vietnam; Nuuk, Greenland; and Jakarta, Indonesia even though the conditions in Ouagadougou are arguably more similar to those in Baghdad and Kabul. For instance, according to the Department’s travel advisory, the Government of Burkina Faso, like Iraq and Afghanistan, maintains a state of emergency throughout much of the country and terrorist groups continue plotting attacks. In addition, as in Iraq and Afghanistan, family members under the age of 21 cannot accompany U.S. government employees who work in Burkina Faso. AF officials told OIG that it is difficult to attract qualified personnel to many positions in Africa when other less challenging locations are similarly incentivized.

AF officials also stated that having the direct authority to hire personal services contractors would afford the bureau the flexibility to assign additional personnel to critical positions. The FAH states that “[p]ersonal services contractors (PSCs) are individuals with a contract that establishes an employer-employee relationship for some purposes. PSCs can be hired locally or from the United States or a third country”⁴⁷ According to the FAH, they can be assigned to monitor and oversee contracts on behalf of the Government.⁴⁸ Other Department bureaus and offices have hired personal services contractors to meet mission needs in countries, including

⁴⁶ Hardship pay is additional compensation provided to employees working in foreign countries where conditions differ substantially from conditions in the United States and warrant additional compensation as a recruitment and retention incentive.

⁴⁷ 6 FAH-5 H-352.3, “Personal Services Contractors (PSCs).”

⁴⁸ 14 FAH-2 H-113, “Qualifying as a COR: Federal Acquisition Certification: Contracting Officer’s Representative (FAC-COR).”

Iraq and Afghanistan.⁴⁹ Before the audit had concluded, AF stated that it was granted authority to hire overseas PSCs and is in the process of hiring three contractors. Officials stated that they have no authority for U.S.-based PSCs and are constrained from using program funds for this purpose. However, they could seek authority to do so.

Conclusion

Many of the monitoring and coordination challenges identified during this audit have been known for many years. Specifically, from 2009 to 2020, OIG has reported, on multiple occasions, significant weaknesses with AF's administration and oversight of assistance awards.⁵⁰ These reports noted the following deficiencies:

- Lack of CORs within AF's Office of Regional and Security Affairs to administer contracts.
- Ineffective contractor oversight by AF CORs due to lack of experience in monitoring construction contracts.
- Weaknesses with COR delegation, lack of quality assurance plans, and improper use of site coordinators.
- Weaknesses in AF's COR workforce management, including CORs who were not in-country to oversee contractor performance.

Most recently, OIG reported in April 2020 that poorly developed performance work statements resulted in millions of dollars in wasted funds associated with TSCTP projects.⁵¹ Furthermore, OIG reported in May 2020 that AF's efforts to address recommendations made in a 2017 report required additional attention to properly document its foreign assistance business process and establish controls to help ensure proper oversight documentation for Federal assistance awards.⁵² In these reports, OIG recommended that AF improve contract oversight by hiring more CORs, develop quality assurance plans and policies for monitoring, ensure that contractors were not conducting inherently governmental contract monitoring functions, and improve the technical expertise of CORs. AF has taken actions to address these recommendations and as a result, OIG has closed several of them. Nevertheless, as this report demonstrates, issues remain.

⁴⁹ Bureaus and offices that have personal services contractors on their staff include the Bureau of Population, Refugees, and Migration; the Bureau of International Narcotics and Law Enforcement Affairs; the Foreign Service Institute; the Office of Foreign Missions; the Bureau of International Organization Affairs; the Bureau of Overseas Buildings Operations; the U.S. Mission to the United Nations; and the Bureau of Diplomatic Security.

⁵⁰ OIG, *Inspection of the Bureau of African Affairs* (ISP-I-09-63, August 2009); *Audit of Allegations Pertaining to Contract With DynCorp International for the Security Sector Transformation Project in South Sudan, Africa* (AUD-SI-10-23, August 2010); *Audit of the Administration and Oversight of Contracts and Grants within the Bureau of African Affairs* (AUD-CG-14-31, August 2014); *Audit of Department of State Selection and Positioning of Contracting Officer's Representatives* (AUD-CG-14-07, January 2014).

⁵¹ OIG, *Management Assistance Report: The Bureau of African Affairs Should Improve Performance Work Statements and Increase Subject Matter Expertise for Trans-Sahara Counterterrorism Partnership Projects* (AUD-MERO-20-29).

⁵² OIG, *Compliance Follow-Up Review Bureau of African Affairs' Foreign Assistance Program Management* (ISP-C-20-23); *Inspection of the Bureau of African Affairs' Foreign Assistance Program Management* (ISP-I-18-02).

While mechanisms were initially put in place to coordinate TSCTP projects, they were not sustained. The Government Accountability Office (GAO) also reviewed the TSCTP program. In 2013, it reported that the Department, along with USAID and DoD, established quarterly meetings at the deputy assistant secretary level. Through the meetings, senior leaders approved TSCTP strategy, decided on membership of new countries, and discussed coordination opportunities with other international donors. In 2014, GAO reported that the implementation of the TSCTP was generally consistent with key practices of interagency collaboration.⁵³ Specifically, it cited the establishment of a joint Department, USAID, and DoD TSCTP Guiding Strategy, a document that outlines lines of effort for the program. However, OIG found in this report that the deputy assistant secretary level meeting (now called the Sahel-Maghreb Deputy Assistant Secretary Oversight Committee meeting) had not occurred in over a year. In addition, an official in the Bureau of Counterterrorism stated that the TSCTP interagency working group had “fallen off” its regular monthly schedule and has not met for several months. It appears that the GAO’s findings were based on actions and processes that have since become obsolete. For example, the 2014 TSCTP Guiding Strategy states that the document “will be updated at least every three years, or sooner when applicable, in order to accommodate, synchronize, or nest with new national-level policy guidance on the region and respond to the ever changing security dynamics.” AF officials told OIG they updated the strategy in 2017, but it never received senior-level approval from the Department.

Many of the deficiencies that have been described over the past decade remain a significant impediment to successfully implementing TSCTP projects. The deficiencies identified in this audit have occurred, in part, because AF has not adequately attended to longstanding challenges with the execution of foreign assistance, including the TSCTP. AF officials acknowledge the lack of progress made to address these challenges but stated that the Department has not appropriately prioritized the bureau’s needs. For example, they state that requests for additional positions are generally reduced by the Department and, even with the reductions, are ultimately not approved by the Office of Management and Budget. AF officials told OIG that a reorganization, which was initiated in October 2019 and approved in June 2020, would address many of the issues identified in this report. They stated that, as part of the reorganization, they would be updating memoranda of understanding and standardizing processes for project oversight.⁵⁴

Regardless of the cause of these deficiencies, until they are addressed, the Department will have limited assurance that TSCTP is achieving its goals of building counterterrorism capacity and addressing the underlying drivers of radicalization in West and North Africa. OIG is, therefore, offering the following recommendations.

Recommendation 9: OIG recommends that the Bureau of African Affairs develop a written framework and work with other Government entities to achieve a whole-of-government

⁵³ Government Accountability Office, *U.S. Efforts in Northwest Africa Would Be Strengthened by Enhanced Program Management* (GAO-14-518, June 2014).

⁵⁴ Because the reorganization was recently approved, it is too soon to determine whether it would address the deficiencies identified in this report.

approach in the execution of the Trans-Sahara Counterterrorism Partnership program that includes elements such as roles and responsibilities, organizational structure, and coordination mechanisms.

Management Response: AF concurred with the recommendation, stating “it has begun internal discussions to reinvigorate TSCTP policy leadership to improve coordination and implementation.” AF stated that “this may include a working level TSCTP interagency cell tasked with routine coordination and will certainly include more regular steering committees involving interagency leadership.” AF also stated that there is legislation currently under review in Congress, and if it becomes law, will “direct the Department to undergo a new strategy development process and additional reporting for various components of TSCTP.” AF further stated that independent of the draft legislation, it “plans to lead a revision of the TSCTP strategy” given changes in the threat environment since the program’s inception in 2005 and it also “plans to formalize the roles and responsibilities of various TSCTP actors to ensure clarity and accountability.”

OIG Reply: On the basis of AF’s concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF has developed a written whole-of-government framework to execute the TSCTP program that includes elements such as roles and responsibilities, organizational structure, and coordination mechanisms.

Recommendation 10: OIG recommends that the Bureau of African Affairs establish and implement memoranda of understanding with the Office of Security Cooperation and other partners, as applicable, to describe roles and responsibilities for coordinating, executing, and monitoring Trans-Sahara Counterterrorism Partnership (TSCTP) projects in the countries where TSCTP is implemented, including establishment of a structure for communicating and coordinating in-country.

Management Response: AF concurred with the recommendation, stating that, in coordination with the Bureau of Political Military Affairs, it will establish and implement memoranda of understanding with the Office of Security Cooperation and other partners “to describe roles and responsibilities for coordinating, executing, and monitoring [TSCTP] projects in the countries where TSCTP is implemented, including establishment of a structure for communicating and coordinating in-country.”

OIG Reply: On the basis of AF’s concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF has developed memoranda[um] of understanding with the OSC and other partners, as applicable, to describe roles and responsibilities for coordinating, executing, and monitoring TSCTP projects in the countries where TSCTP is implemented, including establishment of a structure for communicating and coordinating in-country.

Recommendation 11: OIG recommends that the Bureau of African Affairs, in coordination with relevant bureaus, establish, populate, and maintain a central repository of all Trans-Sahara Counterterrorism Partnership projects, accessible to those involved with the execution of projects, that includes project name and identification number, the project proposal, the award mechanism, a detailed description of the project, and project documentation needed for implementation.

Management Response: AF concurred with the recommendation, stating that in the past year, it has built a central repository of information on several programs and that the repository is accessible to interagency partners. AF stated that the repository organizes information “from proposals, to periodic reporting, to contract documentation” primarily by country or by funding mechanism. For the projects reviewed for this audit, AF stated that 1,500 documents are accessible in the repository. Lastly, AF stated that “for this portal to capture all TSCTP projects, across all accounts, the interagency, other bureaus and agencies would have to bear some of the costs of its maintenance.” Nevertheless, AF stated that it “intends to maintain its repository of TSCTP [peace keeping operations] information.”

OIG Reply: On the basis of AF’s concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF in coordination with relevant bureaus, establish, populate, and maintain a central repository of all TSCTP projects, accessible to those involved with the execution of projects.

Recommendation 12: OIG recommends that the Bureau of African Affairs determine and take steps to hire the appropriate number of staff needed to manage, administer, and support the Trans-Sahara Counterterrorism Partnership projects.

Management Response: AF concurred with the recommendation, stating that the office began a rigorous process to analyze its structure and staffing in the Spring of 2019. AF also stated that the Department approved the Bureau’s reorganization of the Office of Regional Peace and Security in June 2020. As part of the Office, the Plans and Programs division specifically focuses on the design, expenditure, and management of U.S. foreign assistance funds; the division includes four government staff members. AF stated that the Office of Regional Peace and Security also added three key contracted positions to support the office. AF stated that “this staffing complement effectively doubles the amount of staff time dedicated to TSCTP planning and programming functions.”

OIG Reply: On the basis of AF’s concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF took the steps outlined to hire the appropriate number of staff needed to manage, administer, and support the TSCTP projects and the formal AF/RPS structure.

Recommendation 13: OIG recommends that the Bureau of African Affairs establish and lead a working group to develop and implement an action plan to address the longstanding

challenges associated with monitoring and coordinating the Trans-Sahara Counterterrorism Partnership projects.

Management Response: AF concurred with the recommendation, stating that it is anticipating legislation that may impact how the Department manages the overall TSCTP program. In the meantime, AF stated that it “will convoke regular meetings of the Standing Interagency Working Group and (as needed) [Deputy Assistant Secretary]-level oversight committee to discuss the monitoring and coordination issues identified in this report” and that “these sessions will seek to identify lessons learned and best practices from across the TSCTP community and discuss how those practices can be implemented in a more consistent manner across the different implementing bureaus and agencies.”

OIG Reply: On the basis of AF’s concurrence with the recommendation and actions planned, OIG considers the recommendation resolved, pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that AF established and is leading a working group to develop and implement an action plan to address the longstanding challenges associated with monitoring and coordinating the TSCTP projects.

RECOMMENDATIONS

Recommendation 1: OIG recommends that the Bureau of African Affairs develop and implement bureau-wide standard operating procedures for conducting invoice reviews that include (a) steps to independently verify contractor performance is acceptable; (b) methods to ensure payments are authorized, accurate, legal, and correct and that the goods were actually received or services were actually performed; and (c) validation that the certifying officer makes payments only after receiving approval from an officer with knowledge of the receipt of the goods or services covered by the voucher.

Recommendation 2: OIG recommends that the Bureau of African Affairs develop and implement procedures that ensure personnel charged with monitoring and overseeing the Trans-Sahara Counterterrorism Partnership projects in the countries of performance are formally authorized to perform these functions through designation as a government technical monitor or alternate contracting officer's representatives in accordance with the Foreign Affairs Handbook Section 14 FAH-2 H-140.

Recommendation 3: OIG recommends that the Bureau of African Affairs (AF), in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) develop a monitoring plan template that can be tailored to each contract, a quality assurance surveillance plan template that can be tailored to each contract, and include these plans in the contract requirements checklist used by contracting officer's representatives (CORs) overseeing the Trans-Sahara Counterterrorism Partnership projects; and (b) ensure that CORs use these plans and other monitoring methods described in 14 FAH-2 H-520 to perform oversight of contracts.

Recommendation 4: OIG recommends that the Bureau of African Affairs develop a process to monitor assistance provided to host nations participating in the Trans-Sahara Counterterrorism Partnership. In doing so, the Bureau should consider the methods described in 14 FAH-2 H-522.8, "Creative Monitoring," such as global positioning systems units to track the locations and travel of contractors, badge readers to determine number of individuals served at an event, and the use of radio frequency identification to track property, deliveries, and locations.

Recommendation 5: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether \$89,511,708 in questioned costs related to the G5 Force Support Task Order (contract 19AQMM18F3925) were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Recommendation 6: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether \$10,165,351 in questioned costs related to the Regional Boat Capability Program (contract SAQMMA17F4534) were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Recommendation 7: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether

\$3,302,260 in questioned costs related to the Salak Air Base Expansion (contract SAQMMA17F3555) were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Recommendation 8: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether \$5,984,138 in questioned costs related to the Niger C-130 Hangar (contract 19AQMM18F4856), were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Recommendation 9: OIG recommends that the Bureau of African Affairs develop a written framework and work with other Government entities to achieve a whole-of-government approach in the execution of the Trans-Sahara Counterterrorism Partnership program that includes elements such as roles and responsibilities, organizational structure, and coordination mechanisms.

Recommendation 10: OIG recommends that the Bureau of African Affairs establish and implement memoranda of understanding with the Office of Security Cooperation and other partners, as applicable, to describe roles and responsibilities for coordinating, executing, and monitoring Trans-Sahara Counterterrorism Partnership (TSCTP) projects in the countries where TSCTP is implemented, including establishment of a structure for communicating and coordinating in-country.

Recommendation 11: OIG recommends that the Bureau of African Affairs, in coordination with relevant bureaus, establish, populate, and maintain a central repository of all Trans-Sahara Counterterrorism Partnership projects, accessible to those involved with the execution of projects, that includes project name and identification number, the project proposal, the award mechanism, a detailed description of the project, and project documentation needed for implementation.

Recommendation 12: OIG recommends that the Bureau of African Affairs determine and take steps to hire the appropriate number of staff needed to manage, administer, and support the Trans-Sahara Counterterrorism Partnership projects.

Recommendation 13: OIG recommends that the Bureau of African Affairs establish and lead a working group to develop and implement an action plan to address the longstanding challenges associated with monitoring and coordinating the Trans-Sahara Counterterrorism Partnership projects.

APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

The Office of Inspector General (OIG) conducted this audit to determine whether the Bureau of African Affairs (AF) is monitoring and coordinating activities of the Trans-Sahara Counterterrorism Partnership (TSCTP) in accordance with Federal and Department of State (Department) requirements.

OIG conducted this audit from July 2019 to April 2020 in the Washington, DC, metropolitan area; Embassy Yaoundé, Cameroon; Embassy Niamey, Niger; and Embassy Ouagadougou, Burkina Faso. To obtain background information for this audit, OIG researched and reviewed Federal laws and regulations, as well as internal Department policies and procedures relating to foreign assistance funding. Specifically, OIG reviewed the Consolidated Appropriations Acts of 2016, 2017, and 2018; the Foreign Assistance Act of 1961; the Federal Assistance Directive; Foreign Affairs Manual; Foreign Affairs Handbook; Code of Federal Regulations; and the Guidance for the Design, Monitoring, and Evaluation Policy at the Department of State.

OIG conducted over 66 interviews with Department officials from the Bureaus of African Affairs, International Narcotics and Law Enforcement Affairs, Counterterrorism and Countering Violent Extremism, Political-Military Affairs, the Office of U.S. Foreign Assistance Resources, Embassy Yaoundé, Embassy Niamey, and Embassy Ouagadougou. In addition, OIG conducted interviews with officials from the Cameroonian, Burkinabe, and Nigerian militaries. OIG also interviewed contractors, implementors, and grant recipients for the projects selected in this report. OIG collected testimonial information about contract performance monitoring, financial monitoring, and Department-wide TSCTP coordination.

OIG selected eight projects that were implemented between October 2016 and September 2019 based on several criteria (see Sampling Methodology section). OIG obtained and reviewed documentation related to the contract performance and financial monitoring of these projects. For example, OIG reviewed the award files to determine whether monitoring plans and quality assurance plans were completed for selected projects. OIG also selected a sample of invoices to determine whether AF was conducting appropriate financial monitoring. In addition, OIG assessed AF's efforts to coordinate TSCTP activities among Department stakeholders and interagency partners.

This report relates to an overseas contingency operation, the North and West Africa Counterterrorism Operation, and was completed in accordance with OIG's oversight responsibilities described in Section 8L of the Inspector General Act of 1978, as amended. OIG conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objective.

Data Reliability

OIG used computer-processed data to support findings and conclusions presented in this report. Specifically, OIG used data provided by AF that showed the status of obligations and expenditures for TSCTP awards provided to partner nations from FY 2005 to FY 2018. To assess the completeness and accuracy of the data, OIG tested certain data elements. OIG compared a judgmental sample of 15 awards to data obtained from USAspending.gov to estimate the frequency and magnitude of errors in the spreadsheet provided by the monitoring and evaluation team. During testing, OIG found that the information provided by AF was not always complete or accurate. For example, the testing showed that the data was missing information such as the name of the partner nation, project file identification number, funding channel, regional program, implementor, project status, project capacity, or TSCTP objective. OIG also found problems with accuracy. For example, three awards list the country of performance as Benin, which is not a TSCTP partner country. To overcome these deficiencies, OIG discussed with AF officials the limitations of the data and obtained a better understanding of methodology they use to compile and update the data. As a result, OIG determined that the data was sufficiently reliable for selection of the awards outlined in this audit.

Sampling Methodology

OIG selected eight TSCTP contracts, grants, and cooperative agreements using a risk-based selection method for review. OIG gathered a universe of 290 TSCTP awards that AF implemented from FY 2016 through FY 2018, totaling approximately \$440 million. OIG judgmentally selected six contracts, one grant, and one cooperative agreement based on the amount of obligated funds, project risk, recipient, and award type. As of October 2019, the total value of the eight selected awards was \$209,587,355. Table A.1 provides detailed information on the eight selected awards.

Table A.1: TSCTP Projects OIG Reviewed

Contract	Recipient	Contract Name	Value
Contracts			
19AQMM18F3925	PAE	G5 Force Support	\$113,167,134
SAQMMA17F4534	PAE	Regional Boat Capability Program	\$10,165,351
SAQMMA15F3886	AECOM	Logistical Support for Counter Boko Haram	\$64,027,357
19AQMM18F4237	SkyBridge	Vehicle Maintenance Facility	\$3,755,511
SAQMMA17F3555	PAE	Salak Air Base Expansion	\$3,302,260
19AQMM18F4856	Relyant	Niger C-130 Hangar	\$7,161,718
Grant			
SUV70018GR0041	IQRA	Sowing the Seeds of Peace	\$250,000
Cooperative Agreement			
SLMAQM17CA1212	International Organization for Migration	Demobilization, Disassociation, Reintegration, and Reconciliation	\$7,758,024
Total			\$209,587,355

Source: OIG generated from information provided by AF.

Invoice Review Selection Methodology

OIG conducted a financial review of four contracts out of eight contracts, grants, and cooperative agreements in the audit sample. OIG judgmentally selected these four contracts because they were the highest valued contracts in the audit sample and/or OIG identified those contracts as those with issues in a April 2020 management assistance report.⁵⁵ Within the four contracts, OIG reviewed all 43 invoices (100 percent) that were submitted in FY 2019. Table A.2 shows the number of invoices OIG reviewed and their value.

Table A.2: OIG Invoice for Selected Projects

Contract	Contractor	Contract Name	Number of Invoices	Value of Invoices Reviewed
19AQMM18F3925	PAE	G5 Force Support	10	\$89,511,708 ^a
SAQMMA17F4534	PAE	Regional Boat Capability Program	17	\$10,165,351
SAQMMA17F3555	PAE	Salak Air Base Expansion	6	\$3,302,260
19AQMM18F4856	Relyant	Niger C-130 Hangar	10	\$5,984,138
Total			43	\$108,963,457

^a Some of the projects were still being implemented at the time of OIG's request for information. Therefore, the value of invoices may change.

Source: OIG generated from analysis of data provided by AF.

Work Related to Internal Control

OIG considered several factors, including the subject matter of the project, to determine whether internal control was significant to the audit objective. Based on its consideration, OIG determined that internal control was significant for this audit. OIG then considered the components of internal control and the underlying principles included in the *Standards for Internal Control in the Federal Government*.⁵⁶ According to the Government Accountability Office, considering internal controls in the context of a comprehensive framework can help auditors to determine whether underlying deficiencies exist.⁵⁷

For this audit, OIG concluded that two internal control components were significant to the audit objective: Control Environment and Control Activities. The Control Environment component is the foundation for an internal control system; it provides the discipline and structure to help an entity achieve its objectives. The Control Activities component includes the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system. OIG also concluded that four principles related to the two components were significant to the audit objective as described in Table A.3.

⁵⁵ OIG, *Management Assistance Report: The Bureau of African Affairs Should Improve Performance Work Statements and Increase Subject Matter Expertise for Trans-Sahara Counterterrorism Partnership Projects* (AUD-MERO-20-29).

⁵⁶ Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

⁵⁷ Government Accountability Office, *Government Auditing Standards*, 124 (GAO-18-568G, July 2018).

Table A.3: Internal Control Components and Principles Identified as Significant

Components	Principles
Control Activities	Management should design control activities to achieve objectives and respond to risks.
Control Activities	Management should implement control activities through policies.
Control Environment	Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.
Control Activities	Management should design the entity's information system and related control activities to achieve objectives and respond to risks.

Source: OIG generated from GAO's *Standards for Internal Control in the Federal Government*.

OIG performed steps to gain an understanding of internal controls related to the components and principles identified as significant. For example, OIG reviewed relevant Federal regulations and Department policies that provide guidance for administering foreign assistance awards, including contract performance and financial oversight responsibilities. OIG also performed tests to assess the presence and implementation of internal controls. Specifically, OIG:

- Tested some of the “control activities” principles for *contract performance monitoring* by reviewing policies, procedures, and processes in place to guide individuals in monitoring the TSCTP award activities.
- Tested some of the “control activities” principles for *financial monitoring* by reviewing policies and procedures in place to conduct invoice reviews.
- Tested some of the “control activities” principles for *evaluation and coordination* by reviewing information system and related control activities in place to respond to risks (for instance, the risk of not being able to have sufficient information to make decisions).
- Tested some of the “control environment” principles for *coordination* by reviewing AF's organizational structure, assignment of responsibilities, and delegation of authority.

Internal control deficiencies identified during the audit that are significant within the context of the audit objective are presented in the Audit Results section of this report.

Prior Office of Inspector General Reports

In the August 2009 report *Inspection of the Bureau of African Affairs* (ISP-I-09-63), OIG reported that there were not enough contracting officer's representatives (CORs) in AF's Office of Regional Peace and Security to effectively administer a program's contracts. OIG recommended that AF hire additional full-time employees with contracting skills to serve as program managers and CORs. OIG offered 24 recommendations, all of which are closed.

In the August 2010 report *Audit of Allegations Pertaining to Contract With DynCorp International for the Security Sector Transformation Project in South Sudan, Africa* (AUD-SI-10-23), OIG reported that ineffective contractor oversight and monitoring by AF was caused by the COR's lack of experience in monitoring construction contracts. OIG recommended the Office of

Acquisitions Management ensure AF have sufficient on-site contract technical support to regularly monitor and report on contract progress. OIG offered three recommendations to the Office of Acquisitions Management, all of which are closed.

In the August 2014 report *Audit of the Administration and Oversight of Contracts and Grants within the Bureau of African Affairs* (AUD-CG-14-31), OIG reported numerous deficiencies with AF's oversight of contracts and grants, including issues with COR delegation, use of site coordinators, and quality assurance plans. OIG recommended that AF and the Bureau of Administration, Office of the Procurement Executive, develop and implement processes and procedures to ensure proper oversight and ensure compliance with Federal laws and Department guidance. OIG offered 24 recommendations, all of which are closed.

In the January 2014 report *Audit of Department of State Selection and Positioning of Contracting Officer's Representatives* (AUD-CG-14-07), OIG reported that Department-wide COR workforce management and planning needed to be improved and COR-related policies required implementation guidance. OIG also found specific weaknesses related to AF's COR workforce management and made recommendations to improve contract administration within AF. OIG offered 10 recommendations, all of which are closed.

In the October 2017 report *Inspection of the Bureau of African Affairs' Foreign Assistance Program Management* (ISP-I-18-02), OIG reported deficiencies associated with the bureau's strategic oversight of foreign assistance programs as well as shortcomings related to program management, risk management, funds management, and administration of Federal assistance awards. OIG offered 10 recommendations to improve AF's management of foreign assistance programs, all of which are closed.

In the April 2020 report *Management Assistance Report: The Bureau of African Affairs Should Improve Performance Work Statements and Increase Subject Matter Expertise for Trans-Sahara Counterterrorism Partnership Projects* (AUD-MERO-20-29), OIG reported deficiencies with the performance work statements developed for contracts that support the execution of TSCTP projects, which ultimately led OIG to question \$14.6 million expended by the Department. OIG recommended that AF improve the development of performance work statements for TSCTP-supported projects and increase the level of subject matter expertise among personnel responsible for overseeing these projects. OIG offered seven recommendations, and as of June 2020, all seven recommendations are resolved pending further action.

In the May 2020 *Compliance Follow-Up Review Bureau of African Affairs' Foreign Assistance Program Management* (ISP-C-20-23), OIG reported that AF needed to document its foreign assistance business process, expand guidance for reclassifying Peacekeeping Operations funds, and establish controls to help ensure proper Federal assistance award oversight documentation. OIG offered three recommendations, and as of June 2020, all are resolved pending further action.

APPENDIX B: RESPONSE FROM THE BUREAU OF AFRICAN AFFAIRS




United States Department of State

Washington, D.C. 20520

August 27, 2020

UNCLASSIFIED

TO: OIG/AUD – Normal Brown

FROM: AF – Tibor P. Nagy 

SUBJECT: Draft Report on Audit of the Department of State Bureau of African Affairs
Monitoring and Coordination of the Trans-Sahara Counterterrorism Partnership
Program

The Bureau of African Affairs welcomes the opportunity to respond to this audit and to report that many of its recommendations are well on their way to being fulfilled. As reported to the OIG team and referred to in this report, the Office of Regional Peace and Security (AF/RPS), our principal office tasked with the implementation of our security assistance programs, has been undergoing a top to bottom reorganization for the last 12 months. This process has entailed a significant increase in staffing to manage programs and a dedicated policy analysis apparatus to ensure that programs on the ground and results they achieve can inform policy decisions and respond to Post priorities. We are confident that this reorganization is already bearing fruit and yielding responsive and more accountable investments in security assistance.

The Bureau accepts the recommendations described in this report and is committed to improvements in the quality, responsiveness, and accountability of our programs. We remain troubled by the distinction of the expenditure of \$200 million in program funds as “wasteful” by OIG audit standards. At the time of the audit, monitoring reports and equipment delivery back-up documentation for invoices for some projects were unavailable to the OIG team, but a wasteful designation implies that the expenditures were careless, extravagant, or to no purpose. While the regional project in question was not without flaws, AF/RPS and AQM took actions to safeguard and withhold proportional U.S. foreign assistance funds until vendor manufacturing and delivery delays were resolved. In the end, the contracted assistance was provided and many in our partner nations and the interagency point to successes in developing sustainable anti-terrorism capacity, and valuable lessons learned in its implementation. An audit finding of wasteful spending does not define these projects, nor the efforts of our whole-of-government team and their partner nation counterparts. Therefore, AF requests the OIG further clarify on the highlights page that the OIG’s characterization of wasteful only considers the identified weaknesses and not an assessment of the projects’ effectiveness or return on investment.

The Bureau of African Affairs works in some of the world’s most challenging environments and brings to this effort some of the Department’s most talented and dedicated team players. We are not daunted by the challenge of bringing sustainable change to security sector institutions nor the complex demands of monitoring and information sharing in the often isolated and unpredictable

environments where our programs are most needed. We are committed to full accountability, to ensuring that our programs respond to the realities on the ground in Africa, and to providing our diplomats and African partners with the tools they need to improve security and in turn improve the lives of those they serve.

Recommendation 1: OIG recommends that the Bureau of African Affairs develop and implement bureau-wide standard operating procedures for conducting invoice reviews that include (a) steps to independently verify contractor performance is acceptable; (b) methods to ensure payments are authorized, accurate, legal, and correct and that the goods were actually received or services were actually performed; and (c) validation that the certifying officer makes payments only after receiving approval from an officer with knowledge of the receipt of the goods or services covered by the voucher.

Management Response: The Bureau of African Affairs accepts the recommendation. The Bureau will work with its program offices to develop Bureau-wide invoice processing and review procedures.

Recommendation 2: OIG recommends that the Bureau of African Affairs develop and implement procedures that ensure personnel charged with monitoring and overseeing the Trans-Sahara Counterterrorism Partnership projects in the countries of performance are formally authorized to perform these functions through designation as a government technical monitor or alternate contracting officer's representatives in accordance with the Foreign Affairs Handbook Section 14 FAH-2 H-140.

Management Response: The Bureau of African Affairs accepts the recommendation. The Bureau will work with country teams, the Bureau of Political-Military Affairs (PM), and the relevant parts of the Department of Defense to develop formalized guidance with respect to the roles of field-based personnel in conducting monitoring and oversight of TSCTP programming. This effort will include identifying and designating the most appropriate field-based personnel as government technical monitors or alternate contracting officer's representatives. In cases where sufficient oversight personnel cannot be formally designated, AF will appropriately adjust programming to reflect these limitations.

Recommendation 3: OIG recommends that the Bureau of African Affairs (AF), in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) develop a monitoring plan template that can be tailored to each contract, a quality assurance surveillance plan template that can be tailored to each contract, and include these plans in the contract requirements checklist used by contracting officer's representatives (CORs) overseeing the Trans-Sahara Counterterrorism Partnership projects; and (b) ensure that CORs use these plans and other monitoring methods described in 14 FAH-2 H-520 to perform oversight of contracts.

Management Response: The Bureau of African Affairs accepts the recommendation. The Bureau will work with AQM and A/OPE to develop a standardized monitoring plan template and update the documentation requirements for solicitation packages to ensure they include these monitoring plans. Task order quality assurance surveillance plan

(QASP) templates are already used by the Bureau for all FY20 initiated task orders. QASP templates are managed and provided by AQM. There are simplified QASPs used for projects under \$5 million and full QASPs used for projects over \$5 million. The Bureau will develop a standard procedure to ensure that CORs properly make use of monitoring plans and QASPs.

Recommendation 4: OIG recommends that the Bureau of African Affairs develop a process to monitor assistance provided to host nations participating in the Trans-Sahara Counterterrorism Partnership. In doing so, the Bureau should consider the methods described in 14 FAH-2 H-522.8, "Creative Monitoring," such as global positioning systems units to track the locations and travel of contractors, badge readers to determine number of individuals served at an event, and the use of radio frequency identification to track property, deliveries, and locations.

Management Response: The Bureau of African Affairs accepts the recommendation. The Bureau will consult both the relevant FAH reference and other bureaus/agencies engaged in similar activities to identify best practices to monitor assistance. AF will seek to identify which of those methods can be most effectively utilized within the TSCTP operating environment, to include the attendant human resourcing constraints, travel restrictions, and security limitations.

Recommendation 5: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether \$89,511,708 in questioned costs related to the G5 Force Support Task Order (contract 19AQMM18F3925) were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Management Response: The Bureau of African Affairs accepts the recommendation. Appropriate AF/RPS personnel will obtain all relevant documentation related to the expenditures, analyze that documentation, and notify the relevant AQM contracting officer of any costs that appear unallowable and/or unsupported. The final decision on whether to disallow/recover those costs will be a Contracting Officer decision.

Recommendation 6: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether \$10,165,351 in questioned costs related to the Regional Boat Capability Program (contract SAQMMA17F4534) were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Management Response: The Bureau of African Affairs accepts the recommendation. Appropriate AF/RPS personnel will obtain all relevant documentation related to the expenditures, analyze that documentation, and notify the relevant AQM contracting officer of any costs that appear unallowable and/or unsupported. The final decision on whether to disallow/recover those costs will be a Contracting Officer decision.

Recommendation 7: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether

\$3,302,260 in questioned costs related to the Salak Air Base Expansion (contract SAQMMA17F3555) were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Management Response: The Bureau of African Affairs accepts the recommendation. Appropriate AF/RPS personnel will obtain all relevant documentation related to the expenditures, analyze that documentation, and notify the relevant AQM contracting officer of any costs that appear unallowable and/or unsupported. The final decision on whether to disallow/recover those costs will be a Contracting Officer decision.

Recommendation 8: OIG recommends that the Bureau of African Affairs in coordination with the Bureau of Administration, Office of the Procurement Executive, (a) determine whether \$5,984,138 in questioned costs related to the Niger C-130 Hangar (contract 19AQMM18F4856), were allowable and/or supportable; and (b) recover any costs determined to be unallowable and/or unsupported.

Management Response: The Bureau of African Affairs accepts the recommendation. Appropriate AF/RPS personnel will obtain all relevant documentation related to the expenditures, analyze that documentation, and notify the relevant AQM contracting officer of any costs that appear unallowable and/or unsupported. The final decision on whether to disallow/recover those costs will be a Contracting Officer decision.

Recommendation 9: OIG recommends that the Bureau of African Affairs develop a written framework and work with other Government entities to achieve a whole-of-government approach in the execution of the Trans-Sahara Counterterrorism Partnership program that includes elements such as roles and responsibilities, organizational structure, and coordination mechanisms.

Management Response: The Bureau of African Affairs accepts this recommendation and has begun internal discussions to reinvigorate TSCTP policy leadership to improve coordination and implementation. This may include a working level TSCTP interagency cell tasked with routine coordination and will certainly include more regular steering committees involving interagency leadership. Legislation currently under review in the House and Senate would, if it becomes law, direct the Department to undergo a new strategy development process and additional reporting for various components of TSCTP. Independent of this draft legislation, AF plans to lead a revision of the TSCTP strategy given changes in the threat environment since the inception of the program in 2005. AF also plans to formalize the roles and responsibilities of various TSCTP actors to ensure clarity and accountability.

Recommendation 10: OIG recommends that the Bureau of African Affairs establish and implement memoranda of understanding with the Office of Security Cooperation and other partners, as applicable, to describe roles and responsibilities for coordinating, executing, and monitoring Trans-Sahara Counterterrorism Partnership (TSCTP) projects in the countries where TSCTP is implemented, including establishment of a structure for communicating and coordinating in-country.

Management Response: The Bureau of African Affairs accepts the recommendation. The Bureau of African Affairs, in coordination with PM, will establish and implement memoranda of understanding with the Office of Security Cooperation and other partners, as applicable to describe roles and responsibilities for coordinating, executing, and monitoring Trans-Sahara Counterterrorism Partnership (TSCTP) projects in the countries where TSCTP is implemented, including establishment of a structure for communicating and coordinating in-country.

Recommendation 11: OIG recommends that the Bureau of African Affairs, in coordination with relevant bureaus, establish, populate, and maintain a central repository of all Trans-Sahara Counterterrorism Partnership projects, accessible to those involved with the execution of projects, that includes project name and identification number, the project proposal, the award mechanism, a detailed description of the project, and project documentation needed for implementation.

Management Response: The Bureau of African Affairs accepts the recommendation and notes that in the past year, AF/RPS has built a central repository of information on TSCTP PKO, the Partnership for Regional East Africa Counterterrorism (PRACT) PKO, and Africa Regional Counterterrorism (ARCT) PKO-funded programs. The repository is accessible to interagency partners organizing information, from proposals, to periodic reporting, to contract documentation, primarily by country or by funding mechanism. For the State projects covered by this audit, AF/RPS counts a total of 1,500 documents accessible on its portal. For this portal to capture all TSCTP projects, across all accounts, the interagency, other bureaus and agencies would have to bear some of the costs of its maintenance. This points to the ongoing Department challenge of comprehensive data on foreign assistance funding. Until such time as F, M/SS, and other relevant offices develop a consistent, comprehensive tracking system, AF intends to maintain its repository of TSCTP PKO information.

Recommendation 12: OIG recommends that the Bureau of African Affairs determine and take steps to hire the appropriate number of staff needed to manage, administer, and support the Trans-Sahara Counterterrorism Partnership projects.

Management Response: In the spring of 2019, the office started a rigorous process to analyze our structure and staffing to understand how we could better meet our office's mission and vision. As of June 1, 2020, the Department approved the Bureau's reorganization of the now Office of Regional Peace and Security (AF/RPS). AF/RPS established two divisions, each led by a GS-15 Deputy Director. The Plans and Programs division specifically focuses on the design, expenditure, and management of U.S. foreign assistance funds. Plans and Programs includes a Central and West Team that includes four government staff (a Team Lead and three Program Analysts). The three Program Analysts lead on AF/RPS-managed TSCTP programs in their assigned countries of responsibility. Additionally, AF/RPS added three key contracted positions to support the office: a second financial analyst, a construction specialist, and contracts analyst focusing on procurement packages (e.g., Statements of Work and Performance Work

Statements). This staffing complement effectively doubles the amount of staff time dedicated to TSCTP planning and programming functions.

Recommendation 13: OIG recommends that the Bureau of African Affairs establish and lead a working group to develop and implement an action plan to address the longstanding challenges associated with monitoring and coordinating the Trans-Sahara Counterterrorism Partnership projects.

Management Response: The Bureau of African Affairs accepts the recommendation. The Bureau notes that it is anticipating upcoming legislation that may impact how the Department manages the overall TSCTP program moving forward. With that said, in the interim, the Bureau will convoke regular meetings of the Standing Interagency Working Group and (as needed) DAS-level oversight committee to discuss the monitoring and coordination issues identified in this report. These sessions will seek to identify lessons learned and best practices from across the TSCTP community and discuss how those practices can be implemented in a more consistent manner across the different implementing bureaus and agencies.

Approved: Tibor P. Nagy (TPN)

Drafted: Melanie Wilhelm, AF/RPS. 202.615.4052

Clearances:

AF – A/PDAS Elizabeth Fitzsimmons (ok)
AF – DAS Harrington (ok)
AF – A/DAS Fitrell (ok)
AF/RPS: TRoberts-Pounds ok
AF/RPS: CPommerer ok
AF/RPS: CTringale. Ok
AF/RPS: DManning. ok
AF/ERA: PBrown ok
AF/ERA: JCohen. ok
AF/PPD: NSadoski ok
AF/W: BWiselogle ok
AF/EX: KKeshap ok
PM: RFeatherstone ok
Ouagadougou: SCeasaux. ok
Niamey: JKrischke ok
Yaounde: JBah ok

ABBREVIATIONS

AF	The Bureau of African Affairs
COR	Contracting Officer's Representative
Department	The Department of State
DoD	Department of Defense
FAD	Federal Assistance Directive
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAR	Federal Acquisition Regulation
GAO	Government Accountability Office
GTM	Government Technical Monitor
OIG	The Office of Inspector General
OSC	Office of Security Cooperation
TSCTP	Trans-Sahara Counterterrorism Partnership
USAID	United States Agency for International Development

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