



Office of Inspector General
United States Department of State

ISP-I-22-15

Office of Inspections

September 2022

Inspection of the Global Engagement Center

DOMESTIC OPERATIONS



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-22-15

What OIG Inspected

OIG inspected executive direction, policy implementation, federal assistance, resource management, and information technology and records management operations at the Global Engagement Center.

What OIG Recommends

OIG made 18 recommendations to the Global Engagement Center.

In its comments on the draft report, the Global Engagement Center concurred with all 18 recommendations. OIG considers all 18 recommendations resolved. The Global Engagement Center's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The center's formal response is reprinted in its entirety in Appendix B.

September 2022

OFFICE OF INSPECTIONS

DOMESTIC OPERATIONS

Inspection of the Global Engagement Center

What OIG Found

- The Global Engagement Center, under its current leadership, strengthened its relationships in the interagency community, the Department of State, and with international partners while conducting significant work to counter disinformation overseas that threatens U.S. security interests.
- Despite having a clear legal mandate to coordinate Department and interagency efforts to counter propaganda and disinformation by foreign state and non-state actors, the center's legacy organizational structure, insufficient internal controls to properly manage contractors, and a limited strategic planning process affected its ability to fully meet its mission.
- The center's leadership faced a considerable challenge to address a work environment that created Equal Employment Opportunity concerns among staff.
- The center did not conduct risk assessments and obtain authorizations to operate its global and U.S. government analytics platforms.
- Spotlight on Success: The center's August 2020 report, *The Pillars of Russia's Disinformation and Propaganda Ecosystem*, assisted foreign governments, civil society, academia, and media to increase their resilience by exposing Russian disinformation tactics and sources.
- Spotlight on Success: The Tech Challenges program, a series of regional competitions, advanced innovative solutions to counter adversarial disinformation by funding new technologies and offering a forum to highlight and connect entrepreneurs.

CONTENTS

CONTEXT	1
EXECUTIVE DIRECTION	3
Tone at the Top and Standards of Conduct	4
Center’s Work Environment Created Equal Employment Opportunity Concerns	5
Adherence to Internal Controls.....	6
Impact of COVID-19 Pandemic.....	6
Execution of Foreign Policy Goals and Objectives	7
POLICY IMPLEMENTATION.....	14
FEDERAL ASSISTANCE	16
RESOURCE MANAGEMENT	18
INFORMATION TECHNOLOGY AND RECORDS MANAGEMENT	20
RECOMMENDATIONS	25
PRINCIPAL OFFICIALS	31
APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY.....	32
APPENDIX B: MANAGEMENT RESPONSE	34
APPENDIX C: FUNCTIONS OF THE GLOBAL ENGAGEMENT CENTER	39
ABBREVIATIONS	40
OIG INSPECTION TEAM MEMBERS	41

CONTEXT

The Global Engagement Center (GEC) is tasked with leading and coordinating U.S. interagency activities to identify and counter foreign state and non-state disinformation and propaganda which threaten U.S. national and security interests. It is the newest in a series of “centers” dating from 2006 that the Department of State (Department), Congress, and the White House established to coordinate interagency efforts in this area.¹ GEC also coordinates with foreign governments and private sector entities, including academic institutions and social media companies.

According to GEC leadership, the problem of disinformation is serious and growing. Prominent recent examples of disinformation used to threaten U.S. national security include the attempt to influence the 2020 U.S. elections and ongoing efforts to spread disinformation about the safety of U.S.-produced COVID-19 vaccines. Foreign actors spend billions of dollars on disinformation campaigns to establish and legitimize their narratives using constantly changing technology, requiring an agile response from the U.S. government.²

In March 2016, then-President Obama signed Executive Order 13721, which required the Secretary of State to establish GEC. Like the structure and purpose of its predecessor offices, the executive order stated that GEC “shall lead the coordination, integration, and synchronization of Government-wide communications activities directed at foreign audiences abroad and in order to counter the messaging and diminish the influence of international terrorist organizations....” In December 2016, the FY 2017 National Defense Authorization Act (NDAA) expanded GEC’s responsibilities beyond countering terror organizations, requiring the center to “lead, synchronize, and coordinate efforts of the federal government to recognize, understand, expose, and counter foreign state and non-state propaganda and disinformation efforts aimed at undermining United States national security interests.”³ A clause in the 2017 NDAA legislation, still in effect, calls for the center to cease operations in 2024.⁴ In August 2018, the FY 2019 NDAA further amended GEC’s mandate, including adding requirements to measure and evaluate the center’s activities in coordinating counter-disinformation efforts. The complete list of amended GEC authorities is in Appendix C.

At the time of the inspection, GEC’s FY 2018-2022 Functional Bureau Strategy (FBS), articulated its vision to be a “data- and research-driven Mission Center leading U.S. interagency efforts to

¹ Before Executive Order 13721 established GEC, the office existed as the Counterterrorism Communication Center from 2006 to 2008, the Global Strategic Engagement Center from 2008 to 2010, and the Center for Strategic Counterterrorism Communications from 2010 to 2016.

² “The Global Engagement Center: Leading the United States Government’s Fight Against Global Disinformation Threat,” hearing before the Subcommittee on State Department and USAID Management, International Operations, and Bilateral International Development of the Committee on Foreign Relations, United States Senate, March 5, 2020.

³ Public Law No. 114-328 § 1287(a)(2), page 548.

⁴ 2017 NDAA, Section 1287(i), states, “The Center shall terminate on the date that is 8 years after the date of the enactment of the Act.”

proactively address foreign adversaries' attempts to use disinformation and propaganda to undermine U.S. interests."⁵ The FBS, updated on April 30, 2021, includes five goals:

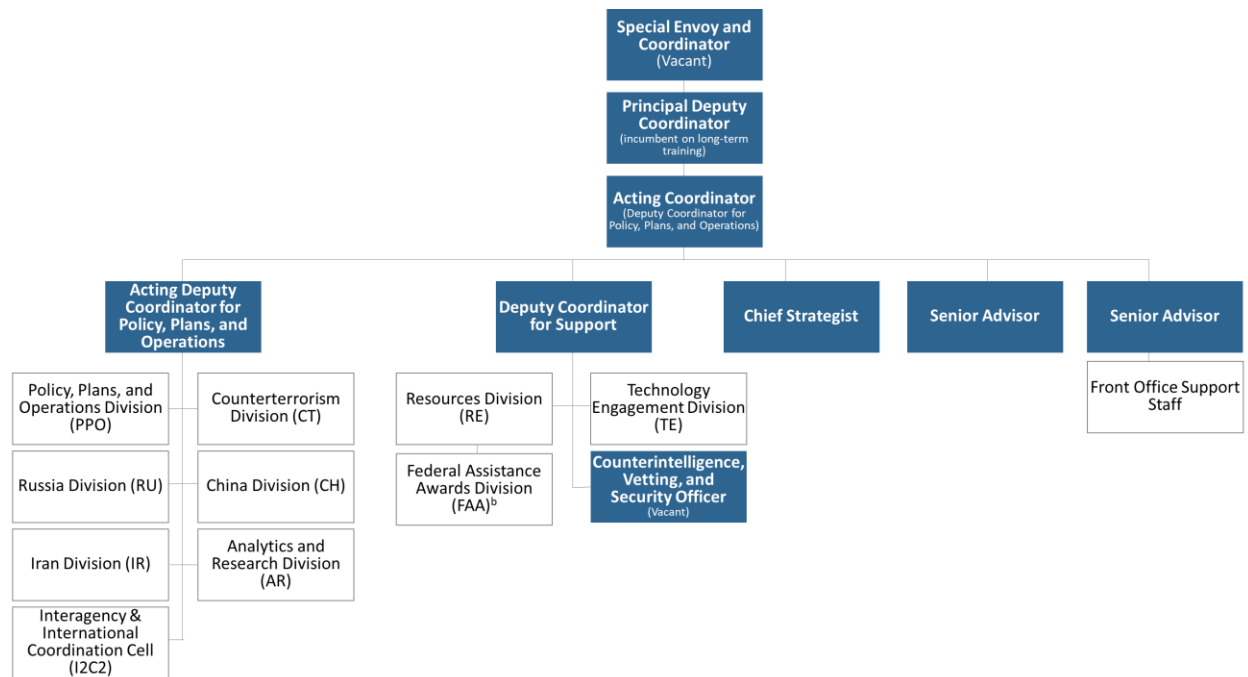
- To convene and lead a network of U.S. government interagency, international, civil society, and expert partners to regularize coordination and build U.S. government and partner capacity to recognize, understand, expose, and counter foreign state and non-state propaganda and disinformation.
- To lead and coordinate best-in-class technologies, analytics, and research for the U.S. government and its partners to integrate into efforts that address current and emerging adversarial propaganda and disinformation threats targeting the United States, its allies, and its partners.
- To degrade foreign violent extremist organizations' ability to attract potential recruits and confront violent ideologies that threaten U.S. national security.
- To expose, deny, degrade, and disrupt the capability and effectiveness of foreign, state-sponsored propaganda and disinformation efforts aimed at undermining or influencing the policies, security or stability of the United States, its allies, and its partners.
- To establish effective management processes and best practices that result in aligning resources to strategic priorities, achieving appropriate staffing with highly qualified and diverse talent, and creating a cohesive and innovative work culture with emphasis on mission fulfillment.

GEC's authorized staffing at the time of the inspection consisted of 21 Civil Service and 15 Foreign Service positions. In addition, it had 8 employees listed as temporary personnel, 6 staff detailed to or from other U.S. government agencies, and 117 contractors (personal services and third-party) for a total of 167 staff members. An acting Coordinator led GEC. The Front Office staff consisted of the acting Coordinator, a Principal Deputy Coordinator, two Deputy Coordinators, two Senior Advisors, and a Chief Strategist.⁶ As shown in Figure 1, below, GEC has nine offices, including four threat divisions related to China, Iran, Russia, and counterterrorism. The remaining offices are the divisions of Analytics and Research; Policy, Plans, and Operations; Resources; Technology Engagement; and the Interagency and International Coordination Cell. The Resources Division, with assistance from three Department bureaus,⁷ provides management support to the center. Because of the COVID-19 pandemic, approximately 88 percent of GEC's staff were teleworking full time as of October 2021.

⁵ Functional Bureau Strategy, GEC, updated April 30, 2021, page 12.

⁶ At the time of the inspection, the Principal Deputy Coordinator was on detail to the National Defense University.

⁷ The Office of the Under Secretary for Public Diplomacy and Public Affairs' Office of Policy, Plans, and Resources provides financial management support; the Executive Office of the Bureau of Education and Cultural Affairs provides general services and travel support; and the joint Executive Office of the Bureaus of European Affairs and International Organizations provides human resources support.

Figure 1: Global Engagement Center Organization Chart^a

^a Organization chart as of November 12, 2021.

^b At the time of the inspection, the Federal Assistance Awards Division was operating as part of the Resources Division.

Source: OIG generated from information obtained from the Global Engagement Center.

GEC's FY 2020 budget totaled \$74.26 million, of which \$60 million was appropriated by Congress. GEC federal assistance programs⁸ totaled approximately \$15.7 million in FY 2019-2020 and approximately \$16.9 million in FY 2020-2021. GEC in FY 2020 also spent \$16.2 million on analytics, research, and technology.

OIG evaluated the center's executive direction, policy implementation, federal assistance, resource management, and information technology and records management operations consistent with Section 209 of the Foreign Service Act of 1980.⁹ A classified annex to this report discusses the inspection's classified and Sensitive But Unclassified findings.¹⁰

EXECUTIVE DIRECTION

OIG assessed GEC's leadership based on interviews, questionnaires completed by center staff, reviews of documents, and observations of GEC events. OIG also conducted interviews with

⁸ GEC used funds from the following appropriation accounts for its federal assistance programs: Diplomatic Program Public Diplomacy Funding (0113.7); Covid Supplemental; Assistance for Europe, Eurasia, and Central Asia; and Countering Chinese Influence Fund, part of the Economic Support Fund appropriation.

⁹ See Appendix A.

¹⁰ OIG, *Classified Annex to the Inspection of the Global Engagement Center* (ISP-S-22-15A, September 2022).

Department and interagency partners regarding GEC's implementation of its NDAA responsibilities and its role in the interagency policy process.

Tone at the Top and Standards of Conduct

GEC, created in 2016, has lacked a presidentially appointed special envoy and coordinator for nearly half of its existence. The current acting Coordinator, who joined GEC in 2018 after serving in the National Security Council, assumed that role in July 2021. She previously served as the center's acting Principal Deputy Coordinator, Deputy Coordinator for Policy, Plans and Operations, and Director of GEC's China Threat Division. The current Principal Deputy Coordinator also served as the acting Coordinator several times, including from January 2017 to January 2019 and from February to July 2021, after which he began a 10-month detail to the National Defense University. The Deputy Coordinator for Support, who joined GEC in August 2020, and the acting Deputy Coordinator for Policy, Plans and Operations, who joined in July 2021, are both Foreign Service officers.

Overall, OIG found that GEC leadership at the time of the inspection—the acting Coordinator, acting Deputy Coordinator for Policy, Plans and Operations, and Deputy Coordinator for Support—set a generally positive tone at the top, consistent with the Department's leadership and management principles in 3 Foreign Affairs Manual (FAM) 1214.¹¹ The acting Coordinator, in OIG questionnaires, received positive ratings from staff for modeling integrity. GEC leadership also communicated the importance of adhering to internal controls and ethics to GEC staff. In addition, center staff told OIG that paper coordination and flow between GEC divisions and the Front Office, along with the speed of decision-making, had improved under the current leadership. GEC leadership communicated frequently with staff through multiple weekly meetings with center division directors. GEC leadership also held virtual all-hands meetings to communicate broad, center-wide developments and to reach employees below the director level. In meetings observed by OIG, GEC leadership maintained a collegial atmosphere, solicited input, and recognized staff for their accomplishments. However, as discussed below, GEC leadership faced a considerable challenge to address a work environment that created Equal Employment Opportunity (EEO) concerns among GEC's employees.

OIG found that GEC, under its current leadership, strengthened its relationships in the interagency community, the Department, and with international partners. Based on interviews, observations, and a review of calendars and documents, OIG determined the acting Coordinator and other Front Office officials engaged regularly and collaborated with senior Department officials, counterparts in other agencies, the National Security Council, Members of Congress, and foreign government officials in support of GEC's mission. In addition, the acting Coordinator briefed newly appointed ambassadors before they assumed their overseas duties and participated in the Foreign Service Institute's ambassadorial seminar.

¹¹ The Department's leadership and management principles outlined in 3 FAM 1214b include (1) model integrity, (2) plan strategically, (3) be decisive and take responsibility, (4) communicate, (5) learn and innovate constantly, (6) be self-aware, (7) collaborate, (8) value and develop people, (9) manage conflict, and (10) foster resilience.

Center's Work Environment Created Equal Employment Opportunity Concerns

OIG found that GEC leadership faced a considerable challenge to address a work environment that created Equal Employment Opportunity (EEO) concerns among GEC's employees, detailees, and contractors (staff). Responses to OIG questionnaires and interviews with GEC staff showed that they had concerns about disparate treatment, including harassing behaviors. Furthermore, a February 2020 climate survey of GEC staff conducted by the Department's Office of the Ombudsman found that 26 of 74 respondents reported experiencing profanity, demeaning jokes, rumors, gossip, and harassment, and 25 of 74 reported experiencing unfair career blocking or advancement. Additionally, a survey conducted by GEC's Diversity and Inclusion Council in February 2021 reported similar staff concerns regarding workplace discrimination including harassment.¹² Finally, the Department's Office of Civil Rights (S/OCR) reported that GEC staff filed 26 complaints between February 2020 and October 2021.¹³ S/OCR told OIG the number of complaints was high, given GEC's relatively small size.

OIG determined that GEC's structure, limited hiring and advancement opportunities, and the center's diverse workforce—a cross-cultural mix of Department Foreign Service and Civil Service employees, detailees from other government agencies, and large numbers of contractors—contributed to tensions in the work environment, most significantly in the Counterterrorism (CT) Division. In that division, staff told OIG that the work environment was unhealthy and risked hindering the center's ability to accomplish its mission. However, tensions in the work environment were not limited to the CT Division. For example, according to OIG interviews with GEC staff and S/OCR, an August 2021 Diversity and Inclusion Council session on civil service hiring opportunities turned contentious, resulting in five EEO complaints and the resignation of several council members.

The acting Coordinator, who assumed her position shortly before the start of the inspection, told OIG she recognized that GEC's work environment was creating EEO concerns among her staff. She also acknowledged that staff were concerned that leadership was not taking action to address complaints, but she said that privacy considerations precluded public discussions of actions taken in response to specific EEO complaints. However, to address the challenging work environment, the acting Coordinator communicated the importance of adhering to EEO principles in emails to staff; participated in Diversity and Inclusion Council activities, including one on women in the workplace; and took steps to mitigate staff conflicts as they rose to her attention. The Deputy Coordinator for Support also met with individuals to address specific complaints and engaged with the Diversity and Inclusion Council to provide program direction and address broader concerns, such as opportunities for advancement. In addition, at the time

¹² According to the Diversity and Inclusion Council's February 2021 survey, 32 percent of surveyed staff reported experiencing discrimination, including harassment; 45 percent said they feared retaliation if they spoke up about discrimination; and 47 percent believed GEC did an insufficient job in preventing discrimination from taking place.

¹³ Most of the 26 complaints were resolved through informal processes, but 7 EEO cases remained active as of November 2021. Some cases involved multiple complaints from the same person, multiple complaints about the same individual, or involved complaints between two individuals in which each filed a complaint against the other.

of the inspection, GEC leadership was in the process of hiring a new diversity and inclusion specialist to work with the council on program activities.

In discussing this matter with OIG, GEC leadership acknowledged that more needed to be done to improve GEC's work environment. The leaders agreed to invite S/OCR to provide EEO training for all direct-hire employees and supervisors, as well as contractors. They also committed to increase center-wide messaging on what constitutes an EEO violation, including harassment, and what official channels and remedies exist to address these problems. Due to GEC leadership's actions, both taken and planned, OIG did not make a recommendation to address this issue.

Adherence to Internal Controls

OIG found the acting Coordinator communicated the importance of adhering to internal controls to GEC staff in meetings and through emails and reviewed the effectiveness of internal controls in preparing the center's 2021 Annual Management Controls Statement of Assurance.¹⁴ The statement identified seven office-level deficiencies and described GEC's steps to mitigate them. OIG identified some of these same deficiencies, as well as other issues, and determined that GEC's management controls did not meet Department standards in the areas of contract management, financial management, federal assistance management, employee training, information technology, and security. These issues are discussed in more detail later in this report and in the classified annex.

Impact of COVID-19 Pandemic

In response to the COVID-19 pandemic, GEC pivoted to a maximum telework posture in spring 2020, which affected workplace esprit de corps and execution of GEC's program objectives. Many GEC staff members told OIG they were able to continue their work during the pandemic; however, some staff members found that the lack of face-to-face interaction increased conflict. A leader linked a breakdown in trust among teams to the fact that they had not worked together in person. Recently arrived staff members told OIG they faced challenges integrating into teams and onboarding remotely. Additionally, according to GEC leadership, the need for some staff members to work on classified systems created unbalanced workload issues in some offices between on-site staff and those working remotely. Moreover, travel restrictions meant the center's grants team relied on desk reviews, emails, and phone calls to monitor recipient performance. Security issues related to the pandemic and telework are addressed in the classified annex.

The pandemic affected grantees as well. For example, some GEC grant program recipients requested extensions to the period of performance in order to complete projects. In addition, one cooperative agreement was suspended for several months until the recipient could determine how to implement its travel provisions under COVID-19 restrictions.

¹⁴ As described in 2 FAM 024d, these guidelines require managers to assess risks and management controls, report deficiencies, and take corrective action on identified deficiencies.

GEC started taking steps to return to the physical office in November 2021 by completing the Department's Mobility Assessment Tool¹⁵ and finalizing staff telework agreements.

Execution of Foreign Policy Goals and Objectives

Center's Role Limited to Supporting Rather Than Leading and Coordinating Efforts to Counter Propaganda and Disinformation

Since its inception in 2016, the center has significantly expanded its staffing, analysis, and programming, enabling it to increase support to the Department and interagency community by producing analysis and research, building international partnerships, executing programs and campaigns, and advancing technology collaboration. In OIG interviews, stakeholders said that, overall, GEC's policy and program offices developed effective interdepartmental and interagency relationships and supported the Department's bureaus and overseas missions. However, OIG observed, and GEC senior leadership and Department and interagency officials confirmed, the center's role in countering disinformation was limited to supporting the various U.S. government efforts rather than leading and coordinating a whole-of government approach as mandated by law.¹⁶

OIG found the center's approach toward fulfilling its interagency leadership and coordination responsibilities contributed to a lack of coordination among countering disinformation programs across the U.S. government, as discussed below. However, GEC also faced some significant external challenges outside its control, including multiple U.S. government agencies active in countering disinformation, some with competing coordination mandates and significantly more funding than GEC.¹⁷ For example, in the interagency community, the Department of Homeland Security,¹⁸ Department of Defense, and the Office of the Director of National Intelligence started their own individual agency efforts to counter disinformation.

Coordination issues also occurred within the Department. For example, Bureau of Counterterrorism officials told OIG that its relationship with GEC's CT Division was challenging,

¹⁵ The Mobility Assessment Tool is designed to create an equitable, standard, and objective methodology to help the Department determine the maximum telework eligibility for domestic positions.

¹⁶ Executive Order 13721, the 2017 NDAA, and 10 FAM 511a all state that GEC should lead, synchronize, and coordinate efforts across federal agencies and the Department to recognize, understand, expose, and counter foreign state and non-state propaganda and disinformation efforts aimed at undermining U.S. national security interests.

¹⁷ Contributing external factors included an ongoing National Security Council process which at the time of the inspection had yet to define agency roles and responsibilities; lack of Department senior leadership engagement asserting GEC's interagency leadership role; and disproportionately small GEC resources relative to other agencies' budgets for countering disinformation. In addition, many stakeholders in the disinformation environment continued to conflate GEC with a negative reputation created by its predecessor organization, the Center for Strategic Counterterrorism Communications.

¹⁸ The Department of Homeland Security leads the interagency community on disinformation efforts which threaten domestic national security, but many of these threats originate outside the United States, creating a competing mandate with GEC.

and that overall coordination and communication was poor, partially due to unclear points of contact within the division. In addition, they said GEC's CT Division did not always include Department bureaus when obtaining external stakeholder approval for documents and actions relevant to a bureau's issue areas. Similarly, based on interviews with Bureau of Near Eastern Affairs (NEA) and GEC staff, OIG found poor communication and coordination between the Iran Threat Division and NEA, caused in part by long-standing tensions over control of disinformation messaging in the region and its potential effect on Iran policy. For example, bureau staff told OIG that NEA refused to clear on new GEC programs because the programs did not fit into larger strategic priorities, or they were not tailored to meet the needs of its overseas posts. NEA staff and GEC staff cited an instance of a proposed GEC-funded program in Syria to counter Iranian propaganda and disinformation directed at U.S. policy that was not approved by NEA.

OIG found three main internal factors contributed to GEC's failure to fulfill its mandate: GEC's legacy organizational structure, exacerbated by communication issues and unclear chains of command and the lack of permanent leadership; insufficient internal controls, including enough direct-hire staff trained to manage contracts, to ensure contractors, which comprised 70 percent of GEC's workforce, did not perform inherently governmental functions; and a limited strategic planning process, including a failure to implement a comprehensive program evaluation plan.

Center's Legacy Organizational Structure Limited its Effectiveness

Based on document reviews and interviews with GEC staff and stakeholders in the Department and the interagency community, OIG assessed that GEC's organizational structure and staffing limited its effectiveness. GEC's legacy structure—which evolved as its mission expanded from countering terrorism messaging primarily in the Middle East to a global response to foreign disinformation—was built around threat and diverse functional teams without a clear internal coordinating mechanism to set priorities matched to resources. In addition, OIG found that poor communication within and between divisions and unclear chains of command, as discussed below, hindered its ability to lead the government-wide effort to counter disinformation.

GEC conducted its own internal strategic personnel review and worked with the Bureau of Global Talent Management¹⁹ to conduct what it characterized as a "reorganization," approved by the Under Secretary for Management in January 2021. However, OIG determined the process merely formalized an existing contractor-heavy structure, cobbled together over GEC's history, which lacked many of the components identified as important elements of government reorganization in 1 FAM 014.2 and by the Government Accountability Office. These include establishing clear reporting lines, an assessment of potential duplication with other entities, an

¹⁹ The Bureau of Global Talent Management's Office of Organization and Talent Analytics provides workforce planning for both the Foreign Service and Civil Service, conducts reviews of all bureau program plans and budget submissions to recommend and justify allocation of human resources; and conducts special studies related to position classification, position management, occupational structure, compensation, workforce planning, or resource planning. See 1 FAM 233.13i, j, and o.

implementation plan, and a communication strategy.²⁰ In addition, OIG found no evidence that GTM, during the reorganization, had conducted a full workload assessment. According to Government Accountability Office guidance,²¹ strategic workforce planning should precede any staff realignments so that changed staff levels do not inadvertently produce skills gaps or other adverse effects that could result in increased use of overtime and contracting. Due to limited hiring authority during its initial creation, GEC relied heavily on contractors to meet its NDAA mandate; contractors continue to make up 70 percent of its staff.

OIG staff questionnaires and interviews indicated that despite the reorganization, GEC personnel continued to have broad concerns about the lack of communication within and among offices and unclear chains of command. In addition, Department and interagency community stakeholders expressed concerns regarding overlapping authorities and duplication of efforts with others who work in the disinformation environment, and confusion about what GEC's various components contributed to its overall mission. This was particularly true of the Policy, Plans, and Operations Division (PPO) and the Interagency and International Coordination Cell (I2C2), as discussed below.

Established initially by congressional mandate with limited resources, GEC has operated for much of its history without permanent leadership and as such, has generally not had someone advocating for GEC with senior administration or Department leaders.²² GEC's parent office, the Office of the Under Secretary for Public Diplomacy and Public Affairs, also lacked full-time, Senate-approved leadership for much of the center's history. This limited GEC's ability to engage at senior levels within the Department and the interagency community. In addition to formalizing its existing structure, GEC leadership at the time viewed the January 2021 reorganization as the first step in its efforts to become a full-fledged functional bureau within the Under Secretary's office. Without a thorough organizational assessment and implementation of its recommendations, however, GEC will continue to be limited in its ability to coordinate effectively with its Department and interagency partners and fully implement its mission.

Recommendation 1: The Global Engagement Center, in coordination with the Bureau of Global Talent Management, should conduct an organizational assessment and align the

²⁰ Government Accountability Office, *Government Reorganization Key Questions to Assess Agency Reform Efforts* pages 10-13, 15, and 18 (GAO-18-427, June 2018). This report states that reforms should address agency management challenges, such as those identified as fragmented, duplicative, or overlapping. In addition, agency cultural factors, such as staff composition, should be considered in developing change management strategies and organizational transformations should be led by a dedicated implementation team of high-performing leaders within the agency.

²¹ GAO-18-427, June 2018, page 18.

²² The Office of the Deputy Secretary for Management and Resources, during the inspection, indicated its intention to review of GEC's staffing and budget to determine what resources it needed to meet its mission. With support from the Office of the Under Secretary for Public Diplomacy and Public Affairs, GEC requested additional direct-hire staff and funding in FY 2022 and FY 2023, as well as elevation to full bureau status within the Department.

center's organizational structure with operational needs. (Action: GEC, in coordination with GTM)

Interagency and International Coordination Cell Operated Independently of the Policy, Plans, and Operations Division

Although the Department-approved reorganization showed I2C2 as part of PPO, OIG found the two entities continued to operate independently, leading to a lack of coordination within GEC and hindering the center's ability to meet its mandates. GEC staff told OIG this separation led to organizational silos within I2C2 and PPO, uncertainty among GEC staff about I2C2's role, and duplication of effort with GEC's threat teams. According to GEC documentation and interviews, PPO is responsible for coordinating center activities as well as acting as the "integrator" between the center, the Department, and the academic community, and separately, I2C2 is responsible for working with other government agencies. OIG found I2C2 worked with other U.S. government agencies as intended. However, OIG determined that PPO, with the exception of three sub-teams,²³ was unsuccessful in coordinating many GEC activities internally across the center. Several Departmental and interagency stakeholders told OIG that the different GEC threat and functional teams did not appear to coordinate their activities with each other. This caused Department staff to question the quality of GEC's coordination. In addition, PPO staff told OIG that GEC lacked established procedures and guidelines for how PPO should interact with functional and threat divisions and what role it should play in responding to emerging threats that did not fit within the established threat teams. Compounding this problem, GEC's current leadership did not provide direction on how I2C2 and PPO should collaborate as separate entities and with other divisions.

Guidance in 3 FAM 1214b(2) specifies a Department leadership principle is to provide clear focus and give direction, while 1 FAM 014.2(6)6.3 and 6.4 state that organizations should establish consistent, two-way communication that meets the specific needs of employees. In addition, 1 FAM 014.6 states that changes in organizational structure at the office level must receive advance written approval from the Under Secretary for Management. Employees told OIG that the decision to allow I2C2 to operate independently was due to a legacy operational concept and because of unresolved disagreements among GEC leaders on I2C2's role in GEC. The lack of clarity regarding PPO's role and authorities left the division unable to achieve its role of coordinating activities within GEC. In addition, the duplication and undefined roles and responsibilities between I2C2 and threat teams created inefficiencies and risked compromising GEC's international and interagency integration coordination mission.

Recommendation 2: The Global Engagement Center should clarify and codify the roles and responsibilities of the Policy, Plans, and Operations Division and the Interagency and International Coordination Cell in the Foreign Affairs Manual. (Action: GEC)

²³ OIG found the relatively small monitoring and evaluations staff, Network Engagement and Training team, and Academic and Think-Tank Outreach team generally performed well in their areas of responsibility.

Center Lacked Internal Controls to Properly Manage Contracts and Ensure Contractors Did Not Perform Inherently Governmental Functions

OIG found GEC lacked necessary internal controls, including sufficient direct-hire staff trained to manage contracts, as well as written procedures and documentation to ensure contractors did not perform inherently governmental functions which impeded its ability to fulfill its mandate.²⁴ Multiple contractors told OIG they were concerned about themselves or other contractors potentially performing inherently governmental functions. In addition, GEC staff expressed unease that contractors were making decisions to publish reports to the public without approval from a direct-hire employee. OIG learned that one contractor who managed a GEC program had limited interaction with the grants officer and did not receive guidance on whether a contractor presentation to a foreign government could be an inherently governmental function. Ensuring effective oversight for contractors was especially important because, as noted earlier, contractors made up 70 percent of GEC's staff. However, GEC was challenged to provide such oversight. For example, at the time of the inspection, the acting Deputy PPO Coordinator also served as the de facto supervisor for the Analytics and Research Division, which was composed solely of contractors. Thus, the acting Deputy PPO Coordinator was not only responsible for the daily supervision of the division's 43 contractors, but was also responsible for simultaneously overseeing six other divisions.²⁵ During the inspection, GEC took steps to fill the Analytics and Research Division's director and deputy director vacancies.

Guidance in 14 Foreign Affairs Handbook (FAH)-2 H-115 states that contracting officer's representatives must advise contractors of the limitations of their responsibilities and authority for functions that are not generally considered inherently governmental functions but may approach that category. GEC staff told OIG that, to strengthen oversight, the center had identified 12 direct-hire employees to serve as government technical monitors,²⁶ 6 of whom had completed training and been nominated to the contracting officer. Furthermore, GEC staff in June 2021 conducted a general overview session on contractors' roles and responsibilities. OIG recently published an audit that included nine recommendations intended to strengthen

²⁴ According to OMB Policy Letter 11-01, inherently governmental functions are defined as those that are so intimately related to the public interest as to require performance by federal government employees. Specifically, inherently governmental functions are anything that binds the United States to take or not take some action by contract, policy, regulation, authorization, or order; or to exert ultimate control over the acquisition, use, or disposition of the property, real or personal, tangible or intangible, of the United States. See also OIG, *Management Assistance Report: Internal Controls Are Needed to Safeguard Inherently Governmental Functions at the Global Engagement Center* (AUD-MERO-22-19, February 2022), which addresses contractors performing inherently governmental functions in the administration of GEC cooperative agreements.

²⁵ The acting Deputy PPO Coordinator supervised the Analytics and Research Division with advice from the former division director, who had moved into a non-supervisory role. The Analytics and Research Division also has a deputy director position, which had been unfilled since October 2019.

²⁶ According to the Code of Federal Regulations 642.271, the contracting officer may nominate government technical monitors to assist the contracting officer's representatives in monitoring performance due to their physical proximity to the contractor's workplace or because they hold the necessary knowledge or specialized skills.

internal controls over contract management.²⁷ Therefore, OIG did not make a recommendation to address this issue.

Center Unable to Determine Whether It Was Meeting Strategic Goals and Objectives

Another factor limiting GEC's ability to fulfill its mandate was GEC leadership's inability to accurately determine whether the center, with a \$74 million budget, was achieving its goals and objectives to counter state-sponsored disinformation campaigns aimed at the United States. OIG found that GEC leadership did not communicate its strategic priorities to the staff, update its major programs to reflect new FBS priorities, develop implementation plans for those priorities, or regularly review their progress. OIG also found that GEC did not implement a comprehensive program evaluation plan. In addition, OIG's review of GEC's strategic planning and risk assessment documents and activities—including its FBS, monitoring and evaluation efforts, and risk management guidance—found they did not meet Department standards.

Leadership Did Not Communicate Strategic Priorities to Employees or Use Functional Bureau Strategy as a Management Tool

In February 2019, GEC leadership took the initiative to revise its FBS out of cycle to match its goals with current mission priorities; the Department approved the revised FBS in April 2021. However, OIG found GEC leadership did not communicate the center's strategic priorities to its staff or develop an FBS implementation plan to use as a management tool, as required. Furthermore, GEC staff told OIG they did not use the strategy, which they described as being overly complex. As a result, GEC offices continued to be strategically siloed, relying on their own independent, internal strategies which often reflected lower-level priorities. Additionally, OIG found that GEC did not update its major programs to address new strategic priorities, such as countering disinformation networks and implementing the new GEC organizational structure. Finally, GEC did not hold regular FBS strategic reviews prior to the inspection.

Guidance in 18 FAM 301.2-4(D) states that bureaus must develop implementation plans for their strategies within the first quarter following approval. Furthermore, cable 16 STATE 122758²⁸ requires that Department leaders regularly assess progress against strategic objectives and maximize use of the FBS as a management tool to prioritize work and ensure staff are focused on achieving goals and objectives. GEC began quarterly FBS strategic reviews during the inspection, a positive step in communicating the center's priorities. However, without a comprehensive implementation plan, GEC risked that staff would continue to lack an understanding of the center's objectives, work priorities, and milestones necessary to strategically manage operations and align resources to support GEC's mandate.

Recommendation 3: The Global Engagement Center should approve a plan to implement its Functional Bureau Strategy, update its major programs to include key priorities, and assess

²⁷ AUD-MERO-22-19.

²⁸ Cable 16 STATE 122758, "Implementation of Strategic Progress Reviews, New Managing For Results Website, and Program Design and Performance Management Toolkit," Paragraph 3, November 15, 2016.

its execution by conducting regular reviews with its staff, in accordance with Department standards. (Action: GEC)

Center Lacked Comprehensive Program Evaluation Planning and Coordination

OIG found GEC failed to conduct required annual program evaluations and lacked a process to plan and coordinate evaluations, which limited the scope of its assessments. Instead, GEC directed most of its evaluations at counterterrorism to the exclusion of other GEC priorities, even though only 2 of the 10 strategic objectives in GEC's FBS were related to counterterrorism.²⁹ Guidance in 18 FAM 301.4-4a and b states that bureaus and independent offices should conduct evaluations to examine performance at a rate commensurate with the scale of their work, scope of portfolio, and size of their budget, with a minimum of one evaluation per year. Furthermore, bureaus and independent offices that manage foreign assistance program funds must evaluate all large programs³⁰ at least once in each large program's lifetime or every 5 years for ongoing programs. In addition, GEC used contract personnel who lacked decision-making authority as its evaluation coordinators, contrary to 18 FAM 301.4-4(A), which states that evaluation coordinators should have decision-making authority. OIG found that contract evaluation staff attempted to elicit planning decisions from GEC leadership, but Front Office delays in responding hindered the center's ability to adequately plan its evaluations over the entirety of its broad portfolio. Because GEC leadership did not establish a comprehensive evaluation plan, it was difficult for the center to determine the effectiveness of its programs. In addition, GEC risked losing key performance data on the relevance, efficiency, sustainability, and impact of its efforts.

Recommendation 4: The Global Engagement Center should appoint an evaluation coordinator with decision-making authority to conduct evaluations appropriate to its portfolio, in accordance with Department standards. (Action: GEC)

Leadership Did Not Incorporate Risk Management Into Planning or Decision-Making

OIG found GEC did not incorporate risk management into its planning or decision-making. Although the center's updated FBS identified 13 strategic risks, it provided clear risk response guidance for only 3 of them. Staff members told OIG they were unaware of any other collaborative or systematic organizational risk management processes used to identify risks to GEC's objectives, assess them, and develop responses. Furthermore, staff members said the FBS failed to address additional strategic risks, such as reputational risk,³¹ internal processes, duplication of work activity, contactor performance, pandemic impact, and staff vacancies. Guidance in 2 FAM 031c requires leaders to ensure risk management is a continuous process and is incorporated into planning and decision-making in a transparent and systematic way. In

²⁹ The remaining eight objectives addressed other strategic priorities such as state-sponsored disinformation, technology, research, and network building.

³⁰ As described in 18 FAM 301.4-4b, large programs are defined as those meeting or exceeding the median cost of programs, projects, or processes for that bureau or independent office.

³¹ Reputational risk is the risk that a failure to manage risk, external events, and external media or to fail to fulfill the agency's role could diminish the stature, credibility, or effectiveness of the agency.

addition, the *Standards for Internal Control in the Federal Government*,³² Principle 7, requires managers to identify, analyze, and respond to risks related to achieving objectives. Without an effective process to identify likely strategic risks and provide leadership guidance regarding those risks, GEC faces an increased risk of not anticipating and mitigating obstacles to its strategic objectives, as well as continued duplication of effort and organizational silos.

Recommendation 5: The Global Engagement Center should review risks to its strategic objectives, implement processes for identifying and responding to risk, and communicate risk response guidance to staff in accordance with Department standards. (Action: GEC)

POLICY IMPLEMENTATION

OIG assessed GEC's policy coordination, implementation, and leadership and management along various lines of effort, including producing analysis and research, building international partnerships, executing programs, campaigns, and initiatives to counter foreign disinformation, and advancing technology collaboration. As discussed earlier, GEC's role generally was limited to supporting, rather than leading, various U.S. government efforts to counter disinformation despite its legal mandate to do so. In this respect, OIG found GEC offices generally were effective in supporting Department programs to counter propaganda and disinformation, as discussed below. However, the reports prepared by the Analytics and Research Division received mixed reviews from the Department, interagency community, and other GEC offices, as also described below.

Center Offices Were Generally Effective in Supporting Programs to Counter Propaganda and Disinformation

Overall, OIG found that, in its support role, GEC's policy and program offices generally were effective in providing support and building constructive relationships with interdepartmental and interagency partners in accordance with 10 FAM 511. Most stakeholders OIG interviewed within and outside the Department commented positively about their interactions with GEC, and especially with the Russia and China Threat Divisions. They gave the center good marks for competence, communication, collaboration, and effectiveness in identifying priorities in countering disinformation, responding to requests for analysis, and executing programs and operations. For example, officials in regional bureaus praised GEC's role in supporting multilateral efforts to counter foreign disinformation and propaganda and, with Embassy Canberra, in creating a strong U.S.-Australia partnership to counter foreign information manipulation in the region. They also praised GEC efforts to assist certain partner countries vulnerable to malign foreign influence during important events, such as national elections, by assisting them in detecting, verifying, and responding to Russian-linked disinformation efforts. While intra-Department cooperation with the CT Division remained challenging, interagency and external partners told OIG they successfully engaged with the CT Division to counter communications-related radicalization and international terrorist recruitment. The Technology Engagement Division also developed effective relationships with Department, interagency, and

³² GAO-14-704G, September 2014, page 9.

private sector partners regarding the use of market research to identify potential future vendors of technologies for countering disinformation.

Spotlight on Success: Center's Reporting Exposed Russian Disinformation Tactics and Sources

The Global Engagement Center's August 2020 report, *The Pillars of Russia's Disinformation and Propaganda Ecosystem*, used publicly available reporting to expose Russian disinformation tactics and sources, in accordance with GEC's mandate in 10 FAM 511b(3)(c) and (d) and the FY 2017 National Defense Authorization Act. GEC produced the report to help foreign governments, civil society organizations, academia, the media, and the general public conduct their own analyses of Russian disinformation efforts and increase their resilience in response to those activities. According to GEC, the report helped to significantly degrade the reach of Russian proxy sites on social media platforms. GEC's external stakeholders told OIG the report added value to their own work and activities. Additionally, several Department stakeholders expressed hope that GEC would continue to produce similar analytic reports in the future.

Analytics and Research Division Reports Received Mixed Reviews

With the exception of IT issues covered in detail later in the report, OIG found the Analytics and Research Division's operations generally conformed to Department management requirements. However, there were divergent views from the Department, interagency community, and other GEC offices on the value of the reports³³ prepared by the division's contractor staff. For example, one regional office lauded a report on troll farms in El Salvador, while another overseas office highlighted a report regarding criticism of Chinese oppression of the Uyghur Muslims and praised GEC insights into Chinese messaging on Twitter. However, others told OIG they did not view the division's reports as responsive to their needs or containing usable information and criticized their lack of context and analysis. For example, one agency said a division report on the origins of COVID-19 lacked context to explain the data presented, resulting in the agency separately asking a threat division to provide a two-page summary detailing what the data signified. Furthermore, GEC's threat divisions, which requested many of the analytical reports, told OIG the report process was flawed because they were not involved in drafting the reports and did not see them prior to publication. In response to this criticism, the Analytics and Research Division's leadership told OIG that its analysts did not formulate policy but instead produced data-driven reports that influence policy and should not be affected by external considerations. OIG's classified annex addresses additional issues with the report process.

During the inspection, GEC developed a new clearance process that allowed the threat divisions to comment on division reports before they were finalized and the division to submit selected draft reports to Department bureaus and offices for review and comment. This process, if used as intended, will give stakeholders the opportunity to provide policy recommendations while

³³ Analytics and Research Division reports primarily consist of open source and social media data collection on various topics.

maintaining the independence of the underlying analysis. Therefore, OIG did not make a recommendation to address this issue.

Spotlight on Success: Tech Challenges Program Supports Combatting Disinformation Worldwide

The Global Engagement Center's Tech Challenges program successfully advanced innovative solutions to counter adversarial propaganda and disinformation overseas. Through a series of regional competitions, GEC conducted Tech Challenges in Asia, Africa, and Europe and, at the time of the inspection, was conducting negotiations with Canada for a fourth Tech Challenge. The competitions—held in collaboration with U.S. overseas missions, host governments, and the private sector—provided funding for new technologies and offered a forum to highlight and connect entrepreneurs. As a result of the Challenges, new programs to counter disinformation were funded in Taiwan, Israel, Democratic Republic of the Congo, Kenya, and South Africa. The Taiwanese winner offered a free detection tool to identify disinformation in text, URLs, and other cybersecurity protection, while the Israeli winner created a platform to detect malicious actors and identify visual content manipulation across major social media platforms. The three African winners intended to pool their complementary technologies to develop localized communication campaigns and tailored messaging to counter harmful vaccine-related misinformation and disinformation in Africa.

FEDERAL ASSISTANCE

OIG reviewed GEC's management of federal assistance awards, including grants, cooperative agreements, and program funding transferred to overseas posts for local awards.³⁴ At the time of the inspection, GEC managed approximately \$47 million in 17 active federal assistance awards, including \$5.4 million awarded in FY 2021 from foreign assistance and public diplomacy funds. GEC also provided \$7.4 million in FY 2021 to embassies overseas for locally managed federal assistance awards. OIG found GEC generally complied with federal assistance awards requirements, with the exceptions described below.

Center Established Burdensome Administrative Requirements for Cooperative Agreements

OIG found that GEC established federal award conditions for cooperative agreements that created burdensome administrative requirements for the U.S. government and award recipients. These conditions included post-award GEC review and approval of campaign and briefing materials and analytical tools, the development of and involvement in subaward pre-approval processes, and the selection of themes, target audiences, languages, and platforms for program activities. Development of these program terms should be completed before awarding the grants to ensure the programs align with GEC's strategic goals and objectives, as required

³⁴ OIG published an audit report in 2020 on GEC federal assistance awards that reviewed whether the awards (1) aligned with U.S. strategic goals and objectives and (2) were monitored in accordance with federal and Department requirements. See OIG, *Audit of Global Engagement Center Federal Assistance Award Management and Monitoring* (AUD-MER-20-26, April 2020). Therefore, OIG limited the scope of this inspection to the pre-award and closeout processes for grants and cooperative agreements and oversight of program funding transferred to overseas awards.

by 2 CFR § 200.202. Federal regulations³⁵ allow additional conditions when the grants officer determines that an organization or program poses a high risk or that the recipient is not complying with the terms of the award and a corrective action plan is necessary, such as enhanced project monitoring and project approvals. However, these must be promptly removed once the related issues have been satisfied.³⁶ Additionally, the Department's Federal Assistance Directive³⁷ requires that terms of substantial involvement on cooperative agreements be reasonable and programmatically necessary and not be used as a means of exercising greater control over a recipient or project. This problem occurred, in part, because staff lacked experience in drafting pre-award documents and because GEC established conditions after cooperative agreements had been awarded. Burdensome requirements create heavier workloads for the U.S. government and recipients and raise the risk that award recipients will not successfully accomplish program objectives.

Recommendation 6: The Global Engagement Center should comply with federal and Department standards with respect to pre-award design and approval processes for its federal assistance programs. (Action: GEC)

Center Did Not Close Out Awards on Time

OIG found 14 of GEC's 26 expired awards from FY 2018 and FY 2019 were overdue for closeout, with a total of \$151,230 in unliquidated obligations. Federal assistance awards must be closed no later than 1 year after the period of performance ends and preferably earlier.³⁸ Program staff told OIG this problem was due to high turnover of grants officer representatives, poor communication between the policy divisions and the federal assistance awards team in the Resources Division, and a lack of training and clear procedures. The lack of timely award closeout increases the risk that future awards may repeat performance problems that would otherwise be detected during the closeout process. It also prevents the use of unliquidated funds remaining on the awards.

Recommendation 7: The Global Engagement Center should complete the closeout process for awards currently overdue and implement procedures for the timely close out of future awards. (Action: GEC)

Center Did Not Exercise Responsibility for Funds Transferred to Embassies

OIG found GEC did not have a system in place to evaluate the outcomes of the \$8.5 million in total funds it issued to 34 embassies in FY 2020 and FY 2021, including requesting data to determine whether the desired results were achieved. GEC threat divisions were responsible for initial program design of embassy-managed federal assistance awards and, in some cases,

³⁵ 2 CFR § 200.208(c)(4) and (6).

³⁶ 2 CFR § 200.208(d) and (e).

³⁷ The Federal Assistance Directive establishes internal guidance, policies, and procedures for all domestic and overseas grant-making bureaus, offices, and posts within the Department when administering federal financial assistance.

³⁸ *Federal Assistance Directive* (May 20, 2017, and later revisions) Chapter 5, Section A.

ran proposal competitions among embassies for the funding. Although the embassies were responsible for issuing, managing, and monitoring the assistance awards, the GEC threat divisions lacked a uniform policy for program design and evaluation. The GEC Resources Division's proposed standard operating procedures for overseas-funded programming focused on funds transfer and not program design and evaluation. According to 18 FAM 301.4-6(B), GEC is responsible for ensuring the appropriate procedures are in place at the receiving institution for managing, monitoring, and evaluating the outcomes pertaining to the use of those funds. At a minimum, the center must obtain from the receiving institution records of how the funds were used, sufficient monitoring data to determine if adequate progress and results are being achieved, and any evaluation findings related to the outcomes achieved with the funds. Without a requirement for these records to be submitted, it is impossible for the center to evaluate the program outcomes and ensure transferred funds are used to support GEC's strategic objectives.

Recommendation 8: The Global Engagement Center should develop and implement standard operating procedures for overseas award programs that include requirements for reporting on monitoring and evaluation data. (Action: GEC)

RESOURCE MANAGEMENT

OIG reviewed the Resource Division's management support operations, including financial management, contracting, facilities management, and human resources. GEC receives supplemental support from the joint Executive Office of the Bureaus of European and Eurasian Affairs and International Organization Affairs (EUR-IO/EX) for human resources in areas such as employee relations; the Office of the Under Secretary for Public Diplomacy and Public Affairs' Office of Policy, Planning, and Resources (R/PPR) for budget execution and formulation; and the Bureau of Educational and Cultural Affairs' Executive Office (ECA/EX) for travel and general services. ECA/EX also provides limited IT support, as discussed later in the report. Because support provided by shared service providers was outside the scope of this inspection, OIG focused its review of resource management and management controls on those functions for which the Resources Division is responsible. OIG determined that, overall, the Resources Division generally implemented applicable processes and procedures in accordance with Department guidance and policies, with the exceptions discussed below.

Center Lacked Service Level Agreements to Manage the Support It Receives

OIG found that GEC did not have up-to-date service level agreements to define customer support responsibilities and assess service quality with any of the service providers, which complicated GEC's operations. For example, EUR-IO/EX did not review GEC's telework eligibility assessment submission because its support role was not clearly defined. Instead, GEC coordinated with ECA/EX to finalize the assessment, resulting in delays in completing this task. In another example, ECA/EX and GEC did not establish responsibilities to confirm and record

receipt of incoming property. The *Standards for Internal Control in the Federal Government*,³⁹ Section 2, OV2.16 and OV2.19, and Principle 10.03, state organizations should have internal control systems in place to carry out duties efficiently and measure the results of key activities.

Prior GEC leadership did not establish service level agreements with ECA/EX and R/PPR, and the agreement with EUR-IO/EX was last updated in August 2019. Shifting priorities left the Resources Division without the necessary resources and time to create or update the agreements. Without service level agreements that include service standards and regular reviews and updates, GEC risks exacerbating service delays, unclear customer service support responsibilities, and the inability to assess and evaluate its services.

During the inspection, GEC initiated an update to the EUR-IO/EX service level agreement for human resource services to include items such as the Mobility Assessment Tool review and agreed to establish service level agreements with its other service providers.

Center Did Not Review Unliquidated Obligations in a Timely Manner

GEC did not conduct monthly reviews of its unliquidated obligations with no activity in more than 1 year and de-obligate those without valid obligations, as required by 4 FAM 225d. As of September 2021, OIG identified \$3.9 million in unliquidated obligations for the 5 fiscal years prior to FY 2021. In addition, the center lacked a standard operating procedure defining responsibilities and processes for systematically reviewing unliquidated obligations, as required by 4 FAM 225a. During the inspection, GEC reviewed its unliquidated obligations and identified \$3.2 million for de-obligation. This lowered the total of unliquidated obligations to \$745,000, a reduction of 81 percent.⁴⁰ Additionally, the budget analyst drafted standard operating procedures for unliquidated obligations review. Failure to review and de-obligate unliquidated obligations in a timely manner can result in an accumulation of funds that could be put to better use.⁴¹

Recommendation 9: The Global Engagement Center should review and de-obligate all invalid unliquidated obligations without activity for more than 1 year, in accordance with Department guidance, so that funds of up to \$745,000 can be put to better use. (Action: GEC)

Contracting Officer's Representatives Did Not Fully Administer Contracts in Accordance With Department Standards

GEC's three contracting officer's representatives (COR) did not fully administer assigned contracts in accordance with Department standards. OIG found the five contracts in its sample

³⁹ GAO-14-704G, September 2014, "Objectives of an Entity" pages 12-13; "Design of Appropriate Types of Control Activities" pages 45-48.

⁴⁰ GEC's unliquidated obligation amounts included \$272,000 from FY 2020, \$333,000 from FY 2019, \$137,000 from FY 2018, and \$4,000 from FY 2017.

⁴¹ In accordance with 1 FAM Exhibit 050(3)d(4), funds put to better use are those that could be used more efficiently if management took certain actions, including de-obligating funds from programs or operations.

review of GEC's COR files⁴² were missing documents, including copies of delegation letters from the contracting officer, and all copies of contract modifications, invoices, and progress reports. In addition, CORs did not prepare quality assurance surveillance plans, as required by the Federal Acquisition Regulation Subpart 46.401(a).⁴³ According to 14 FAH-2 H-341.2-4(B)(b), the quality assurance plan should set the government's performance expectations. Finally, CORs did not document the annual contractor performance assessments in the government-wide Contractor Performance Assessment Reporting System, as required by 14 FAH-2 H-572 for contracts over 1 year in duration.⁴⁴ CORs told OIG they were unaware of some of the requirements and were using multiple systems to manage documents. In addition, they said there were insufficient transition procedures when CORs were replaced. Inadequate contract oversight can result in excessive costs, misuse of government resources, and substandard contractor performance.

Recommendation 10: The Global Engagement Center should comply with Department contracting officer's representative program standards. (Action: GEC)

Center Staff Did Not Comply With Mandatory Leadership Training Requirements

OIG found that GEC direct-hire staff members did not complete mandatory leadership training required by the Department. Although GEC leadership and EUR-IO/EX reminded staff multiple times to complete mandatory leadership training, at the time of the inspection 15 mid-level staff members (26 percent of those eligible) had yet to do so. According to 13 FAM 301.3-2(B)a-b, employees are required to take leadership courses⁴⁵ offered by the Foreign Service Institute within the first year of hiring or promotion. This issue occurred because GEC did not hold delinquent employees accountable for missing training. Failure to complete mandatory leadership training increases the risk that employees do not have the skills needed to fulfill their duties, work with and manage subordinate staff, and improve their overall performance.

Recommendation 11: The Global Engagement Center should comply with mandatory leadership training requirements in accordance with Department standards. (Action: GEC)

INFORMATION TECHNOLOGY AND RECORDS MANAGEMENT

GEC received IT services from the Bureau of Information Resource Management's Consolidated Customer Services Office and limited support from ECA/EX. Despite lacking its own IT staff,

⁴² OIG reviewed the COR file for the highest value contract, worth approximately \$24 million in fiscal year 2021. OIG randomly selected four other contracts for review, ensuring at least one file for each COR was reviewed.

⁴³ The regulation states that quality assurance surveillance plans should outline required performance metrics and how the contractor will be evaluated against those metrics. In addition, the standard contract terms and conditions outline the government's quality assurance surveillance plan to monitor the contractor's quality control efforts to assure that they are timely, effective, and are delivering the results specified in the contract.

⁴⁴ The contracting officer is responsible for ensuring that the evaluation takes place, but the COR may be tasked with evaluating contractor performance. See 14 FAH-2 H-572e.

⁴⁵ Leading Strategically (PT701) is required for FS-01/GS-15 employees, Leading with Influence (PT601) is required for FS-02/GS-14 employees, and Leading at State (PT501) is required for FS-03/GS-13 employees.

GEC's Analytics and Research Division contractor staff operated and managed two analytics platforms, one for the U.S. government and one for global partners. These platforms provided access to analytical and collaboration tools, a centralized data repository, and a library of published analysis and research on disinformation and propaganda to government interagency and international partners. Additionally, the Technology Engagement Division funded and supported the Disinformation Cloud website, an open-source platform that GEC's grantee partner maintained. OIG reviewed GEC's IT systems and records management, including support services from the Bureau of Information Resource Management and ECA/EX, and identified the deficiencies discussed below. OIG also found that GEC did not have direct-hire IT personnel and instead relied exclusively on contractor staff for IT operations and security matters. As a result, knowledge about IT systems operations and security compliance resided mainly with the contractor staff.

Analytics Platforms Lacked Risk Assessments and Authorizations to Operate

OIG found GEC did not conduct risk assessments⁴⁶ and obtain authorizations to operate⁴⁷ from Bureau of Information Resource Management for its global and U.S. government analytics platforms, as required in 12 FAH-10 H-332.2-1(b) and 5 FAM 619c. As a result, the analytics platforms operated without completed systems security and IT contingency plans, including privacy impact assessments. These assessments would provide GEC with an analysis of how its platforms handle personally identifiable information and whether they conform to applicable privacy requirements, determine the privacy risks associated with data stored in the platforms, and evaluate ways to mitigate these risks. Furthermore, prior to issuing authorizations to operate, the Bureau of Information Resource Management requires the results of the risk assessments. At the time of the inspection, GEC had made progress in establishing a risk assessment process for the government platform but had yet to start the process for the global platform. GEC staff told OIG the COVID-19 pandemic had slowed progress on the government platform's risk assessment and therefore the center did not consider initiating the assessment process for the global platform. Operating the analytics platforms without conducting risk assessments to obtain authorizations to operate the platforms increases the risk of confidentiality, integrity, and availability of data being compromised due to inadequate security controls.

⁴⁶ Risk assessment involves conducting and documenting the likelihood and magnitude of harm from the unauthorized access, use, disclosure, disruption, modification, or destruction of information the systems process and store.

⁴⁷ An authorization to operate is the official management decision given by a senior organizational official to authorize operation of an information system and to explicitly accept the risk to organizational operation (including mission, functions, image, or reputation), organizational assets, individuals, other organizations, and the nation based on the implementation of an agreed-upon set of security controls. The National Institute of Standards and Technology Special Publication 800-53A Revision 4—Security and Privacy Controls for Federal Information Systems and Organizations (at B-2).

Recommendation 12: The Global Engagement Center should conduct risk assessments and obtain authorizations to operate for its analytics platforms from the Bureau of Information Resource Management. (Action: GEC)

Analytics Platforms Operated With Unapproved Non-Governmental Domain Names

GEC operated its global and U.S. government analytics platforms using non-governmental “.com” extension domain names without obtaining approval from the Department’s Chief Information Officer or reviews from the Office of Government-wide Policy at the General Services Administration, as outlined in 5 FAH-8 H-342.3-3(1). Despite operating with “.com” extensions, users were notified they were accessing U.S. government-owned information systems when signing on to GEC’s global and U.S. government analytics platforms. GEC staff told OIG that the current and previously designated owners of the analytics platforms⁴⁸ did not seek approval from the Bureau of Information Resource Management or provide justification for not using the “.gov” extension, but instead internally decided to use “.com” extensions.⁴⁹ Using an unapproved non-governmental domain name can diminish the legitimacy of U.S. government sites.

Recommendation 13: The Global Engagement Center should use domain names for the Global Engagement Center’s analytics platforms that comply with Department standards. (Action: GEC)

Analytics Platforms’ Information Systems Security Officers Did Not Perform All Required Duties

OIG found GEC’s global and U.S. government analytics platforms’ Information Systems Security Officers (ISSO) did not perform ISSO duties to implement required policies and procedures on assigned information systems as called for in 12 FAM 613.4. The ISSOs work in ECA/EX and provide application ISSO support to GEC, ECA, and R/PPR. OIG did not find evidence the ISSOs performed required duties, such as user accounts and systems logs reviews, contingency planning and testing, and configuration compliance review of GEC’s global and U.S. government analytics platforms, including file transfers reviews between the analytics platforms and the Department’s OpenNet system.⁵⁰ Moreover, the ISSOs did not have administrative accounts and the rights necessary to access GEC’s global and U.S. government analytics platforms to perform the reviews. Additionally, even though the ISSOs assisted GEC with the risk assessment processes to obtain authorization to operate as discussed above, they did not know that there

⁴⁸ Domestically, the system owner is the bureau-designated senior executive responsible for performance, privacy, and security issues for the system throughout its lifecycle (see 5 FAM 825).

⁴⁹ According to the Office of Management and Budget, the use of “.gov” domain names help users quickly determine if they are on an official U.S. government website and instills trust, allowing the public to confidently access government information in a secure environment knowing that the site is legitimate and authoritative. Office of Management and Budget memo, “Policies for Federal Agency Public Websites and Digital Service” (M-17-06, November 8, 2016).

⁵⁰ OpenNet is the Department’s Sensitive But Unclassified network.

were two analytics platforms. Failure to complete these ISSO duties could put security of the Department's computer systems and information at risk of compromise.

Recommendation 14: The Global Engagement Center, in coordination with the Bureau of Educational and Cultural Affairs, should require the Information Systems Security Officers for the Global Engagement Center analytics platforms to perform their duties in accordance with Department guidance. (Action: GEC, in coordination with ECA)

Center Lacked Procedures to Ensure All Aspects of the Analytics Platform Systems Documents Were Complete and Current

GEC did not implement procedures to ensure all aspects of its global and U.S. government analytics platforms' systems documents were completed and current as required in 5 FAM 867. OIG found documents in draft stages and others, such as access control procedures and data governances, which lacked operational details. For example, the data governance operational plan did not reference the Department's FAM and FAH as operating standards or mention the Bureaus of Information Resource Management or Diplomatic Security, the Department's information management and security stakeholders. OIG also found systems documents stored in multiple locations, potentially complicating document transfer and knowledge sharing. This occurred because GEC did not have direct-hire personnel with IT management job responsibilities to guide contractor staff on computer support and operations policies. The absence of complete and organized systems documentation affected the center's ability to capture, share, transfer, and retain information related to the operations of GEC's global and U.S. government analytics platforms.

Recommendation 15: The Global Engagement Center should implement procedures to ensure all aspects of its analytics platforms' systems documents are completed and current, in accordance with Department standards. (Action: GEC)

Business Case Analysis Needed to Avoid Duplication and Reduce Cost

OIG found GEC did not have plans to conduct a cost-benefit analysis as part of the upcoming rebidding of the support contract for its global and U.S. government analytics platforms. At the time of the inspection, GEC was working with the Bureau of Administration and the Office of the Under Secretary for Public Diplomacy and Public Affairs on a consolidated blanket purchase agreement proposal to identify analytics support for GEC and other entities within the Under Secretary's office. However, OIG did not find evidence that GEC planned to conduct a cost-benefit analysis to identify existing Department alternatives for analytics platforms, data acquisition arrangements, and cloud storage services to avoid duplication and reduce costs. According to 5 FAM 661, a cost-benefit analysis must be prepared for each new, modified, or fully integrated program or project. Not performing such an analysis could result in unnecessary duplication of technology resources and costs to GEC and the Department.

Recommendation 16: The Global Engagement Center, in coordination with the Office of the Under Secretary for Public Diplomacy and Public Affairs, should conduct a cost-benefit analysis for its analytics support program. (Action: GEC, in coordination with R)

Center Lacked a Project Plan to Replace Its Disinformation Cloud Website

GEC did not develop a project plan for developing and implementing a replacement for the current Disinformation Cloud website, known as “DisinfoCloud,” to define and manage requirements, schedule, resources, and security compliance as required in 5 FAM 615. DisinfoCloud enables government agencies and stakeholders to discover hundreds of companies and tested tools and technologies to help identify, understand, and address the challenges of foreign-sponsored disinformation. GEC leadership decided to transition management of the site from a grantee to center staff, which necessitated GEC to develop a replacement website. The Technology Engagement Division director undertook the complex task of planning the new website without a project plan. In the absence of a project plan, GEC faces difficulties in defining desired project outcomes, determining funding and staffing needs, and ensuring security compliance.

Recommendation 17: The Global Engagement Center should develop and implement a project plan for replacing the Disinformation Cloud website. (Action: GEC)

Records Management Program Did Not Comply With Department Standards

GEC’s records management program did not meet Department standards outlined in 5 FAH-4 H-211 and 5 FAH-4 H-212. OIG found GEC created and stored program records in multiple locations, including Microsoft Teams, shared network drives, and SharePoint. However, GEC did not follow the recordkeeping guidance in cable 20 STATE 124322⁵¹ for managing shared drives, including Teams and SharePoint. GEC program records include budgeting, monitoring and evaluation plans, threat division files, and analytics and research products. For example, the Analytics and Research Division mainly kept analytics products on its analytics platform, which is outside the Department’s OpenNet system, and kept other records on OpenNet Teams sites. This created the potential for inconsistent and duplicative records that could complicate the center’s records management. GEC’s records coordinator told OIG that lack of support from the previous center management delayed efforts to standardize its record management practices. The absence of a records management program that complies with Department standards can result in the loss of important data for historical insight into policy analysis, decision-making, and archival research.

Recommendation 18: The Global Engagement Center should implement a records management program that complies with Department standards. (Action: GEC)

⁵¹ Cable 20 STATE 124322, “Updated recordkeeping guidance for managing shared drives on OpenNet and ClassNet and for digitizing temporary paper records,” December 28, 2020.

RECOMMENDATIONS

OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to the Global Engagement Center. The center's complete response can be found in Appendix B.¹ The center also provided technical comments that were incorporated into the report, as appropriate.

Recommendation 1: The Global Engagement Center, in coordination with the Bureau of Global Talent Management, should conduct an organizational assessment and align the center's organizational structure with operational needs. (Action: GEC, in coordination with GTM)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center conducted an organizational assessment and aligned the center's organizational structure with operational needs.

Recommendation 2: The Global Engagement Center should clarify and codify the roles and responsibilities of the Policy, Plans, and Operations Division and the Interagency and International Coordination Cell in the Foreign Affairs Manual. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center clarified and codified the roles and responsibilities of the Policy, Plans, and Operations Division and the Interagency and International Coordination Cell in the Foreign Affairs Manual.

Recommendation 3: The Global Engagement Center should approve a plan to implement its Functional Bureau Strategy, update its major programs to include key priorities, and assess its execution by conducting regular reviews with its staff, in accordance with Department standards. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

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

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center approved a plan to implement its Functional Bureau Strategy, updated its major programs to include key priorities, and assessed its execution by conducting regular reviews with its staff, in accordance with Department standards.

Recommendation 4: The Global Engagement Center should appoint an evaluation coordinator with decision-making authority to conduct evaluations appropriate to its portfolio, in accordance with Department standards. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center appointed an evaluation coordinator with decision-making authority to conduct evaluations appropriate to its portfolio, in accordance with Department standards.

Recommendation 5: The Global Engagement Center should review risks to its strategic objectives, implement processes for identifying and responding to risk, and communicate risk response guidance to staff in accordance with Department standards. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center reviewed risks to its strategic objectives, implemented processes for identifying and responding to risk, and communicated risk response guidance to staff in accordance with Department standards.

Recommendation 6: The Global Engagement Center should comply with federal and Department standards with respect to pre-award design and approval processes for its federal assistance programs. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center complied with federal and Department standards with respect to pre-award design and approval processes for its federal assistance programs.

Recommendation 7: The Global Engagement Center should complete the closeout process for awards currently overdue and implement procedures for the timely close out of future awards. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center completed the closeout process for awards currently overdue and implemented procedures for the timely close out of future awards.

Recommendation 8: The Global Engagement Center should develop and implement standard operating procedures for overseas award programs that include requirements for reporting on monitoring and evaluation data. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center developed and implemented standard operating procedures for overseas award programs that include requirements for reporting on monitoring and evaluation data.

Recommendation 9: The Global Engagement Center should review and de-obligate all invalid unliquidated obligations without activity for more than 1 year, in accordance with Department guidance, so that funds of up to \$745,000 can be put to better use. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center reviewed and de-obligated all invalid unliquidated obligations without activity for more than 1 year, in accordance with Department guidance, so that funds of up to \$745,000 can be put to better use.

Recommendation 10: The Global Engagement Center should comply with Department contracting officer's representative program standards. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center complied with Department contracting officer's representative program standards.

Recommendation 11: The Global Engagement Center should comply with mandatory leadership training requirements in accordance with Department standards. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center complied with mandatory leadership training requirements in accordance with Department standards.

Recommendation 12: The Global Engagement Center should conduct risk assessments and obtain authorizations to operate for its analytics platforms from the Bureau of Information Resource Management. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center conducted risk assessments and obtained authorizations to operate for its analytics platforms from the Bureau of Information Resource Management.

Recommendation 13: The Global Engagement Center should use domain names for the Global Engagement Center's analytics platforms that comply with Department standards. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation. The center noted an estimated completion date of December 2022.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center adopted domain names for its analytics platforms that comply with Department standards.

Recommendation 14: The Global Engagement Center, in coordination with the Bureau of Educational and Cultural Affairs, should require the Information Systems Security Officers for the Global Engagement Center analytics platforms to perform their duties in accordance with Department guidance. (Action: GEC, in coordination with ECA)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center, in coordination with the Bureau of Educational and Cultural Affairs, required the Information

Systems Security Officers for the Global Engagement Center analytics platforms to perform their duties in accordance with Department guidance.

Recommendation 15: The Global Engagement Center should implement procedures to ensure all aspects of its analytics platforms' systems documents are completed and current, in accordance with Department standards. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation. The center noted an estimated completion date of December 2022.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center implemented procedures to ensure all aspects of its analytics platforms' systems documents are completed and current, in accordance with Department standards.

Recommendation 16: The Global Engagement Center, in coordination with the Office of the Under Secretary for Public Diplomacy and Public Affairs, should conduct a cost-benefit analysis for its analytics support program. (Action: GEC, in coordination with R)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center, in coordination with the Office of the Under Secretary for Public Diplomacy and Public Affairs, conducted a cost-benefit analysis for its analytics support program.

Recommendation 17: The Global Engagement Center should develop and implement a project plan for replacing the Disinformation Cloud website. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation. The center noted an estimated completion date of December 2022.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center developed and implemented a project plan for replacing the Disinformation Cloud website.

Recommendation 18: The Global Engagement Center should implement a records management program that complies with Department standards. (Action: GEC)

Management Response: In its August 10, 2022, response, the Global Engagement Center concurred with this recommendation.

OIG Reply: OIG considers this recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Global Engagement Center implemented a records management program that complied with Department standards.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date ^a
Special Envoy and Coordinator:		
Acting Coordinator	Leah Bray ^b	9/2018
Deputy Coordinators		
Principal Deputy Coordinator	Daniel Kimmage ^c	1/2017
Acting Deputy Coordinator for Policy, Plans and Operations	Karl Stoltz	7/2021
Deputy Coordinator for Support	Joseph Parente	8/2020

^a The arrival dates denote the date the employee started working in the Global Engagement Center and not necessarily when they assumed their current position.

^b Leah Bray was the Deputy Coordinator for Policy, Plans and Operations and began serving as the Acting Coordinator in July 2021.

^c At the time of the inspection, Daniel Kimmage was on detail to the National Defense University.

Source: Generated by OIG from data provided by the Global Engagement Center.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from August 30, 2021, to March 18, 2022, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2020 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspections Handbook, as issued by the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM).

Objectives and Scope

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

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

OIG's specific objectives for this inspection of the Global Engagement Center (GEC) were to determine whether:

- GEC's leadership followed Department guidance, specifically whether it organized operations and plans strategically, communicated its structure, mission, and goals effectively, valued and developed its people, and managed conflict.
- GEC carried out its program and policy implementation responsibilities in accordance with applicable standards.
- GEC managed resources with maximum economy and effectiveness, in accordance with applicable standards.
- GEC managed IT resources in compliance with applicable standards related to security, operations, and systems development.
- COVID-19 affected operations and internal controls, and the extent to which COVID-19-related telework affected mission accomplishment, customer service to the public, and employee performance.

Methodology

OIG used a risk-based approach to prepare for this inspection. Due to the COVID-19 pandemic and taking into consideration relevant guidance, OIG conducted the inspection remotely and largely relied on audio- and video-conferencing tools in lieu of in-person interviews with Department and other personnel. OIG conducted in-person interviews when necessary to address sensitive or classified information. OIG also reviewed pertinent records; circulated surveys and compiled the results; and reviewed the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

APPENDIX B: MANAGEMENT RESPONSE



United States Department of State

Washington, D.C. 20520

August 10, 2022

UNCLASSIFIED

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

FROM: R/GEC – Joe Parente, Deputy Coordinator for Support

SUBJECT: Response to Draft OIG Report – Inspection of the Global Engagement Center (ISP-I-22-15)

The central challenge and achievement of the Global Engagement Center (GEC) over the past five years has been to construct an organization to identify and counter foreign state and foreign non-state propaganda and disinformation while simultaneously executing the mission – in essence, building the plane while flying it. As the global community awakened to the national security challenges associated with the 21st century information environment, GEC succeeded in incubating a new enterprise within the Department of State that brings both subject matter expertise and operational capabilities and has notched important successes in establishing U.S. global leadership in mitigating the national security risks of foreign propaganda and disinformation. GEC now spearheads U.S. analytic collaboration and information-sharing on foreign actors' propaganda and disinformation across the U.S. interagency and with international partners; represents the U.S. government in multilateral forums geared towards coordinating responses to security threats in the information environment; and conceptualizes and executes programs and initiatives that protect the integrity of the information space by facilitating fact-based discourse, leveraging cutting-edge technologies, and building resilience to foreign state and foreign non-state propaganda and disinformation.

GEC has assembled a diverse staff from across the U.S. interagency to advance its coordination mandate, while relying on qualified contractors to ramp up technical expertise and support capabilities quickly in a resource-constrained environment. GEC's unique staffing composition has enriched operations by introducing novel and rigorous approaches to such functions as strategic planning, while creating management complexities. In its next phase of growth and guided in part by the recommendations of the Office of the Inspector General, GEC will consolidate its operations, transition to a stable and sustainable staffing pattern underpinned by permanent Foreign and Civil Service professionals, and further cement its institutionalization within the Department of State. Doing so may illuminate a new opportunity for Department of State offices to execute both policy and operational functions at the frontier of national security.

GEC offers the following responses to the Office of the Inspector General's (OIG) recommendations:

OIG Recommendation 1: The Global Engagement Center, in coordination with the Bureau of Global Talent Management, should conduct an organizational assessment and align the

center's organizational structure with operational needs. (Action: GEC, in coordination with GTM)

Management Response: GEC concurs with this recommendation and will work with the Bureau of Global Talent Management to schedule the organizational assessment in calendar year 2022.

OIG Recommendation 2: The Global Engagement Center should clarify and codify the roles and responsibilities of the Policy, Plans, and Operations Division and the Interagency and International Coordination Cell in the Foreign Affairs Manual. (Action: GEC)

Management Response: GEC concurs with this recommendation and plans to update Foreign Affairs Manual (FAM) content related to GEC and its subordinate structures after the Bureau of Global Talent Management concludes the organizational assessment referred to in OIG Recommendation 1.

OIG Recommendation 3: The Global Engagement Center should approve a plan to implement its Functional Bureau Strategy, update it to include key priorities, and assess its execution by conducting regular reviews with its staff, in accordance with Department standards. (Action: GEC)

Management Response: GEC concurs with this recommendation. After the expansion of its Congressional mandate, GEC developed a strategy with corresponding team strategies and a four-year implementation plan to guide the organization's focus and application of limited resources. After finalizing its most recent Functional Bureau Strategy in June 2022, GEC developed an implementation plan and began quarterly strategic assessments in line with Department of State guidelines.

OIG Recommendation 4: The Global Engagement Center should appoint an evaluation coordinator with decision-making authority to conduct evaluations appropriate to its portfolio, in accordance with Department standards. (Action: GEC)

Management Response: GEC concurs with this recommendation. GEC will hire, as soon as practicable, a government employee to perform the functions of a Monitoring and Evaluation (M&E) Coordinator, who will be overseen by a senior manager.

OIG Recommendation 5: The Global Engagement Center should review risks to its strategic objectives, implement processes for identifying and responding to risk, and communicate risk response guidance to staff in accordance with Department standards. (Action: GEC)

Management Response: GEC concurs with the recommendation. Since December 2021, GEC's Risk Mitigation Unit has been identifying risks to GEC's operations and developing mitigation strategies in coordination with all GEC Divisions and several Department stakeholders including, but not limited to, the Bureau of Diplomatic Security. GEC's Risk Mitigation Unit works with the Bureau of Administration's Risk Analysis Management Office to streamline GEC's project vetting processes consistent with Department of State guidelines.

OIG Recommendation 6: The Global Engagement Center should comply with Federal and Department standards with respect to pre-award design and approval processes for its Federal assistance programs. (Action: GEC)

Management Response: GEC concurs with the recommendation. Beginning in fiscal year 2022, GEC reviewed all terms of substantial involvement in order to ensure they are reasonable, streamlined, and programmatically necessary prior to issuing federal assistance awards. In January 2022, GEC's Federal Assistance Award Division delivered a presentation to GEC staff, entitled "Award Provisions and Standard Terms and Conditions," which explained in detail how to incorporate terms of substantial involvement to include collaboration, participation, or intervention in the program to be performed.

OIG Recommendation 7: The Global Engagement Center should complete the closeout process for awards currently overdue and implement procedures for the timely close out of future awards. (Action: GEC)

Management Response: GEC concurs with the recommendation. Starting in 2021, GEC initiated, reconciled, and completed closeout for approximately 38 awards issued through fiscal years 2018-2021. GEC implemented revised closeout procedures for future awards in order to ensure all awards are closed out 12 months after the period of performance.

OIG Recommendation 8: The Global Engagement Center should develop and implement standard operating procedures for overseas award programs that include requirements for reporting on monitoring and evaluation data. (Action: GEC)

Management Response: GEC concurs with the recommendation. In January 2022, GEC finalized a standard operating procedure (SOP) for overseas awards. The SOP requires U.S. embassies and consulates to capture lessons learned, key project outcomes, and reported challenges or successes from their respective competitive small grants processes. The SOP includes requirements to receive routine reporting on performance data as well as monitoring and evaluation data from U.S. embassies and consulates.

OIG Recommendation 9: The Global Engagement Center should review and de-obligate all invalid unliquidated obligations without activity for more than 1 year, in accordance with Department guidance, so that funds of up to \$745,000 can be put to better use. (Action: GEC)

Management Response: GEC concurs with the recommendation and has developed and is executing an unliquidated obligations standard operating procedure. This includes reviewing unliquidated obligations quarterly in collaboration with Department of State stakeholders and de-obligating funds without valid obligations. GEC notes that some unliquidated obligations are part of multi-year contracts and grants, which cannot be de-obligated without creating funding deficiencies.

OIG Recommendation 10: The Global Engagement Center should comply with Department contracting officer's representative program standards. (Action: GEC)

Management Response: GEC concurs with the recommendation. GEC has already made adjustments in line with this recommendation, including submitting annual contractor performance

assessments in the U.S. Government-wide Contractor Performance Assessment Reporting System. GEC will develop quality assurance plans for new or replacement contracts and task orders, and transition procedures for outgoing and incoming contracting officer's representatives.

OIG Recommendation 11: The Global Engagement Center should comply with mandatory leadership training requirements in accordance with Department standards. (Action: GEC)

Management Response: GEC concurs with this recommendation. GEC's Human Resources Shared Services Provider and GEC's Resources Division will continue to require staff attend and complete mandatory training. GEC notes that COVID-19 related disruptions affected training opportunities for some GEC staff.

OIG Recommendation 12: The Global Engagement Center should conduct risk assessments and obtain authorizations to operate for its analytics platforms from the Bureau of Information Resource Management. (Action: GEC)

Management Response: GEC concurs with this recommendation. GEC launched a risk assessment in October 2021 on the U.S. government analytics platform to obtain the authorization to operate. The GEC finished its risk assessment in July 2022 and has established a plan of action with specific milestones for remediation of any risks identified. In July 2022, GEC received an interim authorization from the Bureau of Information Resource Management for its analytics platform. GEC is working with Department of State stakeholders to obtain permanent authorization.

OIG Recommendation 13: The Global Engagement Center should use domain names for the Global Engagement Center's analytics platforms that comply with Department standards. (Action: GEC)

Management Response: GEC concurs with this recommendation and notes that efforts are underway to transition domain names for GEC's analytics platforms. GEC expects to conclude this transition by December 2022.

OIG Recommendation 14: The Global Engagement Center, in coordination with Bureau of Educational and Cultural Affairs, should require the Information Systems Security Officers for the Global Engagement Center analytics platforms to perform their duties in accordance with Department guidance. (Action: GEC, in coordination with ECA)

Management Response: GEC concurs with this recommendation and will provide the Bureau of Educational and Cultural Affairs Information Systems Security Officers (ISSO) with administrative accounts and the rights necessary to access GEC's analytics platforms to perform Department of State required ISSO duties. GEC notes that ISSOs have performed limited system functions including Contingency Planning and Testing. With administrative accounts and additional access permissions, the ISSOs will be able to conduct system logs reviews and configuration compliance reviews, including file transfer reviews between the platforms and the Department of State's OpenNet system.

OIG Recommendation 15: The Global Engagement Center should implement procedures to ensure all aspects of its analytics platforms' systems documents are completed and current, in accordance with Department standards. (Action: GEC)

Management Response: GEC concurs with this recommendation. GEC has onboarded a government employee as Analytics & Research Director and that individual is working with Department of State stakeholders to establish procedures to ensure the analytics platforms' systems documents are complete and current. GEC expects to complete this effort in December 2022.

OIG Recommendation 16: The Global Engagement Center, in coordination with the Office of the Under Secretary of Public Diplomacy and Public Affairs, should conduct a cost-benefit analysis for its analytics support program. (Action: GEC, in coordination with R)

Management Response: GEC concurs with the recommendation and is working with Department of State stakeholders to identify the best course of action for future support of the analytics platform, including evaluating existing analytics platforms, data acquisition arrangements, and cloud storage services. GEC is engaging other Department stakeholders, including the Chief Technology Officer for the Office of the Under Secretary of Public Diplomacy and Public Affairs, as well as the Department of State's Center for Data Analytics, in order to leverage and share analytic capabilities, methodologies, and tools.

OIG Recommendation 17: The Global Engagement Center should develop and implement a project plan for replacing the Disinformation Cloud website. (Action: GEC)

Management Response: GEC concurs with this recommendation. GEC's Technology Engagement Division will assign a project officer to carry out implementation of a replacement for the Disinformation Cloud website. GEC's Technology Engagement Division has coordinated with other GEC divisions to employ lessons learned from similar technology transitions. GEC expects to complete this effort in December 2022.

OIG Recommendation 18: The Global Engagement Center should implement a records management program that complies with Department standards. (Action: GEC)

Management Response: GEC concurs with this recommendation. GEC's Resources Division has worked with the Bureau of Administration to develop a draft records disposition schedule for GEC. GEC has created a consolidated repository of document libraries to store and retain federal records. GEC will work with the records coordinator to ensure that records housed within GEC's analytics platform are maintained and handled in compliance with Department of State records management requirements.

APPENDIX C: FUNCTIONS OF THE GLOBAL ENGAGEMENT CENTER

The FY 2017 National Defense Authorization Act¹ defines the functions of the Global Engagement Center as follows:

1. Direct, lead, synchronize, integrate, and coordinate interagency and international efforts to track and evaluate counterfactual narratives abroad that threaten the policies, security, or stability of the United States and United States allies and partner nations.
2. Analyze relevant information, data, analysis, and analytics from U.S. government agencies, U.S. allies and partner nations, think tanks, academic institutions, civil society groups, and other nongovernmental organizations.
3. As needed, support the development and dissemination of fact-based narratives and analysis to counter propaganda and disinformation directed at the United States and U.S. allies and partner nations.
4. Identify current and emerging trends in foreign propaganda and disinformation in order to coordinate and shape the development of tactics, techniques, and procedures to expose and refute foreign propaganda and disinformation and proactively support the promotion of credible, fact-based narratives and policies to audiences outside the United States.
5. Facilitate the use of a wide range of technologies and techniques by sharing expertise among federal departments and agencies, seeking expertise from external sources, and implementing best practices.
6. Measure and evaluate the activities of the center, including the outcomes of such activities, and implement mechanisms to ensure that the activities of the center are updated to reflect the results of such measurement and evaluation.
7. Identify gaps in U.S. capabilities in areas relevant to the purpose of the center and recommend necessary enhancements or changes.
8. Use information from appropriate interagency entities to identify the countries, geographic areas, and populations in which such propaganda and disinformation is likely to cause the most harm.
9. Administer the established information access fund.²
10. Coordinate with U.S. allies and partner nations in order to amplify the center's efforts and avoid duplication.
11. Maintain, collect, use, and disseminate records for research and data analysis of foreign state and non-state propaganda and disinformation efforts and communications related to public diplomacy efforts intended for foreign audiences.

¹ Public Law No. 114-328 § 1287(b), page 548, and amended in the FY 2019 National Defense Authorization Act (NDAA), Public Law No. 115-232 § 1284 (2).

² The FY 2017 NDAA established the information access fund, which authorizes GEC to provide grants, cooperative agreements, or contracts of financial support in accordance with relevant regulations. See Pub. L. No. 114-328 § 1287(f), pages 549–550.

ABBREVIATIONS

COR	Contracting Officer's Representative
CT	Counterterrorism
ECA/EX	Bureau of Educational and Cultural Affairs' Executive Office
EEO	Equal Employment Opportunity
EUR-IO/EX	Bureaus of European and Eurasian Affairs and International Organization Affairs Joint Executive Office
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FBS	Functional Bureau Strategy
GEC	Global Engagement Center
I2C2	Interagency and International Coordination Cell
ISSO	Information Systems Security Officer
NDAA	National Defense Authorization Act
NEA	Bureau of Near Eastern Affairs
PPO	Policy, Plans, and Operations
R/PPR	Office of the Under Secretary for Public Diplomacy and Public Affairs' Office of Policy, Planning and Resources
S/OCR	Office of Civil Rights

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