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Office of Inspector General  
United States Department of State

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ISP-I-20-14

Office of Inspections

June 2020

# Inspection of the Bureau of Counterterrorism's Foreign Assistance Program Management

DOMESTIC OPERATIONS

UNCLASSIFIED



# HIGHLIGHTS

Office of Inspector General  
United States Department of State

ISP-I-20-14

## What OIG Inspected

OIG inspected foreign assistance program management in the Bureau of Counterterrorism.

## What OIG Recommends

OIG made 7 recommendations to the Bureau of Counterterrorism.

In its comments on the draft report, the Bureau of Counterterrorism concurred with all 7 recommendations. OIG considers all 7 recommendations resolved. The bureau's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The bureau's formal written response is reprinted in its entirety in Appendix B.

June 2020

OFFICE OF INSPECTIONS

DOMESTIC OPERATIONS

## Inspection of the Bureau of Counterterrorism's Foreign Assistance Program Management

### What OIG Found

- The Bureau of Counterterrorism made substantial progress in setting up strategic planning and business operations processes to support an expansion of its foreign assistance program funding since FY 2016. Nonetheless, the bureau did not develop a fully integrated internal planning process to incorporate the range of its programs and those of partner agencies.
- The bureau's monitoring and evaluation framework did not fully comply with Department of State standards. Specifically, the bureau had yet to develop performance management plans for 13 of its 15 major programs.
- The bureau relied on third-party contractors to help with foreign assistance program oversight. OIG identified instances where third-party contractors performed inherently governmental functions.
- Federal agency implementing partners did not submit quarterly performance and financial reports or submitted fewer than required, which contributed to weaknesses in funds control and program management. The bureau also faced challenges in closing out its interagency agreements.
- Federal assistance awards files did not always include monitoring documentation to show whether a recipient performed the award in accordance with the statement of work.
- The bureau returned \$51.9 million in expired and canceled funds from FY 2016 to FY 2019, partly as a result of the weaknesses in funds control.

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## CONTEXT

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The Bureau of Counterterrorism (CT), established in 2012, leads Department of State (Department) efforts on international counterterrorism strategy, policy, and operations. A Coordinator for Counterterrorism (Coordinator), with the rank of Ambassador at Large, and a Principal Deputy Coordinator, a career member of the Senior Executive Service, led the bureau at the time of the inspection.

Among the bureau's key policy objectives are increasing international information sharing capabilities and other nations' capacity to create, administer, and maintain lists of known or suspected terrorists; countering violent extremist ideologies; and repatriating and reintegrating foreign terrorist fighters. The bureau advances these objectives, in part, through its foreign assistance programs, which also aim to strengthen partner countries' capabilities to help achieve U.S. counterterrorism policy goals and objectives.

From the bureau's creation in FY 2012 to the establishment of the Counterterrorism Partnerships Fund (CTPF)<sup>1</sup> in FY 2015, CT managed an annual average of approximately \$252 million in foreign assistance funds. The bureau's foreign assistance portfolio increased dramatically in FY 2016, when CT began receiving CTPF funds, including approximately \$175 million in the first year.<sup>2</sup> With the addition of the new CTPF funds, the bureau began directly executing a larger portfolio of foreign assistance programs, thus increasing its overall program management responsibilities. In addition to the CTPF-funded programs to facilitate counterterrorism and crisis response activities, the bureau manages countering violent extremism and counterterrorism finance programs. Finally, CT also coordinates with the Bureau of Diplomatic Security as part of the Antiterrorism Assistance Program to enhance law enforcement counterterrorism capacities of partner nations.<sup>3</sup>

To execute its many foreign assistance programs, the bureau provides funds to implementing partners in the U.S. Government, international organizations, and nongovernmental organizations. Table 1, below, provides a breakdown of FY 2018 bureau-managed foreign assistance funds.<sup>4</sup> Appendix C details the purpose of the different CT-managed foreign assistance funds and accounts.

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<sup>1</sup> Section 1534 of the National Defense Authorization Act for FY 2015 created CTPF. Its purpose is to provide assistance to foreign security forces or other groups or individuals to facilitate counterterrorism and crisis response activities, such as through building criminal justice sector capacity to respond to and investigate terrorist attacks.

<sup>2</sup> In FY 2016, the bureau received \$404.1 million in foreign assistance funding, including the \$175 million from CTPF. Total CTPF funding in FY 2016 represented 43 percent of the bureau's total foreign assistance appropriations. On average, the bureau has received \$131.3 million annually in CTPF funds since FY 2016.

<sup>3</sup> This inspection did not include Antiterrorism Assistance Program implementation due to an ongoing audit of that program by OIG's Office of Audits.

<sup>4</sup> FY 2018 is the most recent fiscal year for which complete data are available for foreign assistance funding.

**Table 1: Bureau-Managed Foreign Assistance Funding in FY 2018<sup>5</sup>**

<b>Funding Account</b>	<b>Total (in thousands)</b>
Non-Proliferation, Anti-terrorism, Demining and Related Programs (NADR) Anti-Terrorism Assistance	\$89,277
NADR Anti-Terrorism Assistance Overseas Contingency Operations	\$92,723
NADR Counterterrorism Finance	\$12,500
NADR Counterterrorism Partnerships Fund	\$114,250
NADR Relief and Recovery Fund	\$34,125
NADR Terrorist Interdiction Program	\$36,000
<b>Total NADR</b>	<b>\$378,875</b>
Economic Support Fund, Overseas Contingency Operations	\$5,700
<b>Grand Total</b>	<b>\$384,575</b>

Source: Department Foreign Assistance Coordination and Tracking System.

## Foreign Assistance Management Structure

In 2015, the bureau centralized most of its foreign assistance funding management in its Office of Programs, which develops, plans, executes, monitors, and evaluates bureau programs. The office is organized by regional portfolios to help facilitate coordination with other bureau offices. At the time of the inspection, a Director and a Deputy Director led the office, which had 10 authorized direct-hire positions,<sup>6</sup> 4 of which were vacant, 17 third-party contractors, and 1 personal services contractor. The third-party contractors serve as program officers and help direct-hire staff execute the bureau's foreign assistance programs, while the personal services contractors act as overseas grants officer representatives and program officers. The bureau also deploys third-party and personal services contractors as program advisors in high-priority countries. In addition, the Bureau of Administration's Office of Acquisitions Management provides grants officers to help administer the bureau's Federal assistance awards. CT's other offices managed a small number of awards.<sup>7</sup> Finally, CT's Office of the Executive Director performs financial management tasks associated with foreign assistance. Appendix D lists the Department's counterterrorism foreign assistance roles and responsibilities.

OIG inspected CT's management of its foreign assistance, consistent with Section 209 of the Foreign Service Act of 1980.<sup>8</sup> OIG's inspection covered four aspects of the bureau's foreign assistance operations: strategic management, program management, awards management, and funds management. OIG's findings, detailed below, should be read in conjunction with the

<sup>5</sup> CTPF funding is appropriated to the bureau as part of the Non-Proliferation, Anti-terrorism, Demining and Related Programs (NADR) account. NADR funding contributes to certain organizations supporting nonproliferation and provides assistance for nonproliferation, demining, antiterrorism, export control assistance, and other related activities. (See Appendix C for a description of the types of foreign assistance funding CT receives.)

<sup>6</sup> The Bureau Resource Request for FY 2019 sought three new full-time equivalent positions to help manage CTPF foreign assistance funds.

<sup>7</sup> These offices include the Office of Multilateral Affairs; the Office of Strategy, Plans, and Initiatives; and the Office of Terrorist Screening and Interdiction Programs.

<sup>8</sup> See Appendix A.

companion unclassified bureau inspection report.<sup>9</sup> That report addresses strategic planning and staffing issues, some of which pertain to the foreign assistance operations discussed below.

## STRATEGIC MANAGEMENT

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OIG determined that while the bureau took positive steps to strategically manage its CTPF-funded foreign assistance program, it failed to take similar action for its other foreign assistance programs. For example, CT standardized strategic planning<sup>10</sup> for its CTPF-funded programs and held an annual program planning conference focused on CTPF countries—the Counterterrorism Assistance Planning Event—that sought to align funding decisions with the bureau’s strategic priorities. This event included bureau employees, implementing partners, and Department and interagency stakeholders. Additionally, beginning in 2017, the Principal Deputy Coordinator directed a formal annual program review to assess the performance of all the bureau’s major implementing partners. OIG concluded these activities, combined with program management improvements described later in this report, created a positive strategic framework for CTPF-funded foreign assistance programs, consistent with 18 Foreign Affairs Manual (FAM) 301.1-4b program management standards. However, as described below, CT’s strategic planning efforts did not include foreign assistance programs not funded by the CTPF.

### ***Strategic Planning Efforts Did Not Include All Bureau Counterterrorism Programs***

Despite its comprehensive strategic planning efforts for CTPF-funded programs, OIG found CT lacked a similarly comprehensive strategic planning structure for its programs as a whole. For example, different planning processes existed for antiterrorism assistance programs, countering violent extremism programs, and counterterrorism finance programs, none of which aligned with either the strategic planning process for CTPF-funded programs or Department standards. Figure 1, below, describes the different program planning processes for CT’s major programs.

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<sup>9</sup> OIG, *Inspection of the Bureau of Counterterrorism* (ISP-I-20-13, May 2020).

<sup>10</sup> According to 18 Foreign Affairs Manual 301.2-4(A)(6), all foreign assistance strategies should take into account the key elements related to interagency coordination, strategic integration, and assessment of progress toward strategic goals outlined in the Government Accountability Office report *Foreign Assistance: Better Guidance for Strategy Development Could Help Agencies Align Their Efforts* (GAO-18-499, July 12, 2018).

**Figure 1: Program Planning Processes for the Bureau's Counterterrorism Programs**

<b>CTPF Programs</b>	<b>Antiterrorism Assistance Programs</b>	<b>Countering Violent Extremism Programs</b>	<b>Counterterrorism Finance Programs</b>
The bureau develops annual policy priorities for CTPF countries and develops programs in alignment with those policy priorities. In October 2019, the bureau completed its second Counterterrorism Activities Planning Event with Department and interagency stakeholders to develop programs for CTPF-priority countries.	The Antiterrorism Assistance program is executed through a memorandum of agreement between CT and the Bureau of Diplomatic Security. This agreement states that CT sets policy priorities and identifies partner nations while the Bureau of Diplomatic Security develops and executes a country implementation plan for each partner nation.	The Office of Programs and the Office of Countering Violent Extremism identify priorities and annual programming through office coordination and submission of a joint programming memorandum to the Front Office for approval.	The Office of Programs and the Office of Counterterrorism Finance and Designations identify priorities and annual programming through office coordination and submission of a joint programming memorandum to the Front Office for approval.

**Source:** Chart generated by OIG.

Because the bureau did not develop a fully integrated strategic planning process that incorporated the full range of its programs and those of partner agencies, such as the Department of Defense,<sup>11</sup> it did not fully coordinate with interagency stakeholders to avoid program duplication and to leverage whole-of-government resources for counterterrorism assistance programs.

Department guidance in 18 FAM 301.2-4(A)(6) and leading practices<sup>12</sup> for strategic planning state that foreign assistance strategies should take into account interagency coordination and ensure those strategies align with policy goals and objectives and with implementation. In addition, formal documentation of agreed-upon procedures and coordination can strengthen collaborative efforts and reduce the potential for fragmentation, overlap, and duplication.<sup>13</sup> OIG acknowledges that unifying and expanding the bureau's strategic planning processes is likely to be a complex, multi-year endeavor. However, without a process that incorporates all CT programs, as well as other Department and U.S. Government counterterrorism programs, the bureau is unable to effectively coordinate and plan the full range of counterterrorism assistance work.

<sup>11</sup> As stated in 10 U.S.C. § 333(b)(2) and (3), the Department and the Department of Defense are required to jointly develop and plan counterterrorism programs to build the capacity of national security forces of foreign countries.

<sup>12</sup> GAO-18-499, July 12, 2018.

<sup>13</sup> Government Accountability Office, *Overseas Conflicts: U.S. Agencies Have Coordinated Stabilization Efforts but Need to Document Their Agreement* (GAO-18-654, September 27, 2018).

**Recommendation 1:** The Bureau of Counterterrorism should develop and implement a strategic planning process that includes all the bureau's counterterrorism foreign assistance programs and all partner agencies. (Action: CT)

## PROGRAM MANAGEMENT

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OIG found that, since establishing the Office of Programs in FY 2015, CT made substantial progress in setting up processes to support its foreign assistance programs. For example, the bureau hired employees to help manage programs; worked with an outside consultant to develop standard operating procedures and systems to track awards and funding; and, as described earlier, developed a strategic planning framework for CTPF-funded foreign assistance programs. In addition, efforts to develop standard operating procedures and program management plans and to finalize business processes were underway at the time of the inspection. However, as discussed below, OIG determined the bureau still faced program management challenges related to monitoring and evaluation and the use of third-party contractors to perform inherently governmental functions.

### ***Monitoring and Evaluation Plans Did Not Comply With Department Standards***

OIG found CT's monitoring and evaluation plans for 13 of its 15 major programs did not fully comply with Department standards in 18 FAM 301.4-3b.<sup>14</sup> In FY 2019, the bureau initiated a phased implementation approach to develop monitoring and evaluation plans that meet Department standards. This approach called for CT to develop plans for two major programs each year until all programs complied with Department standards. Under this plan, it would take approximately 7 years, or until FY 2026, to bring all 15 programs into compliance, although bureau staff told OIG they were hopeful they could complete the process sooner. Staff told OIG the long timeline was necessary due to limited staff resources. Furthermore, bureau officials argued this approach would allow CT to develop plans that met the intent of the 18 FAM 300 framework. OIG notes, though, that the bureau's decision to limit both the staff assigned to this effort and the number of programs addressed each year extends the time the bureau will be out of compliance with Department standards for monitoring and evaluation plans. Therefore, during this period, the bureau may still be unable to monitor the performance of its implementing partners or to demonstrate that its foreign assistance programs achieved meaningful outcomes.

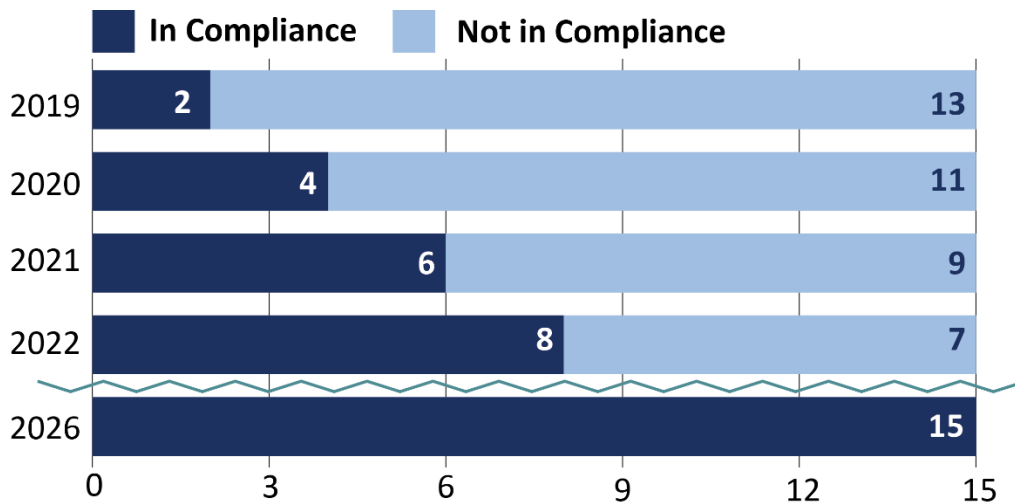
**Recommendation 2:** The Bureau of Counterterrorism should comply with Department standards for monitoring and evaluation of its foreign assistance programs. (Action: CT)

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<sup>14</sup> According to 18 FAM 301.4-3b, monitoring and evaluation plans describe performance indicators and how bureau employees should assess and monitor programs against those indicators. They also help guide bureaus on how performance information can be used to inform budget and program management decisions.



**Figure 2: Bureau Plan to Bring Foreign Assistance Programs into Compliance With Department Monitoring and Evaluation Requirements**



**Source:** Generated by OIG from information provided by CT.

### ***Third-Party Contractors Performed Inherently Governmental Functions***

Third-party contractors in CT's Office of Programs performed management and oversight activities that are, or are closely associated with, inherently governmental functions.<sup>15</sup> At the time of the inspection in October 2019, the bureau had 287 projects in 78 countries (total funding: \$642 million). Third-party contractors served as program officers for 193 projects in 63 countries (total funding: \$451.6 million). OIG identified instances where these contractors performed inherently governmental functions, including preparing and submitting grants officer representative (GOR) reports, directing a recipient to stop representing itself as the Department of State in public communications, and authorizing an extension for a performance deliverable. These and similar functions should have been performed by a GOR. Federal Acquisition Regulation, Subpart 7.5, states that inherently governmental functions must be performed by a U.S. Government employee or personal services contractor. In addition, guidance from the Office of Federal Procurement Policy states that agencies shall provide greater attention and an enhanced degree of oversight to ensure that contractors' duties do not expand to include inherently governmental functions.<sup>16</sup>

OIG found this situation occurred because CT did not have enough direct-hire employees to properly oversee the bureau's third-party contractors. Responsibility for ensuring that third-party contractors did not perform inherently governmental functions primarily fell to four

<sup>15</sup> Inherently governmental functions are those that require discretion in applying Government authority or judgment in making decisions for the Government.

<sup>16</sup> Office of Federal Procurement Policy, Policy Letter 11-01, *Performance of Inherently Governmental and Critical Functions*, September 12, 2011. The policy letter also states that agencies shall take steps to employ and train an adequate number of Government staff to oversee contracts that have been awarded for the performance of activities closely aligned with inherently governmental functions or those where there is a potential for confusion as to whether the work should be performed by Government employees or third-party contractors.

Office of Program employees. However, these employees also were responsible for leading regional teams, serving as GORs and agreement officer representatives, and overseeing their own projects.<sup>17</sup> OIG found that the breadth of these employees' responsibilities contributed to lapses in their management of contractors. The bureau attempted to hire additional staff to help with third-party contractor oversight but faced challenges because of a Department-wide backlog of recruitment action requests. CT also considered hiring personal services contractors<sup>18</sup> to assist but found it lacked the proper authority to do so domestically. These issues should be addressed, as, without appropriate controls and oversight of third-party contractors, the bureau faced additional risks associated with the loss of Government control and accountability for policy and program decisions.

**Recommendation 3:** The Bureau of Counterterrorism should comply with Department standards regarding the use of third-party contractors in its Office of Programs. (Action: CT)

## AWARDS MANAGEMENT

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The bureau implemented \$642 million in foreign assistance funding through intra-Department transfers, interagency agreements,<sup>19</sup> Federal assistance awards, and contracts. For this inspection, OIG reviewed the bureau's interagency agreements and Federal assistance awards and found issues with CT's management of both mechanisms, as detailed below.<sup>20</sup>

For a significant part of its foreign assistance programs, the bureau relied on interagency agreements with other Federal agencies to serve as implementing partners for the programs. Specifically, as shown in Table 2, below, from FY 2015 to FY 2018, CT provided \$168.5 million<sup>21</sup> to implementing partners through interagency agreements, with two Department of Justice entities receiving the majority of this funding.

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<sup>17</sup> According to an Office of Programs internal tracker for active projects and associated funding, one CT employee served as a team lead, a grant or agreement officer representative for 86 projects (valued at \$146.7 million), and as the project manager for 40 of the 86 projects (valued at \$50.4 million).

<sup>18</sup> Personal services contractors have authorities similar to those of direct-hire employees and may spend up to 50 percent of their time on inherently governmental functions. For example, a personal services contractor can serve as a GOR whereas a third-party contractor cannot.

<sup>19</sup> Interagency agreements, made between two Federal agencies, define the support (goods or services) the serving agency (here, the Department of Justice and other agency implementing partners) provides to the requesting agency (in this case, CT).

<sup>20</sup> This inspection did not include a review the bureau's intra-Department transfers due to an ongoing OIG audit of the Antiterrorism Assistance program. Also, a review of staffing contracts was outside the scope of this inspection.

<sup>21</sup> This total only reflects funds provided by CT through unclassified interagency agreements.

**Table 2: Funds Provided to Implementing Partners, FY 2015 to FY 2018**

<b>Implementing Partner</b>	<b>Total Funding</b>
Department of Justice, Office of International Criminal Investigative Training Assistance Programs	\$75,370,035
Department of Justice, Office of Overseas Prosecutorial Development and Assistance Training	\$62,942,072
Federal Bureau of Investigation	\$17,001,389
U.S. National Central Bureau (INTERPOL Washington)	\$3,826,191
U.S. Institute of Peace	\$2,706,000
Transportation Security Administration	\$1,546,380
Department of Homeland Security	\$2,338,915
Department of Justice, Office of the Deputy Attorney General	\$1,500,000
Department of the Treasury, Office of Technical Assistance	\$803,837
U.S. Immigration and Customs Enforcement	\$500,000
<b>Total</b>	<b>\$168,534,819<sup>a</sup></b>

**Source:** Generated by OIG using CT internal tracking data.

<sup>a</sup> For the purpose of this inspection, OIG only reviewed unclassified interagency agreements. As such, this total only reflects funds provided by CT through unclassified interagency agreements.

OIG found the bureau faced challenges in managing and overseeing its interagency agreements. Specifically, as described below, CT experienced difficulty closing out the agreements in a timely manner because it did not include language detailing closeout procedures and deadlines in the agreements. The bureau also struggled to obtain program and financial reporting from its implementing partners.

In addition to the interagency agreements listed above, the bureau awarded \$144.2 million in Federal assistance awards to 44 different entities from FY 2015 to FY 2018. As detailed below, OIG found the bureau's Federal assistance award files did not include all monitoring documentation required by the Department's Federal Assistance Directive.<sup>22</sup>

### ***Interagency Agreements Lacked Closeout Requirements***

OIG concluded that CT's interagency agreements did not include language detailing the closeout procedures required for each award, including specific deadlines. As a result, the bureau found it difficult to close out the agreements and recover associated unspent funds. For example, in one agreement OIG reviewed, the Department of Justice Criminal Division's (DOJ/CRM)<sup>23</sup> inability to determine the amount of funding it had spent and the amount remaining required CT to take more than a year to close the agreement out. This happened

<sup>22</sup> Federal Assistance Directive, Chapter 4, Section D, Monitoring and Reporting (May 20, 2017, and later revisions), which superseded Federal Assistance Procurement Directive, Section 3.01, Monitoring and Performance Reporting (January 14, 2016).

<sup>23</sup> The Department of Justice's Criminal Division includes the Office of Overseas Prosecutorial Development, Assistance and Training, the International Criminal Investigative Training Assistance Program, and International Training Financial Management.

because the CT-developed interagency agreement template lacked any closeout language. The Office of the Procurement Executive's Procurement Information Bulletin 14-05<sup>24</sup> states the closeout process starts after all work specified in an order is completed or terminated, outlines responsibilities of each Federal agency involved, and requires closeout within one year of completion or termination. Without clear language complying with these standards and outlining the proper process, CT cannot enforce timely interagency agreement closeouts and reprogram available funds de-obligated from the agreement.

**Recommendation 4:** The Bureau of Counterterrorism should include standard language on closeout procedures in each interagency agreement, in accordance with Department standards. (Action: CT)

### ***Implementing Agencies Did Not Submit Required Quarterly Performance and Financial Reports***

OIG found CT's implementing partners either did not submit quarterly performance and financial reports or submitted fewer than were required in the interagency agreements. OIG reviewed the files for 12 (total award value: \$32.9 million)<sup>25</sup> of the bureau's 67 interagency agreements issued from FY 2016 to FY 2018 and found none included all required reports. Guidance in 18 FAM 301.4-6(B)(a) requires that a bureau obtain from implementing partners records of how the funds were used and sufficient monitoring data to determine whether adequate progress and results were being achieved. During the January 2019 annual performance review with its implementing partners, the bureau raised these reporting issues. In addition, beginning in FY 2020, CT incorporated a clause into all new interagency agreements stating that funding would not be provided to any implementer that does not submit quarterly reports for two quarters. Because the bureau had taken these steps to address the reporting deficiencies, OIG did not make a recommendation to address this issue.

### ***Federal Assistance Award Files Lacked Monitoring Documentation***

OIG reviewed 12 (total award value: \$48.9 million)<sup>26</sup> of the bureau's 59 Federal assistance awards files and found 9 contained incomplete monitoring documentation. For example, 7 of the 12 files reviewed did not include all required GOR reports, which show whether a recipient performed the award in accordance with the statement of work, and 2 files did not include any GOR reports. According to the Department's Federal Assistance Directive,<sup>27</sup> GORs are to complete a written assessment of the recipient's quarterly reports and include it in the award file. As discussed earlier in this report and in the companion bureau inspection report,<sup>28</sup> staffing shortfalls affected the ability of bureau employees to monitor recipients and perform GOR duties. The inability of staff to perform required monitoring and documentation duties creates additional risk that the bureau may be unable to ensure that recipients spend CT-provided

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<sup>24</sup> Procurement Information Bulletin 14-05, "Non-Acquisition Interagency Agreements," January 23, 2014.

<sup>25</sup> See Appendix E.

<sup>26</sup> See Appendix E.

<sup>27</sup> Chapter 4, Section D (May 20, 2017, and later revisions).

<sup>28</sup> ISP-I-20-13, May 2020.

funding consistent with the terms and conditions of the award or hold recipients accountable for poor performance.

**Recommendation 5:** The Bureau of Counterterrorism should comply with Department standards for Federal assistance award files documentation. (Action: CT)

## FUNDS MANAGEMENT

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OIG found the bureau did not properly manage its foreign assistance funding. As detailed below, the bureau lacked a process to identify funds at risk of expiration or cancellation and, as a result, returned \$51.9 million to the Department of the Treasury from FY 2016 to FY 2019. In addition, the bureau lacked sufficient processes to ensure it managed foreign assistance funds effectively and that spending was consistent with implementation plans and notifications to Congress. Finally, OIG also found the office faced additional challenges in managing funding provided to one of the bureau's implementing partners, resulting in funds returned to the Treasury, untimely closeout of agreements, and overbudgeting of actual expenses, as discussed below.

### ***Bureau Lacked a Process to Ensure Foreign Assistance Funds Were Not Returned to the Treasury***

CT failed to fully track its foreign assistance funding. As a result, it returned funds to the Department of the Treasury that could have been used, in accordance with the bureau's appropriated budget, to further counterterrorism policy goals. OIG found CT returned \$51.9 million in expired and canceled funds from FY 2016 to FY 2019, as shown in Table 3, below.<sup>29</sup> The bureau returned these funds despite having statutory reclassification authority to extend the period of availability for most foreign assistance appropriations. OIG determined CT did not fully use this authority because it lacked a process to systematically identify foreign assistance funds at risk of expiration or cancellation, particularly those that were part of interagency agreements. For example, \$8.3 million of the \$13.1 million returned in FY 2019 were from interagency agreements. CT staff told OIG that implementing partners' failure to consistently submit quarterly financial reports, as discussed above, hindered CT's ability to determine actual expenditure rates.<sup>30</sup> In addition, the bureau lacked a systematic process to track unobligated and unexpended balances, which contributed to the problem. For example, in FY 2019, CT returned almost \$2.7 million in expired funds it never obligated to the Treasury.

CT's lack of a process to track its foreign assistance funding was inconsistent with 4 FAM 084.2, which states that allotments should be managed to provide for efficient and effective funds

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<sup>29</sup> Appropriations expire if unobligated at the end of their period of availability, after which they are referred to as "expired funds." Appropriations that are obligated but not spent by September 30 on the fifth fiscal year after the period of availability for obligation ends are referred to as "canceled funds." As described in 31 U.S.C. § 1552, any unexpended balances are returned to the Department of the Treasury general fund.

<sup>30</sup> A 2012 Department of Justice OIG audit also identified inconsistent submission of quarterly financial reports as a program management issue for its implementers. Department of Justice OIG, *Audit of Management of the Criminal Division's ICITAP and OPDAT* (Audit Report 12-24, March 2012).

management in carrying out the intent of Congress. In the absence of a systematic control process to identify and reclassify funds at risk of expiration or cancellation, the bureau cannot make full use of its foreign assistance resources to achieve counterterrorism policy goals.

**Table 3: CT Funds Returned to Treasury, FY 2016 to FY 2019**

<b>Fiscal Year</b>	<b>Total Funding</b>
2016	\$13,250,533
2017	\$10,760,834
2018	\$14,743,098
2019	\$13,167,508
<b>Total</b>	<b>\$51,921,973</b>

**Source:** Generated by OIG from information provided by CT.

**Recommendation 6:** The Bureau of Counterterrorism should implement a process to identify and reclassify foreign assistance funds at risk of cancellation, in accordance with Department standards. (Action: CT)

***Bureau Could Not Oversee Funds Spent by a Department of Justice Office***

OIG found that CT had difficulties overseeing interagency agreements implemented by DOJ/CRM. CT's issues with funds tracking, discussed above, were exacerbated by DOJ/CRM's irregular submission of required reports.<sup>31</sup> The bureau attempted to improve oversight, but despite conversations with DOJ/CRM management, these challenges persisted. As a result, OIG identified the following issues that affected management of funds furnished to DOJ/CRM:

- The Office of Overseas Prosecutorial Development, Assistance and Training (OPDAT) did not spend all the funding provided by CT and, as a result, the bureau returned \$9.1 million to the Treasury from FY 2017 until FY 2019. For example, OPDAT did not spend \$4.1 million in FY 2014 funding, or 23 percent of the total funds it received from CT that year. CT returned this money to the Treasury at the end of FY 2019.
- DOJ/CRM experienced difficulties reconciling its expenses for one interagency agreement implemented by OPDAT for more than one year, causing follow-on delays in agreement closeout. As a result, CT was unable to reprogram nearly \$800,000 in funding for other counterterrorism programs.
- DOJ/CRM overbudgeted for four of its Regional Legal Advisor positions. As a result, CT obligated 100 percent of each position's estimated costs against the interagency agreements with OPDAT, rather than only CT's share of the position costs.<sup>32</sup>

<sup>31</sup> In a January 2019 meeting with OPDAT, the bureau expressed concerns about reporting submitted by Regional Legal Advisors, including missing or irregular submission of reports as well as of the use of recycled language from previous reports.

<sup>32</sup> OIG's *Audit of Monitoring and Evaluating Department of State Foreign Assistance in the Philippines* (AUD-MERO-19-39, September 2019) found that the Department of Justice funded its Regional Legal Advisor position in the Philippines through interagency agreements with CT and the Bureau of International Narcotics and Law

Office of the Procurement Executive guidance<sup>33</sup> states that funding agencies should identify and monitor financial operations of interagency agreement implementing partners and take corrective action to address identified problems, including reconciling accounts, de-obligating funds, or ending the project and initiating close-out procedures. However, although CT contacted OPDAT leadership to express concerns regarding the slow rate of funds expenditure and the problem of expiring and canceled funds, the issue continued. OIG found the bureau did not consider other steps to address the issue, such as an independent financial audit of the OPDAT interagency agreements.<sup>34</sup> Without greater financial oversight, CT remains at risk of continued program underperformance by and funds control weaknesses for OPDAT.

**Recommendation 7:** The Bureau of Counterterrorism should monitor funds spent through its interagency agreements with the Department of Justice Office of Overseas Prosecutorial Development and Assistance Training and take corrective actions as needed, in accordance with Department guidance. (Action: CT)

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Enforcement Affairs; however, the Department of Justice did not consistently charge each bureau based upon the percentage of work performed by the Advisor. As a result, OIG questioned \$70,000.

<sup>33</sup> Public Information Bulletin 14-05, January 23, 2014.

<sup>34</sup> As stated in the general terms and conditions for the OPDAT interagency agreements, “expenditures are subject to...independent financial audit by the requesting agency or its authorized contractors.”

## RECOMMENDATIONS

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

**Recommendation 1:** The Bureau of Counterterrorism should develop and implement a strategic planning process that includes all the bureau's counterterrorism foreign assistance programs and all partner agencies. (Action: CT)

**Management Response:** In its May 11, 2020, response, the Bureau of Counterterrorism concurred with this recommendation. The bureau noted an expected completion date of July 1, 2020.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a strategic planning process that includes all the bureau's counterterrorism foreign assistance programs and all partner agencies.

**Recommendation 2:** The Bureau of Counterterrorism should comply with Department standards for monitoring and evaluation of its foreign assistance programs. (Action: CT)

**Management Response:** In its May 11, 2020, response, the Bureau of Counterterrorism concurred with this recommendation. The bureau noted an expected completion date of July 1, 2020.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Counterterrorism complied with Department standards for monitoring and evaluation of its foreign assistance programs.

**Recommendation 3:** The Bureau of Counterterrorism should comply with Department standards regarding the use of third-party contractors in its Office of Programs. (Action: CT)

**Management Response:** In its May 11, 2020, response, the Bureau of Counterterrorism concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Counterterrorism complied

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<sup>1</sup> 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.



with Department standards regarding the use of third-party contractors in its Office of Programs.

**Recommendation 4:** The Bureau of Counterterrorism should include standard language on closeout procedures in each interagency agreement, in accordance with Department standards. (Action: CT)

**Management Response:** In its May 11, 2020, response, the Bureau of Counterterrorism concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Counterterrorism included standard language on closeout procedures in each interagency agreement, in accordance with Department standards.

**Recommendation 5:** The Bureau of Counterterrorism should comply with Department standards for Federal assistance award files documentation. (Action: CT)

**Management Response:** In its May 11, 2020, response, the Bureau of Counterterrorism concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Counterterrorism complied with Department standards for Federal assistance award files documentation.

**Recommendation 6:** The Bureau of Counterterrorism should implement a process to identify and reclassify foreign assistance funds at risk of cancellation, in accordance with Department standards. (Action: CT)

**Management Response:** In its May 11, 2020, response, the Bureau of Counterterrorism concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the Bureau of Counterterrorism's process to identify and reclassify foreign assistance funds at risk of cancellation.

**Recommendation 7:** The Bureau of Counterterrorism should monitor funds spent through its interagency agreements with the Department of Justice Office of Overseas Prosecutorial Development and Assistance Training and take corrective actions as needed, in accordance with Department guidance. (Action: CT)

**Management Response:** In its May 11, 2020, response, the Bureau of Counterterrorism concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Counterterrorism monitored funds spent through its interagency agreements with the Department of Justice Office of Overseas Prosecutorial Development and Assistance Training and took corrective actions as needed.

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This inspection was conducted from September 3, 2019, to February 18, 2020, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by OIG for the Department and the U.S. Agency for Global Media (USAGM).

### Objectives and Scope

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

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

The specific objectives for the foreign assistance management portion of OIG's inspection of the Bureau of Counterterrorism (CT) were as follows:

- **Strategic Management:** whether the bureau established processes for linking policy and program activities consistent with 18 Foreign Affairs Manual (FAM) 301, *Strategic Direction and Management, Principles and Practices*.
- **Program Management:** whether (1) the bureau had internal controls to ensure third-party contractors do not perform inherently governmental functions, as prohibited by Federal Acquisition Regulations Subpart 7.5, *Inherently Governmental Functions*; and (2) the bureau integrated measurable, outcome-based metrics into its program design consistent with 18 FAM 300, *Strategic Direction and Management*.
- **Award Management:** whether (1) the bureau's Federal assistance award files included key documents required by Department's Federal Assistance Directive; and (2) the bureau monitored and maintained key documentation for activities performed under its interagency agreements, as required by the terms and conditions of the agreements and the Department's Procurement Information Bulletin 14-05, *Non-Acquisition Interagency Agreements*.

- **Funds Management:** whether the bureau established and employed effective processes to track and monitor pipeline funds, consistent with 4 FAM 225(a), *Accounting Controls and Obligation Management*.

## **Methodology**

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

For this inspection, OIG reviewed a sample of 12 interagency agreements out of the 67 issued from October 2015 to August 2019.<sup>1</sup> For its sample, OIG selected all agreements with a total value of \$1 million or more. OIG selected for review no more than three interagency agreements with any one implementing agency. OIG's sample had a collective total award value of \$32.9 million. OIG also reviewed the files for 12 of the 59 Federal assistance awards issued from October 2015 to August 2019. For this sample, OIG selected all Federal assistance awards with a total value of \$1.5 million or more. This sample had a total award value of \$48.9 million and represented 60 percent of the total funding. OIG's samples of interagency agreements and Federal assistance awards did not include agreements or awards previously reviewed by OIG or those associated with current, ongoing audits. See Appendix E for a list of the specific interagency agreements and Federal assistance awards included in OIG's sample.

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<sup>1</sup> For the purpose of this inspection, OIG only reviewed unclassified interagency agreements and did not review classified interagency agreements.

## APPENDIX B: MANAGEMENT RESPONSE

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United States Department of State

Washington, D.C. 20520

May 11, 2020

UNCLASSIFIED

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

FROM: CT – Nathan A. Sales, Ambassador-at-Large/Coordinator for Counterterrorism

SUBJECT: Response to Draft OIG Report – Inspection of Bureau of Counterterrorism–Foreign Assistance Report

(U) CT Bureau welcomes OIG’s draft inspection reports. We are grateful for OIG’s feedback on what we are doing well and its recommendations on what we might improve. We will use these reports to further refine CT’s effectiveness in executing our mission. On February 14, CT stood up a steering group to begin the process of implementing anticipated OIG recommendations. We established this working group months in advance of receiving the draft reports to ensure that we would be able to implement OIG’s recommendations expeditiously. The steering group was also charged with proposing and implementing more general changes to improve CT’s overall effectiveness. To date, CT has fully implemented four of the seven recommendations in this draft report and has made substantial progress toward implementing the other recommendations. CT offers the following responses to the OIG’s recommendations:

**OIG Recommendation 1:** The Bureau of Counterterrorism should develop and implement a strategic planning process that includes all the bureau’s counterterrorism foreign assistance programs and all partner agencies.

**Management Response:** The Bureau of Counterterrorism concurs with the recommendation and is working with counterparts within the State Department and interagency to develop a strategic planning process that encompasses all Bureau counterterrorism foreign assistance programs and partner entities. It is expected that the plan will be finalized by July 1, 2020.

**OIG Recommendation 2:** The Bureau of Counterterrorism should comply with Department standards for monitoring and evaluation of its foreign assistance programs.

**Management Response:** The Bureau of Counterterrorism concurs with the recommendation. Since the initial interviews with OIG personnel in October of 2019, CT has accelerated progress towards completing the remaining program design steps (referred to as M&E plans in the draft report). CT expects all design steps to be finalized by July 1, 2020.

**OIG Recommendation 3:** The Bureau of Counterterrorism should comply with Department standards regarding the use of third-party contractors in its Office of Programs.

**Management Response:** The Bureau of Counterterrorism concurs with the recommendation. To meet the requirement, CT will make a formal request for additional FTEs in the FY2022 Bureau Resource Request, and will continue to seek opportunities to bolster Programs' direct hire staff. Between now and FY2022, CT will engage Congress to secure permanent domestic Personnel Services Contractor (PSC) authority. If granted, CT will convert existing domestic third party contractors (TPC) into PSCs. Finally, CT/P conducts required trainings for all its staff (FTE, PSC, and TPC) on their roles and responsibilities. For example, on March 21 CT/P conducted a training on Interagency Agreements for all staff that included a section on the roles of the AOR (inherently governmental) and Program Officer. CT/P will conduct another Grants and Cooperative Agreements Training in May 2020 that will similarly outline the respective roles of the GOR and Program Officer. These trainings are mandatory for all new staff and refresher training is offered annually.

**OIG Recommendation 4:** The Bureau of Counterterrorism should include standard language on closeout procedures in each interagency agreement, in accordance with Department standards.

**Management Response:** The Bureau of Counterterrorism concurs with the recommendation. CT has inserted the following language into all new 7600As with interagency partners: "Final Report: A final report for each 7600B order, signed by an authorized employee of the Servicing Agency, is due no later than 90 days after termination of that 7600B order, or this entire Agreement (see Blocks 5 and 16 of the Form 7600A), or expiration of the period of performance of that 7600B order, whichever is earlier. The Final Report shall include commensurate information from both performance and financial reports." In addition, CT has finalized an IAA SOP that covers all phases, from pre-award to closeout.

**OIG Recommendation 5:** The Bureau of Counterterrorism should comply with Department standards for Federal assistance award files documentation.

**Management Response:** The Bureau of Counterterrorism concurs with the recommendation. Since the OIG inspection, CT/P has conducted training for all Programs staff on Department standards for Federal assistance award files and documentation. CT/P has also filled two vacant FTE positions, with a third pending FTE awaiting final security clearance. These new FTEs will be assigned GOR/COR responsibilities, spreading the workload for overtasked staff members, which OIG identified as a factor in the bureau's difficulties complying with these standards.

**OIG Recommendation 6:** The Bureau of Counterterrorism should implement a process to identify and reclassify foreign assistance funds at risk of cancellation, in accordance with Department standards.

**Management Response:** The Bureau of Counterterrorism concurs with the recommendation. In addition to CT's Annual Program Review (APR), CT/P has developed a new quarterly review process for CT/P leadership, during which program managers will report on progress of all CT-funded activities that will also coincide with risk management reporting. CT/EX will provide a report on expenditures as part of the quarterly check-in with Programs leadership, flagging

underperforming programs that will need course correction and/or termination in order to prevent funds cancellation. CT/P, in coordination with CT/EX, has also developed a new SOP specifically with DOJ that spells out the process for reviewing financial reports for the timely reconciliation and closeout of interagency agreements based on period of performance and fund availability criteria. This SOP has been provided to the OIG.

**OIG Recommendation 7:** The Bureau of Counterterrorism should monitor funds spent through its interagency agreements with the Department of Justice Office of Overseas Prosecutorial Development and Assistance Training and take corrective actions as needed, in accordance with Department guidance.

**Management Response:** The Bureau of Counterterrorism concurs with the recommendation. At CT's APR with OPDAT and ICITAP in January 2020, CT/P briefed OPDAT, ICITAP, and ITFM leadership at DOJ on the impending OIG recommendation regarding funds at risk of cancellation and the need to close out agreements more quickly to reduce the amount of funds being cancelled. CT, OPDAT, and ITFM agreed to establish a working group that meets regularly to review implementation of existing IAAs and determine whether to accelerate or close the IAAs to ensure funds are not canceled. The information for these working group meetings will be generated by the quarterly program review process that CT/P is launching, which is supported by the analysis of quarterly financial reports by CT/EX. CT/EX currently monitors funds spent through its interagency agreements as outlined in Department guidance (PIB 14-05). PIB No. 2014-05 states, "Financial status reports should be verified by joint reconciliation efforts," which CT currently does. CT will use these quarterly working group meetings with DOJ/OPDAT to improve the process for reviewing these financial reports for the timely reconciliation and closeout of interagency agreements based on period of performance and fund availability criteria. The document provided to the OIG (titled, "SOP for Timely Closeout of Interagency Agreements") is a copy of CT's Standard Operating Procedure agreement with DOJ. In addition, CT/P took the corrective action of ending joint funding of Resident Legal Advisors (RLAs) with other Bureaus, eliminating the problem of over-funding RLAs.

## APPENDIX C: BUREAU OF COUNTERTERRORISM-MANAGED FOREIGN ASSISTANCE ACCOUNTS

<b>Funding Account</b>	<b>Description</b>
Economic Support Fund	Advances U.S. political and strategic goals in countries of special importance to U.S. foreign policy using economic assistance.
Non-Proliferation, Anti-terrorism, Demining and Related Programs (NADR)	Contributes to certain organizations supporting nonproliferation and provides assistance for nonproliferation, demining, antiterrorism, export control assistance, and other related activities.
NADR Anti-Terrorism Assistance	Provides training, consultations, equipment, infrastructure, and mentoring and advising to enhance partner nations' law enforcement counterterrorism capacities to enable them to deal more effectively with security challenges within their borders; defend against threats to national and regional stability; and deter terrorist operations across borders and regions.
NADR Counterterrorism Finance	Supports basic financial investigations, cash courier training, prosecutor training, and helps prevent the abuse of financial institutions, business, cash couriers, and charitable organizations as conduits for money to terrorist organizations.
NADR Counterterrorism Partnerships Fund (CTPF)	Focuses on building law enforcement capacity to combat terrorism in key countries where there is a high active threat or high risk of threat expansion. Counterterrorism Partnerships Fund countries must be willing partners, and there must be an opportunity to have a defined impact with large-scale, multi-sector programming. Funds may also be used for program support, monitoring, and evaluations.
NADR Relief and Recovery Fund	Seeks to enhance the capacity of law enforcement of partner countries to address counterterrorism-related needs and promote stability and help deny ISIS and other violent extremist organizations the ability to regroup and reemerge. These funds fall under the NADR Anti-Terrorism Assistance account.
NADR Terrorist Interdiction Program	Provides border security screening systems, hardware and software upgrades, and technical assistance and training to partner nations that enable immigration and border control officials to quickly identify suspect persons attempting to enter or leave their countries.

**Source:** Chart generated by OIG.



## APPENDIX D: FOREIGN ASSISTANCE ROLES AND RESPONSIBILITIES

**Table D1: Key Counterterrorism Foreign Assistance Offices in the Department of State**

<b>Bureau/Office</b>	<b>Description</b>
Bureau of Counterterrorism's (CT) Office of Programs	Designs, implements, monitors, and evaluates the bureau's programs and ensures that all programs and activities are implemented in accordance with Federal law and Department guidance and aligned with counterterrorism priorities and strategic goals. Ensures proper management and oversight by agencies and nongovernmental parties responsible for implementing capacity building programs.
CT's Office of the Executive Director	Executes the foreign assistance budget and funds management for the bureau.
CT's Office of Strategy, Plans, and Initiatives	Provides policy and programmatic formulation and strategic direction and guidance for the bureau's anti-terrorism, countering violent extremism, rule of law advisor, regional security initiative, and counterterrorism financing programs, including the strategy documents for the Counterterrorism Partnership Fund (CTPF) priorities.
CT's Office of Countering Violent Extremism	Develops priorities, plans, and programming models for using foreign assistance to counter violent extremist messaging and promote alternative narratives.
CT's Office of Multilateral Affairs	Oversees counterterrorism policy and programs in all multilateral forums and organizations; and serves as the policy lead for the Global Counterterrorism Forum.
CT's Office of Terrorist Screening and Interdiction Programs	Coordinates programs to constrain terrorist mobility globally by helping countries at risk of terrorist activity or transit to enhance their border security capabilities with a computerized screening system known as the Personal Identification Secure Comparison and Evaluation System (PISCES).
Bureau of Budget and Planning	Prepares and submits the Department's budget requests, manages the Department's operational resource requirements, and ensures that operational planning and performance management is synchronized with the Department's resource requirements. This office also coordinates with the Office of Foreign Assistance in developing policies, plans, and programs to achieve foreign policy goals.
Bureau of Administration, Office of Acquisitions Management	Provides a full range of professional grants services, such as grant administration. The grants officers that support the bureau work in this office.
Office of Foreign Assistance	Coordinates foreign assistance resources for the Department and the U.S. Agency for International Development. CT coordinates directly with this office to develop its foreign assistance program budgets.
Bureau of Administration, Office of the Procurement Executive	Establishes acquisition and Federal assistance policy for the Department, provides overall policy and Department management procedures for Federal assistance, and is responsible for appointing grants officers and grants officer representatives.

**Source:** Chart generated by OIG.

**Table D2: Key Counterterrorism Foreign Assistance Positions in the Department of State**

<b>Position</b>	<b>Description</b>
Agreement Officer's Representative (AOR)	Each bureau shall assign to be the AOR an individual who possesses program management expertise and has completed program management training courses. The AOR performs program monitoring based on the size and complexity of the program.
Bureau Evaluation Coordinator	Each bureau and office must identify a point of contact with decision-making authority to serve as the Bureau Evaluation Coordinator to ensure that the evaluation function is fully operational and integrated into the planning and decision-making process. The coordinator will serve as the main point of contact in the bureau on evaluation and will interact with the Bureau of Budget and Planning and the Office of Foreign Assistance on the bureau's evaluation efforts.
Grants Officer	The grants officer is authorized by certificate of appointment issued by the Office of the Procurement Executive to award, amend, and terminate a Federal assistance agreement. The grants officer is responsible for exercising prudent management over assistance funds. The grants officers who support CT's grants work for the Office of Acquisitions Management.
Grants Officer Representative (GOR)	Upon award, Department policy states that the grants officer shall designate a GOR for all grant awards exceeding \$100,000. The GOR is certified by the Office of the Procurement Executive and designated, in writing, by the grants officer to oversee certain aspects of a specific assistance agreement from the award's inception through closeout. The GOR assists the grants officer in ensuring the Department exercises prudent management and oversight of the award through monitoring and evaluation of the recipient's performance. In CT, GORs generally work for the Offices of Programs, Executive Director, Multilateral Affairs, or Strategy, Plans, and Initiatives.
Program Officer	The program officer designs project concepts, facilitates Federal assistance award activities from the pre-award and closeout phases of an award, and supports the GOR with monitoring and implementation of the award. If the program officer is not a third-party contractor, the program officer also may serve as the GOR or AOR for an award.

**Source:** Chart generated by OIG.

## APPENDIX E: OIG SAMPLES OF INTERAGENCY AGREEMENTS AND FEDERAL ASSISTANCE AWARDS

**Table E1: Interagency Agreement Sample**

<b>Project</b>	<b>Implementer</b>	<b>Amount</b>
Foreign Terrorist Fighter – Balkans Automated Targeting System-Global	Department of Justice, Office of International Criminal Investigative Training Assistance Programs (DOJ/ICITAP)	\$5,334,813
Foreign Terrorist Fighter - Balkans Automated Targeting System-Global (Greece, Serbia)	DOJ/ICITAP	\$4,433,996
Bangladesh – Community Policing	DOJ/ICITAP	\$4,000,000
Bangladesh – Regional Legal Advisor (Criminal Justice Reform Program)	Department of Justice, Office of Prosecutorial Development and Assistance Training (DOJ/OPDAT)	\$3,600,000
Regional Legal Advisor (Kenya)	DOJ/OPDAT	\$3,268,800
Counterterrorism Investigations Training (Kenya)	Federal Bureau of Investigation	\$2,208,390
Enhancing INTERPOL Connectivity	U.S. National Central Bureau	\$2,000,000
Global Counterterrorism Forum, Families of Foreign Terrorist Fighters	U.S. Institute of Peace	\$2,000,000
Foreign Terrorist Fighter – Southeast European Law Enforcement Center Regional Legal Advisor	DOJ/OPDAT	\$1,700,000
Foreign Terrorist Fighter – Southeast European Law Enforcement Center Advisor	Department of Homeland Security	\$1,655,435
Afghanistan Counterterrorism Finance	Department of Justice, Office of the Deputy Attorney General	\$1,497,235
Kenya - Border Community Engagement	U.S. Institute of Peace	\$1,200,000
<b>Total</b>		<b>\$32,898,669</b>

**Source:** Chart generated by OIG.

**Table E2: Federal Assistance Award Sample**

<b>Award Number</b>	<b>Project</b>	<b>Total Funding</b>
SLMAQM18CA2043	Libya Airport and Aviation Security	\$12,504,679
SLMAQM16GR1037	Support for the Global Community Engagement and Resilience Fund	\$9,667,500
SLMAQM17CA2058	INTERPOL Analytical Platform	\$7,159,375
SLMAQM16GR1332	Communications Support for Hedayah	\$3,295,423
SLMAQM18CA2071	Continued Support for International Institute for Justice and the Rule of Law Programs	\$3,209,675
SLMAQM18GR2219	Countering Terrorism Through a Strengthened Rule of Law Framework	\$2,962,500
SLMAQM18CA2035	Continuation of U.S. Support to Strong Cities Network	\$1,975,000
SLMAQM18CA2041	Community-based Interventions	\$1,972,285
SLMAQM16CA1214	Countering Violent Extremism Capacity-Building for Ministries in Mali and Mauritania	\$1,573,283
SLMAQM16GR1286	Tales from the Frontline – Morocco	\$1,530,000
SLMAQM18GR2272	Pakistan Counterterrorism Finance Rule of Law	\$1,506,276
SLMAQM19GR2073	U.S. Support for the Global Community Engagement and Resilience Fund	\$1,500,000
<b>Total</b>		<b>\$48,855,696</b>

**Source:** Chart generated by OIG.

## ABBREVIATIONS

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CT	Bureau of Counterterrorism
CTPF	Counterterrorism Partnerships Fund
DOJ/CRM	Department of Justice Criminal Division
FAM	Foreign Affairs Manual
NADR	Non-Proliferation, Anti-terrorism, Demining and Related Programs
OPDAT	Office of Overseas Prosecutorial Development and Assistance Training

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