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United States Department of State

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December 2020

**(U) Management Assistance Report: The  
Bureau of Diplomatic Security Did Not  
Always Conduct Post Security Program  
Reviews Within Required Timeframes**

MANAGEMENT ASSISTANCE REPORT

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## (U) Summary of Review

(U) The Bureau of Diplomatic Security (DS) is the federal law enforcement and security bureau of the Department of State (Department) and has the largest global reach of any U.S. federal law enforcement agency. DS has 253 regional security offices led by a U.S. direct-hire regional security officer (RSO) with oversight responsibility for more than 280 locations around the world. One method used by DS to oversee the regional security offices located at overseas posts is the Post Security Program Review (PSPR) program. A PSPR consists of consultations with relevant DS offices, document reviews, observations at post, and interviews with post personnel to evaluate a regional security office's level of compliance with selected requirements on topics such as life safety and emergency preparedness.<sup>1</sup> Two DS directorates conduct PSPRs using the same overarching policies: (1) the High Threat Programs Directorate (HTP) for high-threat, high-risk (HTHR) posts<sup>2</sup> and (2) the International Programs Directorate (IP) for non-HTHR posts.<sup>3</sup>

(U) During an audit of the PSPR program, the Office of Inspector General (OIG) found that DS did not always conduct PSPRs within required timeframes as set forth in Department policy.<sup>4</sup> Specifically, OIG found that between FY 2016 and February 2020, HTP did not always conduct PSPRs within the required timeframe for 22 of 27 (81 percent) HTHR posts. For example, one post did not undergo the required annual PSPR in 2016 or 2017. In addition, OIG found that IP did not conduct PSPRs within the required timeframes at 84 of 222 (38 percent) non-HTHR posts. For example, a non-HTHR post that required an annual PSPR did not undergo a PSPR in FY 2016, FY 2018, or FY 2019. In another example, OIG found two non-HTHR posts that were to have a PSPR on a 3-year cycle had a PSPR conducted in FY 2016, but neither had a PSPR in FY 2019 and, as of February 2020, were both overdue for a PSPR by 12 months.

(U) HTP and IP officials stated a variety of reasons why the established timeframes for PSPRs had not been met. For example, HTP officials cited regional security officer staffing gaps, the local security environment, and Foreign Service Officer rotations as reasons for not meeting the established timeframe for conducting PSPRs at HTHR posts. IP officials stated that the primary reason it has not met established timeframes for conducting PSPRs at non-HTHR

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<sup>1</sup> (U) 12 Foreign Affairs Manual (FAM) 413.2(a), "Preparation – PSPR Pre-Deployment Review," and 12 FAM 413.3, "Conducting a PSPR."

<sup>2</sup> ~~(SBU)~~ 12 FAM 493, "High Threat, High Risk (HTHR) POST REVIEW Process," states that DS determines which posts are designated as high-threat, high-risk (HTHR) annually based on the following risk factors:

<sup>3</sup> (U) 12 FAM 413.1-1(a)(b), "PSPR Frequency."

<sup>4</sup> (U) 12 FAM 413.1-1 states that the PSPR schedule is based on the type of post and the post's Security Environment Threat List (SETL) ratings. The Background section of this report provides details on the scheduling requirements.

posts is staffing shortages. By not conducting PSPRs within required timeframes, DS has limited assurance that posts are competently managing life safety, emergency preparedness, and information security programs. Therefore, OIG made two recommendations to DS that are intended to improve the timeliness of PSPRs in both HTP and IP. In response to a draft of this report, DS concurred with the recommendations offered. On the basis of DS's concurrence with the recommendations and planned actions, OIG considers the two recommendations resolved, pending further action. A synopsis of DS's response to the recommendations offered and OIG's reply follow each recommendation in the Results section of this report. DS's response to a draft of this report is reprinted in its entirety in Appendix A.

## (U) BACKGROUND

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### (U) The Post Security Program Review Process

(U) DS is the federal law enforcement and security bureau of the Department and has the largest global reach of any U.S. federal law enforcement agency. DS has 253 regional security offices led by a U.S. direct-hire regional security officer with oversight responsibility for more than 280 locations around the world. DS created the PSPR program in 2008 as a mechanism to oversee the regional security offices located at overseas posts. The stated goal of the PSPR program is to "ensure that posts competently manage life safety, emergency preparedness, and information security programs with full mission support and participation, sufficient resources, and appropriate management controls."<sup>5</sup> Embassies, consulates general, and consulates are the main types of posts reviewed.<sup>6</sup>

~~(SBU)~~ Two DS directorates conduct PSPRs using the same overarching policies: (1) HTP for HTHR posts and (2) IP for non-HTHR posts.<sup>7</sup> The directorates' Office of Regional Directors (HTP/RD and IP/RD) are divided by geographic region and are each headed by a Regional Director. Regional Directors serve as liaisons between DS and the Department's regional bureaus' Executive Directors and are responsible for ensuring that post security programs are in compliance with Department policies.<sup>8</sup> As of June 2020, HTP/RD and IP/RD each consisted of over 30 staff members (Regional Directors, Deputy Regional Directors and desk officers) who can conduct PSPRs. HTP is divided into three regional offices.<sup>9</sup> 

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<sup>5</sup> (U) 12 FAM 413.1, "Overview."

<sup>6</sup> (U) Department memorandum, "Standard Operating Procedures (SOP) for Post Security Program Reviews (PSPRs) – For Internal Staff Use," April 3, 2019. This SOP was updated on January 17, 2020, and states, "All U.S. embassies, consulates general (CG), and consulates are required to have a PSPR." PSPRs are required at other post types (e.g., Embassy Branch Offices, American Presence Posts, and consular agencies) that have at least one permanently assigned regional security officer position depending on SETL ratings.

<sup>7</sup> (U) 12 FAM 413.1-1(a)(b).

<sup>8</sup> (U) 1 FAM 262.2-2, "Office of Regional Directors (DS/IP/RD)" and 1 FAM 262.3-2, "Office of Regional Directors (DS/HTP/RD)."

<sup>9</sup> (U) The three HTP regional offices are the (1) Africa Region, (2) Near East Asia and South and Central Asia Region, and (3) Iraq and Afghanistan.

[REDACTED]<sup>10</sup> IP is divided into five regional offices.<sup>11</sup> [REDACTED]

(U) A PSPR is designed to evaluate a regional security office's level of compliance with selected requirements<sup>12</sup> in eight areas:

- RSO Leadership and Management<sup>13</sup>
- Security Directives and Policies
- Life Safety
- Emergency Preparedness
- Safeguarding Classified Material
- Investigations
- Management Requirements
- Reporting Requirements

(U) During a PSPR, the HTP or IP team, composed of at least two program review officers or one or more program review officers and a regional director or deputy regional director from the respective directorate, conducts consultations with relevant DS offices and reviews post documentation before traveling to a post. At post, the team reviews documentation, inspects facilities and residences, observes post operations, and interviews post personnel. At the conclusion of the PSPR, the team discusses any noncompliant areas of review with the RSO. The team then documents any best practices identified at the post, any noncompliant areas of review, and any recommendations in a PSPR report sent to the post's deputy chief of mission and RSO. Within 45 days of the PSPR report date, the RSO is expected to provide a memorandum to DS that outlines corrective actions undertaken to resolve any deficiencies identified by the PSPR.<sup>14</sup>

### **(U) Post Security Program Review Scheduling**

(U) Both HTP and IP are responsible for scheduling PSPRs for their respective posts. The Foreign Affairs Manual (FAM)<sup>15</sup> dictates the required timeframes for conducting PSPRs:

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<sup>10</sup> (U) Of these 36 posts, 7 posts were closed or had suspended operations. OIG did not evaluate PSPR timeliness for these seven posts, one post that did not require a PSPR per the PSPR SOP, and another post that became an HTHR post in 2019.

<sup>11</sup> (U) The five IP regional offices are the (1) Africa Region, (2) Western Hemisphere Region, (3) East Asia and Pacific Region, (4) Europe and Eurasia Region, and (5) Near East and South and Central Asia Region.

<sup>12</sup> (U) 12 FAM 413.3(a).

<sup>13</sup> (U) Per DS officials, this area of review was removed from the form in October 2019 and is now covered as a narrative in PSPR reports.

<sup>14</sup> (U) "Standard Operating Procedures (SOP) for Post Security Program Reviews (PSPRs) - For Internal Staff Use," April 3, 2019 and January 17, 2020.

<sup>15</sup> (U) 12 FAM 413.1-1.

- A PSPR must be conducted annually for all HTHR posts.
- A PSPR must be conducted annually for non-HTHR posts rated “critical” in at least two of the terrorism, political violence, and crime Security Environment Threat List (SETL) categories.<sup>16</sup>
- A PSPR must be conducted every 2 years for non-HTHR posts rated either “critical” in one or “high” in each of the terrorism, political violence, and crime SETL categories.
- A PSPR must be conducted every 3 years for all other non-HTHR posts.<sup>17</sup>

(U) Beyond the required timeframes for conducting the PSPRs, HTP and IP may prioritize PSPRs based on local security environments or when a specific need arises (e.g., following a crisis at a post).<sup>18</sup>

## **(U) Purpose of the Management Assistance Report**

(U) This Management Assistance Report is intended to provide communication of deficiencies that OIG identified during an audit of the PSPR program. The objective of the audit was to determine whether DS’s PSPR process is sufficient to identify and resolve deficiencies in the management of selected posts’ life safety, emergency preparedness, and information security programs. OIG is reporting the deficiencies discussed in this Management Assistance Report in accordance with generally accepted government auditing standards. In performing the work related to these deficiencies, OIG interviewed DS officials, reviewed applicable criteria, and reviewed historical PSPR data and other supporting documentation. OIG believes that the evidence obtained provides a reasonable basis for the conclusions presented in this report.

## **(U) RESULTS**

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### **(U) Finding A: DS Did Not Always Conduct Post Security Program Reviews Within the Required Timeframes**

(U) OIG found that, between FY 2016 and February 2020,<sup>19</sup> DS did not conduct PSPRs within required timeframes. A PSPR must be conducted annually for HTHR posts and conducted in 1-year, 2-year, or 3-year intervals for non-HTHR posts.<sup>20</sup> However, OIG found that during the period under review HTP did not always conduct PSPRs annually at 22 of 27 (81 percent) HTHR posts. In addition, OIG found that IP did not conduct PSPRs when required at 84 of 222 (38 percent) non-HTHR overseas posts. HTP and IP officials stated a variety of reasons why the established timeframes for PSPRs had not been met, including staffing gaps and shortages. By not conducting PSPRs within required timeframes, DS has limited assurance that posts are

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<sup>16</sup> (U) The SETL has four categories of threats and associated ratings for all overseas U.S. posts. The SETL aids DS in the allocation of overseas security resources and programs.

<sup>17</sup> (U) 12 FAM 413.1-1.

<sup>18</sup> (U) Ibid.

<sup>19</sup> (U) OIG selected February 2020 as the end of the scope period because it began the audit in March 2020.

<sup>20</sup> (U) 12 FAM 413.1-1(a)(b).

competently managing life safety, emergency preparedness, and information security programs.

***(U) HTP Did Not Always Conduct PSPRs Within the Required Timeframe for HTHR Posts***

(U) According to the FAM,<sup>21</sup> a PSPR must be conducted annually for all HTHR posts. OIG found that, between 2016<sup>22</sup> and February 2020, HTP did not always conduct PSPRs annually<sup>23</sup> at 22 of 27 (81 percent) HTHR posts. For example, OIG found that one HTHR post did not undergo a PSPR in 2016 or 2017.

***(U) IP Did Not Always Conduct PSPRs Within the Required Timeframes for Non-HTHR Posts***

(U) According to the FAM,<sup>24</sup> a PSPR must be conducted annually<sup>25</sup> for non-HTHR posts rated “critical” in two or more of the terrorism, political violence, and crime SETL categories. Of the 2 non-HTHR posts that required annual PSPRs, OIG found that, between FY 2016 and February 2020, IP did not conduct a PSPR for one (50 percent) within the required timeframe. Moreover, for this post, no PSPR was conducted in FY 2016, FY 2018, and FY 2019.

(U) According to the FAM,<sup>26</sup> a PSPR must be conducted every 2 years<sup>27</sup> for non-HTHR posts rated either “critical” in one or “high” in each of the terrorism, political violence, and crime SETL categories. Of 53 non-HTHR posts that required PSPRs every 2 years, OIG found that, between FY 2016 and February 2020, IP did not conduct a PSPR for 24 posts (45 percent) within the required timeframe. For example, one post was due for a PSPR in FY 2018, but it did not undergo a PSPR until 21 months past the required timeframe.

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<sup>21</sup> (U) 12 FAM 413.1-1(b).

<sup>22</sup> (U) HTP tracked PSPRs by calendar year until FY 2020. Therefore, OIG’s analysis of HTP looked at PSPRs conducted from January 2016 to February 2020. For IP, OIG’s analysis looked at PSPRs conducted from October 2015 to February 2020.

<sup>23</sup> (U) Neither the FAM nor the PSPR SOP defined “annual” for HTHR posts. Therefore, OIG interpreted this requirement as conducting a PSPR during the year that it was due. For example, if a PSPR was conducted in February 2017, OIG verified whether another PSPR was conducted sometime between February 2018 and December 2018.

<sup>24</sup> (U) 12 FAM 413.1-1(a)(1).

<sup>25</sup> (U) Neither the FAM nor the PSPR SOP defined “annual” for IP posts. Therefore, OIG interpreted this requirement as conducting a PSPR during the year that it was due. For example, if a PSPR was conducted in February 2017 (i.e., FY 2017), OIG verified whether another PSPR was conducted sometime between October 2017 and September 2018 (i.e., FY 2018).

<sup>26</sup> (U) 12 FAM 413.1-1(a)(2).

<sup>27</sup> (U) Neither the FAM nor the PSPR SOP defined “every 2 years.” Therefore, OIG interpreted this requirement as conducting a PSPR during every other year. For example, if a PSPR was conducted in February 2017 (i.e., FY 2017), OIG verified whether another PSPR was conducted sometime between October 2018 and September 2019 (i.e., FY 2019).

(U) According to the FAM,<sup>28</sup> a PSPR must be conducted every 3 years<sup>29</sup> for non-HTHR posts rated, at a maximum, as “high” in two or less of the terrorism, political violence, and crime SETL categories. Of 167 non-HTHR posts that required PSPRs every 3 years, OIG found that, between FY 2016 and February 2020, IP did not conduct a PSPR for 59 posts (35 percent) within the required timeframe. For example, OIG found two non-HTHR posts that had undergone a PSPR in FY 2016, but neither had a PSPR in FY 2019 and, as of February 2020, were both overdue for a PSPR by 12 months.

***(U) HTP and IP Officials Stated That PSPRs Were Untimely for a Variety of Reasons***

(U) According to HTP officials, HTP did not always conduct PSPRs for HTHR posts within the required timeframe for a variety of reasons.<sup>30</sup> First, HTP officials cited RSO staffing gaps. For example, a PSPR for one HTHR post was scheduled to take place in December 2017 and was delayed to March 2018 due to RSO staffing gaps. In another example, the RSO at one HTHR post was permanently evacuated due to medical reasons. As a result, HTP officials postponed the PSPR, which was due in January 2017, to January 2018 once a permanent RSO arrived at post. RSO staffing gaps impact PSPR scheduling because an important component of a PSPR is assessing the established working relationships between the RSO, post management, and post section heads. Therefore, PSPRs are delayed until permanent RSOs are in place.

~~(SBU)~~ Second, HTP officials also stated that the staffing composition of HTP, which is mostly comprised of Foreign Service Officers, is a reason for not conducting PSPRs within the required timeframe. Specifically, Foreign Service Officers typically rotate from positions in the summer and are not available to conduct PSPRs during summer months. In addition, the Standard Operating Procedures for conducting PSPRs state that a PSPR should not be scheduled during an RSO's first or last 3 months at post, which further limits when a PSPR can be conducted.

[REDACTED] HTP conducts an average of 19 PSPRs per year. However, during FY 2021, 24 HTP posts are due for a PSPR. Thus, additional staff would help HTP meet its PSPR obligations.

(U) With respect to non-HTHR posts, IP officials stated a variety of reasons but noted that the primary reason it does not always meet the established timeframes for conducting PSPRs at non-HTHR posts is because of staffing shortages. Specifically, in October 2019, IP requested five Civil Service positions to address its staffing shortage. The requested Civil Service positions were not provided, and in April 2020, IP again requested five additional Civil Service positions to

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<sup>28</sup> (U) 12 FAM 413.1-1(a)(3).

<sup>29</sup> (U) Neither the FAM nor the PSPR SOP defined “every 3 years.” Therefore, OIG interpreted this requirement as conducting a PSPR during every third year. For example, if a PSPR was conducted in February 2017 (i.e., FY 2017), OIG verified whether another PSPR was conducted sometime between October 2019 and February 2020 (i.e., FY 2020).

<sup>30</sup> (U) DS officials also noted that, in addition to the reasons noted in this section, the 2019 lapse in appropriations and travel restrictions due to the COVID-19 pandemic impacted DS’s ability to perform all required PSPRs.

<sup>31</sup> (U) Ordered departure is a mandatory procedure where the number of U.S. Government personnel or eligible family members, or both, is reduced.

address its staffing shortage. IP eventually created Personal Services Contract<sup>32</sup> positions for each of its five regional directorates to assist in executing timely PSPRs. IP officials also stated that the program review officers who conduct PSPRs fulfill other duties and often have competing priorities such as serving on protective security details and filling temporary duty assignments to address RSO staffing shortages. IP conducts an average of 76 PSPRs per year. However, during FY 2021, 83 IP posts are due for a PSPPR. Thus, OIG concludes that additional staff would help IP meet its PSPPR obligations.

(U) Although OIG recognizes the limitations cited by HTP and IP officials, OIG found that during the period under review 81 percent of PSPRs for HTHR posts and nearly 40 percent of PSPRs for non-HTHR posts did not meet the required timeframes. OIG concludes that DS needs to evaluate the PSPPR process and take actions to meet the required timeframes for conducting PSPPRs, especially for HTHR posts. The security threats inherent to HTHR posts and the fact that these posts are supposed to receive priority with respect to the distribution of security assets increase the importance of meeting the annual target of conducting PSPPRs. In addition, promptly addressing this issue is important to help ensure posts are competently managing life safety, emergency preparedness, and information security programs. OIG is, therefore, offering the following recommendations.

**Recommendation 1:** (U) OIG recommends that the Bureau of Diplomatic Security (a) evaluate the Post Security Program Review process, including the staffing structure (Foreign Service versus Civil Service) and levels (how many positions are needed to conduct Post Security Program Reviews in a timely manner) and (b) identify recommendations, as appropriate, for meeting required timeframes and the intent of the program.

**(U) Management Response:** DS concurred with this recommendation, stating that it will evaluate the PSPPR process, including the staffing structure and level and, if necessary, examine the current PSPPR frequency guidelines and identify recommendations for meeting the required timeframes and the intent of the program.

**(U) OIG Reply:** On the basis of DS's concurrence with the recommendation and actions planned, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives and accepts documentation demonstrating that DS has evaluated the PSPPR process and identified recommendations, as appropriate.

**Recommendation 2:** (U) OIG recommends that the Bureau of Diplomatic Security develop and execute a corrective action plan that implements the recommendations of its evaluation (Recommendation 1).

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<sup>32</sup> (U) The Department may employ individuals or organizations, by contract, for services abroad. Individuals employed by contract to perform such services (i.e., personal services contractors) are generally not considered to be employees of the U.S. Government.

**(U) Management Response:** DS concurred with this recommendation, stating that following the evaluation noted in its response to Recommendation 1, DS will develop and execute a plan to address any recommendations.

**(U) OIG Reply:** On the basis of DS's concurrence with this recommendation and actions planned, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives and accepts documentation demonstrating that, if recommendations were identified as a result of the PSPR process evaluation, DS has developed and executed a corrective action plan.

## (U) RECOMMENDATIONS

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**Recommendation 1:** (U) OIG recommends that the Bureau of Diplomatic Security (a) evaluate the post security program review process, including the staffing structure (Foreign Service versus Civil Service) and levels (how many positions are needed to conduct Post Security Program Reviews in a timely manner) and (b) identify recommendations, as appropriate, for meeting required timeframes and the intent of the program.

**Recommendation 2:** (U) OIG recommends that the Bureau of Diplomatic Security develop and execute a corrective action plan that implements the recommendations of its evaluation (Recommendation 1).

## (U) APPENDIX A: BUREAU OF DIPLOMATIC SECURITY RESPONSE

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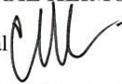
United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

November 20, 2020

### INFORMATION MEMO FOR ACTING INSPECTOR GENERAL KLIMOW - OIG

FROM: DS – Carlos F. Matus , Acting Senior Bureau Official 

SUBJECT: Bureau of Diplomatic Security Response to the Office of Inspector General (OIG) Draft Management Assistance Report: *The Bureau of Diplomatic Security Did Not Always Conduct Post Security Program Reviews Within Required Timeframes* Resulting from Audit of the Bureau of Diplomatic Security's Post Security Program Review (PSPR) Timeliness, AUD-SI-21-XXX

Below is the Bureau of Diplomatic Security's response to OIG's draft report, including recommendations [#1-#2].

#### **DS Response to Audit Finding and Recommendations:**

DS proposes the following corrections to the draft report:

DS notes two important factors that impacted DS' ability to perform all required post security program reviews (PSPR) were the 2019 lapse in appropriations and travel restrictions in place due to the ongoing COVID-19 pandemic. DS requests these two factors be reflected in the report as other key root causes for the number of untimely PSPRs. (REF: Summary of Review, Page 1, Paragraph 3, and Finding A, Page 4, Paragraph 1).

**Recommendation #1:** *OIG recommends that the Bureau of Diplomatic Security (a) evaluate the post security program review process, including the staffing structure (Foreign Service versus Civil Service) and levels (how many positions are needed to conduct Post Security Program Reviews in a timely manner) and (b) identify recommendations, as appropriate, for meeting required timeframes and the intent of the program.*

**DS Response #1 (XX/XX/2020):** DS concurs with this recommendation. DS will evaluate the post security program review (PSPR) process, including the staffing structure (FS vs CS) and levels (how many positions are needed to conduct PSPRs in a timely manner) and, if necessary, will examine the current PSPR frequency guidelines and identify recommendations for meeting required timeframes and the intent of the program.

**Recommendation #2:** *OIG recommends that the Bureau of Diplomatic Security develop and execute a corrective action plan that implements the recommendations of its evaluation (Recommendation 1).*

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**DS Response #2 (XX/XX/2020):** DS concurs with this recommendation. Following the evaluation noted in recommendation 1, DS will develop and execute a plan to address any recommendations, should any recommendations be identified.

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Approved: DS – Carlos F. Matus()

Analyst: DS/MGT/PPD – T. Carnell, ext. 5-3993

Drafted: DS/HTP/RD – A. Madero  
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DS/EX/MGT – J. Schools (ok)  
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DS/IP – C. Chasten (ok)  
DS/IP/OPO – D. Waller (ok)  
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## (U) OIG AUDIT TEAM MEMBERS

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