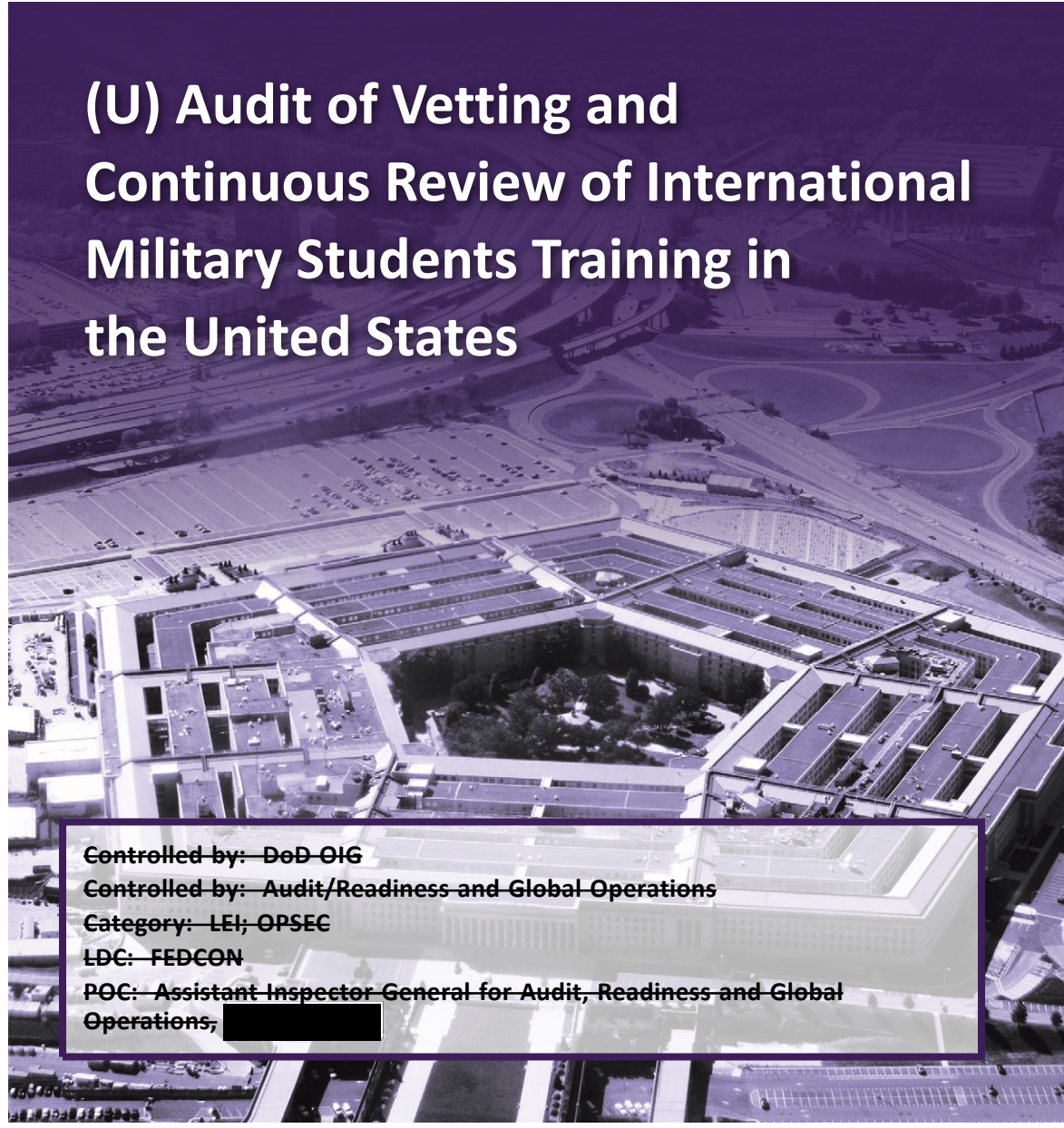


CUI

INSPECTOR GENERAL

U.S. Department of Defense

DECEMBER 7, 2022



(U) Audit of Vetting and Continuous Review of International Military Students Training in the United States

~~Controlled by: DoD OIG~~

~~Controlled by: Audit/Readiness and Global Operations~~

~~Category: LEI; OPSEC~~

~~LDC: FEDCON~~

~~POC: Assistant Inspector General for Audit, Readiness and Global Operations, [REDACTED]~~

INTEGRITY ★ INDEPENDENCE ★ EXCELLENCE

CUI





(U) Results in Brief

(U) Audit of Vetting and Continuous Review of International Military Students Training in the United States

(U) December 7, 2022

(U) Objective

(U) The objective of this audit was to determine whether the Defense Counterintelligence and Security Agency completed DoD security vetting (vetting) of International Military Students (IMS) enrolled in U.S.-based training programs, and their accompanying family members (accompanying family), according to DoD policy and communicated the results of its analysis to appropriate DoD stakeholders.

(U) Background

(U) The DoD typically trains more than 20,000 IMS annually at military institutions in the United States. IMS include any foreign national who is nominated or accepted for training or education on a DoD installation or facility in the United States. IMS may bring accompanying family, such as their spouse or children, to live with them when training in the United States. Examples of DoD training that IMS attend include courses on disaster response, flying aircraft, and explosive ordnance disposal.

~~(CUI)~~ On December 6, 2019, an IMS from the Royal Saudi Air Force, attending flight school at Naval Air Station Pensacola, Florida, killed three Navy sailors, and wounded eight other people. [REDACTED]

(U) Background (cont'd)

(U) The stakeholders responsible for coordinating or implementing DoD vetting requirements for IMS and their accompanying family include the Defense Security Cooperation Agency (DSCA), the Defense Counterintelligence and Security Agency (the Screening Center), the Military Departments, and Security Cooperation Organizations (SCO).

(U) Finding

~~(CUI)~~ The Screening Center communicated 100 percent of its IMS vetting results to all relevant DoD stakeholders. Specifically, we determined that the Screening Center prepared reports containing derogatory information for [REDACTED]

(U) However, the Screening Center did not complete vetting and continuous reviews, as required by DoD policy, for all IMS participating in U.S.-based training programs. Specifically, the Screening Center did not perform vetting procedures for 2 of the 59 IMS we reviewed, in accordance with DoD guidance. This occurred because two SCOs did not provide all the biographic information that the Screening Center requires to vet an IMS. Additionally, the two SCOs issued travel orders to the IMS although the vetting was not complete. This allowed these two IMS to travel to their DoD training location without first being vetted as required by DoD guidance. We also found that the Security Cooperation-Training Management System (SC-TMS), the computer system the DoD uses for managing IMS and issuing travel orders, did not have sufficient internal controls to prevent these SCOs from incorrectly issuing the travel orders before the Screening Center completed vetting.

~~(CUI)~~ We also determined the Screening Center did not complete on-time continuous reviews for 54 of the 57 IMS we reviewed. [REDACTED]



(U) Results in Brief

(U) Audit of Vetting and Continuous Review of International Military Students Training in the United States

(U) Finding (cont'd)

(~~CUI~~) [REDACTED] This occurred because the DSCA and the Screening Center did not have procedures for communicating when these continuous reviews were due.¹

(U) As a result of the Screening Center's effective communication of IMS vetting results, the DoD prohibited four high-risk and one moderate-risk IMS from attending U.S.-based training. However, because the Screening Center did not vet all the IMS in our sample prior to the IMS traveling to the United States, the DoD experienced increased risk that it could have granted credentialed recurring access (CRA) to an IMS who posed a threat to U.S. personnel. Because the Screening Center did not complete on-time continuous reviews, there was also an increased risk that the DoD would not detect behavior indicating that an IMS who was previously granted CRA had radicalized and posed a threat to U.S. personnel.

(U) Recommendations

(U) We recommend that the Director of the DSCA:

- (U) direct his staff to develop internal controls which will prevent an SC-TMS user from issuing a travel order to an IMS before the Screening Center reports favorable vetting results; and
- (U) direct his staff to develop and implement a formal procedure establishing that Defense Security Cooperation Agency personnel must alert the Screening Center when continuous review of an IMS needs to begin.

(U) Management Actions Taken

(U) During the audit, we told DSCA officials that an internal control weakness existed in the IMS vetting process, specifically, that SC-TMS users could issue

(U) travel orders to an IMS before the Screening Center completed its vetting. The officials agreed with our observation and explained that the DSCA was developing a capability that would render the function used to issue travel orders in SC-TMS inoperable until the Screening Center reported favorable vetting results. On October 19, 2022, DSCA personnel showed us various scenarios to demonstrate that this function was operational. For example, DSCA personnel tried to issue a travel order to multiple IMS for whom the Screening Center had not completed vetting. SC-TMS prevented issuance of the travel order and displayed a message on screen that the lack of vetting was the reason. Based on our observation, we concluded that the capability to block travel order issuance until after vetting was complete was operating as intended. This action addressed our concern; therefore, the recommendation is closed.

(~~CUI~~) We also told DSCA officials that a weakness existed in informing the Screening Center when continuous reviews were due for completion. The officials agreed with our observation and in March 2022, DSCA personnel began sending a list of IMS due for continuous review [REDACTED] to the Screening Center. A Screening Center official confirmed that the DSCA began sending a list of upcoming continuous reviews every 3 weeks. The DSCA Chief of International Military Training Education division formally documented this procedure in a memorandum for record addressed to the DSCA's SC-TMS development team and product owner. We analyzed a nonstatistical sample of 50 continuous reviews that the Screening Center completed in July 2022, which is after the DSCA implemented our recommendation. [REDACTED]

[REDACTED] The DSCA's actions addressed our concern and had an immediate impact on the timeliness of continuous reviews; therefore, the recommendation is closed.

¹ (U) Our nonstatistical sample for continuous reviews was 57. The Screening Center did not vet two IMS in our sample of 59 IMS; therefore, a maximum of 57 IMS from our original nonstatistical sample would have been subject to a continuous review.

(U) Recommendations Table

(U) Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
Director, Defense Security Cooperation Agency	None	None	1.a, 1.b (U)

(U) Note: The following categories are used to describe agency management’s comments to individual recommendations.

- **(U) Unresolved** – Management has not agreed to implement the recommendation or has not proposed actions that will address the recommendation.
- **(U) Resolved** – Management agreed to implement the recommendation or has proposed actions that will address the underlying finding that generated the recommendation.
- **(U) Closed** – DoD OIG verified that the agreed upon corrective actions were implemented.





**INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
ALEXANDRIA, VIRGINIA 22350-1500**

December 7, 2022

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR INTELLIGENCE AND SECURITY
DIRECTOR, DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY
DIRECTOR, DEFENSE SECURITY COOPERATION AGENCY

(U) SUBJECT: Audit of Vetting and Continuous Review of International Military Students
Training in the United States (Report No. DODIG-2023-036)

(U) This final report provides the results of the DoD Office of Inspector General's audit. We are providing this report for your information and use. We coordinated a discussion draft of this report with officials from the Office of the Under Secretary of Defense for Intelligence and Security, the Military Departments, the Defense Counterintelligence and Security Agency, and the Defense Security Cooperation Agency. They concurred with our report and provided technical comments, which we incorporated, as appropriate. Management took action to address the recommendations in this report, and we consider the recommendations closed.

(U) We appreciate the cooperation and assistance received during the audit. If you have any questions, please contact me at [REDACTED]

A handwritten signature in black ink that reads "Richard B. Vasquez".

Richard B. Vasquez
Assistant Inspector General for Audit
Readiness and Global Operations

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(U) Acronyms and Abbreviations

(U) Introduction

(U) Objective

(U) The objective of this audit was to determine whether the Defense Counterintelligence and Security Agency completed DoD security vetting (vetting) of International Military Students (IMS) enrolled in U.S.-based training programs, and their accompanying family members (accompanying family), according to DoD policy and communicated the results of its analysis to appropriate DoD stakeholders.

(U) Background

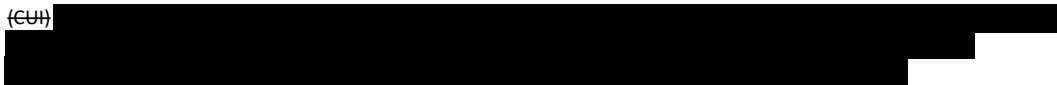
(U) The DoD typically trains more than 20,000 IMS annually at military institutions in the United States. IMS include any foreign national who is nominated or accepted for training or education on a DoD installation or facility in the United States. IMS may bring accompanying family, such as their spouse or children, to live with them while training in the United States. International military training and education programs are an important part of DoD security cooperation relationships, and help the DoD realize its 2022 National Defense Strategy intent to advance U.S. national security goals by, among other means, collaborating with our allies and partners. Examples of DoD training that IMS attend include courses on disaster response, flying aircraft, and explosive ordnance disposal. IMS training can last from two weeks through a year or more.

(U) On December 6, 2019, an IMS from the Royal Saudi Air Force, attending flight school at Naval Air Station Pensacola, Florida, killed three Navy sailors, and wounded eight other people.

(U) On December 6, 2019, an IMS from the Royal Saudi Air Force, attending flight school at Naval Air Station Pensacola, Florida, killed three Navy sailors, and wounded eight other people. Because of this incident, the Office of the Under Secretary of

Defense for Intelligence and Security (OUSD [I&S]) issued several memorandums from December 2019 through April 2020 that updated guidance on vetting and continuous review of IMS and their accompanying family. The OUSD (I&S) consolidated the vetting and continuous review memorandums into a single December 8, 2020 policy regarding the vetting of IMS and their accompanying family.²

² (CUI)



(U) DoD Vetting Guidance

(~~CUI~~) [Redacted text block]

(~~CUI~~) Therefore, the OUSD (I&S) issued a memorandum on December 8, 2020 (the December 8 memorandum) outlining vetting requirements for IMS attending training on DoD installations and facilities located in the United States.⁴ The guidance also applied to an IMS’ accompanying family authorized to live in the United States while the IMS participates in DoD training.

[Redacted text block]

(U) IMS Vetting Roles and Responsibilities for DoD Components

(U) There are four groups of stakeholders responsible for coordinating or implementing DoD requirements for IMS vetting: the Defense Security Cooperation Agency (DSCA), the Defense Counterintelligence and Security Agency, the Military Departments, and Security Cooperation Organizations (SCO).

³ (U) According to the State Department, foreign military members stationed at a U.S. military base located in the U.S. require A-2 visas, which are visas for Diplomats and other foreign government officials traveling to the U.S. to engage solely in official duties.

⁴ (~~CUI~~) [Redacted text block]

⁵ (~~CUI~~) [Redacted text block]

⁶ (U) Public Law 116–283, “The National Defense Authorization Act,” section 1090, January 1, 2021, codified these DoD security vetting requirements into law.

(U) Defense Security Cooperation Agency

(~~CUI~~) The DSCA’s mission is to advance U.S. defense and foreign policy interests by building the capacity of foreign partners to respond to shared defense challenges. Among the DSCA’s responsibilities is jointly managing the International Military Education and Training Program with the Department of State. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

(U) The DSCA maintains the Security Cooperation Training Management System, which is an Internet-based computer system used for the day-to-day management of IMS training.

Finally, the DSCA maintains the Security Cooperation Training Management System (SC-TMS), which is an Internet-based computer system used for the day-to-day management of IMS training. Examples of SC-TMS capabilities include generating invitational travel orders (travel orders) and creating, storing, and modifying IMS biographic and DoD training data. Because of DoD IMS security vetting requirements, the DSCA modified SC-TMS throughout 2021 and 2022 to add capabilities for managing and tracking IMS vetting status.

(U) Defense Counterintelligence and Security Agency

(~~CUI~~) The Defense Counterintelligence and Security Agency’s mission includes performing background vetting for more than 100 federal entities and 10,000 cleared companies, and it conducts around 2 million background investigations each year. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

The Defense Counterintelligence and Security Agency tasked a subordinate division, its Expedited Screening Center (the Screening Center), to execute these vetting requirements. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

(U) Military Departments

(U) The Departments of the Army, Navy, and Air Force sponsor IMS to attend training at DoD installations. According to the December 8 memorandum, the Screening Center was required to inform the sponsoring Military Department of any derogatory reporting it finds for a given IMS or their accompanying family. Based on the Screening Center's findings on the IMS and their accompanying family, the Military Department then determines whether low- and moderate-risk IMS can attend training. However, if the Screening Center designates the IMS or family member as high-risk, they notify the Military Department and the IMS is not permitted unescorted access to DoD facilities.

(U) Security Cooperation Organizations

(U) A SCO is a DoD organization located in a foreign country and responsible for security assistance functions such as administrative support, including issuing IMS travel orders, and liaison duties. The SCO also must coordinate or perform in-country biographic and biometric information collection from the IMS and their accompanying family, and enter this information into SC-TMS.

(U) IMS Nomination and Vetting Process

(U) There are multiple steps for nominating IMS and vetting IMS and their accompanying family before the IMS can attend DoD training in the United States. After a foreign partner nominates an IMS for U.S.-based training, SCO personnel are required to collect and enter the IMS' and accompanying family's biographic data into SC-TMS. SCO personnel are also required to collect biometric information for each IMS and accompanying family. SCOs use portable biometric collection devices to collect this information and the collection device registers the IMS and their accompanying family's information in a centralized database. After the SCO completes these steps, the DSCA is required to notify the Screening Center that the IMS is ready for vetting.

(~~CUI~~) [REDACTED]

- (~~CUI~~) [REDACTED]
- (~~CUI~~) [REDACTED]
- (~~CUI~~) [REDACTED]

- (CUI) [REDACTED]
- (CUI) [REDACTED]
- (CUI) [REDACTED]

(U) Examples of data sources the Screening Center uses to perform background checks on IMS and their accompanying family include the:

- (CUI) [REDACTED]
- (U) Terrorist Identities Datamart Environment, which is the U.S. Government’s central repository of information on international terrorist identities; and
- (U) Terrorist Screening Database, which is the Federal Bureau of Investigation’s database of identifying information about those known to be or suspected of being involved in terrorist activity.

(U) Based on the screening results, the Screening Center assigns either a “No Findings” response or a risk level of low, moderate, or high, to each IMS and to each of their accompanying family members. The Screening Center’s vetting results of accompanying family affect the IMS’ ability to attend U.S.-based training. For example, if the Screening Center finds high-risk, derogatory reporting on an accompanying family, that IMS would not be granted unescorted access to DoD installations and facilities. The Screening Center and the Military Departments use the Screening Center-assigned risk level for an IMS and their accompanying family to establish a fitness for CRA determination. The DoD uses two CRA fitness categories, “Fit for CRA,” and “Unfit for CRA.” Fit for CRA means the IMS or accompanying family demonstrates an acceptable level of risk. Conversely, Unfit for CRA means the IMS or accompanying family demonstrates an unacceptable level of risk based on credible information that suggests involvement in, support of, or

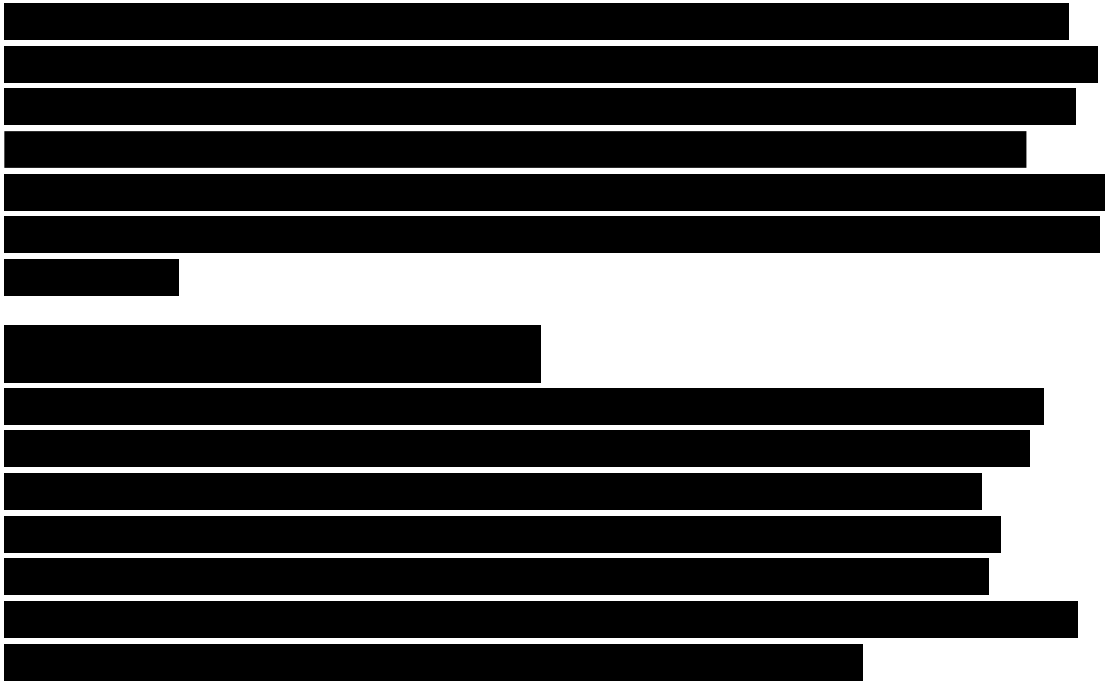
(U) If the Screening Center finds high-risk, derogatory reporting on an accompanying family, that IMS would not be granted unescorted access to DoD installations and facilities.

(U) training to commit acts that are contrary to U.S. Security interests. Table 1 defines each risk level and explains the recommendations for CRA based on the Screening Center's findings.

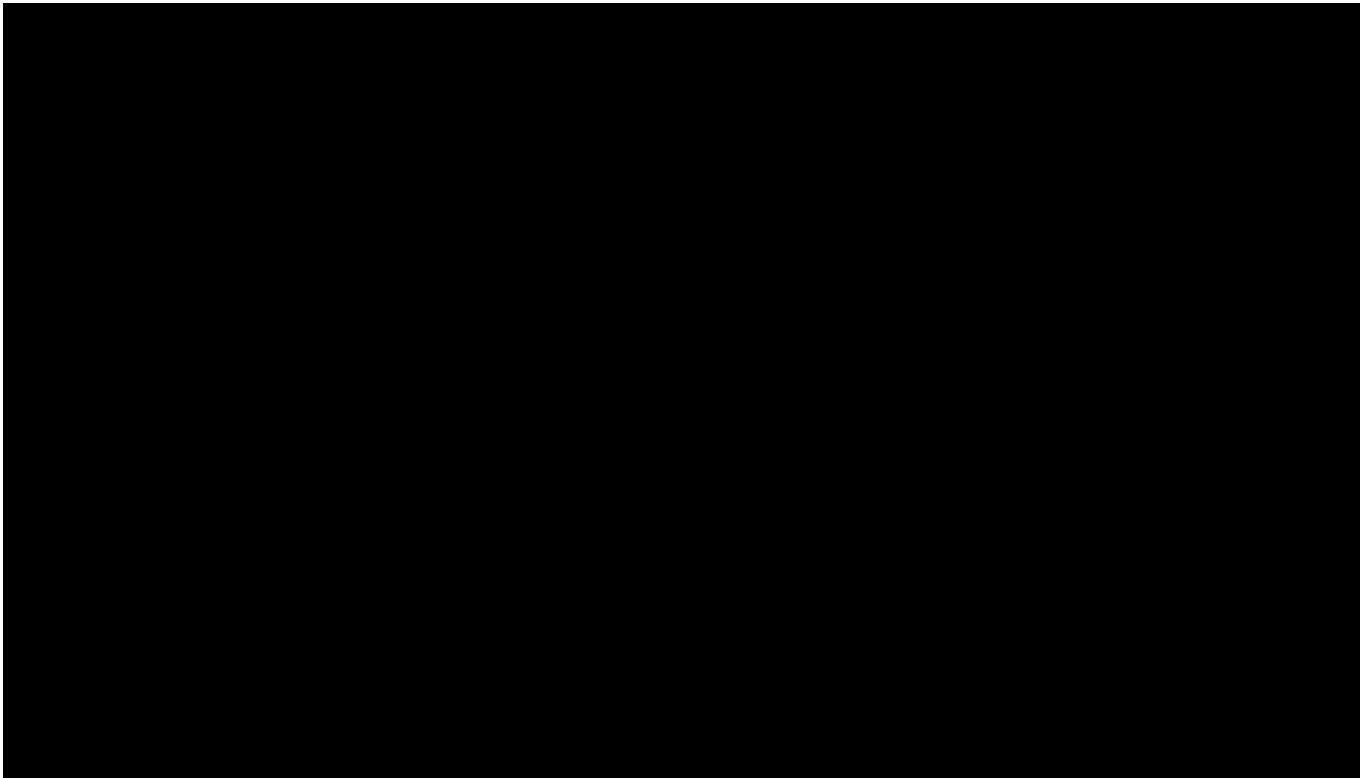
(U) Table 1. Risk Categories Assigned to an IMS and the Corresponding Screening Center Recommendation and Handling Procedures

(U) Screening Center-Assigned Risk Category	Alert Description	Recommendation for CRA
No Findings	The Screening Center did not find any derogatory information on an IMS or their accompanying family.	Positive recommendation for physical access. No further assessment is necessary and the Military Department hosting the training may render a decision of Fit for CRA unless it finds additional information to deny CRA.
Low	The Screening Center found uncorroborated or explainable derogatory information on an IMS or their accompanying family related to one of the six risk categories.	Positive recommendation for physical access. The Screening Center is required to provide findings to the Military Department, which may render a determination of Fit for CRA unless the Military Department finds additional information to deny CRA.
Moderate	The Screening Center found credible information linking an IMS or their accompanying family to at least one of the six risk categories.	Conditional recommendation for physical access. The Screening Center is required to provide findings to the Military Department, which will render a determination of Unfit for CRA unless it identifies mitigating considerations.
High	The Screening Center found clear information linking an IMS or their accompanying family to at least one of the six risk categories.	Negative recommendation for physical access. The Screening Center must determine the IMS Unfit for CRA and notify the Military Department. However, the Military Department may provide mitigating information to the Screening Center and is authorized to request a waiver for high risk IMS and their accompanying family. (U)

(U) Source: Office of the Under Secretary of Defense for Intelligence and Security.



(U) Figure 1. DoD-Required IMS Nomination, Vetting, and Continuous Review Process



(U) Source: The DoD OIG.

⁷ (U) The Screening Center does not issue an ESIR if it does not find derogatory information on an IMS or their accompanying family.

(U) What We Reviewed

(~~CUI~~) To determine whether the Screening Center vetted IMS and their accompanying family, we reviewed a nonstatistical sample of 59 of 1,573 IMS who were scheduled to start U.S.-based training from July 1, 2021, through January 14, 2022, and whose training was scheduled to last at least 180 days. Specifically, we sorted the 1,573 IMS in our universe by geographic combatant command, then selected 10 IMS per command.⁸ Of the 59 IMS in the sample, 17 had accompanying family and the total number of accompanying family was 52. Therefore, we based our conclusions on our analysis of 111 people, including both IMS and accompanying family.⁹ [REDACTED]

(U) To determine whether the Screening Center communicated the results of its analysis to appropriate DoD stakeholders, we requested a list of all IMS and accompanying family for which the Screening Center identified derogatory reporting in 2021. Then we reviewed the classified ESIRs and emails detailing the communication of these results.

(U) Review of Internal Controls

(U) DoD Instruction 5010.40 requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls.¹⁰ We identified that the Screening Center did not vet all IMS in accordance with DoD guidance because SC-TMS, the system the DoD uses for managing IMS and issuing travel orders, did not have sufficient internal controls to prevent SCOs

⁸ (U) There are six geographic combatant commands with countries that can nominate IMS for U.S.-based training: the U.S. Africa Command, the U.S. Central Command, the U.S. European Command, the U.S. Indo-Pacific Command, the U.S. Northern Command, and the U.S. Southern Command. We initially selected 10 IMS per geographic combatant command. However, one IMS cancelled training prior to the Screening Center vetting him, bringing the total nonstatistical sample of IMS we initially selected from 60 to 59.

⁹ (U) Our sample included 17 IMS with 52 total accompanying family members. However, the Screening Center considers each IMS and their accompanying family as a single case of vetting. Therefore, when describing the results of our analysis in the rest of this report, we will refer only to the 59 IMS in our nonstatistical sample. Nonstatistical sample results cannot be projected to an entire population.

¹⁰ (U) DoD Instruction 5010.40, "Managers' Internal Control Program Procedures," May 30, 2013, (Incorporating Change 1, June 30, 2020).

(U) from issuing travel orders before the Screening Center completed vetting. We also determined that the Screening Center did not conduct on-time continuous reviews for the IMS in our sample because the DSCA and the Screening Center did not have procedures for communicating when these continuous reviews were due. We provided a copy of the report to the senior official responsible for internal controls in the DSCA, the Defense Counterintelligence and Security Agency, and each Military Department.

(U) Finding

(U) The Screening Center Communicated Vetting Results but the DSCA Should Improve Internal Controls

~~(CUI)~~ The Screening Center communicated 100 percent of its IMS vetting results to all relevant DoD stakeholders.¹¹ [REDACTED]

(U) However, the Screening Center did not complete vetting and continuous reviews, as required by DoD policy, for all IMS participating in U.S.-based training programs. Specifically, the Screening Center did not perform vetting procedures for 2 of the 59 IMS we reviewed in accordance with DoD guidance.¹² This occurred because two SCOs did not provide all the biographic information that the Screening Center requires to vet an IMS. Additionally, the two SCOs issued travel orders to the IMS although the vetting was not complete. This allowed these two IMS to travel to their DoD training location without first being vetted as required by DoD vetting guidance. We also found that SC-TMS, the computer system the DoD uses for managing IMS and issuing travel orders, did not have sufficient internal controls to prevent these SCOs from incorrectly issuing the travel orders before the Screening Center completed vetting.

(U) We also determined the Screening Center did not complete on-time continuous reviews for 54 of the 57 IMS we reviewed because the DSCA and the Screening Center did not have procedures for communicating when these continuous reviews were due.¹³

(U) As a result of the Screening Center's effective communication of IMS vetting results, the DoD prohibited four high-risk and one moderate-risk IMS from attending U.S.-based training. However, because the Screening Center did not vet all the IMS in our sample before the IMS traveled to the United States, the DoD experienced increased risk that it could have granted CRA to an IMS who posed

¹¹ (U) The Screening Center did not find derogatory information for any of the sampled 59 IMS or their accompanying family members.

¹² (U) We determined that all 52 family members who accompanied the 59 IMS in our sample were vetted as required by DoD guidance.

¹³ (U) Our nonstatistical sample size for continuous reviews was 57. The Screening Center did not vet two IMS in our sample of 59 IMS; therefore, a maximum of 57 IMS from our original nonstatistical sample would have been subject to a continuous review.

(U) a threat to U.S. personnel. Because the Screening Center did not complete on-time continuous reviews, there was an increased risk that the DoD would not detect behavior indicating that an IMS who was previously granted CRA had radicalized and posed a threat to U.S. personnel.

(U) DoD’s IMS Vetting Process Generally Effective; However, Improvements are Needed

(U) The Screening Center communicated 100 percent of its IMS vetting results to all relevant DoD stakeholders. However, the Screening Center did not complete initial security vetting and continuous reviews for all IMS participating in U.S.-based training programs, as required by DoD policy.

(U) Screening Center Communicated Derogatory Information to Military Departments

~~(CUI)~~ The Screening Center communicated 100 percent of its IMS vetting results to all relevant DoD stakeholders. [REDACTED]

[REDACTED] According to the December 8 memorandum, the Screening Center was required to provide its IMS vetting results to the Military Departments. This requirement is intended to ensure high-risk IMS are not granted unescorted access to DoD installations and facilities and that the Military Departments can make fitness determinations for low- and moderate-risk IMS. [REDACTED]

[REDACTED] Table 2 shows the number of each type of alert we reviewed and the final fitness for CRA determination.

(U) Table 2. Number and Type of ESIRs and the Corresponding CRA Determination

(U) Source: The DoD OIG.

(~~CUI~~) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].¹⁵

(U) The Screening Center Did Not Complete Initial Vetting for All IMS

(U) The Screening Center did not perform vetting procedures for 2 of the 59 IMS we reviewed in accordance with DoD guidance. According to the DSCA's Security Assistance Management Manual, before a SCO issues a travel order, every IMS participating in DoD training must be vetted.¹⁶ We reviewed a nonstatistical sample of 59 of 1,573 IMS that started training or were scheduled to start training in the United States from July 1, 2021, through January 14, 2022. To determine whether the Screening Center vetted the IMS in our nonstatistical sample, we compared the vetting status and completion dates in the Screening Center's IMS case tracker to IMS data recorded in the SC-TMS.¹⁷ We also confirmed biometric enrollments for the IMS and accompanying family in our sample by reviewing automated email alerts generated by the Automated Biometric Identification System. After a SCO submits biometric information for IMS and accompanying

¹⁴ (U) The DoD canceled a training course that one IMS was scheduled to attend; however, the Screening Center still communicated the results to the Military Department.

¹⁵ (~~CUI~~) The details of each [REDACTED] are classified above the level of this report.

¹⁶ (U) Defense Security Cooperation Agency Manual 5105.38M, "Security Assistance Management Manual," April 30, 2012.

¹⁷ (U) The IMS case tracker is a manually created, Screening Center spreadsheet that contains all IMS and their accompanying family members that the Screening Center has vetted or is in the process of vetting. The IMS case tracker includes information such as the vetting status of the IMS, the training dates, student identification number, or personal information.

(U) The Screening Center did not identify any low-, moderate-, or high-risk ESIRs for the 57 IMS it vetted.

(U) family, the Screening Center automatically receives an email alert containing the biometric screening results. We determined that the Screening Center vetted 57 of the 59 IMS in our nonstatistical

sample. The Screening Center did not identify any low-, moderate-, or high-risk ESIRs for the 57 IMS it vetted.

~~(CUI)~~ The Screening Center did not vet two IMS, one from Somalia and one from the Dominican Republic, before SCOs issued travel orders and those IMS attended DoD training in United States. The IMS from the Dominican Republic arrived in the United States unvetted and started training on January 19, 2022. Although this IMS was not vetted prior to arrival in the United States, the Screening Center completed vetting of this IMS on February 7, 2022, and found no derogatory information. The second unvetted IMS we identified departed their training at the Defense Language Institute at Joint Base San Antonio, without authorization (absconded), after failing the English Language Proficiency Test. In this instance, the Air Force declared this IMS absent without leave (AWOL), terminated Air Force sponsorship of the student, and alerted the Department of Homeland Security to this IMS' status. Similarly, the SCO Chief in Somalia told us he notified the Somali Ministry of Defense that the IMS it sponsored was AWOL. [REDACTED]

(U) SC-TMS Did Not Have Internal Controls to Prevent Issuance of Travel Orders Prior to DoD Vetting

(U) The Screening Center did not perform initial vetting for all IMS because two SCOs did not provide all the biographic information that the Screening Center requires to vet an IMS. Additionally, the two SCOs issued travel orders to the IMS although the vetting was not complete. This allowed these two IMS to travel to their DoD training location without first being vetted, as required by DoD vetting guidance. We also found that SC-TMS, the computer system the DoD uses for managing IMS and issuing travel orders, did not have sufficient internal controls to prevent these SCOs from incorrectly issuing the travel orders before the Screening Center completed vetting.

(U) SC-TMS, the computer system the DoD uses for managing IMS and issuing travel orders, did not have sufficient internal controls.

(U) SCOs Did Not Provide Sufficient Biographic Information

(~~CUI~~) We reviewed the SC-TMS entries for both of the unvetted IMS in our sample, and found that after the SCOs submitted these IMS for vetting, the Screening Center reported it did not have sufficient biographic information to complete vetting.

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] International Military Education and Training officials from the Joint Staff, and multiple combatant commands, told us that SCOs sometimes submitted incomplete information for multiple reasons, including simple error and difficulty in obtaining the information.

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] We do not know what biographic information was missing when the SCOs submitted these two IMS for vetting because the Screening Center did not list the specific deficiencies in SC-TMS.

(U) SCOs Issued Travel Orders Before Screening Center Vetted IMS

(U) We determined that SCOs in the Dominican Republic and Somalia issued travel orders after the Screening Center reported they were unable to vet the two IMS. The DSCA's Security Assistance Management Manual states that SCO personnel are responsible for issuing travel orders to IMS after the Screening Center or the Military Department determines the IMS is Fit for CRA. We interviewed U.S. Southern Command and U.S. Africa Command officials responsible for coordinating International Military Education and Training. Based on our conversations, we concluded that in both instances, the SCO personnel did not follow the process of issuing travel orders until after the Screening Center vetted the IMS.

(U) Specifically, according to U.S. Southern Command officials, the SCO for the Dominican Republic submitted an IMS' biographic data as required for vetting, but did not wait for a Screening Center notification before issuing a travel order. This SCO eventually did enter the correct information into SC-TMS, and the Screening Center completed vetting, however the IMS was vetted after arriving in the United States for training, not before, as required by DoD guidance.

(U) Additionally, U.S. Africa Command officials stated that a SCO in Somalia issued a travel order for an unvetted IMS because SCO personnel were concerned that the IMS would miss his scheduled class because of the lengthy process for obtaining a U.S. visa. Somalia SCO personnel elaborated that the visa process could take 5-8 months, and that a travel order is required to obtain a visa. Therefore,

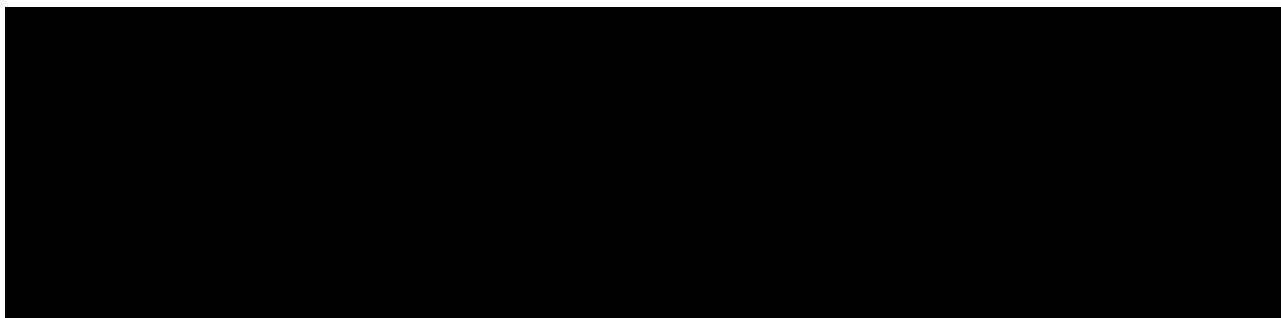
(U) Somalia SCO personnel issued the travel order to initiate getting a visa before the Screening Center vetted the IMS. However, the SCO did not provide sufficient biographic information for the Screening Center to vet this IMS, and the vetting was never completed. The Somalia SCO staff member who prepared the travel order was not assigned to the SCO when we asked about this incident; therefore, we do not know why the staff member did not resubmit the IMS' biographic information to the Screening Center. We interviewed the Somalia SCO Chief, who told us that his office was understaffed and did not use standard operating procedures at the time this issue occurred. Since this incident, the Somalia SCO Chief implemented a checklist, which we reviewed, to ensure that his personnel properly followed DoD vetting guidance before issuing travel orders to IMS.

(U) The Somalia SCO Chief implemented a checklist, which we reviewed, to ensure that his personnel properly followed DoD vetting guidance before issuing travel orders to IMS.

(U) SC-TMS Did Not Have Internal Controls to Prevent Issuance of Travel Orders Before DoD Vetting

(U) We found that SC-TMS, the computer system the DoD uses for managing IMS and issuing travel orders, did not have sufficient internal controls to prevent these SCOs from incorrectly issuing the travel orders before the Screening Center completed vetting. Specifically, according to the SCO in the Dominican Republic, after they entered the IMS' biographic information into SC-TMS, they selected the "Issue ITO" function in SC-TMS. According to the SCO, they thought that if the Screening Center had not vetted the IMS, the SC-TMS function used to create the travel order would not be operable. Similarly, we concluded that if the "Issue ITO" was not operable until after the Screening Center reported favorable vetting results, the SCO in Somalia would not have been able to issue the travel order and the IMS would not have been able to travel to the United States. Figure 2 shows the "Issue ITO" button within the SC-TMS that a SCO uses to create a travel order.

(U) Figure 2. SC-TMS Screen Used for Creating IMS Travel Orders



(U) Source: The DSCA.

(U) We did not identify DoD policy specifically related to internal controls for information technology used during the IMS vetting process; therefore, we reviewed the Government Accountability Office's Standards for Internal Control in the U.S. Government (the Green Book), which provides guidance for federal agencies to use when designing, implementing, and operating internal controls.¹⁸ The Green Book states that management can establish automated control activities (automated controls) through its information technology, and that automated controls are generally more reliable because they are less susceptible to human error.

(U) We asked DSCA officials if the SC-TMS had any automated controls that would ensure the SCOs did not issue travel orders until vetting was complete. DSCA stated that no such automated controls existed. DSCA officials elaborated that SC-TMS is approximately a 15-year old system created, primarily, to store basic biographic data and to generate travel orders. In multiple discussions, DSCA officials explained that the DoD did not design SC-TMS to store, track, or communicate IMS vetting information. DSCA officials explained that since the DoD established the new IMS vetting requirements, the DSCA added capabilities that would facilitate IMS vetting. DSCA officials told us they were researching the ability to update the SC-TMS to have an automated control that prevented the incorrect issuance of a travel order.

(U) We also verified that the Defense Security Cooperation University provides classroom and web-based training related to IMS vetting requirements. Specifically, the Defense Cooperation Security Cooperation University training states that SCOs should not issue travel orders until Screening Center or Military Departments provide vetting results for the IMS. In addition, the DSCA hosts monthly discussions with stakeholders, such as the Military Departments, combatant commands, and SCOs, related to communicating vetting policies and discussing lessons learned. We concluded that there was sufficient communication and training regarding IMS vetting requirements and we are not making a recommendation related to training SCO personnel.

(U) However, we concluded that without sufficient automated controls to prevent SCO personnel from incorrectly issuing travel orders in SC-TMS, there will always be a risk that human error, or deliberate action, will cause an IMS to receive a travel order and travel to the United States before the Screening Center completes vetting. Furthermore, we concluded that improved internal controls in SC-TMS

¹⁸ (U) The Green Book defines control activities, in part, as actions management establishes through policies and procedures to respond to risk. Furthermore, the Green Book defines application control activities as controls built directly into computer applications to achieve accuracy.

(U) will reduce the likelihood that a SCO will prematurely issue a travel order, and that an IMS or accompanying family will arrive in the United States without first being vetted by the Screening Center. Therefore, to strengthen internal controls for issuing travel orders to IMS, we recommend that the Director, DSCA, direct staff responsible for SC-TMS to develop controls which will prevent an SC-TMS user from issuing a travel order to IMS before the Screening Center reports favorable vetting results.

(U) Screening Center Did Not Complete On-Time Continuous Reviews

(~~CUI~~) The Screening Center did not complete on-time continuous reviews for 54 of the 57 IMS we reviewed.¹⁹ [REDACTED]

[REDACTED] We determined that the Screening Center conducted initial vetting on 57 of 59 IMS in our nonstatistical sample. We reviewed all 57 IMS for whom the Screening Center performed this initial vetting to determine whether the Screening Center performed on-time continuous reviews. To determine the date of the continuous reviews, we reviewed the Screening Center’s IMS case tracker and reviewed IMS vetting information in the SC-TMS. We found that as of March 2022 the Screening Center:

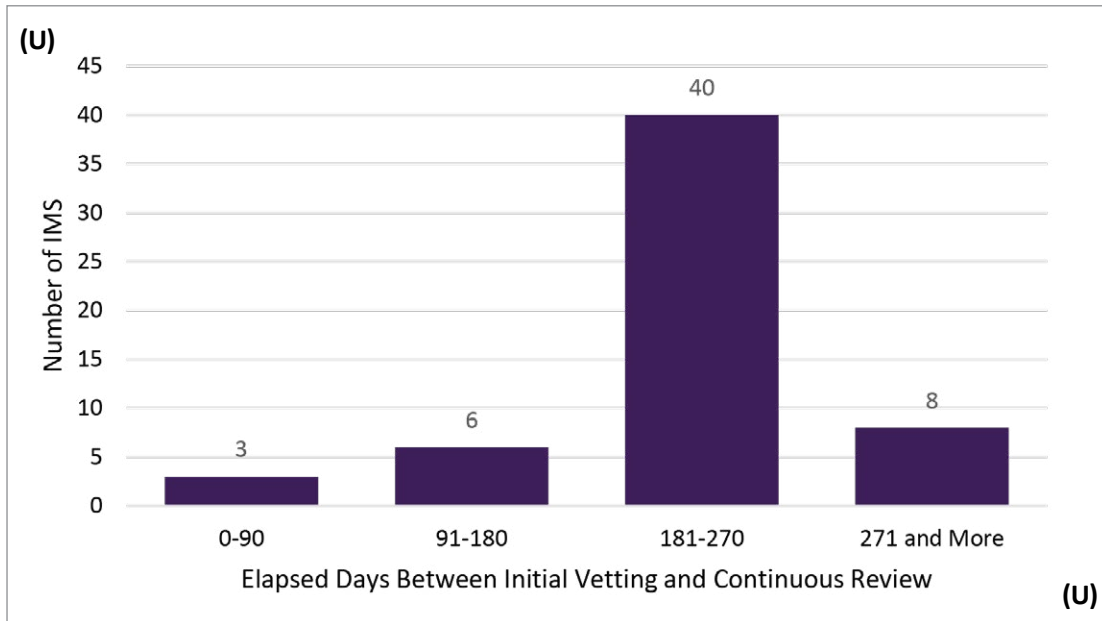
- (~~CUI~~) [REDACTED] and [REDACTED]
- (~~CUI~~) [REDACTED]

(~~CUI~~) [REDACTED]

[REDACTED] The Screening Center did not identify any low-, moderate-, or high risk ESIRs when it performed continuous reviews of the 57 IMS. Figure 3 shows the 57 IMS we reviewed grouped into ranges of the days elapsed between when the Screening Center completed the initial vetting and the continuous review.

¹⁹ (U) Our review included 18 IMS who were from Australia, Canada, New Zealand, or the United Kingdom. The December 8 memorandum and the NDAA exempt these IMS from vetting if their home country granted them a security clearance. We verified that the travel orders for all of these 18 IMS included their security clearances. However, according to the DSCA, SCOs from those countries submitted some IMS for vetting, regardless of the exemption, to learn the vetting processes should the exemption for those countries change. We believe the evidence of these IMS’ vetting and continuous reviews is appropriate to include in our review because these records support whether the DSCA and Screening Center communicated and implemented continuous review requirements.

(U) Figure 3. Elapsed Days Between IMS Vetting and Continuous Review



(U) Source: The DoD OIG.

(U) DSCA and the Screening Center Did Not Establish Procedures for Determining When Continuous Reviews Were Due

(U) The Screening Center did not complete on-time continuous reviews for the IMS in our nonstatistical sample because the DSCA and the Screening Center did not have procedures for communicating when these continuous reviews were due. We explained the results of our continuous review analysis to DSCA and Screening Center officials, and we asked officials from both of these organizations to explain the process for communicating when continuous reviews were due. A Screening Center official told us he expected the DSCA to inform his staff when IMS were due for continuous review. Conversely, DSCA personnel told us the Screening Center had the IMS information it needed to track and complete the continuous reviews. We reviewed criteria such as the December 8 memorandum and the Security Assistance Management Manual, and did not find any responsibilities or procedures detailing communication of continuous review due dates. Therefore, we concluded that no such procedures existed.

(U) We shared our observation with DSCA and Screening Center officials, and they agreed that the late continuous reviews were the result of miscommunication.

(U) We shared our observation with DSCA and Screening Center officials, and they agreed that the late continuous reviews were the result of miscommunication. Because of our observations, DSCA personnel explained that they began

(U) to send a list of IMS due for a continuous review to the Screening Center every 3 weeks. A Screening Center official confirmed that the DSCA began sending a list of upcoming continuous reviews every 3 weeks. However, the DSCA did not formally establish this process in a document such as a standard operating procedure. Formalized procedures will ensure the proper DSCA staff are aware of their responsibilities for communicating continuous reviews and will help ensure continuity during periods of staff turnover. Therefore, we recommend that the Director, DSCA, direct his staff to develop and implement a formal procedure establishing that DSCA personnel must alert the Screening Center when continuous review of an IMS needs to begin.

(U) DoD Prevented High-Risk Personnel from Attending U.S.-Based Training

(~~CUI~~) [REDACTED]
 [REDACTED]
 [REDACTED] However, because the Screening Center did not vet all the IMS in our sample prior to them traveling to the United States, the DoD experienced increased risk that it could have granted CRA to an IMS who posed a threat to U.S. personnel.²⁰ Additionally, because the Screening Center did not complete on-time continuous reviews, there was an increased risk that the DoD would not detect behavior indicating that an IMS, or their accompanying family, previously granted CRA became radicalized and was now a threat to U.S. personnel. However, the Screening Center found no derogatory information for the 54 IMS in our sample that received a late continuous review. The DoD designed the security vetting program to prevent IMS with ties to criminal or terrorist activities from having unescorted access to DoD facilities. Without proper security vetting, Military Departments may unknowingly grant IMS who intend to harm DoD personnel or their family unescorted access to DoD facilities.

(~~CUI~~) We also concluded that conducting security vetting of the Somalian IMS who absconded from training may have revealed indicators prompting the sponsoring departments to further investigate the IMS' background before making a CRA decision. [REDACTED]
 [REDACTED]
 [REDACTED]

[REDACTED] We asked the Director of the Screening Center to describe his office's role when an IMS absconds from DoD-sponsored training in the United States. The Director told us the Screening Center receives AWOL

²⁰ (U) Neither of the two unvetted IMS in our sample had accompanying family.

(~~CUI~~) alerts from the Military Departments. He also told us that to determine whether there is any recent information indicating whether the IMS may be a threat, the Screening Center uses AWOL notifications as triggers to perform a continuous review. However, in this instance, because the SCO did not provide sufficient biographic information for the Screening Center to complete vetting, the Screening Center was not able to vet this IMS after they absconded from training. The Director elaborated that the Screening Center has not identified derogatory reporting for other IMS declared AWOL.

(~~CUI~~) We also contacted the Department of Homeland Security (DHS) to understand their procedures when the DoD alerts them of an AWOL IMS. [REDACTED]

[REDACTED]

(U) Recommendations

(U) Recommendation 1

(U) We recommend that the Director of the Defense Security Cooperation Agency:

- a. **(U) Direct his staff to develop internal controls which will prevent a Security Cooperation Training Management System user from issuing a travel order to IMS before the Screening Center reports favorable vetting results.**
- b. **(U) Direct his staff to develop and implement a formal procedure establishing that Defense Security Cooperation Agency personnel must alert the Screening Center when continuous review of an IMS needs to begin.**

(U) Management Actions Taken

(U) During the audit, we told the Chief of the International Military Training and Education Division at the DSCA that an internal control weakness existed in SC-TMS. Specifically, we informed the Chief that SCOs could use the SC-TMS

²¹ (~~CUI~~) [REDACTED]

(U) to issue travel orders before the Screening Center completed its vetting. The Chief agreed with our observation and explained actions that the DSCA was taking to enhance automated internal controls within SC-TMS. Specifically, DSCA was developing a capability in SC-TMS that would render the travel order function inoperable until the Screening Center reports a no alert, or low risk report, or until the Military Department renders a decision for those IMS found to have moderate

(U) Based on our observation, we concluded the capability to block travel order issuance until after vetting was complete was operating as intended.

risk. On October 19, 2022, DSCA personnel showed us various scenarios to demonstrate that this function was operational. For example, DSCA personnel tried to issue a travel order to multiple IMS for whom the Screening Center had not completed vetting.

SC-TMS prevented issuance of the travel order and displayed a message on screen that the lack of vetting was the reason. Based on our observation, we concluded the capability to block travel order issuance until after vetting was complete was operating as intended.

~~(CUI)~~ During the audit, we also told the Chief that a weakness existed in informing the Screening Center when continuous reviews were due for completion. The Chief agreed with our observation and directed her staff to alert the Screening Center when an IMS was due for a continuous review. Therefore, in March 2022, DSCA personnel began sending a list of IMS due for continuous review [REDACTED] to the Screening Center. A Screening Center official confirmed that the DSCA began sending a list of upcoming continuous reviews every 3 weeks. The DSCA Chief of International Military Training Education Division formally documented this procedure in a memorandum for record addressed to the DSCA's SC-TMS development team and product owner. We analyzed a nonstatistical sample of 50 continuous reviews that the Screening Center completed in July 2022, which is after the DSCA implemented our recommendation. [REDACTED]

[REDACTED]

We do not have a further recommendation; however, the DSCA and the Screening Center should continue to monitor the timeliness of the continuous reviews to ensure that this improvement continues.

(U) The DSCA's actions fully addressed our recommendations; therefore, recommendation 1.a and 1.b are closed.

(U) Appendix

(U) Scope and Methodology

(U) We conducted this performance audit from May 2021 through November 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

(U) We conducted this audit at the Defense Counterintelligence and Security Agency Vetting Risk Operations headquarters in Hanover, Maryland. To understand the DoD's IMS vetting policies and procedures, we interviewed DoD personnel who had IMS-related roles and responsibilities from:

- (U) four geographic combatant commands;²²
- (U) the Army, Navy, and Air Force;
- (U) the Expedited Screening Center;
- (U) the Defense Security Cooperation Agency; and
- (U) the Office of the Under Secretary of Defense for Intelligence and Security.

(U) We also reviewed DoD IMS vetting criteria and policies, and public law. Specifically, we reviewed:

- (U) Public Law 116-283, "The National Defense Authorization Act," section 1090, January 1, 2021;
- (CUI) [REDACTED]
- (CUI) [REDACTED]

²² (U) We interviewed officials from the U.S. Africa Command, the U.S. European Command, the U.S. Indo-Pacific command, and the U.S. Southern Command.

- [REDACTED]
- (U) Defense Security Cooperation Agency, "Electronic Security Assistance Management Manual," last visited July 18, 2022.

(U) Audit Universe and Sample Selection

(~~CUI~~) The scope of our audit included IMS, and their accompanying family, who started or were scheduled to start U.S.-based training from July 1, 2021 through January 14, 2022, and whose training was scheduled to last at least 180 days. We only included IMS scheduled to train in the United States for 180 days to ensure the IMS in our sample would be in the U.S. long enough to require a continuous review. These parameters resulted in a universe of 1,573 IMS. Of this universe, we nonstatistically selected 60 IMS by choosing 10 IMS from each of six geographic combatant commands. While gathering evidence on the 60 IMS in our sample, we learned that 1 IMS' training was cancelled and he was never vetted. Therefore, we reduced our sample of IMS to 59. 17 of the 59 IMS had accompanying family and the total number of accompanying family members was 52. Therefore, our audit observations are based on vetting results of 111 people. [REDACTED]

[REDACTED]

[REDACTED] To determine whether vetting and continuous reviews occurred, we used the Screening Center's vetting and continuous review trackers (vetting trackers). Screening Center analysts manually create these vetting trackers to document the date and results of their vetting as they complete each IMS case. We used the IMS name, date of birth, country, and participation identification number to locate the IMS in our sample in the Screening Center's trackers. The trackers also note any IMS' accompanying family, and the accompanying family's vetting results.

(U) To determine whether the Screening Center communicated all ESIRs generated in 2021 to all Military Departments, we reviewed the classified ESIRs and the distribution emails on the Joint Worldwide Intelligence Communications System. To ensure high-risk IMS were not accidentally admitted to U.S.-based training, we asked DSCA officials to confirm that no travel orders or student information existed for the high-risk IMS in SC-TMS.

(U) Personnel from the OUSD (I&S) reviewed this report to identify whether any of their reported information, including legacy FOUO information, should be safeguarded and marked in accordance with the DoD CUI Program. In preparing and marking this report, we considered any comments submitted by the OUSD (I&S) about the CUI treatment of their information. If the OUSD (I&S) failed to provide any or sufficient comments about the CUI treatment of their information, we marked the report based on our assessment of the available information.

(U) Internal Control Assessment and Compliance

(U) We assessed internal controls and compliance with laws and regulations necessary to satisfy the audit objective. In particular, we assessed internal controls related to ensuring that the Screening Center vetted and performed on time continuous reviews of IMS and their accompanying family. We identified several internal control deficiencies related to our audit objective. Specifically, SC-TMS did not have adequate controls to prevent a SCO from improperly issuing a travel order and the DSCA and Screening Center did not have procedures for determining when continuous reviews were due. However, because our review was limited to these internal controls and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

(U) Use of Computer-Processed Data

(U) We used computer-processed data from the Defense Security Assistance Management System and the SC-TMS to perform this audit; however, we did not rely solely on this data and reviewed the accuracy of the data through source documentation. Both systems contained IMS data used by the DSCA. The Defense Security Assistance Management System contains multiple security assistance management applications and is the system DSCA used to provide us a universe of IMS scheduled to attend DoD training. Based on this data, we selected a nonstatistical sample of IMS scheduled to train in the United States for 180 days to determine whether the Screening Center completed vetting of IMS and their accompanying family. Therefore, we only used computer-processed data from the Defense Security Assistance Management System to select a sample of IMS. The Defense Security Assistance Management System administrators grant users access to the system and assign specific roles and privileges within the system.

(U) We verified through interviews and reviews of Screening Center data that all of the IMS we selected in our nonstatistical sample existed; therefore, we concluded the Defense Security Assistance Management System was reliable to provide a universe of IMS.

(U) SC-TMS is a computer application that the Security Cooperation community uses for the day-to-day management of training programs. During our audit we obtained manually-created spreadsheets of IMS vetting data from the Screening Center. We verified the consistency of Screening Center information by comparing it to DoD security vetting information included for each student in SC-TMS. Therefore, we only used computer-processed data from the SC-TMS to assist in confirming the Screening Center's manual IMS data. We did not identify discrepancies that affected our conclusions in this audit.

(U) Prior Coverage

(U) We determined no prior coverage related to our objective was conducted during the last 5 years.

(U) Acronyms and Abbreviations

AWOL	Absent Without Leave
CRA	Credentialed Recurring Access
CUI	Controlled Unclassified Information
DHS	Department of Homeland Security
DSCA	Defense Security Cooperation Agency
ESIR	Expedited Screening Information Report
IMS	International Military Student
LEI	Law Enforcement Information
NDAA	National Defense Authorization Act
OPSEC	Operations Security
OUSD (I&S)	Office of the Under Secretary of Defense For Intelligence and Security
SC-TMS	Security Cooperation Training Management System
SCO	Security Cooperation Organization

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