



**OIG**

**Office of Inspector General**

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AUD-MERO-18-38

Office of Audits

May 2018

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**Audit of Food Safety Controls Under  
Baghdad Life Support Services Task Order  
SAQMMA14F0721**

MIDDLE EAST REGION OPERATIONS

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# OIG HIGHLIGHTS

AUD-MERO-18-38

## What OIG Audited

U.S. Government personnel working at Department of State (Department) facilities in Iraq rely on the Department to provide life support services. In July 2013, the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management (A/LM/AQM) awarded contract SAQMMA13D0120—referred to as the Baghdad Life Support Services (BLISS) contract—to PAE Government Services, Inc. (PAE). Task order SAQMMA14F0721, associated with this contract, involves food services at three Department sites within Iraq.

The Office of Inspector General (OIG) conducted this audit to determine whether the Bureau of Near Eastern Affairs (NEA) provided oversight of food safety controls for task order SAQMMA14F0721, in accordance with Department and contractual requirements, and whether A/LM/AQM and NEA held PAE accountable for complying with food safety controls.

## What OIG Recommends

OIG made seven recommendations to NEA that are intended to improve oversight of the BLISS food services task order and one recommendation to A/LM/AQM. On the basis of responses received from NEA and A/LM/AQM to a draft of this report, OIG considers five recommendations resolved pending further action and three recommendations unresolved. A synopsis of management comments and OIG's reply follow each recommendation in the Audit Results section of this report. NEA and A/LM/AQM responses to a draft of this report are reprinted in their entirety in Appendices B and C, respectively.

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May 2018

OFFICE OF AUDITS

Middle East Region Operations

Audit of Food Safety Controls Under Baghdad Life Support Services Task Order SAQMMA14F0721

## What OIG Found

NEA officials did not provide sufficient oversight of food safety controls for BLISS task order SAQMMA14F0721. Specifically, NEA did not verify that PAE, or its subcontractor, Taylors International Services, Inc. (Taylors), implemented comprehensive Hazard Analysis and Critical Control Point (HACCP) plans that are meant to assess and prevent potential food safety hazards for each site in Iraq. Rather, Taylors developed a single HACCP plan that covered all sites. NEA officials did not review or approve the single HACCP plan or verify that it included pertinent HACCP principles. The lapse in oversight occurred, in part, because NEA officials did not prioritize food safety planning and did not include a review of HACCP plans in their oversight process. In addition, the Contracting Officer's Representatives (COR) and Alternate CORs were not properly trained on HACCP food safety principles. As a result, the risk increases that food safety hazards could go undetected.

Additionally, OIG found that NEA did not plan or conduct sufficient oversight to hold PAE accountable for complying with food safety controls and contract requirements.

Specifically, NEA officials did not:

- Develop a comprehensive quality assurance surveillance plan that included measurable performance standards or aligned with the BLISS contract's performance metrics.
- Maintain pertinent oversight documentation in the COR files, including monthly food service inspections.
- Complete timely contractor performance assessment report narratives.

A/LM/AQM and NEA officials attributed the insufficient development of a quality assurance surveillance plan to the shortage of subject-matter expertise within the Department and the incomplete COR file to challenges encountered during a security-related crisis in Iraq. A/LM/AQM and NEA officials attributed the untimely past performance evaluations to the frequent turnover of oversight personnel in Iraq and the need to realign period of performance dates within the Contractor Performance Assessment Reporting System. As a result of these factors, the Department was hampered in fully assessing PAE's performance and holding PAE accountable for fulfilling BLISS food safety controls and contract requirements.

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## OBJECTIVE

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The Office of Inspector General (OIG) conducted this audit to determine whether the Bureau of Near Eastern Affairs (NEA) provided oversight of food safety controls for task order SAQMMA14F0721 in accordance with Department of State (Department) and contractual requirements and whether the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management (A/LM/AQM) and NEA held the contractor accountable for complying with food safety controls.

## BACKGROUND

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Personnel working at most U.S. embassies and consulates throughout the world do not reside on post<sup>1</sup> and obtain their food from local grocery stores or restaurants. In Iraq, however, personnel typically work and reside on post and are not authorized to independently leave to purchase food on the local economy. Instead, personnel typically obtain food from Department-owned, contractor-operated dining facilities. To provide food services for its personnel working and residing on its posts in Iraq, the Department awarded the Baghdad Life Support Services (BLiSS) contract.

### BLiSS Contract

In July 2013, A/LM/AQM awarded indefinite-delivery, indefinite-quantity contract SAQMMA13D0120—referred to as the BLiSS contract—to PAE Government Services, Inc. (PAE) for the purpose of providing life support services and logistics functions at various sites in Iraq. A/LM/AQM awarded the BLiSS contract on behalf of NEA.<sup>2</sup> Life support services include food acquisition, preparation, and service as well as bottled water acquisition and distribution.

The BLiSS contract has a maximum performance period of 5 years (base year plus 4 option years) and a not-to-exceed cost of \$1 billion (inclusive of all direct costs, indirect costs, and profit/fees). As of December 2017, the Department issued 15 task orders under the BLiSS contract with a total obligated value of \$645.6 million. The BLiSS contract includes three food services task orders with a total obligated value of approximately \$311 million. The largest of these food services task orders is SAQMMA14F0721, which had an obligated value of \$299.8 million as of December 2017.<sup>3</sup>

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<sup>1</sup> Post means a diplomatic or consular mission of the United States of America, administered or managed by the Department.

<sup>2</sup> A/LM/AQM awarded the BLiSS contract using funds provided by NEA. Personnel from NEA administer and oversee the contract and associated task orders.

<sup>3</sup> For this audit, OIG only reviewed task order SAQMMA14F0721. The other two food services task orders were not included in the scope of this audit.

***Task Order SAQMMA14F0721***

In March 2014, A/LM/AQM awarded PAE BLiSS food services task order SAQMMA14F0721 to provide food services for the Baghdad Embassy Compound (BEC), the Baghdad Diplomatic Support Center (BDSC), and U.S. Consulate General Basrah (Basrah).<sup>4</sup> Task order SAQMMA14F0721 establishes mission-wide food operation and management in Iraq with PAE, the prime contractor, and Taylors International Services, Inc. (Taylors), the subcontractor, for procuring, storing, preparing, and serving food in a hygienic environment that guarantees food safety.

The Statement of Objective for food service operations,<sup>5</sup> which was included in the BLiSS request for proposal, outlines the Department's objectives and requirements for food safety. Among other things, it states that PAE must meet the health codes and regulations relating to food service sanitation and procedures as outlined by the U.S. Food and Drug Administration (FDA)<sup>6</sup> and the U.S. Department of Agriculture. It also states that PAE must develop and use a customized Hazard Analysis and Critical Control Point (HACCP) plan<sup>7</sup> to periodically assess and prevent potential food safety hazards.

HACCP is a prevention-based food safety system that, when properly designed and implemented by a food service operator, identifies and monitors specific hazards that can decrease the safety of food products. The FDA and the World Health Organization endorse the implementation of food safety management systems based on HACCP principles as an effective way to control risk factors that contribute to foodborne illness. According to FDA and World Health Organization guidance, a food safety system based on HACCP contains the following seven principles:

- Perform a Hazard Analysis.
- Decide on Critical Control Points.
- Determine Critical Limits.
- Establish Procedures to Monitor Critical Control Points.
- Establish Corrective Actions.
- Establish Verification Procedures.
- Establish a Record Keeping System.

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<sup>4</sup> As of December 1, 2017, the task order had a total estimated value of \$362.5 million (a base year value of approximately \$40.7 million and 4 option years with a total value of approximately \$321.8 million).

<sup>5</sup> As defined in Federal Acquisition Regulation (FAR) 2.101, a Statement of Objective is a Government-prepared document incorporated into the request for proposal that states the overall performance objectives. The Department incorporated the BLiSS contract's Statement of Objective, by reference, into the food services task order.

<sup>6</sup> The FDA has issued various guidance on food safety, including: *Food Code 2013; Managing Food Safety: A Manual for the Voluntary Use of [Hazard Analysis and Critical Control Point] Principles for Operators of Food Service and Retail Establishments*; and *Managing Food Safety: A Regulator's Manual for Applying [Hazard Analysis and Critical Control Point] Principles to Risk-based Retail and Food Service Inspections and Evaluating Voluntary Food Safety Management Systems*.

<sup>7</sup> An HACCP plan is a written document based on HACCP principles that describes procedures to be followed by a food service operator to control foodborne illness risk factors.

In response to the Department's request for proposal,<sup>8</sup> PAE submitted a technical proposal stating that "Taylors will develop and implement a site specific Food Safety Program (FSP) based on Hazard Analysis and Critical Control Point (HACCP) principles." The technical proposal also states, "[a]ll food service employees are ServSafe Certified<sup>9</sup> and trained on TBMED530 [Tri-Service Food Code]<sup>10</sup> and HACCP Standards." The technical proposal further states, "[t]hese processes are Government and food industry standards, which allow a safe, clean, and hygienic environment that mitigates risk to diners and staff." By awarding task order SAQMMA14F0721 to PAE, the Department accepted PAE's proposal that included the ServSafe certification of and TBMED350 training requirements for food service employees.

### ***Contract Administration and Oversight Responsibilities***

A/LM/AQM is responsible for awarding and administering the BLiSS contract and associated task orders. Contracting Officers (COs) within A/LM/AQM are the Department's authorized agents for working with contractors and have sole authority to solicit proposals; negotiate, award, administer, modify, or terminate contracts; and make related determinations and findings on behalf of the Department. COs perform duties at the request of the requirements office and rely on that office for technical advice concerning the services being acquired.<sup>11</sup>

NEA is responsible for determining contract requirements, providing funding, and overseeing the BLiSS contract and associated task orders. To assist NEA with that oversight, a CO may designate, in writing, technically qualified personnel as Contracting Officer's Representatives (CORs) or Alternate Contracting Officer's Representatives (ACORs) to be the CO's authorized representatives in the administration of contracts. Collectively, CORs and ACORs serve as the "eyes and ears" of the CO to ensure that the Department receives high-quality supplies and services on time, within the agreed-upon price, and in accordance with all contract requirements. The CORs and ACORs do not, however, have the authority to make any commitments or changes that affect price, quality, quantity, delivery, or other terms and conditions of the contract.<sup>12</sup> CORs and ACORs who oversee the BLiSS contract and corresponding task orders at the BEC, the BDSC, and Basrah are part of NEA's Contract Management Office in Iraq (CMO-Iraq).

According to CMO-Iraq standard operating procedures (SOPs), CORs and ACORs are responsible for ensuring that PAE and its subcontractors follow the procedures outlined in the contract. The CORs and ACORs monitor contract performance via a variety of methods, including daily spot checks; regular meetings; monthly, bi-monthly, and quarterly inspections;

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<sup>8</sup> As noted in FAR 2.101, "offer" means a response to a solicitation that, if accepted, would bind the offeror to perform the resultant contract. Responses to requests for proposals are offers called "proposals."

<sup>9</sup> ServSafe is a food and beverage safety training and certificate program administered by the National Restaurant Association.

<sup>10</sup> The Tri-Service Food Code, also known as TBMED530, is a standardized military food safety code published by the Department of Defense. It is designed to be consistent with the FDA's *Food Code*.

<sup>11</sup> 14 Foreign Affairs Handbook (FAH)-2 H-141, "Responsibilities of the Contracting Officer."

<sup>12</sup> FAR 1.602-2(d)(5), "Responsibilities."

quarterly program management reviews; and interim and annual entries into the Contractor Performance Assessment Reporting System (CPARS).<sup>13</sup> Each COR and ACOR is responsible for maintaining all documentation in the COR files, including inspection records, as required by the Federal Acquisition Regulation (FAR), Department guidance, and CMO-Iraq SOPs.

## Medical Service Support Iraq

Separate from the BLiSS contract, in June 2017, A/LM/AQM awarded a bridge Medical Service Support Iraq contract<sup>14</sup> to Comprehensive Health Services (CHS) to continue to “provide public health oversight for all [Department] food facilities” in Iraq. Specifically, the contract states the contractor will be responsible for “[f]ood receipt inspections” and “[d]ining facility inspections” among other tasks. CHS is also required to “investigate all foodborne illness outbreaks and provide guidance to [Department] and other contractors as necessary.” CHS public health inspectors communicate to the BLiSS COR and ACORs deficiencies that they identify as well as any recommendations to reject food items during shipments.<sup>15</sup>

## AUDIT RESULTS

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### Finding A: NEA Did Not Verify Whether PAE Developed and Implemented Food Safety Plans

NEA officials did not provide sufficient oversight of food safety controls for BLiSS task order SAQMMA14F0721. Specifically, NEA officials did not verify that PAE or its food services subcontractor, Taylors, developed and implemented comprehensive HACCP plans for each Department site within Iraq, as required by the BLiSS contract. For example, neither PAE nor Taylors developed and implemented site-specific HACCP plans for the BEC, the BDSC, or Basrah. Rather, Taylors developed a single HACCP plan for operations at the three Department sites. Furthermore, NEA officials did not review or approve the single HACCP plan or verify that it

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<sup>13</sup> According to 14 FAH-2 H-572, “Final Evaluation,” CPARS is used to capture contractor performance reports. Past performance evaluation reports are required for all completed contracts. Additionally, contracts longer than 1 year in duration require annual reports that are due within 60 days of the anniversary of the contract award date. The CO is responsible for ensuring that the evaluation takes place, but the COR may be assigned to evaluate contractor performance.

<sup>14</sup> The Government Accountability Office defines a bridge contract as an extension to an existing contract beyond the period of performance (including option years) or a new, short-term contract awarded on a sole-source basis to an incumbent contractor to avoid a lapse in service caused by a delay in awarding a follow-on contract. *See* Government Accountability Office, *Sole Source Contracting, Defining and Tracking Bridge Contracts Would Help Agencies Manage Their Use*, 4 (GAO-16-15, October 2015). Bridge contract SAQMMA17C0180 became effective May 19, 2017. The previous Medical Service Support Iraq contract, SAQMMA11D0073, was awarded by the Department to CHS in May 2011 and had a 5-year period of performance.

<sup>15</sup> OIG’s report, *Management Assistance Report—Concerns with the Oversight of Medical Support Service Iraq Contract No. SAQMMA11D0073* (AUD-MERO-15-20, December 2014) identified issues with the oversight of the Medical Service Support Iraq contract, including concerns that embassy personnel hindered the contractor’s and COR’s ability to conduct inspections and perform testing related to an outbreak of gastroenteritis. The recommendations made in that report—to designate contract oversight staff and return contract oversight staff to Embassy Baghdad—have since been implemented and are considered closed.

included pertinent HACCP principles. The lapse in oversight occurred, in part, because NEA officials did not prioritize food safety planning and did not include a review of HACCP plans in their oversight process. For example, OIG's review of NEA oversight documentation for the BLISS contract found no references to the single HACCP plan. In addition, the COR and ACORs were not properly trained on HACCP food safety principles. Without appropriate oversight methods and food safety training for oversight personnel, the risk increases that food safety hazards could go undetected.

### ***Food Service Sites Did Not Have Required Site-Specific HACCP Plans***

The BLISS contract requires PAE to develop and implement a site-specific food safety program based on HACCP principles. However, PAE's subcontractor, Taylors, developed a single HACCP plan for the BEC, the BSDC, and Basrah,<sup>16</sup> rather than site-specific HACCP plans as required by the contract.

According to FDA guidance, HACCP plans should contain a number of aspects that are site-specific. For example, plans should consider equipment and facility design as well as maintenance.<sup>17</sup> Plans should also identify and designate a food safety team composed of managers, chefs, cooks, dishwashers, wait staff, and other personnel.<sup>18</sup> Additionally, an HACCP plan requires a hazard analysis, which involves identifying food safety hazards that might be present in food, given the particular food preparation process, the handling of the food, and the facility design.<sup>19</sup>

During audit fieldwork in Iraq, OIG observed that food operations varied across the BEC, the BDSC, and Basrah. For instance, OIG found that the layout of the kitchens, storerooms, and cafeterias were not uniform among the sites and that each site served a different sized population. OIG also observed different serving methods at each site; for example, customers were allowed to self-serve most food at the BDSC and Basrah, although Taylors employees typically served most of the food at the BEC. Despite the unique physical characteristics of each location, the single HACCP plan developed for all sites did not detail any of these differences. Furthermore, the food safety team identified in the single HACCP plan was only composed of upper-level managers and did not include site-specific individuals who would actively be involved in the day-to-day preparation and service of food, as required. Finally, although each site faced different food safety hazards, the HACCP plan contained only a single hazard analysis that treated the receipt, storage, preparation, and cooking of food as identical across all sites.

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<sup>16</sup> Taylors's HACCP plan, with an effective date of July 2017, also covered operations for the Union III compound, which is under a different task order and not included in the scope of this audit.

<sup>17</sup> *Food Code*, "Active Managerial Control" 549 (2013).

<sup>18</sup> Food and Drug Administration, *Managing Food Safety: A Manual for the Voluntary Use of HACCP Principles for Operators of Food Service and Retail Establishments*, "Developing Your Food Safety System," 21 (April 2006).

<sup>19</sup> *Food Code*, "The HACCP Principles" 563 (2013).

### ***NEA Officials Did Not Approve the HACCP Plan or Verify That the Plan Included Pertinent HACCP Principles***

The BLISS contract also requires the Department to approve the HACCP plans. Yet, OIG found no evidence that any Department officials did so. In fact, the COR and ACORs told OIG that they did not review or approve the HACCP plan and stated that it had not been made clear to them that reviewing the HACCP plan was their responsibility. As a result, they did not verify that the HACCP plan included pertinent HACCP principles.<sup>20</sup> OIG's analysis of Taylors's HACCP plan and the extent to which it incorporated the HACCP principles is described below.

#### *Performing a Hazard Analysis*

The first HACCP principle is to perform an analysis to understand the operation and determine what food safety hazards are likely to occur if they are not effectively controlled.<sup>21</sup> A hazard analysis first identifies biological, chemical, and physical food safety hazards and then evaluates these hazards to determine which are severe enough to warrant control in the HACCP plan. Although Taylors's HACCP plan included a hazard analysis that generally complied with FDA guidance, some aspects of the analysis lacked specificity. For example, the hazard analysis in Taylors's HACCP plan did not adequately consider chemical and physical food safety hazards. Instead, the hazard analysis only lists "food allergens" as a potential chemical hazard during food delivery operations, without explanation. Additionally, the only physical hazard listed in the hazard analysis was "foreign matter"—again, without further explanation.

#### *Deciding on Critical Control Points*

The second HACCP principle is to identify critical control points in a food system in which loss of control may result in an unacceptable health risk. Each critical control point will have one or more control measures—such as proper cooking, cooling, or refrigeration—to assure that the health risks are prevented, eliminated, or reduced to acceptable levels. The food service operator then decides on points in the food preparation process at which these control measures can be applied.<sup>22</sup> Although the single HACCP plan that Taylors developed included a section on "process preventative controls," it did not clearly define the control measures that were being identified and at what point these critical control points would be applied in the food preparation process. For example, the plan lists "raw egg prep" and "dairy items" as "process controls"; the plan did not, however, set forth specific control measures that would be applied or the critical control points at which they would be applied to ensure food safety.

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<sup>20</sup> Annex 7 of FDA's *Managing Food Safety: A Regulator's Manual For Applying HACCP Principles to Risk-based Retail and Food Service Inspections and Evaluating Voluntary Food Safety Management Systems* (2006) contains a Verification Inspection Checklist that can be used to evaluate a food safety management system on the basis of HACCP principles. The checklist includes steps to: (1) review the food service operator's prerequisite program documentation, flow diagrams, and hazard analysis; (2) to identify the food service operator's critical control points, critical limits, monitoring procedures, and types of records maintained; and (3) assess whether corrective actions taken by the food service operator reflect actions described in the established plan.

<sup>21</sup> *Food Code*, "The HACCP Principles" 563 (2013).

<sup>22</sup> *Managing Food Safety: A Manual for the Voluntary Use of HACCP Principles for Operators of Food Service and Retail Establishments*, "Introduction," 2006, at 10.

### *Determining the Critical Limits*

The third HACCP principle is to determine critical limits, which are measurable and observable parameters that must be met to ensure that food safety hazards are controlled at each critical control point.<sup>23</sup> An example of how a critical limit applies to reducing the risk of salmonella in poultry is shown in Table 1.

**Table 1: Example of Food Hazard, Control Measure, and Critical Limit for Poultry**

Food	Hazard	Control Measure	Critical Limit
Poultry	Salmonella	Cook the Poultry	Cook at 165°F for 15 seconds

**Source:** OIG generated from FDA guidance.

OIG found that the critical limits identified by the HACCP plan were not specific and therefore were difficult to measure and observe. For example, the critical limit for receiving food was variously listed as 80°F, between 32 °F and 41°F, and less than 32°F; the plan did not at any point specify to which foods any particular limit applied. Similarly, the critical limit for cooking meat was listed as between 145°F and 165°F, thereby requiring a plan user to refer to the hazard analysis to determine the specific temperature for each type of meat. Additionally, OIG found that some critical limits set forth in the HACCP plan were inconsistent with those listed in the BLISS contract. For example, the HACCP plan identifies the hot holding temperature for cooked foods as 135°F, but the contract identified the appropriate temperature as 140°F.

### *Establishing Procedures for Monitoring Critical Control Points*

The fourth HACCP principle is to establish monitoring procedures to determine if critical limits are being met.<sup>24</sup> According to FDA guidance, monitoring (whether through direct observation or by taking appropriate measurements) is by far the most important step in ensuring food safety.<sup>25</sup> FDA guidance states that monitoring procedures should identify the operational steps and critical limits to be monitored, the equipment used, the frequency of monitoring efforts, and the person responsible for monitoring.<sup>26</sup> OIG found that, although the HACCP plan did contain monitoring procedures, some of those procedures were incomplete or inconsistent with other documentation. For example, the HACCP plan states that monitoring of cold storage occurs “as needed.” However, the BLISS contract states that personnel must log cold storage temperatures at the start and middle of each meal period. Additionally, the HACCP plan states that contractor staff will monitor hot holding food temperatures every 4 hours by examining readings on a food warmer and every 30 minutes by examining readings on a serving line. These instructions are

<sup>23</sup> *Food Code*, “The HACCP Principles” 567 (2013).

<sup>24</sup> *Ibid.*

<sup>25</sup> Food and Drug Administration, *Managing Food Safety: A Regulator’s Manual for Applying HACCP Principles to Risk-based Retail and Food Service Inspections and Evaluating Voluntary Food Safety Management Systems*, “Conducting Risk-based Inspections,” 12 (April 2006).

<sup>26</sup> *Managing Food Safety: A Manual for the Voluntary Use of HACCP Principles for Operators of Food Service and Retail Establishments*, “Developing Your Food Safety Management System,” 2006, at 41.

contrary to Taylors's SOP, which requires staff to conduct monitoring every 2 hours by a probe thermometer.

### *Establishing Corrective Actions*

The fifth HACCP principle is to establish corrective actions for addressing unmet critical limits.<sup>27</sup> Examples of corrective actions include heating food to the required temperature, discarding food, or rejecting a food shipment. In the event that a corrective action is taken, FDA guidance recommends that the food service operator document and communicate the actions taken and review and modify the food safety system to prevent the problem from occurring again.<sup>28</sup> Although OIG found that the HACCP plan contained potential corrective actions, none of them included documenting problems and communicating them to the food service operator's management so that the food safety management system could be modified to prevent the problem from reoccurring.

### *Establishing Verification Procedures*

The sixth HACCP principle is to establish verification procedures—other than monitoring—that determine the validity of the HACCP plan and show that the food system is operating according to the plan.<sup>29</sup> According to FDA guidance, verification should be conducted by someone other than the person who is directly responsible for performing the activities specified.<sup>30</sup> However, OIG found that the HACCP plan sometimes listed one individual as responsible both for performing the activity and for verifying its implementation. FDA guidance also states that verification should occur at a frequency that can ensure the food safety management system is being followed.<sup>31</sup> However, OIG found that the HACCP plan did not list the frequency of verification activities.

### *Establishing Record Keeping System*

The seventh HACCP principle is to establish a record-keeping system, which should include records related to prerequisite programs,<sup>32</sup> monitoring, corrective action, verification and validation, and calibration.<sup>33</sup> OIG found that the HACCP plan contained a number of templates for record-keeping, including freezer temperature logs, cleaning schedules, cooking logs, thaw logs, calibration logs, and fit-for-duty rosters. During visits to each site, OIG observed these

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<sup>27</sup> *Food Code*, "The HACCP Principles" 568 (2013).

<sup>28</sup> *Managing Food Safety: A Manual for the Voluntary Use of HACCP Principles for Operators of Food Service and Retail Establishments*, "Developing Your Food Safety Management System," 2006, at 42.

<sup>29</sup> *Food Code*, "The HACCP Principles" 569 (2013).

<sup>30</sup> *Ibid.*

<sup>31</sup> *Managing Food Safety: A Manual for the Voluntary Use of HACCP Principles for Operators of Food Service and Retail Establishments*, "Developing Your Food Safety Management System," 2006, at 44.

<sup>32</sup> Prerequisite programs are procedures, including SOPs, that address basic operational and sanitation conditions in an establishment. They include vendor certification programs, training programs, allergen management, buyer specifications, recipe/process instructions, and First-In-First-Out procedures.

<sup>33</sup> *Food Code*, "The HACCP Principles" 570 (2013).

records in use by Taylors. However, OIG found that the HACCP plan did not contain a record-keeping system for corrective actions and that some prerequisite program documentation—namely Taylors’s vendor certification program—was not outlined in the HACCP plan.

### ***A Lack of Comprehensive HACCP Plans Leaves Food Operations Vulnerable***

NEA did not verify whether PAE developed and implemented site-specific HACCP plans or review and approve the single HACCP plan because NEA did not prioritize food safety planning and because the COR and ACORs lacked training on HACCP principles. For example, OIG’s review of NEA oversight documentation for the BLiSS contract—including the food service inspection checklist, CMO-Iraq’s SOPs, the quality assurance surveillance plan, program management reviews, and performance assessment reports in CPARS—found no references to the single HACCP plan. The COR and ACORs reported that they had no experience in food safety before accepting their oversight responsibilities and that the Department did not provide them with any training on food safety. The COR and ACORs said that they became familiar with food safety only from on-the-job experience.

Without comprehensive HACCP plans at each site, PAE runs the risk of being unable to identify the cause of hazards, such as foodborne illnesses, and prevent future occurrences. When lapses in food safety occurred, PAE and Taylors’s food management system was not structured to identify the root causes or formulate corrective actions to address the lapses. For example, when performing audit fieldwork in Iraq, OIG observed an inspection of the BEC dining facilities performed by the CHS public health inspector. The CHS public health inspector identified chicken that was not maintained at the FDA-recommended hot holding temperature of 135°F or higher.<sup>34</sup> The CHS public health inspector inspected the hot holding equipment and concluded the hot holding equipment was functioning properly; however, neither the CHS inspector nor Taylors personnel could determine why the chicken was not at the proper temperature (see Figure 1 and Figure 2, respectively).

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<sup>34</sup> As noted previously, per the Medical Service Support Iraq SOP, CHS public health inspectors test items to the FDA-recommended hot holding of 135°F; however, the BLiSS contract states that the hot holding temperature should be 140°F.



**Figure 1:** Chicken not being maintained at the FDA-recommended hot holding temperature of 135°F or above.

**Source:** OIG photo taken September 2017.



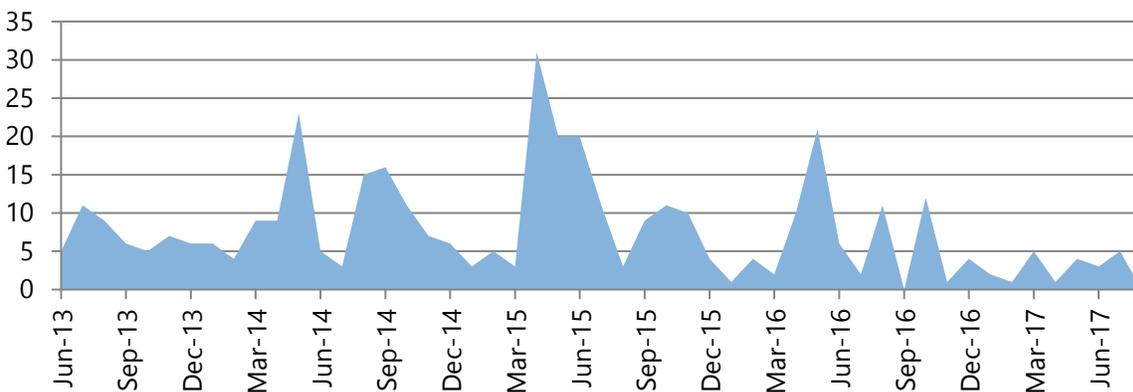
**Figure 2:** CHS public health inspector examination of chicken sample.

**Source:** OIG photo taken September 2017.

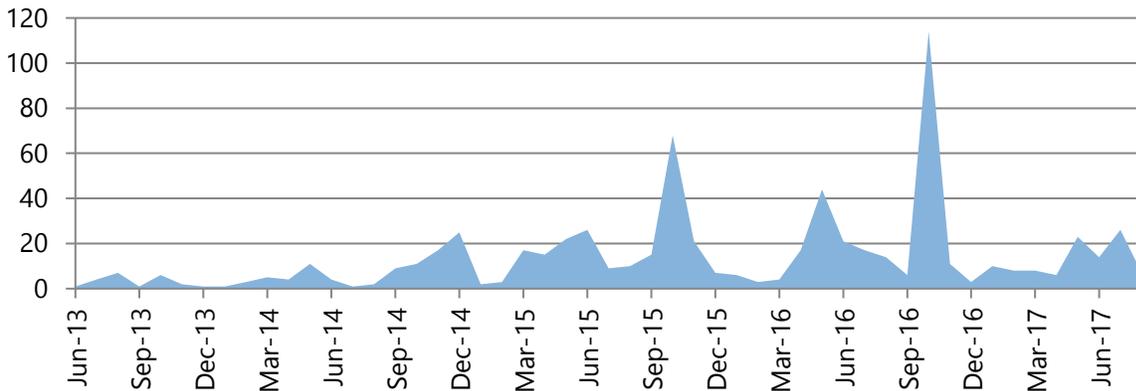
In response to the CHS public health inspector findings, Taylors’s personnel took immediate corrective action by disposing of the chicken; however, they did not identify any root cause for the underlying failure to comply with the hot holding temperature requirements. OIG reviewed PAE’s and Taylors’s monthly quality assurance reports but found no mention of the incident or corrective actions taken to prevent the problem from reoccurring.

PAE and Taylors’s food management system was also not structured to identify the root causes of previous periodic increases in gastrointestinal illness. OIG examined data on reported cases of gastrointestinal illness at the BEC, the BDSC, and Basrah between June 2013 and August 2017 and observed that reported cases varied by site and month. See Figures 3 through 5.

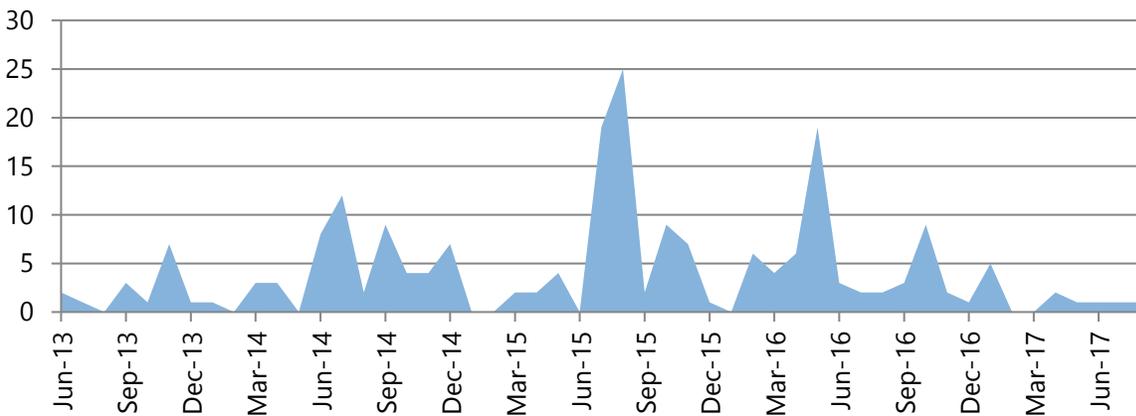
**Figure 3: Reported Cases of Gastrointestinal Illness at the BEC by Month**



**Source:** OIG generated from a review of CHS monthly gastrointestinal illness report for the BEC.

**Figure 4: Reported Cases of Gastrointestinal Illness at the BDSC by Month**

**Source:** OIG generated from a review of CHS monthly gastrointestinal illness report for the BDSC.

**Figure 5: Reported Cases of Gastrointestinal Illness at Basrah by Month**

**Source:** OIG generated from a review of CHS monthly gastrointestinal illness report for Basrah.

OIG reviewed quality assurance reports that PAE and Taylors prepared during and after the months that had unusually high numbers of incidences of reported cases of gastrointestinal illnesses<sup>35</sup> to determine if they identified gastrointestinal illness-related deficiencies and established corrective actions. One report, completed in October 2015 for the BDSC cafeteria, identified a “human/foodborne illness” deficiency but did not include details on the corrective action taken. A different report completed in the same month for the BDSC cafeteria indicated that “human/foodborne illness” was considered “N/A” and stated that “[c]orrective actions were opened and closed by [the Food Safety] Site manager for quality and safety issue;” no other details on the corrective action, however, were included. None of the other PAE and Taylors reports reviewed during and after these months of unusually high numbers of reported cases of gastrointestinal illnesses identified lapses in food safety related to “human/foodborne illness” deficiencies. OIG also reviewed monthly BLISS food service inspections prepared by the CORs

<sup>35</sup> OIG reviewed quality assurance reports prepared for the BEC in May 2014, April 2015, and May 2015 (according to NEA, no reports were conducted at the BEC in June 2014 because of a security-related crisis); the BDSC in October 2015, November 2015, May 2016, June 2016, October 2016, and November 2016; and Basrah in July 2015, August 2015, September 2015, May 2016, and June 2016. See Appendix A for OIG’s detailed sampling methodology.

and ACORs during and after the same months of unusually high numbers of incidences of reported cases of gastrointestinal illnesses to determine if deficiencies related to gastrointestinal illness were identified and if corrective actions were issued.<sup>36</sup> CORs issued some corrective actions during these months, but only one inspection included a corrective action related to a potential gastrointestinal illness deficiency. This inspection, completed in September 2015 for the Basrah Cafeteria, noted that a vegetable table failed a cleanliness test and stated "more prudent cleaning practices are necessary."

Without comprehensive HACCP plans for each site, assurance that PAE can properly identify and provide preventative measures for potential hazards is reduced. Assurance that Government oversight personnel are aware of potential vulnerabilities and are adequately evaluating the effectiveness of PAE's food management system is also reduced. In addition, without CORs and ACORs who have been properly trained in food safety and HACCP principles, the Department's ability to hold PAE accountable for providing a safe, clean, and hygienic environment for dining is weakened.

**Recommendation 1:** OIG recommends that the Bureau of Near Eastern Affairs, in accordance with the Baghdad Life Support Services contract SAQMMA13D0120, food services task order SAQMMA14F0721, require PAE Government Services, Inc. and Taylors International Services, Inc. to develop and implement a Hazard Assessment and Critical Control Point plan for each Department site in Iraq.

**Management Response:** NEA concurred with the recommendation, stating that an HACCP plan, among other documentation, was "turned over to the CMO office for validation in April 2014" and that an independently contracted verification and validation team reviewed the plan. NEA also stated that Taylors International Services "developed a single HACCP plan that has been tailored to individual product, processing, and distribution conditions at each food establishment as needed" and that "[e]ach site has its own flow charts to capture the unique Hazard Analysis."

**OIG Reply:** Although NEA concurred with the recommendation, OIG considers this recommendation unresolved. OIG disagrees with NEA's assertion that the single HACCP plan developed by Taylors was adapted to each site. As discussed in this report, OIG found that the single HACCP plan developed by Taylors, which was updated in July 2017, did not contain details specific to each of the sites, as required by FDA guidance. In addition, OIG found that the single hazard analysis performed by Taylors treated the receipt, storage, preparation, and cooking of food identically across all sites in Iraq notwithstanding important differences among those locations.

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<sup>36</sup> OIG reviewed monthly food service inspections prepared for the BEC in April 2015 and May 2015; the BDSC in October 2015, November 2015, and May 2016; and Basrah in July 2015, August 2015, September 2015, May 2016, and June 2016. NEA attributed missing BEC inspections for May 2014 and June 2014 to challenges encountered during a security-related crisis in Iraq in 2014. CMO-Iraq officials were unable to account for inspections prepared for the BDSC for June 2016, October 2016, and November 2016. The missing oversight documentation is discussed in Finding B of this report.

This recommendation will be considered resolved when NEA agrees to implement the recommendation and require PAE and Taylors to develop and implement an HACCP plan for each Department site in Iraq. This recommendation will be closed when OIG receives and accepts documentation demonstrating that NEA has required PAE and Taylors to develop and implement an HACCP plan for each Department site in Iraq, in accordance with BLISS contract SAQMMA13D0120, food services task order SAQMMA14F0721.

**Recommendation 2:** OIG recommends that the Bureau of Near Eastern Affairs review the Hazard Assessment and Critical Control Point plans developed by PAE Government Services, Inc. and Taylors International Services, Inc. referenced in Recommendation 1. The review should, at a minimum, use the Food and Drug Administration's Hazard Assessment and Critical Control Point Verification Inspection Checklist to verify that the plans for each site comply with Food and Drug Administration guidance based on Hazard Assessment and Critical Control Point principles. The review should also ensure the plans are revised, as needed, for any deficiencies identified.

**Management Response:** NEA stated that, as indicated in its response to Recommendation 1, the HACCP plans have already been appropriately reviewed.

**OIG Reply:** OIG considers this recommendation unresolved. Although NEA's response to Recommendation 1 asserts that Taylors developed a single HACCP plan, which was reviewed by an independent contractor in April 2014, NEA did not provide OIG with a copy of that plan or evidence of any NEA review during audit fieldwork or in response to a draft of this report. Furthermore, while NEA did provide OIG with a copy of a July 2017 HACCP plan, which OIG discussed in this report, NEA did not provide OIG with evidence that the plan had been reviewed. In any event, as discussed in this report, OIG found that the Taylors's July 2017 HACCP plan did not fully incorporate or comply with the seven HACCP principles.

This recommendation will be considered resolved when NEA demonstrates that it has both required the development of site-specific HACCP plans and reviewed those plans to help ensure Government oversight personnel are aware of potential vulnerabilities and are adequately evaluating the effectiveness of PAE's food management system. This recommendation will be closed when OIG receives and accepts documentation demonstrating that NEA has reviewed the site-specific HACCP plans developed by PAE and Taylors. The review should, at a minimum, use the FDA's HACCP Verification Inspection Checklist to verify that the plans for each site comply with FDA guidance on the basis of HACCP principles. The review should also ensure the plans are revised, as needed, for any deficiencies identified.

**Recommendation 3:** OIG recommends that the Bureau of Near Eastern Affairs, within 60 days of its approval of the Hazard Assessment and Critical Control Point plans, incorporate the plans' requirements into the Baghdad Life Support Service food service inspection checklist.

**Management Response:** NEA concurred with the recommendation and stated that it had already implemented it through the 2014 process described in response to

Recommendation 1. NEA also stated that, as set forth in its response to Recommendation 1, the independently contracted verification and validation team verified that the HACCP plan matched the created SOPs and worked with the COR and ACORs to develop their audit forms.

**OIG Reply:** OIG considers this recommendation unresolved. As discussed in this report and in OIG replies to Recommendations 1 and 2, OIG found that the single HACCP plan was not adapted for each site and received no evidence that NEA reviewed the single HACCP plan or its revisions. Furthermore, OIG found that the single HACCP plan did not fully incorporate or comply with the seven HACCP principles. OIG therefore maintains that without comprehensive HACCP plans for each site, assurance that PAE can properly identify and provide preventative measures for potential hazards is reduced. Assurance that Government oversight personnel will become aware of potential vulnerabilities and can remedy any inadequacies identified with PAE's food management system is also reduced.

This recommendation will be considered resolved when NEA agrees to direct PAE and Taylors to develop site-specific HACCP plans (Recommendation 1), reviews those plans (Recommendation 2), and incorporate the plans' requirements into the BLISS food service inspection checklist. This recommendation will be closed when OIG receives and accepts documentation demonstrating that NEA has incorporated site-specific HACCP requirements into the BLISS food service inspection checklist within 60-days after review and approval.

**Recommendation 4:** OIG recommends that the Bureau of Near Eastern Affairs develop and implement food safety training for all current and future personnel assigned to conduct oversight of food services in Iraq, including training on Hazard Analysis and Critical Control Point principles.

**Management Response:** NEA stated that it will seek to incorporate HACCP principles into its COR training in Frankfurt. NEA explained that the intent of the training will be to provide participants with "the expertise required to ensure that HACCPs are in place and being followed, and to know when to consult with a third party specialist."

**OIG Reply:** On the basis of NEA's concurrence with the recommendation and planned actions, OIG considers this recommendation resolved pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that NEA has developed and implemented food safety training, including training on HACCP principles, for all current and future personnel assigned to conduct oversight of food services in Iraq.

## Finding B: NEA Did Not Plan For or Conduct Effective Contract Oversight of BLiSS Food Services Task Order SAQMMA14F0721

NEA did not plan or conduct sufficient oversight to hold PAE accountable for complying with food safety controls and requirements contained in the BLiSS contract and food services task order SAQMMA14F0721. Specifically, NEA personnel did not:

- Develop a comprehensive quality assurance surveillance plan that included measurable and structured performance standards or that aligned with the key performance indicators and metrics defined in the BLiSS contract.
- Maintain pertinent oversight documentation in the COR files, including monthly food service inspections.
- Complete contractor performance assessment report narratives in a timely manner.

The CO attributed the insufficient development of a quality assurance surveillance plan and performance metrics to the shortage of subject-matter expertise within the Department. According to the CO, the Department does not currently have the expertise necessary to develop a comprehensive quality assurance surveillance plan that includes adequate performance metrics for food services. As a result, the quality assurance surveillance plan associated with the BLiSS food services task order has not been approved and has remained in draft form for 4 years since the award of the task order.

With respect to the COR files, NEA officials were unable to account for monthly food service inspections that were missing from the COR file. NEA officials attributed the incomplete COR file to challenges encountered during a security-related crisis in Iraq in 2014. In addition, the CO attributed the untimely contractor performance report narrative submissions, in part, to the frequent turnover of oversight personnel in Iraq. A/LM/AQM and NEA officials also noted that CPARS contained incorrect BLiSS food services task order period of performance dates; these dates had to be corrected before narratives could be submitted, which led to delays. Regardless of these explanations, these deficiencies—namely, the absence of a comprehensive quality assurance surveillance plan, the lack of appropriate oversight documentation relating to the BLiSS food services task order, and the failure to conduct timely performance assessment reports of PAE for inclusion in CPARS—hamper the Department’s ability to fully assess PAE’s performance and hold PAE accountable for fulfilling BLiSS food safety controls and contract requirements.

### *Lack of Comprehensive Quality Assurance Surveillance Plan*

According to Department guidance, it is the COR's responsibility to ensure that the Department receives high-quality contractor performance that complies with the contract.<sup>37</sup> One tool that CORs and ACORs use to monitor contractor performance is the quality assurance surveillance plan, which establishes the methodology for evaluating the contractor’s actual performance to determine compliance with contractual requirements.<sup>38</sup> Additionally, Department guidance

<sup>37</sup> 14 FAH-2 H-521(b), "Elements of Contract Administration."

<sup>38</sup> FAR 46.401(a), "Government Contract Quality Assurance."

states that quality assurance provides a framework from which to monitor the requirements and specifications helping to ensure that project guidelines, policies, and procedures are followed in the development of services and products.<sup>39</sup> According to the FAR, the performance work statement should enable assessment of work performance against measurable performance standards.<sup>40</sup> The quality assurance surveillance plan should be prepared in conjunction with the performance work statement and should specify all work requiring surveillance and the method of surveillance.<sup>41</sup> Department guidance states that a well-documented quality assurance plan must be provided during project initiation to ensure that the development of the project follows established project guidelines for producing a complete, accurate, and easily understood product within the framework.<sup>42</sup>

Although a COR developed a quality assurance surveillance plan for the BLiSS food services task order, as of March 2018, it had yet to be approved by the CO four years into contract performance. OIG also found that the quality assurance surveillance plan did not include measurable and structured performance standards or align with the key performance indicators and metrics defined in the BLiSS contract. For example, the BLiSS contract lists food safety as a key performance indicator to be assessed on the basis of contract and Department standards. However, no reference is made to food safety or applicable metrics for assessing contractor performance in the draft quality assurance surveillance plan.

The CO stated that the CORs are responsible for developing the quality assurance surveillance plan. However, the CO stated that those individuals, typically Foreign Service Officers, do not have the expertise necessary to develop a comprehensive quality assurance surveillance plan that includes adequate performance metrics for food services. He explained that he did not approve the draft quality assurance surveillance plan submitted by the COR for that very reason. Without a comprehensive, approved quality assurance surveillance plan that includes adequate performance metrics, the BLiSS COR and ACORs cannot sufficiently evaluate the quality of services or deliverables provided by PAE.

### ***BLiSS Food Service Inspections Missing from the COR File***

In January 2017, CMO-Iraq implemented its "BLiSS Inspections" SOP for the inspection and reporting of contractor performance. The SOP establishes procedures for documenting inspections and maintaining quality assurance records and draws guidance from the FAR on selecting ratings. As indicated in the SOP, food service is rated "high risk" on the BLiSS Service Inspection Schedule and food service inspections must accordingly be performed monthly by

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<sup>39</sup> 5 FAH-5 H-411(b), "Quality Assurance Discipline."

<sup>40</sup> FAR 37.602(a), "Performance work statement," states that a performance work statement may be prepared by the Government or result from a Statement of Objective (also prepared by the Government) where the offeror proposes the performance work statement. The Department issued a Statement of Objective for the BLiSS food services task order and incorporated both the Statement of Objective and PAE's technical proposal by reference into the task order. These documents serve as the performance work statement.

<sup>41</sup> FAR 46.401(a), "Government Contract Quality Assurance."

<sup>42</sup> 5 FAH-5 H-412(a), "Quality Assurance Plan."

the COR or ACOR. According to the SOP, all monthly scheduled inspections should be completed and documented by close of business on the last day of the month and all results should be captured on a summary BLiSS Service Inspection Schedule form.

OIG requested all monthly BLiSS food service inspections from NEA for all sites from contract inception through June 2017. The COR and NEA officials were, however, unable to provide 66 of 246 (26.8 percent) of the BLiSS food service inspections. OIG received various explanations for the missing documents. CMO-Iraq officials stated that documented BLiSS food service inspections began in July 2014 and attributed missing inspections to a data destruction exercise that was implemented when personnel were evacuated from the BEC during a security-related crisis in Iraq in 2014. OIG calculated that this would account for 24 of the 66 missing inspections. However, Embassy Baghdad's Information Resource Management office contradicted this, reporting that the embassy prepared for, but did not implement, the emergency destruction exercise at issue. CMO-Iraq also informed OIG that 22 of the 66 missing inspections were saved to an inaccessible server and that the embassy's Information Resource Management staff was unsuccessful in their attempt to retrieve the missing inspections from this server. Finally, CMO-Iraq officials were unable to account for 20 of the 66 missing monthly BLiSS food service inspections that should have been retained in the COR file.<sup>43</sup> In addition, the COR informed OIG that that no backups existed containing the overall ratings for all 66 unaccounted-for inspections and that the results of those monthly inspections were not captured on the BLiSS Service Inspection Schedule. On the basis of OIG's inquiry, NEA added a memorandum of record to the COR file regarding the missing files from summer 2014. Table 2 shows the number of missing BLiSS food service inspections by site during and after the 2014 security-related crisis.

**Table 2: Number of Missing BLiSS Food Service Inspections by Site During and After the 2014 Security-Related Crisis**

Sites	Missing Inspections During 2014 Security-Related Crisis (March 2014 – June 2014)	Missing Inspections After 2014 Security-Related Crisis (July 2014 – June 2017)
BEC Dining Facilities*	16	21
Basrah Dining Facilities*	4	8
BDSC Dining Facility	4	13
<b>Total</b>	<b>24</b>	<b>42</b>

**Source:** OIG generated from a review of monthly BLiSS food service inspections.

\*Includes inspections of snack bars.

OIG previously reported on NEA's incomplete COR files for the BLiSS contract and made

<sup>43</sup> CMO-Iraq officials were also unable to account for and provide 3 of 15 of the Department's quarterly program management reviews covering the period September 2014 through June 2015.

recommendations to address the needed improvements.<sup>44</sup> In response to that report, NEA implemented an electronic filing system that all CMO-Iraq staff can access. Additionally, NEA revised the Contract and COR File Maintenance SOP in March 2017 to include the requirement for CMO-Iraq personnel to perform monthly COR file inspections to ensure that the files are complete and that non-compliance is reported to the appropriate supervisor. Despite this requirement, which was incorporated as of March 2017, OIG found that monthly BLiSS food service inspections were missing from the COR file through June 2017. Without complete oversight documentation, the Department cannot effectively support its assessments of the contractor's performance and hold PAE accountable for any subpar performance. Therefore, it is imperative that BLiSS CORs validate monthly reviews of the COR files to ensure that pertinent oversight documentation is maintained.

### ***Contractor Performance Assessment Reports Not Completed Timely***

The primary purpose of the CPARS is to ensure that current, complete, and accurate information on contractor performance is available for use in procurement source selections.<sup>45</sup> The contractor performance evaluations in this system are used by source selection officials throughout the U.S. Government when awarding contracts and orders. Because PAE is eligible to receive contract awards from multiple Government agencies, it is critical that the Department submit accurate, complete, and timely performance information in CPARS. Doing so will help ensure that the U.S. Government does business only with companies that provide quality products and services in support of the agency's missions.

Department policy designates the COR as the Assessing Official Representative, who is responsible for providing a timely and quality contractor performance assessment report narrative. The policy designates the CO as the Assessing Official, who is responsible for reviewing, signing, and processing the contractor performance assessment report no later than 120 days after the end of the evaluation period.<sup>46</sup> According to the FAR, past performance

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<sup>44</sup> OIG report, *Audit of the Oversight of Fuel Acquisition and Related Services Supporting Department of State Operations in Iraq* (AUD-MERO-17-16, December 2016) stated that "the COR files lacked documentation regarding the acceptability of goods and services and site-visit results, and they did not contain copies of all correspondence and synopses of telephone calls to and from the contractor and CO." In the report, OIG noted that the COR files showed improvement over time; however, they continued to lack complete documentation to support PAE's annual rating in the CPARS. In order to permit accurate reporting of contractor performance in CPARS, OIG recommended that NEA update its COR File Audit Plan to include a requirement for the CORs to conduct monthly reviews of the COR files for sufficiency of oversight documents, such as documentation regarding the acceptability of goods and services, site-visit results, and copies of all correspondence and synopses of telephone calls to and from the contractor and CO. NEA concurred with the recommendation and provided documentation to support its implementation. OIG accordingly closed the recommendation.

<sup>45</sup> Contractor Performance Assessment Reporting System, *Guidance for the Contractor Performance Assessment Reporting System*, Section 1.2 "Purpose," 1 (August 2017).

<sup>46</sup> Department of State, *Contractor Performance Assessment Reporting System/Architect-Engineer Contract Administration Support System/Construction Contractor Appraisal Support System Policy Guide*, Section 4.4.1, "Assessing Official (AO) (Contracting Officer)," 11 (September 2010).

evaluations should be prepared at least annually and at the time the work under a contract or task order is completed.<sup>47</sup>

An NEA official stated that documentation could not be located to establish that CORs completed the contractor performance assessment report narratives for the base year and option years 1 and 2 on a specific date or in a timely manner. The NEA official also acknowledged that the base year narrative, with a March 2014 to November 2014 period of performance, was outstanding as of September 2015. As a result of the late submission of contractor performance assessment report narratives, the CO signed contractor performance assessment reports 778 and 490 days after the 120-day requirement for the base year and option year 1, respectively. Additionally, the contractor performance assessment report for option year 2 remained incomplete and unsigned by the CO as of March 2018. Table 3 shows the dates when BLiSS contractor performance assessment reports were due, actual completion dates, and total number of days CPARS input was past due.

**Table 3: BLiSS Contractor Performance Assessment Report Completion Dates**

Year	Performance Period	Contractor Performance Assessment Report Due Date <sup>a</sup>	Actual Contractor Performance Assessment Report Completion Date	Days Past Due <sup>b</sup>
Base Year	3/1/2014 to 11/30/2014	3/30/2015	5/16/2017	778
Option Year 1	12/1/2014 to 11/30/2015	3/29/2016	8/01/2017	490
Option Year 2	12/1/2015 to 11/30/2016	3/30/2017	<sup>c</sup>	-
Option Year 3	12/1/2016 to 11/30/2017	3/30/2018	-	-
Option Year 4	12/1/2017 to 11/30/2018	3/30/2019	-	-

**Source:** OIG generated from a review of CPARS completion dates for the base year and option years 1 and 2.

<sup>a</sup> Contractor performance assessment reports are due 120 days after the end of the performance period.

<sup>b</sup> Number of days the contractor performance assessment report was past the 120-day requirement.

<sup>c</sup> Contractor performance assessment report incomplete and unsigned by the CO as of March 2018.

According to the CO, the untimely completion of the narratives can be attributed to frequent turnover of CORs and ACORs in Iraq who typically work on 1-year assignments and whose tours of duty do not typically align with the task order periods of performance. Furthermore, an NEA official attributed the untimely completion of contractor performance assessment report narratives to the fact that period of performance dates in CPARS did not correspond to the BLiSS food services task order period of performance dates. This required a realignment of the period of performance dates in CPARS before NEA officials could enter the narratives, thereby delaying the submission of the narratives.

It is ultimately the CO's responsibility to ensure that contractor performance assessments are entered into CPARS in a timely fashion.<sup>48</sup> Without preparing the underlying assessments, the

<sup>47</sup> FAR 42.1502 (a), "Policy."

Department cannot fully assess PAE's performance or hold PAE accountable for implementing important food safety controls and fulfilling BLISS contract requirements. In addition, other Government agencies will not be fully informed of PAE's past performance and source selection officials will not have current, pertinent information as to whether PAE can provide the quality products and services the agency requires to meet contract requirements.

**Recommendation 5:** OIG recommends that the Bureau of Near Eastern Affairs develop a comprehensive quality assurance surveillance plan for food services task order SAQMMA14F0721 in accordance with Federal Acquisition Regulation 46.4, "Government Contract Quality Assurance" and implement the quality assurance surveillance plan upon the review and approval of the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management. The plan should, at a minimum, include measurable and structured performance standards and align with the key performance indicators and metrics defined in the Baghdad Life Support Services contract.

**Management Response:** NEA stated that it concurred with the recommendation.

**OIG Reply:** On the basis of NEA's concurrence with the recommendation, OIG considers the recommendation resolved pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that NEA has developed and implemented a comprehensive quality assurance surveillance plan for food services task order SAQMMA14F0721 that complies with FAR 46.4, "Government Contract Quality Assurance," includes measurable and structured performance standards, and aligns with key performance indicators and metrics defined in the BLISS contract.

**Recommendation 6:** OIG recommends that the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management review the quality assurance surveillance plan for food services task order SAQMMA14F0721 that is to be developed by the Bureau of Near Eastern Affairs in response to Recommendation 5 and approve it if the quality assurance surveillance plan complies with Federal Acquisition Regulation 46.4, "Government Contract Quality Assurance."

**Management Response:** A/LM/AQM stated that it concurred with the recommendation and will review the quality assurance surveillance plan developed by NEA in response to Recommendation 5.

**OIG Reply:** On the basis of A/LM/AQM's concurrence with the recommendation, OIG considers the recommendation resolved pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that A/LM/AQM has reviewed and approved a quality assurance surveillance plan for food services task order SAQMMA14F0721 that complies with FAR 46.4, "Government Contract Quality Assurance."

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<sup>48</sup> Department of State, *Contractor Performance Assessment Reporting System/Architect-Engineer Contract Administration Support System/Construction Contractor Appraisal Support System Policy Guide*, Section 1.5, "Responsibility for Completing CPARs," 4 (September 2010).

**Recommendation 7:** OIG recommends that the Bureau of Near Eastern Affairs develop a process to verify that monthly Contracting Officer's Representative file inspections are completed as required and to report instances of Contracting Officer's Representative non-compliance to the appropriate supervisor, in accordance with its "Contract and COR File Maintenance" standard operating procedures.

**Management Response:** NEA stated that it concurred with the recommendation.

**OIG Reply:** On the basis of NEA's concurrence with the recommendation, OIG considers the recommendation resolved pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that NEA has developed a process to verify that monthly COR file inspections are completed as required and that instances of COR non-compliance are reported to the appropriate supervisor, in accordance with the "Contract and COR File Maintenance" standard operating procedures.

**Recommendation 8:** OIG recommends that the Bureau of Near Eastern Affairs, in coordination with the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management, develop and implement controls to ensure that Contracting Officer's Representatives enter timely contractor past performance evaluation report narratives into the Contractor Performance Assessment Reporting System so the Contracting Officer can review, sign, and process the contractor performance assessment reports no later than 120 days after the end of the evaluation period.

**Management Response:** NEA stated that it concurred with the recommendation.

**OIG Reply:** On the basis of NEA's concurrence with the recommendation, OIG considers the recommendation resolved pending further action. This recommendation will be closed when OIG receives and accepts documentation demonstrating that NEA has implemented controls that ensure the CORs enter timely contractor past performance evaluation report narratives into CPARS so the Contracting Officer can review, sign, and process the contractor performance assessment reports no later than 120 days after the end of the evaluation period.

## RECOMMENDATIONS

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**Recommendation 1:** OIG recommends that the Bureau of Near Eastern Affairs, in accordance with the Baghdad Life Support Services contract SAQMMA13D0120, food services task order SAQMMA14F0721, require PAE Government Services, Inc. and Taylors International Services, Inc. to develop and implement a Hazard Assessment and Critical Control Point plan for each Department site in Iraq.

**Recommendation 2:** OIG recommends that the Bureau of Near Eastern Affairs review the Hazard Assessment and Critical Control Point plans developed by PAE Government Services, Inc. and Taylors International Services, Inc. referenced in Recommendation 1. The review should, at a minimum, use the Food and Drug Administration's Hazard Assessment and Critical Control Point Verification Inspection Checklist to verify that the plans for each site comply with Food and Drug Administration guidance based on Hazard Assessment and Critical Control Point principles. The review should also ensure the plans are revised, as needed, for any deficiencies identified.

**Recommendation 3:** OIG recommends that the Bureau of Near Eastern Affairs, within 60 days of its approval of the Hazard Assessment and Critical Control Point plans, incorporate the plans' requirements into the Baghdad Life Support Service food service inspection checklist.

**Recommendation 4:** OIG recommends that the Bureau of Near Eastern Affairs develop and implement food safety training for all current and future personnel assigned to conduct oversight of food services in Iraq, including training on Hazard Analysis and Critical Control Point principles.

**Recommendation 5:** OIG recommends that the Bureau of Near Eastern Affairs develop a comprehensive quality assurance surveillance plan for food services task order SAQMMA14F0721 in accordance with Federal Acquisition Regulation 46.4, "Government Contract Quality Assurance" and implement the quality assurance surveillance plan upon the review and approval of the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management. The plan should, at a minimum, include measurable and structured performance standards and align with the key performance indicators and metrics defined in the Baghdad Life Support Services contract.

**Recommendation 6:** OIG recommends that the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management review the quality assurance surveillance plan for food services task order SAQMMA14F0721 that is to be developed by the Bureau of Near Eastern Affairs in response to Recommendation 5 and approve it if the quality assurance surveillance plan complies with Federal Acquisition Regulation 46.4, "Government Contract Quality Assurance."

**Recommendation 7:** OIG recommends that the Bureau of Near Eastern Affairs develop a process to verify that monthly Contracting Officer's Representative file inspections are completed as required and to report instances of Contracting Officer's Representative non-compliance to the

appropriate supervisor, in accordance with its "Contract and COR File Maintenance" standard operating procedures.

**Recommendation 8:** OIG recommends that the Bureau of Near Eastern Affairs, in coordination with the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management, develop and implement controls to ensure that Contracting Officer's Representatives enter timely contractor past performance evaluation report narratives into the Contractor Performance Assessment Reporting System so the Contracting Officer can review, sign, and process the contractor performance assessment reports no later than 120 days after the end of the evaluation period.

## APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

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The Office of Inspector General (OIG) conducted this audit to determine whether the Department of State's (Department) Bureau of Near Eastern Affairs (NEA) provided oversight of food safety controls for task order SAQMMA14F0721 in accordance with Department and contractual requirements and whether the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management (A/LM/AQM) and NEA held the contractor accountable for complying with food safety controls.

OIG conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

OIG conducted this audit from July 2017 to March 2018. OIG performed audit work in Iraq at the Baghdad Embassy Compound (BEC), the Baghdad Diplomatic Support Center (BDSC), U.S. Consulate General Basrah (Basrah), and U.S. Consulate General Frankfurt, Germany. OIG's audit work focused on the Baghdad Life Support Services (BLISS) indefinite-delivery, indefinite-quantity contract number SAQMMA13D0120 and BLISS food services task order SAQMMA14F0721 and associated modifications.

To obtain background information for the audit, OIG researched and reviewed Federal laws and regulations, as well as internal Department policies and procedures and other guidance. Specifically, OIG reviewed the Federal Acquisition Regulation; Office of Management and Budget circulars; the Foreign Affairs Manual; the Foreign Affairs Handbook; the Department of State Acquisition Regulations; and the Department's Regional Contract Management Office (CMO) policy, guidance, and standard operating procedures. OIG also reviewed the World Health Organization's Food and Agriculture Organization's *Codex Alimentarius*, the Department of Defense's *Tri-service Food Code*, and the following guidance issued by the Food and Drug Administration (FDA): *Food Code 2013, Managing Food Safety: A Manual for the Voluntary Use of [Hazard Analysis and Critical Control Point] Principles for Operators of Food Service and Retail Establishments, Managing Food Safety: A Regulator's Manual for Applying [Hazard Analysis and Critical Control Point] Principles to Risk-based Retail and Food Service Inspections and Evaluating Voluntary Food Safety Management Systems*, and *FDA Procedures for Standardization of Retail Food Safety Inspection Officers*.

To determine whether NEA conducted oversight of food safety controls for task order SAQMMA14F0721 in accordance with Department and contractual requirements and whether A/LM/AQM and NEA held the contractor accountable for complying with food safety controls, OIG coordinated with and interviewed officials from A/LM/AQM, NEA—including CMO officials in Iraq—the Regional Medical Office in Germany and Iraq, PAE Government Service, Inc. (PAE), Taylors International Services, Inc. (Taylors), and Comprehensive Health Services (CHS). OIG reviewed and analyzed BLISS contract SAQMMA13D0120, task order SAQMMA14F0721,

modifications to the contract and task order, quality assurance surveillance plans, program management reviews, and food inspections completed by Contracting Officer's Representatives and Alternate Contracting Officer's Representatives. OIG reviewed CHS's Medical Service Support Iraq contract SAQMMA17C0180 and standard operating procedures for conducting health assessments. OIG also reviewed and analyzed Taylors's Hazard Analysis and Critical Control Point plan as well as PAE's and Taylors's internal audit reports related to food operations.

## Prior Reports

OIG did not identify any prior reports specifically related to food safety controls under the BLiSS contract. However, OIG initiated an "Audit of Cost Controls for Food Services in Iraq Under Baghdad Life Support Services (BLiSS) Task Order SAQMMA14F0721" on May 24, 2017. The primary objective of the audit was to determine whether A/LM/AQM established and implemented cost controls that were successful in controlling costs over the life of task order SAQMMA14F0721 and whether A/LM/AQM and NEA held the contractor accountable for complying with the established cost controls, including the contractor's cost control plan. OIG issued *Management Assistance Report: Cost Controls for Food Services Supporting Department of State Operations in Iraq Require Attention* (AUD-MERO-18-31, March 2018) to provide early communication of deficiencies that relate to the first part of this objective. Specifically, OIG found that A/LM/AQM did not effectively implement contractually established cost controls to protect the Department's financial interests. OIG made 14 recommendations to the Department to address identified questioned costs totaling approximately \$45 million and noncompliance with the contract terms and conditions. As of March 2018, OIG considers all 14 recommendations resolved pending further action.

Additionally, OIG issued the following audit products that relate to other task orders and elements of the BLiSS contract: *Aspects of the Invoice Review Process Used by the Bureau of Near Eastern Affairs to Support Contingency Operations in Iraq Need Improvement* (AUD-MERO-17-33, March 2017); *Audit of the Oversight of Fuel Acquisition and Related Services Supporting Department of State Operations in Iraq* (AUD-MERO-17-16, December 2016); *Management Assistance Report: Questionable Practices Regarding the Department of State Baghdad Life Support Services (BLiSS) Contract, Including Suspected Use of Cost-Plus-a-Percentage-of-Cost Task Orders* (AUD-MERO-16-27, June 2016); and *Management Assistance Report: Improper Use of Overtime and Incentive Fees Under the Department of State Baghdad Life Support Services (BLiSS) Contract* (AUD-MERO-16-08, November 2015).

## Work Related to Internal Controls

OIG performed steps to assess the adequacy of internal controls related to the areas audits. For example, OIG reviewed the BLiSS contract and task order as they related to food services and compared identified requirements against procedures executed by NEA oversight personnel to determine whether these personnel appropriately administered and monitored the contract. OIG performed tests of internal controls, including a review of the contract and documented quality assurance procedures, and verified their implementation against documentation that noted

PAE's performance. In addition, OIG observed food deliveries and cafeteria and snack bar inspections to determine compliance with contract requirements, Department policies, and NEA procedures. OIG also reviewed Department guidance, policies, procedures, and related controls and tested their implementation through onsite observations and interviews to ensure that NEA oversight personnel implemented the guidance. Significant internal control deficiencies identified are presented in the Audit Results section of this report.

## Use of Computer-Processed Data

OIG did not use computer-processed data for evidence for this audit. Therefore, information systems controls were not significant to the audit objectives and it was not necessary to assess the use of controls for computer-processed data.

## Detailed Sampling Methodology

OIG used a detailed sampling methodology to identify months of unusually high numbers of reported cases of gastrointestinal illness. OIG used these months and the subsequent months to assess if PAE or Taylors self-identified food safety issues and if they—or the Department—took corrective actions. Unusually high numbers of reported cases were defined as strong outliers.

To compute the value of a strong outlier, OIG organized the number of reported cases of gastrointestinal illness into quartiles. OIG then determined the interquartile range by subtracting the first quartile figure from the third quartile figure. The difference was then multiplied by three to determine the threshold of being a strong outlier. All months with figures above the threshold were identified as strong outliers for the BEC, the BDSC, and Basrah. Table A1 shows the quartiles, interquartile range, and strong outlier thresholds that OIG identified for reported gastrointestinal illness cases per month by site.

**Table A1: First Quartile, Third Quartile, Interquartile Range, and Strong Outlier Threshold for Reported Gastrointestinal Illness Cases by Site**

	BEC	BDSC	Basrah
First Quartile	3	4	1
Third Quartile	10.5	17	5.5
Interquartile Range	7.5	13	4.5
Strong Outlier Threshold	22.5	39	13.5

**Source:** OIG generated from a review of CHS monthly gastrointestinal illness reports by site.

## APPENDIX B: BUREAU OF NEAR EASTERN AFFAIRS RESPONSE



United States Department of State

Washington, D.C. 20520

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April 18, 2018

## MEMORANDUM

TO: OIG/AUD – Norman P. Brown

FROM: NEA – Acting Principal Deputy Assistant Secretary Joan A. Polaschik 

SUBJECT: NEA Response to recommendations 1 – 5, 7, and 8 in draft report: *Audit of Food Safety Controls Under Baghdad Life Support Services Contract Task Order SAQMMA14F0721* (AUD-MERO-17-83)

Thank you for giving us the opportunity to respond to this draft report. NEA's follow-up responses for recommendations 1 – 5, 7, and 8 of the subject draft report are provided below.

**Recommendation 1:** OIG recommends that the Bureau of Near Eastern Affairs, in accordance with the Baghdad Life Support Services contract SAQMMA13D0120, food services task order SAQMMA14F0721, require PAE Government Services, Inc. and Taylors International Services, Inc. to develop and implement a Hazard Assessment and Critical Control Point (HACCP) plan for each Department site in Iraq.

**Management Response:** NEA concurs with this recommendation. Post has already implemented it. An overview plan was created and vetted at the onset of the BLiSS program in March 2014. All Program SOPs, HACCP Plan, HSE/QA manual, and Menu plans were turned over to the CMO office for validation in April 2014. The independently contracted IV&V team on the ground to support the transitional period reviewed the packet. Adhering to the Food and Drug Administration's guidance that HACCP principles should be standardized to provide uniformity in training and application, the Taylors International Services (TIS) developed a single HACCP plan that has been tailored to individual product, processing, and distribution conditions at each food establishment as needed. Each site has its own flow charts to capture the unique Hazard Analysis.

**Recommendation 2:** OIG recommends that the Bureau of Near Eastern Affairs review the Hazard Assessment and Critical Control Point plans developed by PAE Government Services, Inc. and Taylors International Services, Inc. referenced in recommendation 1. The review should, at a minimum, use the Food and Drug Administration's Hazard Assessment and Critical Control Point Verification inspection checklist to verify that the plans for each site comply with Food and Drug Administration guidance based on Hazard Assessment and Critical Control Point principles. The review should also ensure the plans are revised, as needed, for any deficiencies identified.

**Management Response:** NEA acknowledges this recommendation. Per our response to recommendation 1, the HACCP plans have already been appropriately reviewed.

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**Recommendation 3:** OIG recommends that the Bureau of Near Eastern Affairs, within 60 days of its approval of the Hazard Assessment and Critical Control Point plans, incorporate the plans' requirements into the Baghdad Life Support Service Contracting Officer's Representative food service inspection checklists.

**Management Response:** NEA concurs with this recommendation, which NEA has already implemented. Per our response to recommendation 1, the IV&V team verified that the HACCP plan matched the created SOPs and worked with the COR/ACORS to develop their Audit forms.

**Recommendation 4:** OIG recommends that the Bureau of Near Eastern Affairs develop and implement food safety training for all current and future personnel assigned to conduct oversight of food services in Iraq, including training on Hazard Analysis and Critical Control Point principles.

**Management Response:**

NEA acknowledges this recommendation, and will seek to incorporate HACCP principles in its COR training in Frankfurt, as prescribed in the Food and Drug Administration's guidance documents for A Regulator's Manual for Applying HACCP Principles to Risk-based Retail and Food Service Inspections and Evaluating Voluntary Food Safety Management Systems. The intent of the training will be for them to have the expertise required to ensure that HACCPs are in place and being followed, and to know when to consult with a third party specialist.

**Recommendation 5:** OIG recommends that the Bureau of Near Eastern Affairs develop a comprehensive Quality Assurance Surveillance Plan for food services task order SAQMMA14F0721 in accordance with Federal Acquisition Regulation 46.4, "Government Contract Quality Assurance" and implement the Quality Assurance Surveillance Plan upon the review and approval of the Bureau of Administration, Office of Logistics Management, and Office of Acquisitions Management. The plan should, at a minimum, include measurable and structured performance standards and align with the key performance indicators and metrics defined in the Baghdad Life Support Services contract.

**Management Response:** NEA concurs with this recommendation.

**Recommendation 7:** OIG recommends that the Bureau of Near Eastern Affairs develop a process to verify that monthly Contracting Officer's Representative file inspections are completed as required and to report instances of Contracting Officer's Representative non-compliance to the appropriate supervisor, in accordance with its "Contract and COR File Maintenance" standard operating procedures.

**Management Response:** NEA concurs with this recommendation.

**Recommendation 8:** OIG recommends that the Bureau of Near Eastern Affairs, in coordination with the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management, develop and implement controls to ensure that Contracting Officer's Representatives enter timely contractor past performance evaluation report narratives into the Contractor Performance Assessment Reporting System so the Contracting Officer can review,

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sign, and process the contractor performance assessment reports no later than 120 days after the end of the evaluation period.

**Management Response:** NEA concurs with this recommendation.

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APPENDIX C: BUREAU OF ADMINISTRATION, OFFICE OF LOGISTICS MANAGEMENT, OFFICE OF ACQUISITIONS MANAGEMENT RESPONSE

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United States Department of State

Washington, D.C. 20520

April 12, 2018

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**MEMORANDUM**

TO: OIG/AUD – Norman P. Brown

FROM: A/LM – Jennifer A. McIntyre

SUBJECT: Draft Report – *Audit of Food Safety Controls Under Baghdad Life Support services Task Order SAQMMA14F0721*

Thank you for the opportunity to provide our comments on the subject draft OIG Management Assistance Report.

**Recommendation 6:** OIG recommends that the Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management review the quality assurance surveillance plan for food services task order SAQMMA14F0721 that is to be developed by the Bureau of Near Eastern Affairs in response to Recommendation 5 and approve it if the quality assurance surveillance plan complies with Federal Acquisition Regulation 46.4, “Government Contract Quality Assurance.”

**Management Response to Draft Report (04/12/2018):** The Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management, concurs with Recommendation 6 to review the quality assurance surveillance plan for food services task order SAQMMA14F0721 that is to be developed by the Bureau of Near Eastern Affairs in response to Recommendation 5 and ensure it complies with Federal Acquisition Regulation 46.4, “Government Contract Quality Assurance.”

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## ABBREVIATIONS

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A/LM/AQM	Bureau of Administration, Office of Logistics Management, Office of Acquisitions Management
ACOR	Alternate Contracting Officer's Representative
Basrah	U.S. Consulate General Basrah
BDSC	Baghdad Diplomatic Support Center
BEC	Baghdad Embassy Compound
BLISS	Baghdad Life Support Services
CHS	Comprehensive Health Services
CMO-Iraq	Contract Management Office-Iraq
CO	Contracting Officer
COR	Contracting Officer's Representative
CPARS	Contractor Performance Assessment Reporting System
FAH	Foreign Affairs Handbook
FAR	Federal Acquisition Regulation
FDA	U.S. Food and Drug Administration
HACCP	Hazard Analysis and Critical Control Point
NEA	Bureau of Near Eastern Affairs
OIG	Office of Inspector General
PAE	PAE Government Services, Inc.
SOP	standard operating procedure
Taylors	Taylors International Services, Inc.

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