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United States Department of State
and the Broadcasting Board of Governors
Office of Inspector General

Office of Audits
Middle East Region Operations

Evaluation of the Antiterrorism Assistance
Program for Countries Under the
Bureau of Near Eastern Affairs and
South and Central Asian Affairs

Report Number AUD/MERO-12-29, April 2012

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PREFACE

This report was prepared by the Office of Inspector General (OIG) pursuant to the Inspector General Act of 1978, as amended, and Section 209 of the Foreign Service Act of 1980, as amended. It is one of a series of audit, inspection, investigative, and special reports prepared by OIG periodically as part of its responsibility to promote effective management, accountability and positive change in the Department of State and the Broadcasting Board of Governors.

This report is the result of an assessment of the strengths and weaknesses of the office, post, or function under review. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and a review of applicable documents.

The recommendations therein have been developed on the basis of the best knowledge available to the OIG and, as appropriate, have been discussed in draft with those responsible for implementation. It is my hope that these recommendations will result in more effective, efficient, and/or economical operations.

I express my appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in black ink, appearing to read "H. W. Geisel".

Harold W. Geisel
Deputy Inspector General

Acronyms

ATA	Antiterrorism Assistance
COR	contracting officer's representative
CT	Bureau of Counterterrorism
DRL	Bureau of Democracy, Human Rights and Labor
DS	Bureau of Diplomatic Security
DS/T/ATA	Bureau of Diplomatic Security's Office of Antiterrorism Assistance
FAM	<i>Foreign Affairs Manual</i>
GAO	Government Accountability Office
OIG	Office of Inspector General
RSO	regional security officer

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Executive Summary

In 1983, Congress authorized the Department of State Antiterrorism Assistance (ATA) program to enhance the ability of foreign countries' law enforcement personnel to deter terrorists and terrorist groups from engaging in international terrorist acts such as bombing, kidnapping, assassination, hostage taking, and hijacking. From FYs 2002 through 2010, the Bureau of Diplomatic Security's Office of Antiterrorism Assistance (DS/T/ATA) and the Bureau of Counterterrorism (CT) have been provided nearly \$1.4 billion for ATA programs worldwide, with approximately 65 percent of that assistance (\$873.3 million) going to programs in North Africa, the Middle East, South Asia, and Central Asia.

The Office of Inspector General (OIG) initiated this work under the authority of the Inspector General Act of 1978, as amended, to evaluate the ATA program. The primary objectives of this program evaluation were (1) to determine the degree to which ATA programs had achieved their intended outcomes and (2) to assess whether DS/T/ATA provided effective oversight of contracts and U.S. Government-provided equipment.

In FY 2010, the ATA program trained nearly 2,700 participants from countries in North Africa, the Middle East, South Asia, and Central Asia at a cost of approximately \$1,800 per student per day of training. However, DS/T/ATA could not determine the ATA program's effectiveness because it had not developed specific, measurable, and outcome-oriented program objectives or implemented a mechanism for program evaluation. In addition, DS/T/ATA and CT were not consulting with the Bureau of Democracy, Human Rights and Labor (DRL), when selecting partner countries or when determining the assistance to be provided to those countries. As a result, the Department has no assurance that the ATA program is achieving its intended statutory purposes or that the overall or individual programs are successful. Further, DS/T/ATA has no basis for determining when partner countries are capable of sustaining their own ATA programs without U.S. support.

DS/T/ATA had not appointed a contracting officer's representative (COR) to provide oversight of contractor-provided ATA program training or developed a process for ensuring that the contractor was meeting contract requirements. DS/T/ATA was conducting periodic end-use monitoring inspections for the U.S. Government equipment provided under the ATA program. However, the equipment records were not complete, and the equipment was sometimes unused; was incompatible with the partner country's existing equipment; and, in some cases, exceeded the country's needs.

OIG recommended the establishment of a monitoring and evaluation system with clearly defined and measurable outcome-oriented goals, objectives, and performance indicators; definition and consistent application of a threshold for sustainability, including establishment of sustainability timelines for country programs meeting or exceeding the threshold; establishment of a consultative process with DRL when determining eligible countries for the ATA program; implementation of a standardized reporting process for in-country oversight of ATA training contracts; periodic validation of the End Use Monitor database; establishment of a process to

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determine whether equipment to be provided a country is appropriate; and a review of the types, utility, and appropriate disposition of the Iraq ATA Program equipment in storage.

In its February 17, 2012, response (see Appendix C), CT concurred with its two recommendations, stating that it was working with DS to improve the monitoring and evaluation system for assessing ATA performance and that it, DS, and DRL had begun to establish a process for consulting with DRL on human rights issues in partner countries.

In its undated response (see Appendix D), DS concurred with three recommendations, partially concurred with two recommendations, and did not concur with one recommendation. DS agreed to consult with DRL on human rights issues in partner countries, establish a process to determine the appropriateness and likely use of equipment transferred to partner countries prior to providing such equipment, and determine the appropriate disposition of the Iraq equipment in storage. DS also agreed to work with CT to establish a monitoring and evaluation system.

However DS disagreed that sustainability timelines should be developed for all partner countries. To further address the issue of sustainability, OIG added a recommendation (No. 2) requesting that DS develop and consistently apply a threshold for sustainability and ensure that timelines for sustainability are established for those country programs meeting or exceeding that threshold.

DS agreed to request in-country confirmation that the ATA program training courses and deliverables were meeting contract requirements but stated that it had already appointed a COR and Government Technical Monitor. DS disagreed that it needed to reconcile the ATA program equipment databases, stating that the two databases should not reconcile because they are used for different purposes.

Based on the responses and the actions taken, OIG considers Recommendations 1, 3, 4, 6, and 7 resolved, pending further action, and Recommendations 2 and 5 unresolved.

Responses from CT and DS and OIG's replies to the responses are presented after each recommendation.

Background

The ATA program was established to provide training and equipment to foreign countries as authorized by the Foreign Assistance Act of 1961, as amended by the International Security and Development Assistance Authorization Act of 1983.¹ The Act of 1983 authorizes the President to provide assistance to foreign countries in enhancing the ability of their law enforcement personnel to deter terrorists and terrorist groups from engaging in international

¹ Pub. L. No. 87-195, pt. II, § 571, as added by Pub. L. No. 98-151 § 101(b)(2), 97 stat. 972 (1983) (codified at 22 U.S.C. § 2349aa).

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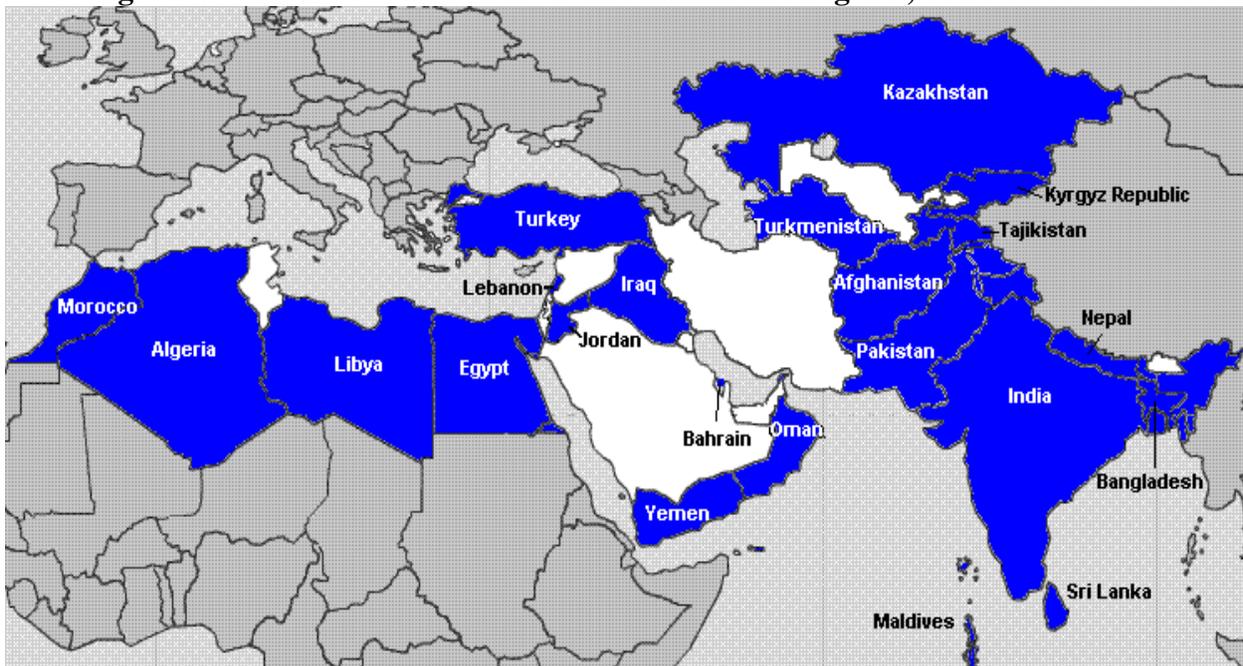
terrorist acts such as bombing, kidnapping, assassination, hostage taking, and hijacking. The Act of 1983 states that activities provided under its authority should

- enhance the antiterrorism skills of friendly countries by providing training and equipment to deter and counter terrorism;
- strengthen the bilateral ties of the United States with friendly governments by offering concrete assistance in deterring terrorism; and
- increase respect for human rights by sharing with foreign civil authorities modern, humane, and effective antiterrorism techniques.

Specific to the issue of human rights, the Act of 1983 requires that DRL be consulted when the Department is determining the countries that will be provided assistance and the nature of the assistance provided to each country. The requirement is intended to ensure that assistance is not provided to known abusers of human rights.

From 1983 to 2010, the ATA program delivered training to more than 73,000 civilian law enforcement personnel from 154 partner countries worldwide (the training courses are listed in Appendix B). From FYs 2002–2010, about 65 percent of ATA program funding went to countries in North Africa, the Middle East, South Asia, and Central Asia, as shown in Figure 1.

Figure 1. The 22 Countries in North Africa, the Middle East, South Asia, and Central Asia Receiving Assistance Under the Antiterrorism Assistance Program, FYs 2009-2010*



*For purposes of this report, Turkey is included in the Middle East.
Source: OIG analysis of Bureau of Diplomatic Security data.

ATA Program Management and Oversight

Requirements for ATA program management and oversight are contained in the *Foreign Affairs Manual* (FAM),² which designates CT as responsible for overseeing policy for all Department counterterrorism programs, including ATA training, and coordinating counterterrorism activities among U.S. Government agencies. As delineated in a memorandum of agreement between the DS and CT, CT's policy oversight includes recommending to the Department's Office of the Director of U.S. Foreign Assistance which countries should receive ATA program assistance. The memorandum also instructs CT to provide DS/T/ATA with specific strategic objectives for the ATA program in partner countries, in regions, and globally.

DS/T/ATA is the primary implementer of ATA program training and is required³ to conduct capabilities assessments of partner country law enforcement and security organizations. The capability assessment results are used to develop country assistance plans for each partner country. The country assistance plans should contain program objectives that provide the basis for determining ATA training activities and equipment allocations. DS/T/ATA provides the assistance, which it does primarily through the use of contracted security companies.⁴ DS/T/ATA is also required to evaluate the effectiveness of the assistance and assess whether a partner country's anti-terror capabilities developed under the ATA program are sustainable.

ATA Program Funding

From FYs 2002 through 2010, the U.S. Government allocated approximately \$1.4 billion to the ATA program (see Figure 2). Of the \$1.4 billion, approximately \$875 million was dedicated to assistance programs in the 22 North Africa, Middle East, Central Asia, and South Asia countries identified in Figure 1. In FY 2011, the ATA program's budget request was \$205 million, with approximately \$125 million designated for the 22 North Africa, Middle East, Central Asia, and South Asia countries.

² 1 FAM 022.5a, "Office of the Secretary of State (S)–Coordinator for Counterterrorism (S/CT)."

³ 1 FAM 262.4-1, "Principal Deputy Assistant Secretary for Diplomatic Security and Director of the Diplomatic Security Service (DS/DSS)–Office of Antiterrorism Assistance (DS/T/ATA)."

⁴ These contracted security companies are DECO Security Services, TAC Technologies, US Investigations Services Inc., Orion Management LLC, Commonwealth Trading Partners Inc., and the U.S. Training Center.

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Figure 2. Antiterrorism Assistance Program Funding, FYs 2002-2010 (Amounts in millions of U.S. dollars)

Fiscal Year	Total Funding	Funding to North Africa, Middle East, Central Asia, South Asia
2010	\$197.7	\$128.2
2009	155.0	102.4
2008	123.3	76.1
2007	175.1	109.0
2006	136.0	72.9
2005	175.5	100.5
2004	143.2	97.0
2003	111.3	88.7
2002	152.0	98.6
FYs 2002-2010 Total	\$1,369.1	\$873.3

Source: OIG analysis of DS data.

Evaluation Objectives

The primary objectives of this program evaluation were (1) to determine the degree to which ATA programs had achieved their intended outcomes and (2) to assess whether DS/T/ATA provided effective oversight of contracts and U.S. Government-provided equipment.

Evaluation Results

Finding A. ATA Program Training Was Provided, but Effectiveness Was Not Measured

Since 1983, DS/T/ATA has provided ATA program training to participants from North Africa, the Middle East, Central Asia, and South Asia. However, DS/T/ATA could not determine the program's effectiveness because it had not developed specific, measurable, and outcome-oriented program objectives or implemented a mechanism for program evaluation. In addition, DS/T/ATA and CT were not consulting with DRL when selecting partner countries or when determining the assistance to be provided to those countries because DS/T/ATA and CT officials stated they were unaware of the requirement. As a result, the Department has no assurance that the ATA program is achieving its intended statutory purposes or that the overall or individual programs are successful. Further, DS/T/ATA has no basis for determining when partner countries are capable of sustaining their own ATA program without U.S. support.

ATA Program Training

From FYs 2002 through 2010, DS/T/ATA provided ATA program training to participants from North Africa, the Middle East, Central Asia, and South Asia at a cost of approximately

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\$426 million.⁵ The training included subjects such as fraudulent document recognition, very important person protection, and critical incident management (the complete list of courses is provided in Appendix B). In FY 2009, the ATA program expended approximately \$62 million to train 2,700 participants from North Africa, the Middle East, Central Asia, and South Asia. The average training course lasted 13 days and was attended by 21 students, which equates to approximately \$23,000 per student per class, or \$1,800 per student per day of training.⁶

Program Effectiveness Measures

Although ATA program training was conducted, DS/T/ATA could not determine the program's effectiveness because it had not developed specific, measurable, and outcome-oriented objectives or a system for program evaluation. According to a memorandum of agreement between DS and CT, the planning process for establishing ATA program priorities should include objectives that are specific, measurable and have a given timeframe. The memorandum also states that once training is completed, DS/T/ATA is responsible for evaluating training effectiveness, outcomes, and progress toward training program objectives and sustainability.

The Performance Management Handbook,⁷ the Department's guidance for strategic and performance planning, states that each bureau, mission, office, program, or project should set clear results-oriented performance goals, also called long-term or end outcomes, which reflect what they are trying to achieve. Performance goals should be declarative and should be specific statements about what is to be accomplished and when it will be accomplished. The Handbook also states that bureaus, missions, offices, programs, and projects should establish medium- and short-term outcomes, or performance objectives, that demonstrate progress toward the end outcome. Performance objectives should focus on achieving specific outcomes rather than actions that merely establish programs. Examples of performance objectives include changes in behavior (medium-term outcome) and changes in attitudes, knowledge, skills, and abilities (short-term outcomes) that are attributable to the actions taken.

The Handbook also states that bureaus, missions, offices, programs, and projects need to establish effective measures, or performance indicators, to monitor progress toward achieving a desired outcome. Performance indicators are specific qualitative or quantitative information that

- clearly, materially, and objectively shows progress toward achieving the intended performance goals and objectives;
- unambiguously identifies what is measured and how it is measured, is uni-dimensional, and is precisely defined;

⁵ This amount varies from the total allocation of \$873.3 million stated in Figure 2 because the "approximately \$426 million" does not include the cost of equipment or equipment-related overhead and does not include any unobligated funds.

⁶ Cost breakouts do not include costs for equipment or for Department of State employees who provide ATA program support.

⁷ See http://diplopedia.state.gov/index.php?title=Performance_Management_Handbook, accessed on March 14, 2012.

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- ensures that progress toward a given result is sufficiently captured;
- compares actual results to specific, measurable targeted results (performance targets); and
- is useful for key budget, planning, and policy decisions.

OIG reviewed the strategic and performance goals for 22 ATA partner countries in North Africa, the Middle East, Central Asia, and South Asia, as defined in the respective 2009, 2010, and 2011 Country Assistance Plans.⁸ Country Assistance Plans are annual documents that provide background on the need for ATA training with the strategic goals provided by CT and performance goals provided by DS/T/ATA. OIG found that for 20 of the 22 countries, CT and DS/T/ATA did not develop specific or measurable strategic or performance objectives in the Country Assistance Plans. Although CT provided general strategic objectives and DS/T/ATA provided general performance objectives, the objectives were often too broad to provide meaningful criteria for selecting courses for the partner countries or to act as measures for program success. For eight of the 22 countries, CT provided broad strategic objectives that were vague or included an inordinate number of goals. For example, the strategic objectives for Lebanon directed the ATA program to help modernize and professionalize security forces “through basic and advanced training and equipment and operation upgrades.”⁹ The strategic objectives for India directed the program to emphasize critical incident response; post-incident investigation; human rights; border security; international threat finance; extradition and prosecution; and the protection of critical infrastructure, including port, rail, and airport security.¹⁰

Further, the performance objectives for 14 of the 22 partner countries would support nearly any training program.¹¹ For example, a performance objective for both Bahrain and Morocco is to enhance the country’s “capability in investigating, and responding to terrorism.”¹² The two program objectives for Nepal are “to enhance the capabilities of Nepalese police to utilize ATA training” and to “improve capabilities of the Nepalese police to counter and respond to terrorism.”¹³ Similarly, other country programs, including Bangladesh, India, Kazakhstan, Kyrgyz Republic, Tajikistan, Turkey, and Turkmenistan, listed the enhancement of police leadership and management capabilities as a performance objective. Any of the training courses provided by the ATA program would be within the purview of these objectives.

In addition, nearly all of the performance indicators and targets used to define success or failure of a country program were ambiguous, were not measurable, or lacked meaning. For example, one performance indicator for measuring the success of the increasing protection capabilities for Bangladeshi leaders was “regular updates from U.S. Embassy, ATA program visits, and feedback from Bangladesh’s law enforcement community on enhanced institutional management and procedures developed through ATA training to protect national leaders.” In

⁸ OIG reviewed 22 Country Assistance Plans for FYs 2009 and 2010 and 19 Country Assistance Plans for FY 2011.

⁹ ATA Country Assistance Plan – Lebanon.

¹⁰ ATA Country Assistance Plan – India.

¹¹ Six of these countries also had broad strategic objectives.

¹² ATA Country Assistance Plan – Bahrain.

¹³ ATA Country Assistance Plan – Nepal.

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addition, some other performance indicators were simply descriptions of actions ATA would take. For example, one indicator used to measure progress in Kazakhstan was to “train management elements of the Kazakh police in the following areas in order to improve their skills: combating domestic and international terrorism, senior crisis managements, tactical commanders, [and] major case management.”¹⁴ A similar indicator was provided for the Tajikistan program, which stated, “train management elements of the Tajik police in the following areas in order to improve their skills: counterterrorism components of academy development, critical incident management, mass casualty incident management, and mentoring assistance.”¹⁵ For each of these three indicators, it was not clear what would be measured or how it would be measured. Moreover, the indicators were not clearly, materially, or objectively linked to an intended performance outcome, which would make it difficult to evaluate program effectiveness after training had been completed.

Finally, DS/T/ATA did not have an evaluation system to determine whether specific training was effective in enhancing partner countries’ antiterrorism skills. Such an effort would systematically and routinely collect, analyze, and report data on the performance indicators it identified to track progress toward the stated performance goals and objectives for the country program. Although DS/T/ATA recorded some output statistics, such as the number and types of classes held and the number of students trained, there was no followup on the outcome, such as how the students performed, where the students were placed in their respective organizations, or how many students had become instructors. Instead, DS/T/ATA officials stated that they considered their needs assessment process to be an acceptable method for measuring ATA program training success. Specifically, DS/T/ATA officials stated that by comparing a country’s needs assessment before ATA program training with a subsequent needs assessment, a country’s progress could be measured effectively. However, while the needs assessments might track a country’s progress in counterterrorism capabilities over time, the assessments did not systematically collect and analyze data on the performance indicators DS/T/ATA identified to track progress toward the stated country performance goals and objectives, nor did they measure the specific effect of the ATA program on that progress (or lack of progress).

OIG noted that DS/T/ATA did collect some information that could provide indications of progress toward achieving programmatic goals. For example, OIG compared pre-training and post-training test scores as a potential measure of ATA program training success. Although OIG did not use a statistically significant sample and could not measure overall training success, the test scores for participants from Afghanistan, Algeria, Bangladesh, India, Iraq, Pakistan, and Turkey indicated that the training had increased the participants’ knowledge. Specifically, students scored an average of 49 percent on course knowledge tests before training, which improved to 79 percent after the training (an increase of 30 percent). The use of an indicator such as an increase in pre-course and post-course test scores could provide a better indication of training success.

¹⁴ ATA 2011 Country Assistance Plan – Kazakhstan

¹⁵ ATA 2011 Country Assistance Plan – Tajikistan.

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Examinations of ATA program test scores could also identify potential problems with the actual training. For example, OIG examined the pre-training and post-training test scores for seven of the eight courses taught in Iraq from 2009 to 2011. As shown in Figure 3, students in each course improved their scores, on average, by approximately 9 to 48 percentage points. However, the post-training test scores for four courses—Crisis Response Team, Tactical Commanders, Very Important Person Protection, and Vital Infrastructure Security—indicated that the students did not understand from one-quarter to more than one-half of the material presented in the curriculum. Such results could indicate potential problems with a course and could guide DS/T/ATA to where further evaluation of training effectiveness is needed. For example, further evaluation could indicate that the students did not have the prerequisite skills, knowledge, and abilities needed to pass the courses; course materials were not properly developed; or the training was not delivered effectively.

Figure 3: ATA Iraq Training Courses, Number of Police Trained, and Results of Pre-Course and Post-Course Tests, 2009 to 2011

ATA Course	Number of Police Trained	Average Test Scores (percent)		Change (percent)
		Pre-training	Post-training	
Armored Vehicle Driver Training	24	Not tested	Not tested	--
Crisis Response Team	24	38.7	70.7	32.0
Explosives Incident Countermeasures	11	57.3	85.9	28.6
Instructor Development	17	31.8	80.0	48.2
Post Blast Investigations	20	59.3	84.8	25.5
Tactical Commanders	24	49.0	57.9	8.9
Very Important Person Protection	261	44.8	74.3	29.5 ^a
Vital Infrastructure Security	24	24.1	45.9	21.8

^a A total of 11 Very Important Person Protection classes were taught from 2009 to 2011. However, data were available for only six of the classes.

Source: OIG analysis of DS/T/ATA data.

Other outcome-measures that could be useful to assess effectiveness of ATA programs include student placement into police units, how long students stay in those positions or police units (retention), and whether and how frequently students use the skills taught in the ATA training. DS/T/ATA collects some information on placement, retention, and skills use; however, these data are not systematically collected or analyzed. For example, in a March 2011 capabilities assessment for Iraqi police, DS/T/ATA noted that less than one-half of the approximately 140 members of the Iraqi Emergency Response Brigade who received ATA training had remained in the unit. However, DS/T/ATA reported no information on how many Kurdish police who received ATA training had remained in their units. In addition, program officials in Pakistan stated that the program only informally monitored students' after-graduation retention and monitored whether students had used the training they received; however, OIG found no documents confirming such monitoring. The officials also stated that they planned to implement a tracking system to monitor students after graduation, but they gave no timeline on the program's implementation. OIG's analysis of ATA country assistance plans for FY 2011 showed that DS/T/ATA has established retention-based performance indicators for four

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countries: Kazakhstan, Morocco, Tajikistan, and Turkmenistan. However, these country assistance plans do not state how DS/T/ATA will collect and analyze retention data.

Coordination of Human Rights Issues

Although DS/T/ATA and CT officials vetted individual students with DRL and included human rights instruction in course curricula, DS/T/ATA and CT were not coordinating with DRL before determining the countries that would receive training or the content of the assistance to be provided under the ATA program. The Act of 1983 requires that DRL be consulted when determining which foreign countries to provide assistance to and the nature of that assistance.¹⁶ DS/T/ATA and CT officials stated that they were unaware of that requirement.

DRL's involvement in the ATA program was limited to the vetting of individual ATA students to ensure compliance with the Leahy Amendment to the Foreign Operations Appropriations Act. The Leahy Amendment forbids the funding of security forces of a foreign country if the Department has credible evidence that these forces have committed gross violations of human rights.¹⁷ However, ATA programs operate in complicated environments with regard to human rights, and the programs may require oversight more rigorous than the Department's Leahy vetting, which focuses only on known individual perpetrators. OIG reviewed the Department's 2010 Country Reports on Human Rights Practices, issued by DRL, for all countries in North Africa, the Middle East, Central Asia, and South Asia and found that police forces of several partner countries were listed as human rights violators, including forces in Afghanistan, Bangladesh, Jordan, Kazakhstan, and the Kyrgyz Republic. In each case, individual students may not be known human rights abusers, but actions of the group may warrant closer examination by DRL.

DRL officials stated that individuals could pass Leahy vetting and receive training, even if their police force is a known human rights violator. Although DRL has periodically vetted the police forces of partner countries on an ad hoc basis, there was no coordinated effort between DS/T/ATA, CT, and DRL to vet all of the police forces so that flagrant violators of human rights could be excluded from training. For example, in 2005 DRL contacted DS/T/ATA to bar the Bangladesh Rapid Action Battalion from receiving ATA training and equipment because of reports that the group had carried out extrajudicial killings. Without a regular coordinated effort, however, DRL might not be aware of some of the ATA training planned or provided. To prevent the possible distribution of assistance to known human rights abusers, CT and DS/T/ATA need to establish a formal process for including DRL when choosing foreign countries to provide assistance to and when determining the content of the assistance. DS/T/ATA and CT should also ensure that all Department personnel responsible for the ATA program are aware that DRL should be consulted.

¹⁶ 22 U.S.C. § 2349aa-2(b).

¹⁷ Pub. L. No. 109-102 § 551.

Assurance of Compliance and Success

Without specific, measurable, and outcome-oriented objectives and an evaluation system, the Department has no assurance that the ATA program is achieving its intended statutory purpose or that the overall or individual programs are successful. In addition, for partner countries where sustainability is a stated ATA performance goal or objective, DS/T/ATA lacks a comprehensive system for determining when those countries are capable of sustaining their own ATA programs without U.S. support.

As stated in the Act of 1983, one purpose of the ATA program is to enhance the antiterrorism skills of participants. The lack of an evaluation system limits the ability to determine whether the ATA program has met that purpose. Under the current system, policy makers do not have the information available to determine the success of the overall ATA program, the country-specific programs, or the individual training courses. It is imperative for the Department to be able to identify the country-specific programs and training courses that provide the greatest return on investment, as that information can be used to guide funding decisions and contents of training curricula.

The second purpose of the ATA program is to strengthen the bilateral ties between the United States and the partner countries.¹⁸ During the evaluation, OIG interviewed several regional security officers (RSO) who stated that ATA training had strengthened bilateral ties between United States and partner countries. They further stated that the ATA program had been a factor in improved relations and coordination between RSOs at U.S. embassies and local law enforcement entities during recent terror attacks in several countries. For example, RSOs in Yemen stated that during the 2008 attacks on Embassy Sana'a, when embassy guards fled, the local Yemeni police force arrived to guard the embassy. The RSO in New Delhi, India, said that after the 2008 Mumbai terror attacks in which six Americans were killed, relations with the Mumbai police facilitated examination of the crime scene by the Federal Bureau of Investigation. The RSO in Algiers stated that the Algerian police had provided information on a dozen terrorist attacks and that the information had helped him make the embassy more secure. While RSOs emphasized that they believed the ATA program added significantly to closer cooperation between their respective offices and local law enforcement entities, ATA did not keep quantitative data to support these statements. RSOs stated that they were not certain that examples of cooperation resulted directly from the ATA program or were attributable to other factors.

The third purpose of the ATA program is to increase respect for human rights in the partner countries. The Act of 1983 specifically states that the ATA program should coordinate with DRL before determining whether a country should be provided ATA training. Not coordinating with DRL before making such a determination increases the risk that assistance may be provided to law enforcement groups that have committed human rights abuses, potentially groups that have had ATA training and have ATA equipment.

¹⁸ 22 U.S.C. § 2349aa-1.

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The Department lacks a comprehensive system for determining when partner countries are capable of sustaining their own ATA program without U.S. support. DS/T/ATA is unable to determine whether a partner country's anti-terror capabilities are sustainable or whether a partner country has the ability to take responsibility for and continue the training on its own. Although ATA routinely conducts train-the-trainer courses to promote sustainability, there are no training benchmarks and no evaluation processes to ensure training objectives are achieved. Without measurements of success or failure for ATA program training or for the establishment of a train-the-trainer program, there is no basis for determining whether a country is qualified to conduct its program without U.S. support. Since its inception in 1983, the ATA program has yet to have a country "graduate" from its training program.

Management Actions Taken in Response to Government Accountability Office Report

OIG's findings contained in this report are similar to those contained in a 2008 Government Accountability Office (GAO) review of the ATA program.¹⁹ In its report, GAO stated that DS/T/ATA "does not assess program outcomes and, as a result, cannot determine the effectiveness of program assistance." GAO recommended that the Department "ensure that needs assessments and program reviews are both useful and linked to ATA resource decisions and development of country specific assistance plans." GAO also recommended that the Department "establish clearer measures of sustainability, and refocus the process for assessing the sustainability of partner nations' counterterrorism capabilities, including specific outcomes for the ATA program."

In its response to GAO's recommendations, DS/T/ATA officials stated that efforts were underway to "rewrite the standard operating procedures for the ATA needs assessment and program review process, as a well as accurately define metrics of success." DS/T/ATA officials further stated that they would include objective capability ratings in initial country assessments and subsequent country reports. GAO subsequently closed the recommendations based on a May 2010 memorandum of agreement between DS and CT requiring compliance with the GAO recommendations.

Since the 2008 GAO report was issued, DS/T/ATA has added a CT representative to the needs assessment teams and has begun to examine a country's ability to sustain ATA training as part of the assessment. Although OIG agrees with these changes and considers the needs assessments a valid tool for determining the types and quantity of ATA training needed, the assessments are not a substitute for an evaluation process. An evaluation measures progress toward achieving desired outcomes, usually the strategic goals or program objectives. To evaluate a program, one must first have clearly defined and measurable desired outcomes of the program, the indicators or benchmarks that clearly link to the desired outcomes, and baseline data and annual performance targets for each indicator to track progress. These items should be established during the needs assessment stage and should also include statements of how, when, and by whom data for each indicator would be collected. Therefore, OIG is making recommendations to address these issues in this report.

¹⁹ *Combating Terrorism: State Department's Antiterrorism Program Needs Improved Guidance and More Systematic Assessment of Outcome* (GAO-08-336, Feb. 2008).

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Recommendation 1. OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, establish a monitoring and evaluation system that includes clearly defined and measurable outcome-oriented strategic goals and program objectives; measurable performance indicators that clearly link to strategic goals and program objectives; baseline data and annual performance targets for each indicator; and descriptions of how, when, and by whom performance data will be collected, analyzed, and reported.

CT Response: CT concurred, stating that it has begun working with DS and a private consulting firm to improve the ATA program's monitoring and evaluation system. CT further stated that the results-based management system will build on the existing assessment process and includes all of the elements identified in the audit report. CT stated that sustainability it is not a strategic or programmatic goal in all ATA partner countries.

DS Response: DS partially concurred, stating that its programmatic objectives are already measurable and that it uses the Performance Measures of Effectiveness System as the primary mechanism for program evaluation. DS further stated that subject matter experts use detailed checklists and a Likert scale to make capability assessments on initial and subsequent visits to the participating nations. DS also stated that it is transitioning to an outcome-based standard to measure success in achieving programmatic standards, which it expects will be more indicative of long-term impact of the ATA program. DS added that OIG should recommend that CT provide strategic objectives that are as specific as possible.

DS also stated that a number of points in the finding warranted clarification. First, DS stated that it provided OIG with ATA program strategic and programmatic objectives for FY 2011 (FY 2012 objectives were not yet available) but that the draft report "implies" that program objectives did not exist for 20 countries. DS also stated that timelines for sustainability should apply only to those countries whose ATA programs were funded at the developmental level (exceeding \$5 million) and that only seven of the 62 funded countries were in that category. The remaining programs are intermittent assistance-level training not focused on sustainability.

OIG Reply: Based on DS's statement that it is transitioning to outcome-based standards and CT's statement that it and DS are working to establish an improved results-based management system that will include all of the elements identified in the report, OIG considers the recommendation resolved. The recommendation can be closed when OIG reviews and accepts confirmation from CT and DS showing that a monitoring and evaluation system has been established.

OIG does not agree that the DS Performance Measures of Effectiveness System provides a true indication of ATA program performance, as that system measures success by comparing only the results of successive capabilities assessments. As stated in this

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report, those capabilities (needs) assessments do not report on the performance indicators DS/T/ATA identified to track progress toward achieving performance goals and objectives, nor do they measure the specific effect of the ATA program on that progress (or lack of progress). OIG also does not agree that the report implies that 20 countries did not have program objectives. Specifically, OIG stated that DS/T/ATA had performance objectives, but those objectives were too broad and did not provide meaningful guidance to program managers when selecting courses for the partner countries or to act as measures for program success.

Regarding sustainability, OIG was not aware that DS had established a \$5 million threshold to differentiate between developmental-level training, where partner country sustainability is a primary goal, and assistance-level training, which is intermittent and does not focus on partner country sustainability. However, it does not appear that DS consistently applies that definition to its ongoing country programs. Upon reviewing the FY 2011 Country Assistance Plans, OIG identified eight country programs that listed sustainability as a performance goal or objective despite having funding levels well below \$5 million. These countries and their respective funding levels for FY 2011 were Bahrain (\$1.5 million), Kazakhstan (\$500,000), Kyrgyz Republic (\$500,000), Morocco (\$800,000), Nepal (\$700,000), Oman (\$500,000), Turkmenistan (\$250,000), and Yemen (\$2.5 million).

OIG does not dispute that a sustainability goal may be limited to developmental programs, but DS should consistently apply its definition of what constitutes a developmental program. Therefore, OIG has modified Recommendation 1 to delete reference to partner countries' sustainability timelines and has added a new recommendation (No. 2) pertaining to development and consistent application of a definition for which ATA programs should include sustainability as a performance goal. DS is requested to respond to the new recommendation, which is unresolved.

Recommendation 2. OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, develop a definition for what constitutes a developmental ATA program, consistently apply that definition to country programs, and ensure that partner country sustainability timelines are established for developmental ATA programs.

Recommendation 3. OIG recommends that the Bureau of Diplomatic Security and the Bureau of Counterterrorism, in coordination with the Bureau of Democracy, Human Rights and Labor (DRL), establish and implement a process that ensures effective consultation with DRL on the designation of foreign countries that are eligible for assistance through the Antiterrorism Assistance program as well as the training and equipment each designated country is to receive.

DS, CT, and DRL Joint Response: DS, CT, and DRL concurred, stating that they are taking steps to implement the recommendation. Specifically, according to the responses, CT will obtain DRL input and clearance on its annual review of ATA partner nations, DS

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and CT will obtain DRL clearance on revisions to the Country Assistance Plans for countries identified as being of concern, and DS will obtain separate clearance for any courses added to a training program that were not approved in the Plans. Finally, DS/T/ATA will solicit DRL input into any revisions of the human rights module in all ATA courses.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG reviews and accepts confirmation from CT, DS, and DRL showing that they have established and implemented a consultative human rights process for selecting partner nations and their corresponding program elements.

Finding B. ATA Program Training Was Not Actively Monitored

DS/T/ATA was not providing adequate oversight of contractor-provided ATA program training. The *Foreign Affairs Handbook*²⁰ requires that a contractor's performance be actively monitored and that prompt action be taken to correct performance problems. DS/T/ATA had not appointed a COR or developed a process for ensuring that the contractor met contract performance standards. The lack of oversight increases the risk that the Department could pay for work that is not performed or work that is not in accordance with contract requirements.

Inadequate Contractor Oversight

DS/T/ATA was not providing contract oversight as required by the *Foreign Affairs Handbook*, which states that to ensure contract performance "most beneficial to the U.S. Government, the U.S. Government has the responsibility to actively watch and follow the contractor's performance and take prompt, affirmative action to correct problems."²¹ However, while observing contractor performance during training courses in Beirut (Lebanon), Dhaka (Bangladesh), and Nasik (India), OIG determined that none of the training courses were being monitored by a U.S. Government official with contract oversight responsibility. The RSOs for each country stated that they try to attend either the first or the last day of training but that they do not generally have time to observe the entire course. Locally employed staff from the regional security office are assigned to help organize the training and, in that role, generally attend most of the training sessions. However, the RSOs and locally employed staff are not responsible for reviewing deliverables or reporting on contractor performance to ATA management. The ATA contracting officer stated that he sometimes receives feedback from the RSOs concerning contractor performance but generally only when the training goes very poorly. The contracting officer further stated that he assumes the training went well if he receives no feedback stating otherwise.

²⁰ 14 FAH-2 H-511(a), "Post-Award Contract Administration—Administration."

²¹ Ibid.

Contractor Oversight Process

DS/T/ATA had not appointed a COR or developed a process for ensuring that the contractor met contract performance standards. The *Foreign Affairs Handbook* states that a COR should be appointed as the technical representative of the contracting officer, “relaying any information affecting contractual commitments and requirements.”²² Generally, the COR performs various oversight functions, such as conducting on-site visits, reviewing deliverables, and ensuring the quality of contractor performance. However, once the individual ATA program contracts were awarded, the training courses were conducted without a COR to perform such duties.

The DS/T/ATA contracting officer stated that he anticipated creating a COR position but that the COR would be located in Washington, DC, and not at the locations where training is taking place. The appointment of a primary COR in Washington would benefit the ATA program, as the COR could synchronize the oversight process across the Department. However, it would be impractical for the COR to travel to all of the ATA training sites. Therefore, the primary COR should establish a mechanism for using in-country personnel to oversee the training and provide feedback to the COR. For example, the COR could appoint RSO representatives from each country as assistant CORs. These representatives, who often already observe the training, could review contract deliverables and report to the contracting officer and primary COR on the quality of the contractor’s performance.

Increased Risk of Contract Underperformance

Without a contract oversight mechanism, the Department increases the risk that it could pay for work that has not been performed or for work that is not in accordance with contract requirements. A contractor could potentially deliver fewer hours of training than required or deliver insufficient or inappropriate training. Although obvious poor performance can be noted by an RSO representative under the current system, more subtle or technical underperformance cannot be noted. Furthermore, without a formal contract oversight mechanism, there is no assurance that the Department will receive contract deliverables, such as tests and course critiques, that can be used to measure the effectiveness of training and improve course content. In that regard, OIG determined, based on its analyses of contract deliverables for 92 training courses held in Algeria, Bangladesh, India, Iraq, Lebanon, and Pakistan between FYs 2009 and 2011, that the contractors did not deliver 14 sets of student tests, 14 sets of course critiques, and 10 after-action reports.

DS/T/ATA Actions Taken

In February 2012, the Contracting Officer appointed a COR and a Government Technical Monitor to administer three new Global Antiterrorism Training Assistance contracts. These two representatives are based in the Washington, DC, region. Although DS/T/ATA has established

²² 14 FAH-2 H-513 (a), “Post-Award Contract Administration–The Contracting Officer’s Representative’s (COR) Role in Contract Administration.”

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these positions, DS/T/ATA officials stated that it is still cost prohibitive and impractical to have one of these appointed representatives attend all overseas classes. Nonetheless, the appointment of the COR and technical monitor in Washington will benefit the ATA program, as both individuals can synchronize the oversight process across the Department. OIG agrees that it would be impractical for the COR or the GTM to travel to all of the ATA training sites. Therefore, the DS/T/ATA should establish a mechanism for using in-country personnel to oversee the training and provide feedback to the COR. For example, the COR could appoint RSO representatives from each country as assistant CORs. These representatives, who often already observe the training, could review contract deliverables and report to the contracting officer and COR on the quality of the contractor's performance.

Recommendation 4. OIG recommends that the Bureau of Diplomatic Security appoint a contracting officer's representative to oversee Antiterrorism Assistance training contracts and implement a standardized reporting process for in-country oversight of contracts for Antiterrorism Assistance program training in partner countries.

DS Response: DS partially concurred, stating that it has a COR who addresses all issues related to contracts, including in-country training services in partner countries, and that therefore the portion of the recommendation requesting appointment of a COR should be omitted. Regarding the in-country oversight of contracts, DS stated that it was cost prohibitive to attend every training event but that in those instances in which a DS representative will not attend, the ATA program manager will request that the Regional Security Office confirm in writing that the training course and deliverables met the contract and task order requirements.

OIG Reply: OIG considers the recommendation resolved, pending further action, based on the appointments of the COR and the GTM and on DS's statement that DS will work with RSOs to oversee in-country training. The recommendation can be closed once OIG reviews and accepts confirmation showing that DS has formalized the requirement that the Regional Security Office should provide written confirmation of contractor compliance with task order and contract requirements.

Finding C. The Antiterrorism Assistance Program Was Conducting End-Use Monitoring, but Equipment Records Were Not Accurate and Specific Equipment Needs Were Not Evaluated

DS/T/ATA was conducting end-use monitoring inspections as required by the Arms Export Control Act to ensure that U.S.-provided equipment was being used for its intended purpose. However, DS/T/ATA was not maintaining accurate records of the ATA program equipment. In addition, DS/T/ATA had purchased equipment that exceeded the needs of partner countries and was largely unused. This occurred because DS/T/ATA had not evaluated the need and potential use of equipment for the ATA partner countries. As a result, the Department could be allocating funds and equipment that might be put to better use in other countries.

End-Use Monitoring

DS/T/ATA was performing end-use monitoring inspections as required to ensure that the partner nations had control of ATA-provided equipment included on the United States Munitions List. The Arms Export Control Act²³ requires that Government agencies maintain control over any imported or transferred defense articles for foreign assistance that are included on the United States Munitions List. The act also requires that the Department establish an end-use monitoring program that provides reasonable assurance that articles and services are being used for the purposes for which they are provided.²⁴ Because ATA-provided equipment includes a number of items on the United States Munitions List such as rifles and handguns,²⁵ the program is required to perform end-use monitoring of those items.

Inaccurate Inventory Records

OIG analyzed end-use inspection reports for North Africa, Middle East, South Asia, and Central Asia partner countries and compared serial numbers for weapons with serial numbers on DS/T/ATA's End Use Monitor database of weapons transfers. As of April 2011, 3,152 weapons had been provided to law enforcement agencies in Afghanistan, Bangladesh, Egypt, Jordan, Lebanon, Nepal, Pakistan, Tajikistan, and Yemen. Of those 3,152 weapons, only one was unaccounted for. However, end-use monitoring reports included approximately 800 weapons that were not in the database, mostly in Afghanistan. Additionally, several weapons' serial numbers and make did not match what was recorded in the master database. The results of OIG's analysis of weapons end-use inspection reports are shown in Figure 4.

Figure 4. Locations of Antiterrorism Assistance Program Weapons

Country	Weapons Provided by ATA	Unaccounted for Weapons	Weapons Found Not in ATA Database	Date of Last Inspection
Afghanistan	637	0	801	November 2011
Bangladesh	270	0	0	March 2011*
Egypt	80	-	-	Not yet conducted
Jordan	1,059	0	0	August 2010
Lebanon	247	0	0	May 2011*
Nepal	127	0	0	September 2009
Pakistan	549	0	13	April 2010
Tajikistan	91	0	0	September 2009
Yemen	92	1	0	July 2009
Totals	3,152	1	814	

*OIG-conducted inspection.

Source: OIG and OIG analysis of DS/T/ATA data.

In Bangladesh and Lebanon, OIG conducted a physical inspection and confirmed that local law enforcement officials had all 270 weapons in Bangladesh and all 247 weapons in Lebanon that had been provided under the ATA program. OIG verified the serial numbers on the handguns and automatic weapons and found no discrepancies in either of these two inventories.

²³ 22 U.S.C. § 2778.

²⁴ 22 U.S.C. § 2785(a)(2).

²⁵ 22 CFR pt. 121.1.

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Based on its inventory of explosives detection equipment provided to bomb disposal units in Bangladesh, OIG determined that the units had all such serialized equipment received within the past 2 years from the ATA program.

Excess Equipment Purchased

In Bangladesh and Pakistan, equipment went largely unused or was inappropriate for the ATA training mission in that country. When OIG inventoried explosives detection equipment valued at more than \$100,000, the bomb disposal unit took more than an hour to locate the equipment. Bangladesh police officials stated that the equipment had never been used because they already had other bomb detection equipment. Bangladesh law enforcement agencies had also received Glock-17 handguns through the ATA program; however, some Glocks were not being used. Law enforcement officers stated that they preferred their agency-issued Chinese type 77 pistols because they had trained and qualified with them for years. They also stated that obtaining ammunition for the Chinese type 77 pistols was easier, since the ammunition was readily available in-country while ammunition for the Glock-17s had to be ordered through ATA. In Pakistan, certain weaponry went unused because law enforcement officials had not ordered ammunition for the weapons.

In addition, according to the Global Financial Management System, DS/T/ATA purchased approximately \$2.9 million worth of equipment between May and September 2010 for the ATA Iraq program. The purchased equipment was then stored in a Northern Virginia warehouse until mid-December 2011, when DS/T/ATA shipped a portion of the equipment, valued at approximately \$1.35 million, to Iraq. However, as of December 31, 2011, 21 months after DS/T/ATA began these equipment purchases, approximately 6,700 pieces of equipment purchased for the Iraq program, valued at approximately \$1.5 million, remained in the warehouse.

When equipment purchased for ATA programs is stored and not immediately transferred to the host nations, ATA graduates will not have the tools to execute the jobs for which they were trained. Failure to provide the equipment upon the completion of the course could affect the students' ability to perform their duties and to retain their newly obtained skills. Thus this lack of equipment potentially affects the effectiveness of the program. Further, retaining high-value equipment for more indefinite periods is inefficient and diverts funds that could be used for other purposes.

Potential Equipment Use Not Evaluated

While DS/T/ATA's end-use inspections ensure compliance with the Arms Export Control Act, the inspections do not include a determination of whether the equipment is being used, whether the equipment is appropriate for the needs of the partner country, or whether there is a sufficient amount of equipment. Additionally, in countries with no weaponry and no inspections, there is no followup on the disposition of equipment that is not weaponry, such as explosives detection equipment. Therefore, the Department could be allocating funds and equipment that might be put to better use in other countries. To prevent unnecessary expenditures and to ensure

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the ATA-provided equipment is used, DS/T/ATA should establish a process to determine whether equipment will be used and whether it is compatible with and at an appropriate level for the partner country. This process should occur before the equipment is transferred to the partner country.

Recommendation 5. OIG recommends that the Bureau of Diplomatic Security periodically validate its End Use Monitor database to ensure that the database includes records of all weapon transfers.

DS Response: DS did not concur, stating that it maintains, for weapons accountability, a weapons database and the End Use Monitor database. DS further stated that the two databases do not reconcile because the End User Monitor Database includes both DS/T/ATA-purchased weapons, as well as weapons purchased by other agencies and provided to partner countries through the ATA program. The master database contains only those weapons purchased by DS/T/ATA.

OIG Reply: The recommendation resulted from OIG's finding that the end use monitoring reports, which derived from the End Use Monitor database, did not contain information on approximately 800 weapons DS/T/ATA provided to partner countries. Records for all weapons provided to such countries should be contained in the End Use Monitor database regardless of whether DS purchased those weapons or received them from another U.S. Government agency. OIG considers this recommendation to be responsive to its findings. However, to avoid confusion, OIG has modified the original recommendation and the text of the report to include mentions of the End Use Monitor database. DS is requested to respond to this modified recommendation, which is unresolved.

Recommendation 6. OIG recommends that the Bureau of Diplomatic Security establish a process, before equipment is provided to partner countries, to determine whether the equipment will be used and whether the equipment is compatible with and at an appropriate level for the partner country.

DS Response and OIG Reply: DS concurred with the recommendation. Based on the response, OIG considers the recommendation resolved, pending further action. This recommendation can be closed when OIG reviews and accepts documentation showing that DS established the process for determining equipment compatibility and level of appropriateness.

Recommendation 7. OIG recommends that the Bureau of Diplomatic Security review the types of the remaining equipment for the Iraq program stored in the Northern Virginia warehouse, evaluate the equipment's utility, and determine an appropriate disposition. (Action: DS.)

DS Response and OIG Reply: DS concurred with the recommendation. Based on the response, OIG considers the recommendations resolved, pending further action. The

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recommendation can be closed when OIG reviews and accepts confirmation showing that DS completed its disposition of Iraqi program equipment warehoused in Northern Virginia.

List of Recommendations

Recommendation 1. OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, establish a monitoring and evaluation system that includes clearly defined and measurable outcome-oriented strategic goals and program objectives; measurable performance indicators that clearly link to strategic goals and program objectives; baseline data and annual performance targets for each indicator; and descriptions of how, when, and by whom performance data will be collected, analyzed, and reported. (Action: DS in coordination with CT.)

Recommendation 2. OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, develop a definition for what constitutes a developmental ATA program, consistently apply that definition to country programs, and ensure that partner country sustainability timelines are established for developmental ATA programs. (Action: DS in coordination with CT.)

Recommendation 3. OIG recommends that the Bureau of Diplomatic Security and the Bureau of Counterterrorism, in coordination with the Bureau of Democracy, Human Rights and Labor (DRL), establish and implement a process that ensures effective consultation with DRL on the designation of foreign countries that are eligible for assistance through the Antiterrorism Assistance program as well as the training and equipment each designated country is to receive. (Action: DS and CT in coordination with DRL.)

Recommendation 4. OIG recommends that the Bureau of Diplomatic Security implement a standardized reporting process for in-country oversight of contracts for Antiterrorism Assistance program training in partner countries. (Action: DS)

Recommendation 5. OIG recommends that the Bureau of Diplomatic Security periodically validate its End Use Monitor database to ensure that the database includes records of all weapon transfers. (Action: DS.)

Recommendation 6. OIG recommends that the Bureau of Diplomatic Security establish a process, before equipment is provided to partner countries, to determine whether the equipment will be used and whether the equipment is compatible with and at an appropriate level for the partner country. (Action: DS.)

Recommendation 7. OIG recommends that the Bureau of Diplomatic Security review the types of the remaining equipment for the Iraq program stored in the Northern Virginia warehouse, evaluate the equipment's utility, and determine an appropriate disposition. (Action: DS.)

Scope and Methodology

The Office of Inspector General (OIG) initiated this work under the authority of the Inspector General Act of 1978, as amended, to evaluate Antiterrorism Assistance (ATA) programs. The primary objectives of this evaluation were (1) to determine the degree to which ATA programs had achieved their intended outcomes and (2) to assess whether the Bureau of Diplomatic Security's Office of Antiterrorism Assistance (DS/T/ATA) provided effective oversight of contracts and U.S. Government-provided equipment.

To determine the degree to which ATA programs had achieved their intended outcomes, OIG focused on three areas of performance that were aligned with the legislative purposes of the ATA program:¹ (1) the enhancement of antiterrorism skills of friendly countries, (2) the strengthening of bilateral ties of the United States with friendly governments, and (3) the increase in respect for human rights by sharing antiterrorism techniques. To determine whether country-specific training programs met planned program goals and objectives, OIG analyzed and compared strategic objectives provided by the Bureau of Counterterrorism (CT) with program objectives provided by DS/T/ATA for 22 partner countries that received ATA training or equipment between FYs 2009 and 2011. The OIG team also traveled to Sana'a, Yemen, and to Baghdad, Iraq, to observe a country needs assessment performed jointly by CT and DS/T/ATA. OIG met with officials from regional security offices in Algeria, Bangladesh, India, Lebanon, and Yemen. OIG reviewed relevant laws and the U.S. Code related to human rights and met with Bureau of Democracy, Human Rights and Labor (DRL), officials concerning their roles and responsibilities with respect to the ATA program. OIG also reviewed ATA program material for 10 courses to determine whether information on human rights had been incorporated into the curricula.

To assess whether DS/T/ATA provided effective oversight of contracts and U.S. Government-provided equipment, OIG met with the contracting officers for the ATA program and reviewed relevant laws and the *Foreign Affairs Manual* and *Foreign Affairs Handbook*. OIG observed ATA training courses and met with course instructors in Nasik (India), Dhaka (Bangladesh), Amman (Jordan), Beirut (Lebanon), and Islamabad (Pakistan). OIG also reviewed contract deliverables, including course tests, critiques, and after-action reports, to determine whether contractors were complying with contract requirements. OIG conducted a physical inventory of ATA program-provided weapons in Dhaka, Amman, Baghdad, Beirut, and Islamabad. Further, OIG inventoried explosives detection equipment provided to Bangladeshi bomb disposal units and analyzed ATA end-use monitoring reports for all countries in the North Africa, Middle East, South Asia, and Central Asia regions. Lastly, OIG reviewed shipping manifests and toured an ATA warehousing operation in Reston, Virginia.

¹ 22 U.S. Code § 2349aa-1.

Review of Internal Controls

OIG performed steps to assess the adequacy of internal controls related to the monitoring of contracts. For example, the OIG team observed that certain contracting officer's representative functions were not being performed on ATA programs in foreign countries.

Use of Computer-Processed Data

OIG did not use computer-processed data for this evaluation.

OIG conducted this evaluation from January to November 2011 in accordance with the *Quality Standards for Inspection and Evaluation*, issued in January 2011 by the Council of the Inspectors General on Integrity and Efficiency. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the evaluation objectives.

Antiterrorism Assistance Program Courses

Chemical, Biological, Radiological, and Nuclear

Chemical, Biological, Radiological, and Nuclear – Hospital-Based Management of Mass Casualty Incidents

Chemical, Biological, Radiological, and Nuclear – Awareness

Chemical, Biological, Radiological, and Nuclear – Operations

Chemical, Biological, Radiological, and Nuclear – Refresher

Crisis Management

Critical Incident Management

Emergency Management Exercise Design

Hostage Negotiations

Cyber

Cyber Awareness for Prosecutors

Fundamentals of Network Security

Identification and Seizure of Digital Evidence

Identification and Seizure of Digital Evidence Train the Trainer

Introduction to Digital Forensics and Investigations

Proactive Internet Investigation Course

Explosives

Advanced Explosives Incident Countermeasures

Explosives Incident Countermeasures

Post Blast Investigations

Underwater Explosives Incident Countermeasures

Homeland Security

Airport Security Management

Border Control Management

Fraudulent Document Recognition

Quality Control in Civil Aviation Security

Investigative

Forensic Examination of Terrorist Crime Scenes

Interdicting Terrorist Activities

Interviewing Terrorist Suspects

Investigating Terrorist Incidents

Major Case Management

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Maritime

Maritime Interdiction of Terrorism
Maritime Port and Harbor Security Management

Management

Combating Domestic and Transnational Terrorism
Identifying and Developing Investigative Information
Integrating Counterterrorism Strategies at the National Level
Investigating Information Management
Police Leader's Role in Combating Terrorism

Protection

Preventing Attacks on Soft Targets
Surveillance Detection
Very Important Person Protection
Very Important Person Protection Designated Defense Marksman
Very Important Person Protection Tactical Support Team
Vital Infrastructure Security

Tactical

Advanced Crisis Response Team
Crisis Response Team
Tactical Commander's Course
Tactical Management of Special Events

Training

Counterterrorism Components of Academy Development
Instructor Development Course

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Appendix C



United States Department of State

Washington, D.C. 20520

February 17, 2012

MEMORANDUM

TO: OIG – Harold W. Geisel

FROM: CT – Robert F. Godec, Acting

SUBJECT: The Bureau of Counterterrorism's Responses to
Recommendations #1 and #2 Contained the Office of Inspector
General's Draft Report *Evaluation of the Antiterrorism
Assistance Program for Countries Under the Bureaus of Near
Eastern Affairs and South and Central Asian Affairs*

Attached is the Bureau of Counterterrorism's response to your request of February 2, 2012, for written comments on the subject draft report. In addition, my staff has sent an electronic copy of this official final response to Evelyn R. Klemstine, Assistant Inspector General for Audits, at klemstinee@state.gov, and Carol Gorman, Deputy Assistant Inspector General, Middle East Region Operations, at gormancn@state.gov.

Attachment: As stated.

cc: M – Patrick F. Kennedy

**The Bureau of Counterterrorism's Responses to Recommendations #1 and #2
contained in OIG-MERO's Evaluation of the ATA Program for NEA and
SCA Countries**

The Bureau of Counterterrorism (CT) requests that the report's references to "the Bureau of Diplomatic Security's Office of Antiterrorism Assistance (DS/ATA) programs" or "DS/ATA programs" (e.g., on pages 4 and 18) be corrected to read "the Antiterrorism Assistance (ATA) program in the countries under examination" or "the ATA program." The latter language reflects the fact that the ATA program is managed as a partnership between CT and the Bureau of Diplomatic Security (DS), in which CT is responsible for policy formulation and oversight and DS for program administration and implementation.

OIG/MERO Recommendation 1. OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, establish a monitoring and evaluation system that includes clearly defined and measurable outcome-oriented strategic goals and program objectives; measurable performance indicators that clearly link to strategic goals and program objectives; baseline data and annual performance targets for each indicator; timelines for partner countries' self-sufficiency in training; and descriptions of how, when, and by whom performance data will be collected, analyzed, and reported.

CT Response to Recommendation 1

The Bureau of Counterterrorism (CT) agrees with this recommendation and has already begun to work with the Bureau of Diplomatic Security's Office of Antiterrorism Assistance (DS/T/ATA) to further improve the Antiterrorism Assistance (ATA) program's current monitoring and evaluation system. Assisted by a private consulting firm, CT and DS have begun to develop a results-based management (RBM) system that builds upon the existing assessment process and includes all of the elements identified in the audit report. However, it should be noted that self-sufficiency in training is not a strategic goal or programmatic objective in all ATA partner nations. CT and DS/T/ATA will continue to develop and implement this RBM system over the coming months.

OIG Recommendation 2. OIG recommends that the Bureau of Diplomatic Security and the Bureau of Counterterrorism, in coordination with the Bureau of Democracy, Human Rights and Labor (DRL), establish and implement a process that ensures effective consultation with DRL on the designation of foreign countries that are eligible for assistance through the Antiterrorism

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Assistance program as well as the training and equipment each designated country is to receive.

Joint DS-CT-DRL Response to Recommendation 2. DS and CT agree with this recommendation and have already taken steps to implement it by agreeing with DRL to collaborate in the execution of the following procedures. CT will obtain DRL input and clearance on its annual review and revision of the list of ATA partner nations. CT will obtain DRL clearance both on the ALDAC which announces this list every year and on any additions to the list made outside the established annual process. DS/T/ATA and CT will obtain DRL's clearance on the annual updates and any other revisions to the Country Assistance Plans (CAPs) for countries identified by DRL as being of concern. Each CAP contains the strategic and programmatic objectives as well as the planned course offerings for an individual ATA partner nation. Whenever possible, the CAPs also identify the law enforcement entities that are to receive ATA assistance. DS/T/ATA also will obtain DRL's clearance on any ATA course offer cable that offers a post a course not listed in the previously cleared CAP for that country. Finally, DS/T/ATA will solicit DRL's input into any future revisions of the human rights module which is an integral part of all ATA courses. It also should be noted that in May 2011 DS/T/ATA and DRL officials met to examine and discuss the current ATA human rights module, which received DRL's approval.

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Appendix D



United States Department of State

Washington, D.C. 20520

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**INFORMATION MEMO TO OIG – DEPUTY INSPECTOR GENERAL
HAROLD W. GEISEL**

FROM: DS – Eric J. Boswel

A handwritten signature in black ink, appearing to be 'EB' or similar initials, written over the name 'Eric J. Boswel'.

SUBJECT: DS Response to the Draft Report of Evaluation of the ATA Program
for Countries under the Bureaus of NEA and SCA – Report Number
AUD/MERO-12-XX, dated February 2012

Attached are the Bureau of Diplomatic Security's comments on
Recommendations 1 through 6 of the subject report.

Attachment:

As stated.

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**DS Responses to OIG Office Audits Draft Evaluation of the ATA Program
for Countries under NEA and SCA Bureaus
(AUD/MERO-12-XX, February 2012)**

OIG Recommendation 1. OIG recommends that the Bureau of Diplomatic Security (DS), in coordination with the Bureau of Counterterrorism, establish a monitoring and evaluation system that includes clearly defined and measurable outcome-oriented strategic goals and program objectives; measurable performance indicators that clearly link to strategic goals and program objectives; baseline data and annual performance targets for each indicator; timelines for partner countries' self-sufficiency in training; and descriptions of how, when, and by whom performance data will be collected, analyzed, and reported.

DS Response to Recommendation 1. DS does not fully concur with this draft recommendation as written. The findings for Recommendation 1 assert generalizations that the Office of Antiterrorism Assistance (DS/T/ATA) "had not developed specific, measureable, and outcome-oriented program objectives or implemented a mechanism for program evaluation." Those generalizations do not reflect the facts or acknowledge the complex interrelationships involved in administration of the program.

Concerning the program objectives, the point not adequately clarified is that although the policy-based strategic objectives are central to the focus of the whole implementation process, they are not the responsibility of DS to formulate. Once strategic objectives are received from CT, DS/T/ATA has a very well-defined process by which those strategic objectives¹ are developed within DS/T/ATA into programmatic objectives.² At that point, the applicable "Critical Capabilities" - drawn from a comprehensive list of 23 "Critical Capabilities" - necessary to achieve the specified programmatic objectives indicate the specific training courses that the program manager may select in the preparation of a detailed Country Assistance Plan. Thus, DS agrees that the strategic objectives provided to DS/T/ATA should be as specific as possible. Since they are formulated at a policy level, they tend to be general in nature and are refined into more specific programmatic objectives only in the subsequent assessment and planning process.

¹ An example of a strategic objective is, "Protect the partner nation's national leadership."

² An example of a programmatic objective is, "Train and equip a dignitary protection unit."

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DS/T/ATA's programmatic objectives are already measurable. Several years ago, the office developed the objectively-based Performance Measures of Effectiveness (PME) system and uses it as the primary mechanism for program evaluation. The PME system employs the services of subject matter experts on the assessment team drawn from the interagency law enforcement community. These experts utilize detailed checklists and a simple Likert scale (scoring 1 through 5) to make capability assessments on initial visits to a participating nation, as well as on subsequent visits for purposes of both program evaluation and updated planning. In addition, the PME system was updated in early 2011 to eliminate incorporation of inadequate threat assessments at the governments' capabilities level, and now focuses mainly and more reliably on actual skills and knowledge-based performance standards.

The measurement of the success in achieving the programmatic objectives is already in transition to an outcome-based standard. By mutual agreement last year with the CT and the Office of U.S. Foreign Assistance Resources (F), DS/T/ATA will phase out use of the output-based measurement of numbers of students and will replace it with number of programmatic objectives achieved annually on a program-wide basis. This new evaluation standard is expected to be more indicative of long-term impact of the program and consistent with guidance being implemented by F throughout the foreign assistance programs.

A number of other related misunderstandings in the findings also warrant comment for clarification. The draft report implies the non-existence of program objectives for 20 countries in the program. However, the program objectives simply had not been prepared yet for the current year (2012) because the office was still awaiting formulation, approval and receipt of the updated strategic objectives upon which they are based. The prior year's (2011) strategic and programmatic objectives were made available for review. Also, DS/T/ATA has available well-defined programmatic objectives for every ATA program partner nation for several years.

In addition, the draft report asserts that "Other outcome measures that could be useful to assess the effectiveness of the ATA program include student placement into police units [and] how long the students stay in those positions or police units." DS/T/ATA implemented the practice of requesting a formal memorandum of intent (MOI) with willing participating nations. These MOIs stipulate student placement and reasonable retention in appropriate police units. In reality, the documents (when successfully executed by the embassies) may be helpful to a limited degree for persuasive purposes, but carry no legal or practical enforceability.

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Lastly, the findings and recommendation suggest a need for “timelines for partner countries’ self-sufficiency in training.” Recognition needs to be made of the difference between country programs that are funded at just the *training* level, and those that are funded at the more demanding *development* level. Only seven of the current 62 participating nations’ programs are funded at or above the \$5 million level, which roughly equates to a threshold development level of activity warranting establishment of an in-country manager for ongoing direct coordination and delivery oversight. In those seven countries, numerous methodologies are used to advance the participating nations toward self-sustainability. These methodologies include, but are not limited to, upgrades in classroom and range facilities, instructor development courses, transfer of student and facilitator course materials and equipment, phased inclusion and gradual full assumption of teaching responsibility by the partner nations’ instructors in the teaching cadre, and ongoing contact with previously trained operational units for training effectiveness feedback. The other 57 countries are funded at only training levels. This means that courses are offered only intermittently, there is no permanent program management presence in-country, and the opportunities for regularly encouraging and evaluating sustainment are very limited. If sustainment of a majority of participating nations is mandated as a goal of the program, then realistically there are only two solutions: either more funding broadly distributed; or fewer participating nations receiving larger shares of available funding.

In summary, DS/T/ATA has already developed “specific, measureable, and outcome-oriented program objectives” and has “implemented a mechanism for program evaluation.” Also, the assessment, delivery and review process and the development and updating of country assistance plans (CAPs) already link the programmatic objectives to the strategic objectives and facilitate the regular collection of baseline and subsequent performance data at appropriate intervals. DS can agree with OIG that a reasonable recommendation in this program area would include: CT should provide strategic objectives that are as specific as possible.

OIG Recommendation 2. OIG recommends that the Bureau of Diplomatic Security and the Bureau of Counterterrorism, in coordination with the Bureau of Democracy, Human Rights and Labor (DRL), establish and implement a process that ensures effective consultation with DRL on the designation of foreign countries that are eligible for assistance through the Antiterrorism Assistance program as well as the training and equipment each designated country is to receive.

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Joint DS-CT Response to Recommendation 2. DS and CT concur with this recommendation.

OIG Recommendation 3. OIG recommends that the Bureau of Diplomatic Security appoint a contracting officer's representative (COR) to oversee Antiterrorism Assistance contracts and implement a standardized reporting process for in-country oversight of contracts for Antiterrorism Assistance program training in partner countries.

DS Response to Recommendation 3. DS does not concur with the first part of this draft recommendation to appoint a COR. DS/T/ATA already has a COR who addresses all issues related to contracts, including in-country training services in partner countries. The COR provides oversight for the contracts, ensuring the vendors are in compliance with the terms and conditions of the agreements. The COR is a GS employee, who has served as a COR since 1990 and possesses a COR certification valid until August 2014. Thus, DS/T/ATA believes that the first portion of the recommendation had already been accomplished and should be omitted.

Concerning "in-country oversight of contracts," DS/T/ATA responds that due to the volume of training deliveries conducted on an annual basis, e.g., 537 in FY 2011, it is cost prohibitive for DS/T/ATA personnel to attend every training event. DS/T/ATA made such an attempt with the former On-Site Representative program, but had to discontinue it due to excessive costs and the determination of other reasonable oversight measures. These measures include: DS/T/ATA conducts both random and independent third-party evaluations of training deliveries, domestically and overseas, to assess contract instructors' abilities and their adherence to the DS/T/ATA instructor policies and curriculum. DS/T/ATA also conducts pre- and post-testing of the participants to measure increases in knowledge and skills. In addition, DS/T/ATA requires the lead instructors to submit detailed after action reports that are analyzed by all the concerned divisions within the organization.

However, as a means of reasonable and cost efficient compliance with this portion of the recommendation in those events where a DS/T/ATA representative will not be in attendance at a training delivery, the program manager will request that the responsible Regional Security Office confirm in writing to ATA:

- the training venue is adequate with regard to vendor responsibilities

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- the approved instructors are present
- the instructors are using the appropriate version of the training materials
- the instructors have provided the participants with their specified training materials and equipment
- the participants appear to be actively engaged and understand the material
- all testing, skills evaluation, and critique instruments are properly administered
- all locally procured support services are provided per terms of the agreements
- the instructional team's draft After Action Report is prepared upon conclusion of the session.

OIG Recommendation 4. OIG recommends that the Bureau of Diplomatic Security periodically reconcile its electronic master database to ensure that the database includes records of all weapon transfers.

DS Response to Recommendation 4. DS does not concur with this draft recommendation. DS/T/ATA maintains two databases for weapons accountability: a master database and the End Use Monitor (EUM) database. The master database encompasses all weapons purchased by DS/T/ATA and shipped either overseas as part of a grant equipment package or to a domestic training facility for training support. Each weapon on the master database can be verified by purchase receipt, shipping documents, and receipt of acceptance at the final destination. The EUM database lists all weapons positioned overseas that have either been shipped by DS/T/ATA to a partner nation, or weapons that have been purchased and signed over from another U.S. Government entity for use in the ATA program in a specific country. Due to this variable, not all weapons on the EUM database can be tracked to the point of origin/point of purchase. For accountability purposes only, DS/T/ATA has assumed responsibility for these weapons under the EUM program. Thus, the apparent discrepancy between the master database and the EUM database found during the OIG inspection can be reasonably explained given not all weapons in the program were purchased and issued by DS/T/ATA.

OIG Recommendation 5. OIG recommends that the Bureau of Diplomatic Security establish a process, before equipment is provided to partner countries, to determine whether the equipment will be used and whether the equipment is compatible with and at an appropriate level for the partner country.

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DS Response to Recommendation 5. DS concurs with this draft recommendation.

OIG Recommendation 6. OIG recommends that the Bureau of Diplomatic Security review the types of the remaining equipment for the Iraq program stored in the Northern Virginia warehouse, evaluate the equipment's utility, and determine an appropriate disposition.

DS Response to Recommendation 6. DS concurs with this draft recommendation.

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