



UNITED STATES DEPARTMENT OF STATE  
AND THE BROADCASTING BOARD OF GOVERNORS  
*OFFICE OF INSPECTOR GENERAL*

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ISP-I-13-18

Office of Inspections

February 2013

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**Inspection of  
the Bureau of Diplomatic Security,  
Office of Investigations and Counterintelligence,  
Divisions of Special Investigations,  
Criminal Investigations, and  
Computer Investigations and Forensics**

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## **PURPOSE, SCOPE, AND METHODOLOGY OF THE INSPECTION**

This inspection was conducted in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2011 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by the Office of Inspector General for the U.S. Department of State (Department) and the Broadcasting Board of Governors (BBG).

### **PURPOSE AND SCOPE**

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

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

### **METHODOLOGY**

In conducting this inspection, the inspectors: reviewed pertinent records; as appropriate, circulated, reviewed, and compiled the results of survey instruments; conducted on-site interviews; and reviewed the substance of the report and its findings and recommendations with offices, individuals, organizations, and activities affected by this review.



United States Department of State  
and the Broadcasting Board of Governors

*Office of Inspector General*

## **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". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Harold W. Geisel  
Deputy Inspector General

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## Key Judgments

- The Bureau of Diplomatic Security (DS) Special Investigations Division (SID), which investigates allegations of criminal and administrative misconduct, lacks a firewall to preclude the DS and Department of State (Department) hierarchies from exercising undue influence in particular cases.
- DS does not have a comprehensive, up-to-date manual with approved policies and guidelines on how to conduct investigations.
- DS's quality assurance measures are not sufficient to ensure that investigations comport with law enforcement standards and powers. DS should use peer reviews to help correct flaws and identify best practices.
- Frequent agent turnover in DS investigative offices reduces long-term, specialized expertise and hampers complex criminal investigations.
- The Criminal Fraud Investigations (CFI) branch of the Criminal Investigations (CR) Division should become a new division.
- DS and the Bureau of Consular Affairs (CA) have not completed a long-pending memorandum of understanding regarding CA's Consular Integrity Division (CID).
- Inspectors found personnel in the three Office of Investigations and Counterintelligence (ICI) divisions to be professional and dedicated to their jobs.

All findings and recommendations in this report are based on conditions observed during the on-site review and the standards and policies then in effect. The report does not comment at length on areas where the OIG team did not identify problems that need to be corrected.

The inspection took place in Washington, DC, between October 1 and November 16, 2012. (b)(2)(b)(6)

conducted the inspection.

## Context

This inspection addresses three divisions within the Bureau of Diplomatic Security (DS), Directorate of Domestic Operations, Office of Investigations and Counterintelligence (ICI): the Special Investigations Division (SID), the Criminal Investigations (CR) Division, and the Computer Investigations and Forensics (CIF) Division. ICI has two other divisions: Counterintelligence, inspected in 2011, and Field Offices, which has the single largest number of ICI personnel.

SID's mission is "to conduct administrative and criminal investigations related to alleged misconduct and security clearance eligibility and investigations of unauthorized disclosure and compromise of classified and sensitive information involving Department employees, contractors, locally employed staff, and all U.S. Government personnel under chief of mission authority." The range of SID investigations is diverse, from substance abuse to domestic violence, deaths, discharge of a firearm, sex crimes, and other conduct that may merit criminal or administrative discipline. SID, which opened 350 cases in 2012, has 29 employees and a program budget of \$479,000, which includes two personal services contract positions but no other salaries.

CR is a large division with five branches and a mandate that relates to crimes involving consular activities. CR opened 695 cases in 2012. The Criminal Fraud Investigations (CFI) branch investigates allegations of malfeasance involving visa and passport fraud, complex visa and passport crimes spanning multiple jurisdictions, and human trafficking. The Criminal Investigative Liaison (CIL) branch coordinates investigative requests from Federal, state, local, and foreign law enforcement agencies and facilitates fugitive returns. CIL has liaison officers in several agencies plus the International Criminal Police Organization. The Overseas Criminal Investigations (OCI) branch supports the assistant regional security officer-investigator program. The Special Projects (SP) branch specifically targets fraud related to temporary worker and trainee visas and intracompany transferee visas (H&L), working with the Department of Homeland Security/Immigration and Customs Enforcement Document and Benefits Task Forces and the Kentucky Consular Center. The Criminal Intelligence and Research (CIR) branch conducts consular fraud-related research and analysis, including financial forensic efforts directed at asset forfeiture and seizure; manages the DS evidence program; and oversees all DS database-access programs. Significant CR funding comes from machine readable visa fees and H&L employment visa funding. CR has 277 personnel and a program budget of \$22,942,303.

CIF, established in 2004, provides DS and others in the Department with technical assistance for computer-evidence recovery and analysis and for Internet and network investigations. Within CIF, the Computer Investigations Program supports cyber crime investigations, carries out related security functions, and provides support for evidence collection from electronic devices. The Digital Forensics Program provides laboratory support related to digital evidence. The Technical Surveillance Program provides equipment, operational support, and training to DS investigators and staff. CIF has 57 authorized employees, with current staffing of 26 third-party contractors, 25 direct hires, and 1 personal services contractor. The CIF budget is \$8,678,940, with about three-quarters for contract staffing and one-quarter for program funds.

A December 23, 2010, memorandum of understanding between the DS Diplomatic Security Service and the OIG Office of Investigations delineates responsibilities for Department investigations, including areas of potential overlap.

Nearly 88 percent of employees in the three divisions completed OIG personal questionnaires, a remarkably high total. Most personnel were complimentary of their supervisors and expressed satisfaction in their involvement in important work. The inspection team was impressed by the candor, devotion to duty, and professionalism of staff in each division. When staff members voiced criticism, they did so in the context of improving the system and enabling dedicated employees to do their jobs more effectively.

## Need for Independence

A number of investigative standards are generally accepted to be requirements for any Federal investigative entity. The Council of the Inspectors General on Integrity and Efficiency has laid out broad categories of such standards, which are equally relevant to offices of inspectors general and to DS ICI divisions. One such essential investigative standard is independence, both in fact and appearance, from undue influence by higher authorities concerning the opening and conduct of cases. SID does not have that independence.

In all matters relating to investigative work, the investigative organization needs to be free, in fact and appearance, from impairments to independence in both organization and attitude. Such independence is essential so that an organization's decisions about obtaining evidence, conducting interviews, and making recommendations will be impartial and viewed as such by knowledgeable third parties. The credibility of the Department's investigative organizations and disciplinary system depends on that independence, yet the perception exists among knowledgeable parties that external influences have negatively affected some SID investigations.

SID is one of many offices that report up the normal chain to the principal deputy assistant secretary and director of the Diplomatic Security Service. Foreign Service special agents in SID, 80 percent of whom are junior in rank, ordinarily serve only one tour as an investigator. Subjects of their investigations may include more senior DS agents; other senior DS agents are sometimes hostile witnesses for interviews. The SID supervisors also are in the DS mainstream and subject to regular "up or out" assignment and promotion processes. During inspection interviews, nearly every SID special agent acknowledged being aware that one or more suspects, witnesses, or senior Department officials could one day serve on a promotion board or on a DS assignment panel that would decide the investigator's career prospects. Although most investigators said that they had not experienced career pressure in any particular cases, some had indeed felt such pressure. Several special agents in SID observed that Civil Service agents with sufficient rank are less susceptible to such pressure, as their careers do not depend on DS assignment panels or Foreign Service promotion boards.

Inspectors observed that the Central Intelligence Agency, Department of Justice, and U.S. Secret Service internal affairs investigative offices all have protections in place to insulate sensitive internal investigations from even the perception of interference. The current SID structure does not foster independence from career pressures and creates significant potential for undue influence, favoritism, and potential retribution. Various corrective mechanisms may be possible. U.S. Government investigative experts from outside the Department could offer helpful structural benchmarks.

**Recommendation 1:** The Office of the Deputy Secretary should restructure the investigative responsibilities currently assigned to the Special Investigations Division. The outcome should include safeguards to prevent any Department of State or Diplomatic Security official from improperly influencing the commencement, course, or outcome of any investigation. (Action: S/ES)



(b) (5)



**Recommendation 2:**



The SID chief is an FS-01 position, which, as a number of observers commented, leaves any chief who aspires to the Senior Foreign Service vulnerable to pressure from above. Sources also suggested that having three bureaucratic layers between the SID chief and the DS Assistant Secretary makes sensitive cases vulnerable to multiple types of interference and the leaking of information. Making the SID chief a Senior Executive Service officer and streamlining the chain of authority would mitigate these risks.

**Recommendation 3:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should convert the Special Investigations Division chief position to Senior Executive Service and have that position report directly to the Bureau of Diplomatic Security Assistant Secretary. (Action: DS, in coordination with DGHR)

## Professional Standards and Quality Assurance

Aside from independence, several other Council of the Inspectors General on Integrity and Efficiency's investigative standards relating to professional performance and quality assurance measures reflect general principles that are essential to the success of any Federal investigative entity. Among the broad categories are the following:

- Exercising professional care, which ensures impartiality, integrity, timeliness, appropriate techniques, adherence to legal requirements, thoroughness, accurate and complete documentation, and documented policies and procedures;
- Planning, which includes both case and organizational levels;
- Executing investigations, which encompasses interviewing, collecting evidence, documenting work, adhering to legal requirements, and conducting supervisory progress reviews;
- Reporting; and
- Managing investigative information, which includes information flow, complaint handling, and investigative database management.

DS lacks such clearly stated professional investigative standards for investigative functions, with the result that DS agents who circulate through the ICI divisions make decisions about procedures and cases in ad hoc and sometimes inconsistent ways. Without such standards, it is difficult to ascertain whether adequate internal safeguards and standard management procedures exist. Peer reviews of investigative divisions can help correct flaws and incorporate best practices.

### *Diplomatic Security Investigators' Manual*

An up-to-date and comprehensive manual of procedures for conducting investigations is an essential requirement for any Federal investigative entity. Current provisions in the classified *Foreign Affairs Manual* address only some elements of investigations and some are outdated. DS has completed *Foreign Affairs Manual* revisions for a few issues and is drafting others, but the current guidelines do not constitute an up-to-date and comprehensive manual. Agent training provides an overview of investigative skills but is no substitute for an inclusive resource.

The absence of a comprehensive, up-to-date manual increases the potential for errors, particularly for new agents who are forced to rely on on-the-job training. Inspectors discovered uncertainty among SID agents about which warnings to provide subjects prior to their interviews in investigations, though the wrong choice of warning can ruin a potential criminal prosecution. Inspectors were told that SID supervisors have sometimes pursued investigations excessively against other DS agents and that some supervisors have chosen to open cases on every allegation, including for those types of workplace issues that Department managers should ordinarily attempt to handle via other means. The likelihood of such problems increases when clear guidelines are lacking and individual preferences prevail. SID leadership appears to have

recognized the need for structure and is, on an ad hoc basis, compiling relevant documents on an intranet site.

CR created a handbook on passport and visa investigations for use in the Basic Special Agent Course, but that handbook is 8 years out of date and is not readily accessible to DS agents. Furthermore, no standard operating procedures exist for the Consular Integrity Division (CID), a joint CR/CA entity. Lack of standard procedures contributes to disagreement about roles and responsibilities, including those relating to the Procedural Integrity Testing and Training Program, which CA established to help detect and prevent passport fraud and to improve the passport issuance process.

In investigative entities like SID and elements of CR where agents with limited investigative experience fill most positions, comprehensive, up-to-date written guidelines are essential. DS could draw on the manuals of other Federal law enforcement entities, including OIG's Office of Investigations, to improve its own manual.

**Recommendation 4:** The Bureau of Diplomatic Security should revise its outdated manual of standard investigative policies and procedures to make it a comprehensive, up-to-date document with annexes applicable to particular offices, including the Special Investigations Division and the Criminal Investigations Division's Criminal Fraud Investigations branch. (Action: DS)

### *Special Investigations Division Workmanship*

For several years, SID has worked closely with the Bureau of Human Resources, Office of Conduct, Suitability, and Discipline to reduce the adjudication time required for administrative disciplinary actions. In the past, the Office of Conduct, Suitability, and Discipline frequently requested additional information from SID, claiming that some reports of investigation (ROI) did not contain sufficient information. SID management has attempted to regularize the ROI process, including by establishing regular dialogue with the Office of Conduct, Suitability, and Discipline and the Bureau of Human Resources Grievance Office and by establishing informal guidelines for ROI production, which now include discussion of the Douglas factors<sup>1</sup> used in administrative discipline decisions, judgments about whether the investigator has found sufficient evidence to "substantiate" or "not substantiate" allegations of facts, and discussion of "venue" elements. Despite such SID efforts, complaints from ROI users continue, with estimates of problem ROIs varying from "just a few" to "25 percent."

SID has historically not had a clear policy that supervisors must conduct case reviews with their subordinates on a regular basis. Although SID has recently initiated regular reviews, its implementation of the policy is ad hoc. Furthermore, feedback on ROI preparation often only took place after completion of the case file and was sometimes cursory or targeted at spelling and grammar, not substance. Without regular and institutionalized case reviews, supervisors cannot assess the professional development and competence of their subordinates nor provide timely input and guidance on the conduct of cases.

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<sup>1</sup> Douglas factors are 12 elements that Federal adjudicators consider in gauging the severity of administrative disciplinary actions to prescribe against Federal employees.

**Recommendation 5:** The Bureau of Diplomatic Security should include in the work requirements statements of all Special Investigations Division supervisors a requirement to conduct regular reviews of cases, including report of investigation preparation, with each investigator. (Action: DS)

***Memorandum of Understanding with Consular Affairs***

With its variety of consular-related functions, CR interacts closely with CA. Two CR agents and one analyst report directly to the CR Division chief and work in CID within the Office of Fraud Prevention Programs in CA. As CA's designated clearinghouse for all allegations of consular-related malfeasance, CID analyzes use of consular systems and identifies anomalies. CID also monitors U.S. Government access to passport records. The DS agent in charge acts as a liaison with CA on a number of issues, including DS access to consular databases, and also works closely with other CR elements. In the past, disagreements occurred over the division of labor in CID between the DS and CA elements. DS and CA have not signed a memorandum of understanding that would establish necessary guidelines for the investigative unit of CID, including DS access to CA systems and databases.

**Recommendation 6:** The Bureau of Diplomatic Security, in coordination with the Bureau of Consular Affairs, should complete and sign a memorandum of understanding for the Consular Integrity Division. (Action: DS, in coordination with CA)

***Assistant Regional Security Officer-Investigator Issues***

The OCI branch of CR supports assistant regional security officer-investigators who conduct investigations of visa fraud in embassies abroad. DS performance reviews and previous OIG reports indicate that assistant regional security officer-investigator performance has been uneven. Some agents are extremely successful and others less so. Contributing factors include the level of cooperation of the consular section, the relationship with the regional security officer, the relationship with local law enforcement and the host government, and the experience and skills of the incumbent as a criminal investigator. An updated memorandum of understanding can resolve some of the problems regarding coordination of consular section and regional security officer approaches to the investigator program; however, a clear set of operational guidelines governing case referrals and other procedures is also important. DS and CA recommend that each post establish standard operating procedures, but many posts have not done so. Although DS has made model standard operating procedures available, these guidelines do not adequately address core issues, such as a case referral policy, and were not created in coordination with CA.

**Recommendation 7:** The Bureau of Diplomatic Security, in coordination with the Bureau of Consular Affairs, should establish model standard operating procedures for all posts with assistant regional security officer-investigators. (Action: DS, in coordination with CA)

DS wants to increase the number of assistant regional security officer-investigator positions to 123, but DS and CA have not developed clear criteria for determining where to establish the additional positions. The only definite requirement that DS offers is to have an assistant regional security officer-investigator at every post where the Department of Homeland Security has a visa security unit, although the nexus between the two is unclear. There are no

clear standards to judge the effectiveness of established assistant regional security officer-investigator positions in meeting the goals of the investigator program, and to date the Department has never abolished a position as ineffective. Some consular sections resist establishing an investigator position, and others wish to have an existing position abolished. In a survey of assistant regional security officer-investigators, a few stated that they do not have real work to do and that the Department should abolish their positions. In the absence of metrics to measure the value of existing positions and the success of the investigator program overall, the Department cannot make informed decisions on the future of this program.

**Recommendation 8:** The Bureau of Diplomatic Security, in coordination with the Bureau of Consular Affairs, should establish criteria for creating new assistant regional security officer-investigator positions and for judging whether an existing position remains important to meet program goals. (Action: DS, in coordination with CA)

*Investigative Units at Embassies Baghdad and Kabul*

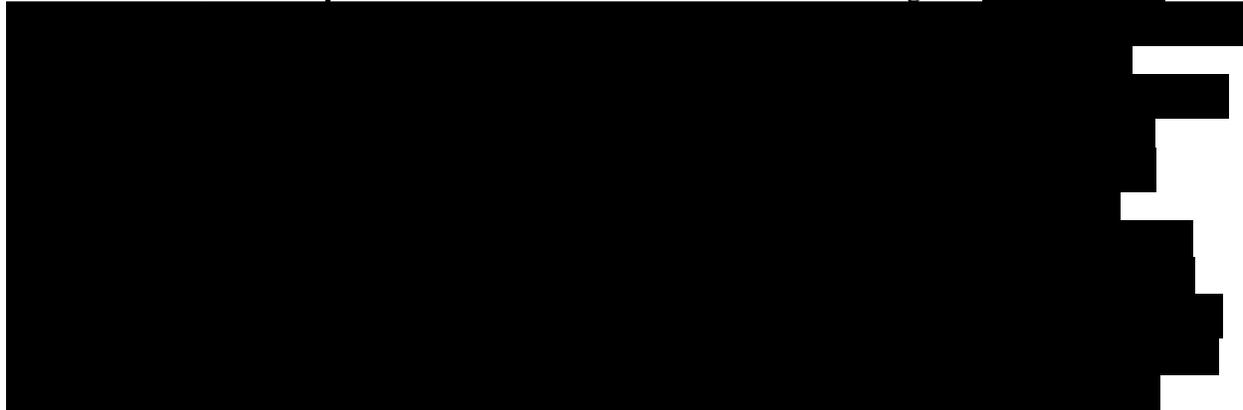
Embassies Baghdad and Kabul each have an investigative unit located within the regional security office. Although the DS agents assigned to those units conduct a variety of investigations, including specialized cases for which SID provides support, they report to the regional security officer at post, not directly to SID. This arrangement leaves SID without sufficient ability to oversee the proper handling of such cases. Possible solutions include establishing SID positions in Baghdad and Kabul, having SID agents provide rotational temporary duty support to posts, and transferring to SID oversight and operational control of all investigative cases at Embassies Baghdad and Kabul.

**Recommendation 9:** The Bureau of Diplomatic Security should reassess the staffing and reporting chain of the investigative units at Embassies Baghdad and Kabul and make the Special Investigations Division responsible for overseeing all investigations that fall under the Special Investigations Division mandate. (Action: DS)

 *Administrative Subpoena*

Inspectors heard repeated complaints that two unresolved procedural issues, both beyond DS control, hinder investigators' ability to pursue cases effectively.

In 1977, Secretary of State Vance issued a memorandum stating that 



(b)(5)(b)(7)(E)

**Recommendation 10:**

Administrative subpoena authority allows a Federal law enforcement agency to issue a compulsory request for documents or testimony without prior approval from a grand jury, court, or other judicial entity. Congress has provided administrative subpoena authority to many agencies with the mandate to conduct criminal investigations, but not to DS. According to agents and senior managers, lack of administrative subpoena authority significantly hampers agents' ability to conduct investigations.

**Recommendation 11:** The Bureau of Diplomatic Security, in coordination with the Office of Legislative Affairs and the Office of the Legal Adviser, should seek congressional action that provides the bureau with administrative subpoena authority. (Action: DS, in coordination with H and L)

***Peer Reviews***

Peer reviews can be a useful tool to determine whether adequate internal safeguards and management procedures exist so that investigative entities follow law enforcement standards and properly exercise law enforcement powers. Peer reviews are conducted by nonaffiliated U.S. Government entities that perform similar work and offer a fresh perspective on what works and what does not, based on generally accepted standards. DS has not invited such reviews, nor included them in its action agenda, for its investigative divisions. A vigorous peer review process could have helped identify and address the issues noted in this report.

**Recommendation 12:** The Bureau of Diplomatic Security should commence peer reviews and conduct them on a regular schedule for the Special Investigations, Criminal Investigations, and Computer Investigations and Forensics Divisions' investigative policies, procedures, and activities. (Action: DS)

## Human Resources

Having qualified investigators is another standard essential for any Federal investigative entity, as reflected in Council of the Inspectors General on Integrity and Efficiency's general principles. Individuals assigned to conduct investigative activities must collectively possess, via education, training, and professional development, the requisite knowledge, skills, and abilities to perform tasks at their grade level. Also vital is a systematic, progressive, and documented plan to maintain those fundamentals. Several aspects of the DS approach to investigative assignments in ICI complicate day-to-day performance and discourage development of a professional investigative corps. Basic DS assignment criteria, the lack of an investigator career path, the current 2-year assignment length for DS agents, and the paucity of civil servant investigators all contribute to the problem. These factors, discussed in turn below, are interconnected, and the manner of the Department's solution to the independence problem (see Recommendation 1) will determine which ones are central to the challenges noted in SID.

### *Special Agent Investigator Requirements*

All three ICI divisions have a mixture of career Civil Service/General Schedule (GS) and career Foreign Service (FS) positions. CR and CIF also hire civilian contractors. DS hires GS investigators, designated as GS-1811s, based at least in part on past investigative credentials. The FS agents whom DS assigns to investigative positions are DS agent generalists, designated FS-2501s. The vast majority are junior in FS rank. In some cases, the FS-2501s have significant investigative experience from pre-DS jobs. However, many lack such experience, though DS provides all agents with basic training, including an introductory Federal Law Enforcement Training Center investigative course, and most agents do some investigative work when serving a first tour in a domestic DS field office. Some agents bid for SID, CR, and CIF jobs to develop an investigative specialty or to gain knowledge that could prove useful in future assignments. In some cases, DS force-assigns agents to ICI divisions. Assignment panels reportedly use only general DS criteria in deciding which FS-2501s to assign to investigative positions, with timing rather than any special skills or experience being key. Lack of experience necessitates lengthy learning curves and can result, at least initially, in flawed ROIs, which can impede the prosecution of criminal cases.

**Recommendation 13:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should incorporate investigative skill requirements, technical aptitude, and agents' work histories into criteria for making FS-2501 agent assignments to the Office of Investigations and Counterintelligence divisions' investigative offices. (Action: DS, in coordination with DGHR)

### *Investigator Career Path*

DS expects all FS agents to gain experience in three types of assignments in building a career: protection details, security assignments at embassies, and investigative work. Most DS agents believe the brightest career paths emphasize protection and security assignments. Those who aspire to specialize in an investigator career path with systematic and progressive follow-on training struggle to achieve that goal, and few succeed in making a career of DS investigative assignments. In SID, CR, and CIF, new FS-2501 agents receive some formal training within their

first 6 months on the job, including Federal Law Enforcement Training Center courses. Very few agents follow a first investigator tour with more such assignments. Currently in SID and CR investigative offices, none of the FS-2501 supervisors have experienced a continuous career investigator development program, with the result that both supervisors and staff usually face sharp learning curves on arrival.

**Recommendation 14:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should establish an investigator specialized career path for FS-2501 agents (or a separate numerical designator for investigators) at least up to the rank of FS-01, incorporating systematic and progressive training and assignments. (Action: DS, in coordination with DGHR)

### *Assignment Length for Agent Investigators*

All FS-2501 agents in the three ICI divisions receive 2-year assignments, with the possibility to extend for a third year. This time period is too short, given the importance of their investigations, which can dramatically affect a suspect's career and can result in severe criminal or administrative penalties. ICI supervisors can count on only 12 to 15 productive months from newly arrived FS-2501s. Initially, agents require a month or more in classroom and on-the-job training. This training requirement applies equally to SID criminal investigators, CR investigators of passport and visa fraud, and CIF agents entering the world of computer forensics. Apart from training, DS routinely calls on FS-2501 agents in ICI for temporary duty in diplomatic protection work, often during the United Nations General Assembly period but at other times as well. Finally, when an FS-2501 agent receives an onward assignment, language training and other preparation for that assignment can consume up to 6 months of the agent's 2-year tour. These realities keep DS from reaping the full benefit from training and experience. The problem is particularly acute when an investigation involves a vulnerable victim or is moving toward a Federal prosecutor who values continuity and an agent's tour ends. The solution in the three ICI divisions has been to encourage FS-2501 agents to extend for a third year. Many in SID and CR's CFI branch did so in 2012; others did not. DS has created some 3-year domestic tours for positions requiring specialized skills and unusual continuity, as allowed under Standard Operating Procedure A-03, but has resisted doing so in ICI.

**Recommendation 15:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should change the normal assignment length for FS-2501 special agents in the Special Investigations, Criminal Investigations, and Computer Investigations and Forensics Divisions to 3 years, recognizing specialized skills and unusual continuity requirements as justification. (Action: DS, in coordination with DGHR)

### *Adding More General Schedule Investigators to the Mix*

Yet another approach to meeting continuity and expertise standards entails increasing the percentage of GS-1811s, both as supervisors and investigators. Depending on the restructuring discussed above for SID, that division might be majority, or even 100 percent, GS-1811s. At present, SID and CR investigative staffs are heavily weighted toward FS-2501s, with a small minority of GS-1811 Civil Service investigators. Out of SID's 24 currently filled investigator positions, 21 are FS-2501s. Only one supervisor and two staff investigators are GS-1811s. For CFI, the numbers are 21 FS-2501s and 2 GS-1811s. A benefit of GS-1811 investigators is that

they can stay indefinitely to provide long-term continuity and expertise. On the positive side for FS-2501s, many in SID, CR, and CIF report that assigning FS agents to ICI investigative positions and then circulating those agents to the field, including to assistant regional security officer positions in embassies, improves the ability of field agents to serve as first responders when investigations arise. On balance, the frequent turnover of FS-2501s in SID and CR investigative units is not sufficiently buffered by the number of GS-1811s in place. Extending FS-2501 tours to 3 years would help with continuity; however, increasing the percentage of GS-1811s would better guarantee long-term stability for sensitive cases and specialized expertise during the inevitable FS-2501 transitions. Some in ICI leadership have urged a dramatic increase in the number of investigator positions, particularly in SID. However, interviews at lower levels in ICI suggest that, although case distribution is sometimes uneven, total caseloads are manageable with the current staffing levels. DS could achieve a better balance by countering any increase in the number of GS-1811 investigators in ICI with a reduction in the number of FS-2501 investigators, bringing the net position cost of that adjustment to near zero.

**Recommendation 16:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should increase the percentage of GS-1811 investigators in the Special Investigations Division and the Criminal Investigations Division to include at least two GS-1811s in each investigative work unit and at least one GS-1811 supervisor in each division. (Action: DS, in coordination with DGHR)

The CFI branch in CR has three units, each led by a supervisor. Only 3 of the 20 CFI investigator positions and none of the 3 unit chief positions are designated as GS-1811s. Agents complain about the lack of continuity due to FS officer turnover and note the problems that this causes when working with assistant U.S. attorneys in prosecuting cases. The agents believe that having an experienced GS-1811 unit chief would provide needed stability and help them perform more effectively.

**Recommendation 17:** The Bureau of Diplomatic Security should designate at least one unit chief position in the Criminal Fraud Investigations branch as Civil Service. (Action: DS)

## Other Management Issues

### Special Investigations Division

#### *Violent Crimes and General Investigations Units*

When the inspection began, SID had one Violent Crimes unit and two General Investigations units. Although all SID agents received the same basic investigative training, those in the Violent Crimes unit received additional, specialized training for conducting forensic interviews (child abuse/homicide) and death investigations. Those same agents then received workloads reflecting this specialized training. Agents in the General Investigations units did not receive such opportunities and would not be prepared to address the range of investigative issues they would later encounter in assignments to embassies abroad. As a result, General Investigations unit agents felt disadvantaged and suffered from poor morale. There was also evidence of uneven distribution of cases among the three SID units, resulting in overutilization of some agents and underutilization of others. SID has since appropriately abolished the distinction between the Violent Crimes and General Investigations units. Providing training to all agents in the full range of SID specialties remains important.

**Recommendation 18:** The Bureau of Diplomatic Security should develop a training plan that provides all agents in the Special Investigations Division with training and experience in the various types of investigative skills. (Action: DS)

#### *Relationship Between the Special Investigations Division and U.S. Attorneys*

SID has useful relationships with some offices in the Department of Justice, but agents reported that routine liaison relationships are not strong with assistant U.S. attorneys, which has hampered criminal prosecution efforts. Strengthening such relationships might increase U.S. attorney acceptance of SID cases for criminal prosecution.

**Informal Recommendation 1:** The Bureau of Diplomatic Security should increase liaison efforts between Special Investigations Division supervisors and all U.S. attorney offices in the Washington, DC, region.

#### *Relationship Between the Special Investigations Division and the Bureau of Human Resources, Office of Conduct, Suitability, and Discipline*

Some personnel in the Bureau of Human Resources, Office of Conduct, Suitability, and Discipline proposed addressing the concerns discussed above about the quality of SID's ROIs via upfront training, requiring each new SID agent to attend a day or two of orientation in the Office of Conduct, Suitability, and Discipline at the beginning of an investigative assignment. In turn, SID agents raised frustrations about Office of Conduct, Suitability, and Discipline procedures and recommendations. Past quarterly meetings between the two entities have fallen by the wayside, perhaps because particular issues that require immediate attention do not appear on a quarterly schedule. Although ad hoc conversations can help address existing problems with ROIs, they are less effective at preventing problems from occurring in the first place. A better

understanding of each other's mission would alleviate frustration and facilitate better cooperation.

**Recommendation 19:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should implement an orientation program that requires each new investigator in the Special Investigations Division to attend at least one full day of consultations with adjudicators in the Office of Conduct, Suitability, and Discipline and that includes reciprocal orientation days for adjudicators with agents in the Special Investigations Division. (Action: DS, in coordination with DGHR)

### ***Poor Administrative Support***

SID has four support staff members: one investigative assistant and three investigative analysts. Nevertheless, supervisors have assigned routine administrative duties, such as oversight of vehicle usage and management of information systems, to agents, thereby distracting them from investigative work. Previous staffing shortages among the analysts and modifications of the investigative assistant's duties have caused confusion about work responsibilities. SID also has not delineated administrative and investigative support functions in position description updates. Accurate position descriptions are essential to employee performance, accountability, and morale and to the equitable distribution of work.

**Recommendation 20:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should rewrite the position descriptions of the support staff in the Special Investigations Division to include the variety of routine office management responsibilities and stop assigning noninvestigative duties to agents. (Action: DS, in coordination with DGHR)

### ***Vehicle Policy***

Inspectors received reports that some SID employees had abused the DS home-to-work policy by routinely using official vehicles for home-to-office transport. Inspectors made inquiries, and SID issued a new standard operating procedure on October 10, 2012, that provides clear guidance on proper home-to-work vehicle usage.

### **Criminal Investigations Division**

As noted previously, CR's five branches all relate to crimes involving consular activities. CFI investigates allegations of consular malfeasance and human trafficking; CIL coordinates investigative requests; OCI supports the assistant regional security officer-investigator program; CIR conducts consular fraud-related research and analysis, manages the DS evidence program, and oversees all DS database access programs; and SP targets H&L employment visa fraud.

With its focus on criminal activity involving the Department's consular functions, CR works closely with CA, the Department of Homeland Security, the Department of Justice, and other agencies. CR funding is sufficient and comes primarily from machine readable visa revenues and fees derived from H&L employment visas. Such funds reportedly are available to add visa-related positions if necessary.

CR has expanded rapidly. Last year one branch, OCI, grew from one employee and two contractors to eight employees. Another branch, CFI, is bigger than some divisions. DS has located some functions in CR to serve the entire bureau, including the property and evidence program and responsibility for the informant and monitoring programs. The size and diversity of the division make it difficult to manage and restrict the rank of subunit managers.

### ***Telework***

CR management has not clarified a telework policy for the division, although some employees telework occasionally. Employees have expressed the desire to telework, and the Department encourages this policy when feasible.

***Informal Recommendation 2:*** The Bureau of Diplomatic Security should formulate and disseminate a policy on teleworking for the Criminal Investigations Division.

### ***Criminal Fraud Investigations Branch***

CFI investigates cases of criminal fraud involving U.S. passports and visas, specifically those including allegations of employee malfeasance in consular operations that would otherwise go to SID. The visa and passport cases are typically complex fraud schemes involving both overseas and domestic criminal activities that cross jurisdictional lines. The branch also investigates cases of human trafficking, particularly those involving diplomatic A and G visa domestic servants.

The CFI branch now includes 29 positions and is bigger than several divisions in DS. The branch chief and unit chiefs are all FS-02 officers. CFI's roles are expanding to include investigations of employee malfeasance and an array of other consular frauds. CFI must work with the Office of Protocol, the Department of Homeland Security, and other law enforcement agencies around the country. Making CFI a separate division within ICI, with a concomitantly more senior chief, would help keep pace with these developments.

**Recommendation 21:** The Bureau of Diplomatic Security should split the Criminal Fraud Investigations branch responsibilities from the Criminal Investigations Division to create a new division. (Action: DS)

CFI shares the 12th floor of Department annex SA-20 with the other CID branches.

(b) (5)

CFI has active cases involving DS personnel, and on at least one occasion, DS assigned an employee under investigation to a job in another unit on the 12th floor. The current configuration jeopardizes the confidentiality of sensitive case materials and the conduct of investigations.

**Recommendation 22:** The Bureau of Diplomatic Security should restrict access to the Criminal Fraud Investigations branch workspace by reconfiguring the SA-20 12th floor space or relocating the branch. (Action: DS)

The operations assistant in CFI is responsible for coordinating and obtaining clearances for all undercover, surveillance, and monitoring operations for DS headquarters and field offices.

This is an essential function for all DS investigations. In the operations assistant's absence, an agent fills the position, but there is no formal designation or training for a backup.

***Informal Recommendation 3:*** The Bureau of Diplomatic Security should designate and train an employee to serve as regular backup for the operations assistant position in the Criminal Fraud Investigations branch.

### ***Overseas Criminal Investigations Branch***

DS established what became the assistant regional security officer-investigator program in 1996 to assign special agent investigators in consular sections with a mandate to fight international terrorism, augment consular efforts to combat visa and passport fraud, and assist international and domestic prosecutions. DS created OCI at headquarters to support the assistant regional security officer-investigator program, which has expanded rapidly from fewer than 20 positions to more than 100 in 2012 and a projected 123 by 2014. Assistant regional security officer-investigator positions are intended to be largely independent from regional security offices at posts, and agents are to spend 80 percent of their time on consular fraud-related activities. The regional security officer and consular chief at post supervise the agents jointly. The program is generally judged a success, though it has experienced growing pains.

In 2012, OCI expanded from one agent and two contractors to five agents and three Civil Service support personnel in response to the program's growth. Four desk officers now divide the world regionally to provide logistical and investigative support. The branch also periodically conducts a program review of each assistant regional security officer-investigator position. Two administrative assistants and one investigative analyst provide additional support, and the branch is hiring a new program analyst.

Rapid program expansion and lack of emphasis on overseas experience have resulted in problems. All but one of the four agents assigned as desk officers lack overseas experience, placing them at a disadvantage when conducting program reviews that require interaction with senior embassy officials. They are also ill prepared to advise assistant regional security officer-investigators, who are often junior in rank and on their first overseas assignment.

**Recommendation 23:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should assign only agents with overseas experience to be desk officers in the Overseas Criminal Investigations branch. (Action: DS, in coordination with DGHR)

The branch chief manages the overseas program, including the establishment of new assistant regional security officer-investigator positions, while also supervising the new branch without a single experienced employee. He has devoted much of his time to the overseas program and has traveled with each desk officer on at least an initial site visit. The chief has not devoted equivalent attention to management of OCI itself. The descriptions for desk officer positions in OCI are too general, and employees expressed frustration at not having clearly defined roles. The distribution of work is uneven and, at times, inequitable.

**Recommendation 24:** The Bureau of Diplomatic Security should establish an accurate position description and work requirements for each position in the Overseas Criminal Investigations branch. (Action: DS)

A key OCI function is performing program reviews of each assistant regional security officer-investigator position. DS provides a report of this review to post management and CA as well. The stated goal is to review each assistant regional security officer-investigator approximately midway through the assignment. The reviews are useful, though their frequency may need revisiting as the program matures. OCI is already too small to meet the current, ambitious program review goal. Each of the four desk officers, even if traveling alone instead of the current practice of traveling in pairs, would have to make 12 visits each year to achieve the goal. If the number of positions increases by more than 20 percent, the burden will only increase.

**Recommendation 25:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should request an additional desk officer position for the Overseas Criminal Investigations branch. (Action: DS, in coordination with DGHR)

Foreign Service national investigators working for assistant regional security officer-investigators do not have the same Consular Consolidated Database access as Foreign Service national investigators who work for fraud prevention managers in the consular section. Both positions perform essentially the same functions and need the same access, without which their effectiveness is severely limited.

**Recommendation 26:** The Bureau of Consular Affairs should grant Foreign Service national investigators working for assistant regional security officer-investigators the same Consular Consolidated Database access it grants to consular Foreign Service national investigators. (Action: CA)

### ***Criminal Intelligence and Research Branch***

CIR is a collection of very different units, all of which support the work of the other branches of CR and of DS in general. CIR provides direct case support through the Visa and Passport Analysis unit and the Financial Analysis and Forfeiture unit. The management and program analyst oversees the property and evidence management program for all of DS. The database manager controls database access, logons, and permissions to many government and private databases for all DS employees. CIR also deploys analysts to other government agencies and to CA to provide access to Department databases and help conduct investigations.

The Financial Analysis and Forfeiture unit contracts for forensic accountants in field offices and at headquarters to provide financial research and analysis to identify monies that the government can seize if the origin is visa or passport fraud. Turnover among contractors can be high, as they are not tied to the Department. To provide greater continuity, the unit is trying to convert some contract positions to Civil Service. For this approach to be successful, it is important for DS to grade these positions at a high enough level to recruit qualified accountants.

**Recommendation 27:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should complete the process of converting three positions in the Financial Analysis and Forfeiture unit to Civil Service, assigning a series and grade commensurate with the needed level of expertise. (Action: DS, in coordination with DGHR)

The Visa and Passport Analysis unit supports CR agents primarily with database research and analysis. The unit uses a wide array of government and commercial databases to research the

activities of targets and uncover relationships to other persons possibly involved in consular fraud in order to develop additional leads and prove criminal activity. The unit also produces intelligence reports on fraud trends at a broader, less case-specific level. Agents in CFI and the field most value the unit's assistance in specific cases and see less usefulness in broader fraud trend analysis. They believe the Visa and Passport Analysis unit puts too much emphasis on the latter. The branch manager understands the conflicting demands on the unit and on CIR in general and has developed a plan to reorganize the branch to include separate units for case support and criminal intelligence analysis.

**Recommendation 28:** The Bureau of Diplomatic Security should split the Visa and Passport Analysis unit of the Criminal Intelligence and Research branch into two units to better meet the need for case support. (Action: DS)

The management and program analyst position oversees the DS evidence program and provides training to all evidence custodians at headquarters and at DS field offices. The analyst also leads efforts to develop and deploy new evidence management software. To meet the demands of an expanding program, the analyst must travel more to conduct training; however, the analyst has no backup or subordinate to assist with his growing portfolio or to provide coverage during his absences.

**Recommendation 29:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should add a second analyst position in the Property and Evidence Support unit of the Criminal Intelligence and Research branch. (Action: DS, in coordination with DGHR)

At the time of the inspection, the CIR database manager position was vacant, with no formal designation of a temporary replacement. Because the database manager is responsible for providing database access to all DS employees, continuity in this position is of critical importance.

**Recommendation 30:** The Bureau of Diplomatic Security should create a backup plan to provide continuity for the Criminal Intelligence and Research branch database manager position whenever the incumbent is absent. (Action: DS)

### ***Criminal Investigative Liaison Branch***

This branch takes requests for assistance from other Federal, state, local, and foreign law enforcement agencies and determines how to assist, if appropriate. Most of the requests come to a DS online mailbox. The branch also puts DS agents in other agencies, primarily to field requests for assistance. The current positions are with the International Criminal Police Organization, the Department of Homeland Security/Immigrations and Customs Enforcement, the U.S. Marshals Service, and a new position with the Federal Bureau of Investigation. CIL agents direct the requests to DS elements as appropriate. All CIL agents are FS-2501 officers, and overseas experience is a key factor in their work. The Department of Homeland Security/Immigrations and Customs Enforcement reported satisfaction with having a DS agent colocated at the National Tracing Center-Passenger. Other agencies are similarly pleased.

CIL has an analyst located part time in CA's Passport Office to evaluate hits in the passport name check system in order to identify applicants with outstanding warrants and spot possible criminal activities. This operation is expanding, and the volume of the work could overwhelm a single analyst. Given the complex and time-sensitive nature of the work, it is essential that staffing be sufficient to avoid mistakes that could have both national security and criminal implications.

**Recommendation 31:** The Bureau of Diplomatic Security, in coordination with the Bureau of Consular Affairs, should evaluate the workload of the Criminal Investigative Liaison branch analyst position in the Passport Office and determine whether a second position is required. (Action: DS, in coordination with CA)

CIL operations provide a valuable link to other law enforcement entities and DS agents in the field. CIL provides triage to requests for assistance and directs traffic so others can deal efficiently with the requests.

CA replaced front channel telegrams with the American Citizens Services Plus application in the Consular Consolidated Database for embassies to report all arrests and deaths of American citizens abroad. CIL does not have access to this application and, as a result, no longer sees death and arrest notices. This information is valuable in identifying fugitives living abroad who have outstanding domestic warrants and in closing warrants when the subject has died. Without access to the American Citizens Services Plus application, CIL cannot monitor these events adequately and provide timely support.

**Recommendation 32:** The Bureau of Consular Affairs, in coordination with the Bureau of Diplomatic Security, should facilitate access for Criminal Investigative Liaison branch personnel to the American Citizens Services Plus application. (Action: CA, in coordination with DS)

### *Special Projects Branch*

The SP branch leads the H&L employment visas fraud investigation program. The branch has deployed 24 agents and investigative analysts to 18 field offices, where they further deploy to Department of Homeland Security/Immigrations and Customs Enforcement Document and Benefits Task Force offices. The special agent in charge at each field office directly supervises the agents and analysts, with the SP branch chief, a GS-1811 position, adding oversight from headquarters. The branch also manages the investigative unit at CA's Kentucky Consular Center, which primarily investigates H&L visa fraud. The SP branch has investigative analysts at headquarters to support agents in the field, including assistant regional security officer-investigators who are investigating H&L visa fraud.

The working relationships at each field office among the agent, the special agent in charge, and the Department of Homeland Security/Immigrations and Customs Enforcement Task Force director determine the effectiveness of the program. The special agents in charge have considerable autonomy. Some do not provide effective support to the SP branch agents assigned to the task forces or require those agents to perform too many tasks assigned directly to the field office. Some special agents in charge are not familiar with the SP branch program and provide too little oversight, contributing to time and attendance abuses. Special agents in charge write

evaluations of SP branch Document and Benefits Fraud Task Force agents and analysts, sometimes disadvantaging promotion opportunities.

**Recommendation 33:** The Bureau of Diplomatic Security should revise oversight procedures for Special Projects branch Document and Benefits Fraud Task Force agents in the field so that supervisors at headquarters rate and review the agents. (Action: DS)

The above recommendation would require the SP branch chief to rate 34 employees, which is too many for effective management. In any case, the branch chief is already overtasked, managing agents in Washington and the field, as well as a vigorous training program that is popular, successful, and expanding. Supplementing the SP branch with two mid-level GS-1811 positions would ease the current burden and provide additional continuity.

**Recommendation 34:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should create two GS-1811 mid-level supervisory positions in the Special Projects branch. (Action: DS, in coordination with DGHR)

## **Computer Investigations and Forensics Division**

### *Acknowledging Capabilities*

CIF, first established as a branch of CR in 2004, expanded to a division in 2009 with a mixture of 57 civil servants, FS-2501 agents, and private contractor personnel. Personnel numbers and logistics support are more than adequate. The training CIF provides is sufficient to keep contractor certifications current. CIF now provides a GS-1811 to each of the ICI field offices. Although CIF capabilities have expanded, its workload has not. One reason is that CIF is not located with its sister divisions in Department annex SA-20 and is therefore less visible. Expanding CIF's customer base would allow the division to take full advantage of its capabilities.

**Informal Recommendation 4:** The Bureau of Diplomatic Security should provide greater publicity within the bureau and among its regional security officers regarding Computer Investigations and Forensics Division capabilities.

(b)(5)(b)(7)(E)

**Recommendation 35:**

*Converting the Contract Lab Manager Position to a Team Leader*

CIF is not making full use of its contractors as digital forensic analysts. The CIF Digital Forensics Program has, as its chief, a GS-1811 supervisor, assisted by an internally created contract lab manager position. The two duplicative positions oversee two Digital Evidence Analysis teams along with one Video/Audio team and one Hardware/Network Support team. This contractor supervisory position is not needed, as the contractor already provides a representative to service the personnel needs of its employees. The individual occupying the contract lab manager position would be better used if CIF were to form three Digital Evidence Analysis teams instead of two, making him a team leader. Three five-person groups would better align with the Department contract for the hiring of forensic analysts.

**Recommendation 36:** The Bureau of Diplomatic Security should convert the contract lab manager position to a Digital Evidence Analysis team leader and create three Digital Evidence Analysis teams with five members each. (Action: DS)

*Integrating Administrative and Operational Components*

The administrative staff members of CIF feel that they are underappreciated. The configuration of CIF spaces, which separates the administrative and operational components, contributes to the problem. Integration of all personnel would promote mission unity.

**Informal Recommendation 5:** The Bureau of Diplomatic Security should consider integrating the administrative and operational workforces of the Computer Investigations and Forensics Division in its upcoming renovation of the 12th floor of SA-14.

The staffing configuration of CIF further promotes lack of cohesion, with the majority of contractors occupying positions in the Digital Forensics Program and full-time equivalents in CIF operations. Little professional or personal communication takes place between the two programs due to different mission requirements. At times, it appears that some CIF personnel in one program do not even recognize personnel in the other program as being in the same division. This lack of communication hinders mission effectiveness.

**Informal Recommendation 6:** The Bureau of Diplomatic Security should hold periodic meetings for all Computer Investigations and Forensics Division personnel to build unit cohesion.

**Information Technology Systems**

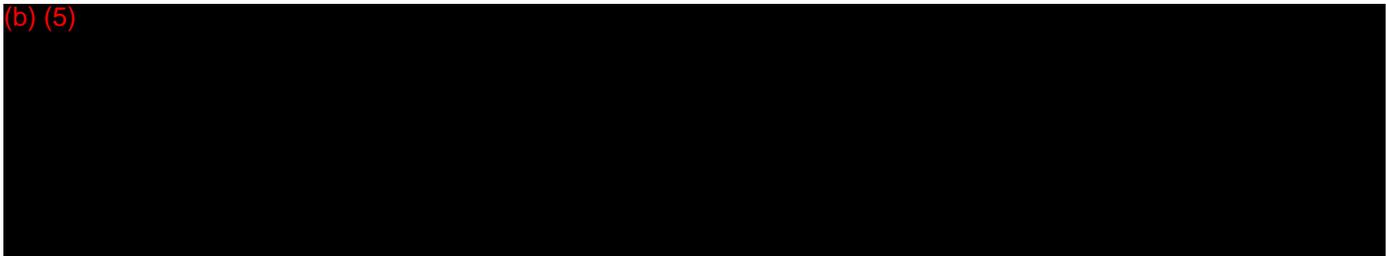
DS has developed the computerized Investigative Management System (IMS) to track and document investigative cases worldwide. Nearly all ICI offices reportedly use the

unclassified IMS, but SID has judged that the sensitivity of some of its cases and the ability of locally employed staff at embassies to access unclassified systems require that SID use the classified IMS. Unfortunately, SID agents have found the classified IMS's low bandwidth, small font size, instability, and lack of editing features unwieldy. As a result, SID has elected to use Microsoft Word templates, adapted to SID needs, for all casework even though the Word system lacks case-tracking capability. Agents use IMS only as a repository of closed case files, at the very end scanning sometimes voluminous paper files and uploading them into IMS. They sometimes do not bother to scan each document from particularly large files.

SID has brought its IMS issues to the attention of the IMS Rapid Development team responsible for the program. Software updates and adjustments thus far have focused on the unclassified IMS program with its higher customer base, but classified system upgrades are being implemented in conjunction with the unclassified IMS program. In addition, DS is introducing SharePoint sites and applications to supplement IMS. SID plans to use the SharePoint option for managing cases as soon as the Bureau of Information Resource Management authorizes storage of personally identifiable information on SID-developed InfoPath forms. The goal is one information system that allows SID agents and supervisors to manage cases day to day and track the progress of those cases over time, all in a secure environment.

**Recommendation 37:** The Bureau of Diplomatic Security should improve the performance of the classified Investigative Management System application and seek ways to adapt Microsoft Word-based template and SharePoint capabilities to better meet the information management needs of the Special Investigations Division. (Action: DS)

(b) (5)



**Recommendation 38:** (b) (5)



## List of Recommendations

**Recommendation 1:** The Office of the Deputy Secretary should restructure the investigative responsibilities currently assigned to the Special Investigations Division. The outcome should include safeguards to prevent any Department of State or Diplomatic Security official from improperly influencing the commencement, course, or outcome of any investigation. (Action: S/ES)

**Recommendation 2:** (b) (5)



**Recommendation 3:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should convert the Special Investigations Division chief position to Senior Executive Service and have that position report directly to the Bureau of Diplomatic Security Assistant Secretary. (Action: DS, in coordination with DGHR)

**Recommendation 4:** The Bureau of Diplomatic Security should revise its outdated manual of standard investigative policies and procedures to make it a comprehensive, up-to-date document with annexes applicable to particular offices, including the Special Investigations Division and the Criminal Investigations Division's Criminal Fraud Investigations branch. (Action: DS)

**Recommendation 5:** The Bureau of Diplomatic Security should include in the work requirements statements of all Special Investigations Division supervisors a requirement to conduct regular reviews of cases, including report of investigation preparation, with each investigator. (Action: DS)

**Recommendation 6:** The Bureau of Diplomatic Security, in coordination with the Bureau of Consular Affairs, should complete and sign a memorandum of understanding for the Consular Integrity Division. (Action: DS, in coordination with CA)

**Recommendation 7:** The Bureau of Diplomatic Security, in coordination with the Bureau of Consular Affairs, should establish model standard operating procedures for all posts with assistant regional security officer-investigators. (Action: DS, in coordination with CA)

**Recommendation 8:** The Bureau of Diplomatic Security, in coordination with the Bureau of Consular Affairs, should establish criteria for creating new assistant regional security officer-investigator positions and for judging whether an existing position remains important to meet program goals. (Action: DS, in coordination with CA)

**Recommendation 9:** The Bureau of Diplomatic Security should reassess the staffing and reporting chain of the investigative units at Embassies Baghdad and Kabul and make the Special Investigations Division responsible for overseeing all investigations that fall under the Special Investigations Division mandate. (Action: DS)

**Recommendation 10:** (b)(5)(b)(7)(E)



**Recommendation 11:** The Bureau of Diplomatic Security, in coordination with the Office of Legislative Affairs and the Office of the Legal Adviser, should seek congressional action that provides the bureau with administrative subpoena authority. (Action: DS, in coordination with H and L)

**Recommendation 12:** The Bureau of Diplomatic Security should commence peer reviews and conduct them on a regular schedule for the Special Investigations, Criminal Investigations, and Computer Investigations and Forensics Divisions' investigative policies, procedures, and activities. (Action: DS)

**Recommendation 13:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should incorporate investigative skill requirements, technical aptitude, and agents' work histories into criteria for making FS-2501 agent assignments to the Office of Investigations and Counterintelligence divisions' investigative offices. (Action: DS, in coordination with DGHR)

**Recommendation 14:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should establish an investigator specialized career path for FS-2501 agents (or a separate numerical designator for investigators) at least up to the rank of FS-01, incorporating systematic and progressive training and assignments. (Action: DS, in coordination with DGHR)

**Recommendation 15:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should change the normal assignment length for FS-2501 special agents in the Special Investigations, Criminal Investigations, and Computer Investigations and Forensics Divisions to 3 years, recognizing specialized skills and unusual continuity requirements as justification. (Action: DS, in coordination with DGHR)

**Recommendation 16:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should increase the percentage of GS-1811 investigators in the Special Investigations Division and the Criminal Investigations Division to include at least two GS-1811s in each investigative work unit and at least one GS-1811 supervisor in each division. (Action: DS, in coordination with DGHR)

**Recommendation 17:** The Bureau of Diplomatic Security should designate at least one unit chief position in the Criminal Fraud Investigations branch as Civil Service. (Action: DS)

**Recommendation 18:** The Bureau of Diplomatic Security should develop a training plan that provides all agents in the Special Investigations Division with training and experience in the various types of investigative skills. (Action: DS)

**Recommendation 19:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should implement an orientation program that requires each new investigator in the Special Investigations Division to attend at least one full day of consultations with adjudicators in the Office of Conduct, Suitability, and Discipline and that includes reciprocal orientation days for adjudicators with agents in the Special Investigations Division. (Action: DS, in coordination with DGHR)

**Recommendation 20:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should rewrite the position descriptions of the support staff in the Special Investigations Division to include the variety of routine office management responsibilities and stop assigning noninvestigative duties to agents. (Action: DS, in coordination with DGHR)

**Recommendation 21:** The Bureau of Diplomatic Security should split the Criminal Fraud Investigations branch responsibilities from the Criminal Investigations Division to create a new division. (Action: DS)

**Recommendation 22:** The Bureau of Diplomatic Security should restrict access to the Criminal Fraud Investigations branch workspace by reconfiguring the SA-20 12th floor space or relocating the branch. (Action: DS)

**Recommendation 23:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should assign only agents with overseas experience to be desk officers in the Overseas Criminal Investigations branch. (Action: DS, in coordination with DGHR)

**Recommendation 24:** The Bureau of Diplomatic Security should establish an accurate position description and work requirements for each position in the Overseas Criminal Investigations branch. (Action: DS)

**Recommendation 25:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should request an additional desk officer position for the Overseas Criminal Investigations branch. (Action: DS, in coordination with DGHR)

**Recommendation 26:** The Bureau of Consular Affairs should grant Foreign Service national investigators working for assistant regional security officer-investigators the same Consular Consolidated Database access it grants to consular Foreign Service national investigators. (Action: CA)

**Recommendation 27:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should complete the process of converting three positions in the Financial Analysis and Forfeiture unit to Civil Service, assigning a series and grade commensurate with the needed level of expertise. (Action: DS, in coordination with DGHR)

**Recommendation 28:** The Bureau of Diplomatic Security should split the Visa and Passport Analysis unit of the Criminal Intelligence and Research branch into two units to better meet the need for case support. (Action: DS)

**Recommendation 29:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should add a second analyst position in the Property and Evidence Support unit of the Criminal Intelligence and Research branch. (Action: DS, in coordination with DGHR)

**Recommendation 30:** The Bureau of Diplomatic Security should create a backup plan to provide continuity for the Criminal Intelligence and Research branch database manager position whenever the incumbent is absent. (Action: DS)

**Recommendation 31:** The Bureau of Diplomatic Security, in coordination with the Bureau of Consular Affairs, should evaluate the workload of the Criminal Investigative Liaison branch analyst position in the Passport Office and determine whether a second position is required. (Action: DS, in coordination with CA)

**Recommendation 32:** The Bureau of Consular Affairs, in coordination with the Bureau of Diplomatic Security, should facilitate access for Criminal Investigative Liaison branch personnel to the American Citizens Services Plus application. (Action: CA, in coordination with DS)

**Recommendation 33:** The Bureau of Diplomatic Security should revise oversight procedures for Special Projects branch Document and Benefits Fraud Task Force agents in the field so that supervisors at headquarters rate and review the agents. (Action: DS)

**Recommendation 34:** The Bureau of Diplomatic Security, in coordination with the Bureau of Human Resources, should create two GS-1811 mid-level supervisory positions in the Special Projects branch. (Action: DS, in coordination with DGHR)

**Recommendation 35:** (b)(5)(b)(7)(E)

**Recommendation 36:** The Bureau of Diplomatic Security should convert the contract lab manager position to a Digital Evidence Analysis team leader and create three Digital Evidence Analysis teams with five members each. (Action: DS)

**Recommendation 37:** The Bureau of Diplomatic Security should improve the performance of the classified Investigative Management System application and seek ways to adapt Microsoft Word-based template and SharePoint capabilities to better meet the information management needs of the Special Investigations Division. (Action: DS)

**Recommendation 38:** (b) (5)

## List of Informal Recommendations

Informal recommendations cover operational matters not requiring action by organizations outside the inspected unit and/or the parent regional bureau. Informal recommendations will not be subject to the OIG compliance process. However, any subsequent OIG inspection or on-site compliance review will assess the mission's progress in implementing the informal recommendations.

***Informal Recommendation 1:*** The Bureau of Diplomatic Security should increase liaison efforts between Special Investigations Division supervisors and all U.S. attorney offices in the Washington, DC, region.

***Informal Recommendation 2:*** The Bureau of Diplomatic Security should formulate and disseminate a policy on teleworking for the Criminal Investigations Division.

***Informal Recommendation 3:*** The Bureau of Diplomatic Security should designate and train an employee to serve as regular backup for the operations assistant position in the Criminal Fraud Investigations branch.

***Informal Recommendation 4:*** The Bureau of Diplomatic Security should provide greater publicity within the bureau and among its regional security officers regarding Computer Investigations and Forensics Division capabilities.

***Informal Recommendation 5:*** The Bureau of Diplomatic Security should consider integrating the administrative and operational workforces of the Computer Investigations and Forensics Division in its upcoming renovation of the 12th floor of SA-14.

***Informal Recommendation 6:*** The Bureau of Diplomatic Security should hold periodic meetings for all Computer Investigations and Forensics Division personnel to build unit cohesion.

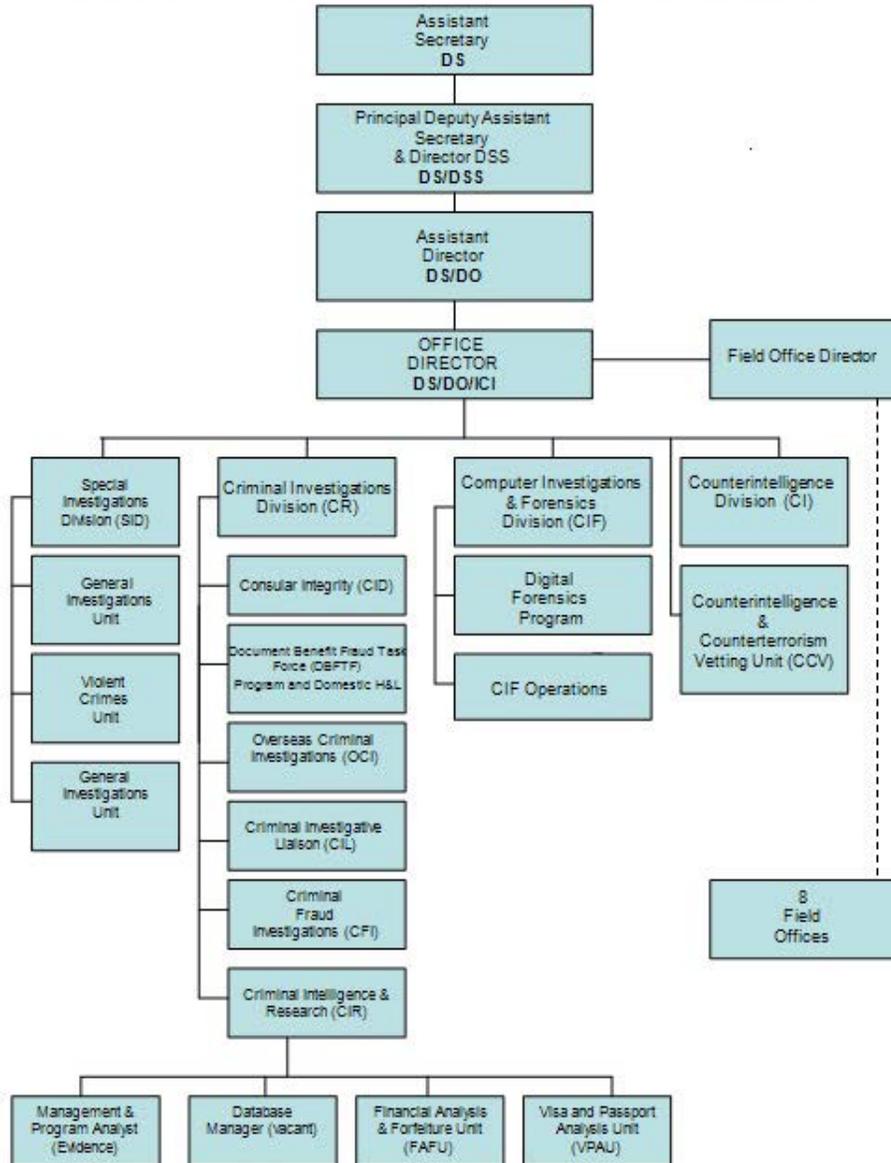
## Principal Officials

	<b>Name</b>	<b>Arrival Date</b>
Assistant Secretary, DS	Eric Boswell	07/08
Principal Deputy Assistant Secretary and Director, Diplomatic Security Service	Scott P. Bultrowicz	11/11
Assistant Director, DS/Domestic Operations	Barry M. Moore	07/10
Director, DS/ICI	Kimber E. Davidson	08/12
Division Chiefs		
Special Investigations Division	Paul Houston	08/12
Criminal Investigations Division	David C. Zebley	09/12
Computer Investigations and Forensics Division	David Trosch	06/05

## Abbreviations

CA	Bureau of Consular Affairs
CFI	Criminal Fraud Investigations branch
CID	Consular Integrity Division
CIF	Computer Investigations and Forensics division
CIL	Criminal Investigative Liaison branch
CIR	Criminal Intelligence and Research branch
CR	Criminal Investigations division
Department	U.S. Department of State
DS	Bureau of Diplomatic Security
FS	Foreign Service
GS	General Schedule
H&L	Temporary workers and trainees visa and intracompany transferee visa
ICI	Office of Investigations and Counterintelligence
IMS	Investigative Management System
OCI	Overseas Criminal Investigations branch
ROI	Report of investigation
SID	Special Investigations Division
SP	Special Projects branch

## Appendix: Reporting Chain of Command for the Bureau of Diplomatic Security, Directorate of Domestic Operations, Office of Investigations and Counterintelligence



*In the above chart, the DS Assistant Secretary oversees the Principal Deputy Assistant Secretary and Director (DS/DSS), the Assistant Director (DS/DO), and the Office Director (DS/DO/ICI). The Office Director oversees the Field Office Director, which includes eight field offices, and four divisions. The Special Investigations Division (SID) includes two General Investigations Units and the Violent Crimes Unit. The Criminal Investigations Division (CR) includes Consular Integrity (CID), Document Benefit Fraud Task Force (DBFTF) and Program and Domestic H&L, Overseas Criminal Investigations (OCI), Criminal Investigative Liaison (CIL), Criminal Fraud Investigations (CFI), and Criminal Intelligence and Research (CIR). Criminal Intelligence and Research (CIR) oversees the Management and Program Analyst (Evidence), the Database Manager (now vacant), the Financial Analysis and Forfeiture Unit (FAFU), and the Visa and Passport Analysis Unit (VPAU). The Computer Investigations and Forensics Division (CIF) includes the Digital and Forensics Program and CIF Operations. The Counterintelligence Division (CI) includes the Counterintelligence and Counterterrorism Vetting Unit (CCV).*



**FRAUD, WASTE, ABUSE,  
OR MISMANAGEMENT  
OF FEDERAL PROGRAMS  
HURTS EVERYONE.**

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