Audit of Department of State Compliance With Physical and Procedural Security Standards at Selected High Threat Level Posts
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.

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Deputy Inspector General
Acronyms

AF  Bureau of African Affairs
CAC  compound access control
DS  Bureau of Diplomatic Security
FAH  *Foreign Affairs Handbook*
FAM  *Foreign Affairs Manual*
FE/BR  forced-entry and ballistic-resistant
GAO  Government Accountability Office
NCC  New Consulate Compound
NEC  New Embassy Compound
NSDD-38  National Security Decision Directive 38
OBO  Bureau of Overseas Buildings Operations
OIG  Office of Inspector General
OSPB  Overseas Security Policy Board
RSO  Regional Security Officer
USAID  United States Agency for International Development
# Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Summary</td>
<td>1</td>
</tr>
<tr>
<td>Background</td>
<td>4</td>
</tr>
<tr>
<td>Objective</td>
<td>9</td>
</tr>
<tr>
<td>Audit Results</td>
<td>10</td>
</tr>
<tr>
<td>Finding A. Common Security Deficiencies Were Found at Selected Posts.</td>
<td>10</td>
</tr>
<tr>
<td>Finding B. Increased Personnel Levels Presented Security Challenges</td>
<td>30</td>
</tr>
<tr>
<td>List of Recommendations</td>
<td>36</td>
</tr>
<tr>
<td>Appendices</td>
<td></td>
</tr>
<tr>
<td>A. Scope and Methodology</td>
<td>39</td>
</tr>
<tr>
<td>B. Physical Security Criteria</td>
<td>43</td>
</tr>
<tr>
<td>C. Outline for Action Reports</td>
<td>52</td>
</tr>
<tr>
<td>D. Statues of Recommendations for Outline for Action Reports</td>
<td>97</td>
</tr>
<tr>
<td>E. Bureau of Diplomatic Security Comments to the Draft Report</td>
<td>102</td>
</tr>
<tr>
<td>F. Bureau of Overseas Buildings Operations Comments to the Draft Report</td>
<td>110</td>
</tr>
<tr>
<td>G. [Redacted] (b) (5), [Redacted] (b) (7)(F) Comments to the Draft Report</td>
<td>118</td>
</tr>
<tr>
<td>Major Contributors to This Report</td>
<td>119</td>
</tr>
</tbody>
</table>
(U) Executive Summary

(U) On August 7, 1998, the U.S. embassies in Nairobi, Kenya, and in Dar es Salaam, Tanzania, were attacked, and 12 Americans and 40 Kenyan and Tanzanian employees of the U.S. Foreign Service were killed. The Department of State (Department) Accountability Review Boards that were convened by the Secretary of State (Secretary) to examine the circumstances surrounding the attacks found that the U.S. Government had devoted inadequate resources to security at U.S. diplomatic facilities and had placed too low a priority on security concerns. As a result, the Department implemented a program to replace deficient buildings with new, safe, secure, and functional facilities. However, the conditions confronting U.S. Government personnel abroad are still fraught with security risks, as evidenced by the September 2012 attacks on two compounds in Benghazi, Libya, that killed four Americans, including the American Ambassador.

(U) The Office of Inspector General (OIG) conducted this audit to determine to what extent selected New Embassy Compounds (NEC) and New Consulate Compounds (NCC) at overseas posts that have high threat levels complied with current physical security standards and whether post management officials used available authorities to effectively implement the post security program.

(SBU) OIG conducted physical security compliance reviews to determine to what extent the selected [Redacted] (b) (5), [Redacted] (b) (7)(F) complied with current physical security standards. (The scope and methodology used for this audit are shown in Appendix A, and physical security standards used to conduct the compliance reviews are shown in Appendix B.) OIG provided the ambassadors and the consul general at the selected posts with a post-specific “Outline for Action” report detailing selected deficiencies found during the physical security compliance reviews.1 The ambassadors and the consul general at the posts promptly took action to address or mitigate many of the deficiencies reported. Of 38 recommendations that OIG made, 28 have been closed and 10 remain open.2 For the majority of recommendations that remain open, posts responded that plans are underway to remedy the deficiencies. These reports, including the posts’ responses, are included in Appendix C.

(SBU) OIG found that selected posts were not always in compliance with current physical security standards and that common physical and procedural security deficiencies occurred among the posts reviewed.3 [Redacted] (b) (5), [Redacted] (b) (7)(F)

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1 (U) In the “Outline for Action” reports, OIG reported deficiencies that the posts could or should address in a timely manner.
2 (SBU) The “Outline for Action” reports in Appendix C note the statuses of recommendations at the time that the report was sent to the chief of mission. Several posts have closed recommendations since the reports were issued.
3 (U) OIG defined common deficiencies as deficiencies found at two or more of the five posts reviewed.
Physical security deficiencies occurred for a variety of reasons, ranging from changes in physical security standards to design, construction, and maintenance issues, that, if exploited, could compromise the safety of post personnel and property.

(SBU) OIG also found that the Chiefs of Mission used their National Security Decision Directive 38 (NSDD-38) authority to increase post personnel levels in alignment with their mission strategic plans.5

(SBU) Department guidance states that NSDD-38 decisions should be part of a mission’s efforts to tie resources to the priorities outlined in the mission strategic plan.6

4 (U) As defined in the Foreign Affairs Handbook, 12 FAH-5, a hardline is “a system of barriers surrounding a protected area which affords degrees of forced entry, ballistic resistant, or blast protection, or combinations of these three.”

5 (U) Each U.S. mission is under the direction of a chief of mission, who is an ambassador or chargé d’affaires. The chief of mission’s authority encompasses not only the personnel of the Department but also personnel of other U.S. executive branch agencies (excluding those personnel under the command of a U.S. area military commander) that have programs or activities in the country.

6 (U) Department of State “Action Request and Guidance for Chief of Mission NSDD-38 Requests.”
In this report, OIG made 24 recommendations addressed to DS, OBO, and the Office of Management Policy, Rightsizing and Innovation, which were intended to improve the physical security posture of posts worldwide respective to each post’s threat level. DS, in its response (see Appendix E) to its 14 recommendations, concurred with three recommendations but did not concur with 11 of the recommendations. DS stated that the primary reason it did not concur with the recommendations was because it did not believe that OIG’s random, non-statistical sampling of posts provided “sufficient justification for action by RSOs worldwide.” Based on the response, OIG considers three recommendations resolved, pending further action, and 11 recommendations unresolved because no action has been taken to implement them. The unresolved recommendations can be closed when OIG reviews and accepts documentation showing that DS has directed RSOs worldwide to assess and correct identified physical and procedural security deficiencies presented in this report.

DS also provided additional comments not directly relating to the recommendations pertaining to OIG’s audit findings and sampling methodology. These comments, along with OIG’s responses, are synopsized at the end of Finding A.

OBO, in its response (see Appendix F) to its eight recommendations, concurred with seven recommendations but did not concur with one recommendation (No. 12), stating that action for that recommendation should be redirected to DS. OIG considers four recommendations closed; three recommendations resolved, pending further action; and one recommendation (No. 12) unresolved. OIG maintains that OBO is the lead action bureau for this recommendation primarily because OBO is the primary point of contact for post requests concerning maintenance. This recommendation can be closed when OIG reviews and accepts documentation showing that OBO has provided specific guidance to overseas posts.

, in its response (see Appendix G), stated that it “clears in draft” OIG’s report except for Recommendation 23, the one recommendation addressed to it. suggested that the Office of Management Policy, Rightsizing and Innovation be the action office for this recommendation. OIG considers Recommendation 23 unresolved. OIG maintains that the lead action bureau for this recommendation is , and the unresolved recommendation can be closed when implements a policy that instructs posts on how to manage the personnel levels required to meet mandated programs without compromising the security of post personnel.
(U) As of June 3, 2013, the Office of Management Policy, Rightsizing and Innovation had not responded to the draft report. Therefore, Recommendation 24 is unresolved. The unresolved recommendation can be closed when OIG reviews and accepts documentation showing the Office of Management Policy, Rightsizing and Innovation has advised post management officials to provide tenant agencies with post-specific guidance on the NSDD-38 process.

(U) The bureaus’ comments have been considered and incorporated into the report as appropriate, and the bureaus’ responses to the recommendations and OIG’s replies are presented after each recommendation.

(U) Background

(U) The Accountability Review Boards that were convened following the 1998 attacks on the U.S. embassies in Nairobi, Kenya, and in Dar es Salaam, Tanzania, concluded that the U.S. Government had devoted inadequate resources to security against terrorist attacks at U.S. diplomatic facilities and placed too low of a priority on security concerns. Specifically, Public Law 106-113, Appendix G, states, “The result has been a failure to take adequate steps to prevent tragedies such as the bombings in Kenya and Tanzania.”

Since 1998, the Department implemented a program to replace deficient buildings with new, safe, secure, and functional facilities. NECs and NCCs are Department projects “to design, construct, and move a US mission from [its] current facility into a newly constructed facility.” Since 2000, the Department has constructed 72 NECs and NCCs, and as of June 2013, the Department was overseeing 16 NEC and NCC construction projects worldwide.

(U) The presence of U.S. Government personnel abroad is important to ensure that our nation’s interests are represented. However, the conditions confronting U.S. Government personnel and missions abroad are still fraught with security concerns. Since the 1998 attacks against the U.S. Embassies in Kenya and Tanzania, there have been approximately 40 attacks aimed at U.S. embassies, consulates, or personnel. This number includes the 2002 assassination of a United States Agency for International Development (USAID) director in Amman, Jordan, by al-Qaida; the 2004 raid of Consulate General Jeddah (Saudi Arabia); and the 2012 attack on the U.S. diplomatic post in Benghazi, Libya. Thus, it is imperative for U.S. diplomatic facilities overseas to be as physically secure as possible to protect against further tragedies.

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(U) Legislation and Policies

(U) Secure Embassy Construction and Counterterrorism Act

(U) As a result of the 1998 embassy attacks and the subsequent findings of the related Accountability Review Boards, Congress passed the Secure Embassy Construction and Counterterrorism Act of 1999. This Act set forth two physical security standards for U.S. diplomatic facilities. The Act\textsuperscript{10} states that in selecting a site for any new U.S. diplomatic facility abroad, “the Secretary shall ensure that all United States Government personnel at the post (except those under the command of an area military commander) will be located on the site.” The Act further states, “Each newly acquired United States diplomatic facility shall be sited not less than 100 feet from the perimeter of the property on which the facility is to be situated.”

(U) Overseas Security Policy Board

(SBU) The Overseas Security Policy Board (OSPB) is a subgroup of the National Security Council. The OSPB is chaired by the Assistant Secretary of State for Diplomatic Security, and the Board’s membership consists of representatives from entities across the Federal Government, including USAID, the Defense Intelligence Agency, the Department of Justice, the National Security Agency, and the Peace Corps. The OSPB considers, develops, coordinates, and promotes policies, standards, and agreements on overseas security operations, programs, and projects that affect all U.S. Government agencies under the authority of a chief of mission.

(SBU) The OSPB establishes physical security standards for overseas posts. Some standards correspond to the Security Environment Threat List, which DS produces annually. The Security Environment Threat List categorizes threats, such as terrorism, political violence, and crime, into four levels, depending on their impacts on American officials: critical (grave), high, medium, and low (minor).\textsuperscript{11} There are also OSPB standards that are not threat level specific and that apply to all posts. Examples of physical security standards are shown in Figure 1.

\textsuperscript{10} (U) Ibid.
\textsuperscript{11} (U) A post’s threat level is determined by the post in coordination with DS, the Department, and other Government agencies. The latest Security Environment Threat List was issued in January 2013.
(U) The Department implements physical security standards through the Foreign Affairs Manual. The FAM assigns DS the responsibility to ensure that all new construction and major renovation design plans for buildings occupied by U.S. Government personnel comply with physical security standards. The FAM assigns OBO the responsibility for implementing physical security standards into the Department’s building projects.

(SBU) The Department also incorporates physical security standards into the Foreign Affairs Handbook through the Physical Security Handbook (12 FAH 5) and the OSPB Security Standards and Policy Handbook (12 FAH 6), both of which provide detailed guidance regarding the general policies on physical security standards established in the FAM. The Physical Security Handbook outlines the Department’s security concept, which uses tiers of increasing defense to provide early detection of potential danger, to deter and delay hostile action, and to allow time for local security forces to respond. Security standards for each of the defense tiers are based upon the threat levels for “political violence,” which include “Terrorism, War, and Civil Disturbance.”

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16 (U) 12 FAM 300, “Physical Security Programs.”
17 (U) 12 FAM 312.b, “Program Management Responsibilities.”
18 (U) 12 FAM 312.c, “Program Management Responsibilities.”
19 (SBU) Although this FAH section includes terrorism under “political violence,” specific physical security standards are indexed only to the political violence threat level as established in the Security Environment Threat List. When conducting physical security compliance reviews at post, OIG applied the higher of the political violence or terrorism threat levels. For example, although some selected posts had a medium political violence threat level, OIG used the physical security standards for a high political violence threat post because the selected posts had a high terrorism threat level. DS and OBO have recommended revisions to the FAH that will provide for using the higher threat level of the two categories when applying physical security standards.
DS is the Department’s security arm. DS is responsible for providing a safe and secure environment for the conduct of U.S. foreign policy. Every diplomatic mission in the world operates under a security program designed and maintained by DS.

Office of Intelligence and Threat Analysis. The DS Office of Intelligence and Threat Analysis is responsible for producing the Security Environment Threat List and for assigning threat levels to posts that fall into the terrorism and political violence categories. In the terrorism category, a post’s threat level is based on potential threat from a group with the capability to recruit, plan, finance, and/or execute a local attack. In the political violence category, a post’s threat level is based on potential threat from civil disorder, coups d’état, and inter- or intra-state conflicts, to include feuds between significant gangs and/or clans.

Office of Physical Security Programs. The DS Office of Physical Security Programs directs the development of OSPB security standards and Department policies and procedures associated with physical security at U.S. missions. The Office is responsible for overseeing the implementation of these programs abroad to ensure compliance with OSPB security standards. Responsibilities of the Office’s Physical Security Division include the following: (1) overseeing new construction and major renovation projects abroad and (2) ensuring conformance with OSPB-approved security standards.

The Certification, Accreditation, and Transit Security Branch is responsible for approving construction security plans and certifying projects to Congress or the Department. The branch’s certification and accreditation teams are responsible for performing onsite physical security inspections. The teams document their inspections, which note physical security construction deficiencies or discrepancies relating to the project and provide corrective recommendations.

The New Office Building Branch provides physical security oversight of OBO project design and development for new office building initiatives. In concert with the Certification, Accreditation, and Transit Security Branch, the New Office Building Branch is responsible for ensuring new office building and major renovation designs meet mandated
Among other security responsibilities, the Project Coordination Branch conducts risk assessments of overseas facilities to rank their risk based on factors such as their threat level for terrorism and political violence, the host government’s counterterrorism capability, and the percentage of desk positions not collocated. This ranked data is used to help prioritize new construction and major physical security upgrades.

(SBU) Office of the Regional Directors. The Office of the Regional Directors oversees the work of over 700 RSOs at over 250 posts worldwide. The RSO serves as the personal advisor to the chief of mission on all security issues and coordinates all aspects of a mission’s security program. RSOs develop and implement security programs to protect Department employees from attacks.

(U) Bureau of Overseas Buildings Operations

(U) OBO’s mission is to provide secure, safe, functional, and well-maintained facilities for the conduct of U.S. diplomacy and the promotion of U.S. interests worldwide. OBO directs the Department’s worldwide overseas building program. In concert with other Department bureaus, U.S. Government agencies, and Congress, OBO sets worldwide priorities for the design, construction, acquisition, maintenance, use, and sale of real properties.

(SBU) Office of Security Management. OBO’s Office of Security Management is responsible for overseeing and implementing security plans for constructing and renovating U.S. diplomatic facilities. The Office’s mission is to ensure that all appropriate physical, technical, and procedural security standards are incorporated into every OBO project design for diplomatic facilities and to manage construction security programs that prevent physical and technical penetration and safeguard against mob violence and terrorist attacks. The Office is the primary OBO liaison with DS and works with DS during certification and accreditation inspections. The Office’s Security Operations Division has overall responsibility for the oversight and funding of compound security programs and FE/BR maintenance and repair.

(U) The Program Security Operations Branch controls the funding for physical security upgrades of existing facilities, which include NECs and NCCs after the warranty period ends. There are two categories of physical security upgrades: major and minor. Major upgrades are large-scale multi-million dollar projects for posts that will not receive an NEC in the near future. These projects are generally prioritized using DS’s risk rankings and are managed by an OBO Project Director. Minor upgrades are quick projects that are not very complex, such as installing planters, bollards, window grills, or mantraps. OBO sets aside between $2 million and
$3 million annually for minor upgrades, which, according to OBO, has been an amount sufficient to meet posts’ needs in the past. Minor upgrades are managed by post personnel, and OBO provides the post with design expertise.

(U) National Security Decision Directive 38

(U) NSDD-38, signed by President Reagan on June 2, 1982, gives the chief of mission at each Department mission control of the size, composition, and mandate of overseas full-time mission staffing for all U.S. Government agencies. Chief of mission approval is required before any U.S. Government agency can make personnel changes at a post. The NSDD-38 process applies to direct-hire, full-time permanent positions staffed by U.S. citizens and foreign nationals. An NSDD-38 decision should be part of the mission’s efforts to tie resources to the priorities outlined in the mission strategic plan. The Department’s Under Secretary of State for Management has the lead in managing requests by U.S. Government agencies for additions, deletions, and changes to their staffing overseas.

(U) RSOs have the responsibility under NSDD-38 to advise the chief of mission about the impact of personnel increases on the post security program, both short term and long term. Specifically, RSOs evaluate the impact of additional personnel on the regional security program and determine whether existing resources would sustain additional personnel given the threat environment.

(U) Objective

(U) The objective of this audit was to determine to what extent selected NECs and NCCs at overseas posts that have high threat levels complied with current physical security standards and whether management officials at these posts used available authorities to effectively implement the post security program.

21 (U) The Capital Security Construction Program provides funding for the replacement of facilities at vulnerable posts.
(U) Audit Results

(U) Finding A. Common Security Deficiencies Were Found at Selected Posts

(SBU) OIG conducted physical security compliance reviews at five selected posts that had NECs or NCCs. OIG found that the posts were not always in compliance with current physical security standards and that common physical and procedural security deficiencies23 existed at the posts. These physical security deficiencies occurred for reasons ranging from changes in physical security standards to design, construction, and maintenance issues that, if exploited, could compromise the safety of post personnel and property.

(U) OIG provided the ambassadors and the consul general at the posts with a post-specific Outline for Action report detailing selected deficiencies found during the physical security compliance reviews.24 The ambassadors and the consul general at the posts promptly took action to address or mitigate many of the deficiencies reported. Of 38 recommendations that OIG made, 25 had been closed and 13 remained open awaiting resolution. For the majority of recommendations that remained open, posts responded that plans were underway to remedy the deficiencies. These reports, including the posts’ responses, are included in Appendix C.

23 (U) OIG defined common deficiencies as deficiencies found in two or more of the five posts reviewed.
24 (U) In the “Outline for Action” reports, OIG reported deficiencies that the posts could or should address in a timely manner.

(U) In its May 8, 2013, response (Appendix E) to the draft report, DS provided comments that were not directly related to the recommendations. As appropriate, OIG incorporated those technical comments into the report. DS’s principal comments and OIG’s replies are as presented.

(U) Identified Physical Security Deficiencies

(SBU) DS provided comments on the report’s findings and discussed the physical security deficiencies OIG had identified during its audit of five overseas posts. DS acknowledged the deficiencies identified in the report and noted “the prompt and proper attention from [RSOs] to correct identified issues.” DS also noted, however, that some deficiencies were “minor” and had “a minimal impact on posts’ overall security posture.”

(U) OIG Response

(SBU) OIG acknowledges the prompt response from post officials to improve posts’ physical security posture by addressing the recommendations OIG presented in the Outline for Action reports. However, it is important to recognize that the common deficiencies presented in this report were found at New Embassy Compounds (NEC) and a New Consulate Compound (NCC). The type and extent of physical and procedural security deficiencies identified at these posts are significant because these posts were completed after the Department had implemented a program to replace deficient buildings with new, safe, secure, and functional facilities following the 1998 attacks on the U.S. embassies in Nairobi, Kenya, and Dar es Salaam, Tanzania. Moreover, physical and procedural security standards are required for the purpose of providing a safe and secure environment in which post personnel can work. OIG used the criteria established by the Department to assess compliance with physical and procedural security standards. OIG submits that although DS may consider some of the deficiencies identified in this audit report to be minor, these deficiencies do impact the overall security posture because they fail to meet the very standards established by the Department.

(U) No Need for Worldwide Action

(SBU) DS stated that it did not believe that OIG’s random, non-statistical sampling of posts provided “sufficient justification for action by RSOs worldwide.” DS further stated that RSOs “perform a large number of priority security functions” and that, as such, was “reluctant to task them further . . . to conduct reviews that are otherwise done” routinely through physical security surveys, post security program reviews, program management reviews, and OIG inspections. DS also noted that none of the audit’s findings “came as a surprise” to RSOs or to post management at the posts audited and that RSOs routinely take corrective action to address procedural security lapses and to report critical physical security deficiencies.
(U) OIG Response

(SBU) In the selection of the posts reviewed for this audit, OIG used a judgmentally selected sample to assess compliance with physical security standards at NECs and NCCs considered high threat posts according to the political violence and/or terrorism categories in the Security Environment Threat List. Moreover, the sample comprised posts that spanned three regional bureaus. OIG submits that the sample selection based on threat levels and location of the posts was appropriate and helpful in informing the Department about the type and degree of common deficiencies that merited additional scrutiny at posts worldwide according to their respective threat level.

(SBU) The Government Auditing Standards stipulates that both a statistical or judgment sample yield sufficient and appropriate audit evidence. A statistical sample is generally preferable, although it may not always be practicable. By definition, a statistical sample requires that each sampling unit in the population be selected via a random process and have a known, non-zero chance of selection. These requirements often pose a problem when conducting audits of the Department. When performing work overseas, for example, all posts, irrespective of size, must have a chance to be randomly selected. Therefore, the exclusion of one or more small posts, for example, Luxembourg, cannot be allowed. All posts—large and small—must have a chance to be randomly selected, and that chance must not be zero. However, a Department auditee would undoubtedly deem Luxembourg or many other small posts too atypical in most instances to merit inclusion in an OIG sample of posts.

(SBU) Consequently, OIG must often employ another type of sample permitted by Government Auditing Standards—namely, a non-statistical sample known as a judgment sample. A judgment sample is a sample selected by using discretionary criteria rather than criteria based on the laws of probability. As it did for this audit, OIG routinely takes great care in determining the criteria to use for sampling posts and other population sampling units.

(SBU) Although it is possible that the physical security deficiencies identified in this report may not be as prevalent or may not exist at all the posts that OIG did not audit, it would not be prudent to automatically presume that these conditions are nonexistent at other posts. Such a supposition would be especially ill-advised for an issue as important as the security of Department personnel. Moreover, OIG visited some posts that had incorporated some of the newest physical security measures but found that physical and procedural security deficiencies still persisted. In addition, in the latest inspections reports for the selected posts, the Office of Inspections found similar deficiencies. Therefore, OIG concluded, and maintains, that DS should take appropriate actions to resolve and close the recommendations offered in this report.
List of Recommendations

(SBU) Recommendation 1.

(SBU) Recommendation 2.

(SBU) Recommendation 3.

(SBU) Recommendation 4.

(SBU) Recommendation 5.

(SBU) Recommendation 6.

(SBU) Recommendation 7.

(SBU) Recommendation 8.

(SBU) Recommendation 9.
(SBU) Recommendation 19. [Redacted] (b) (5), [Redacted] (b) (7)(F)

(SBU) Recommendation 20. [Redacted] (b) (5), [Redacted] (b) (7)(F)

(SBU) Recommendation 21. [Redacted] (b) (5), [Redacted] (b) (7)(F)

(SBU) Recommendation 22. [Redacted] (b) (5), [Redacted] (b) (7)(F)

(SBU) Recommendation 23. [Redacted] (b) (5), [Redacted] (b) (7)(F)

(U) Recommendation 24. [Redacted] (b) (5), [Redacted] (b) (7)(F)
The Department of State (Department), Office of Inspector General (OIG), Office of Audits, conducted this performance audit to determine to what extent selected New Embassy Compounds (NEC) and New Consulate Compounds (NCC) at overseas posts that have high threat levels complied with current physical security standards and whether management officials at these posts used available authorities, such as the National Security Decision Directive 38, to effectively implement the post security program.

In the Washington, DC, metropolitan area, OIG interviewed officials from the Bureaus of Diplomatic Security, Overseas Buildings Operations, and from the Office of Management Policy, Rightsizing and Innovation. At the selected posts, OIG interviewed officials who included the Deputy Chief of Mission, the Regional Security Officer, the Management Officer, the Human Resources Officer, the Financial Management Officer, the Facilities Manager, the Security Engineering Officer, and tenant agency representatives.

OIG conducted fieldwork for this audit from April to October 2012 in the Washington, DC, metropolitan area and at four NECs and one NCC at overseas posts that had high terrorism and/or political violence threat levels. OIG developed a sampling methodology to select the five overseas posts. (The Detailed Sampling Methodology section of this appendix provides additional details.)

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


In the Washington, DC, metropolitan area, OIG interviewed officials from the Bureaus of Diplomatic Security, Overseas Buildings Operations, and from the Office of Management Policy, Rightsizing and Innovation. At the selected posts, OIG interviewed officials who included the Deputy Chief of Mission, the Regional Security Officer, the Management Officer, the Human Resources Officer, the Financial Management Officer, the Facilities Manager, the Security Engineering Officer, and tenant agency representatives.

OIG conducted physical security compliance reviews at the five selected posts to determine compliance with current physical security standards. The compliance review instrument included criteria contained in the Secure Embassy Construction and Counterterrorism Act of 1999, the Foreign Affairs Manual, the Foreign Affairs Handbook, the Bureau of Overseas Buildings Operations Codes, and internal guidance memoranda. Upon identifying physical security deficiencies at the selected posts, OIG determined the immediate causes for the
deficiencies and what effect, if any, the discrepancies had at post. OIG used the results from the physical security compliance reviews to identify common deficiencies. Furthermore, OIG obtained access to the Web-based application that manages National Security Decision Directive 38 applications to determine how many requests were submitted for FYs 2009, 2010, and 2011.

(U) Prior Reports

(SBU) From 2007 to 2011, ISP assessed, for the five posts selected for this audit, physical and procedural security, ISP issued 68 recommendations to address physical security weaknesses identified. As of February 2013, all but one of the physical security-related recommendations had been implemented and closed.

(U) The Government Accountability Office (GAO) reported in January 2008 that the Department had enhanced security at overseas facilities but that site conditions prevented full adherence to physical security standards. For example, most of the posts GAO visited were located in dense urban areas, which prevented the posts from achieving the required 100-foot standoff from the perimeter. In other cases, buildings were not structurally capable of handling heavy forced-entry/blast-resistant windows, and host nations or cities would not allow certain upgrades to be implemented, such as removing trees to create a clear zone around the embassy or changing the facade of historic buildings. GAO also found that the Department had used a threat- and vulnerability-based planning process to prioritize security projects. However, this process only accounted for the needs of the main compound and did not factor in security for off-compound facilities. GAO found that many of these off-compound facilities lacked required physical security measures. GAO did not make any recommendations regarding physical security in its January 2008 report.

(U) In a July 2010 report, GAO found that over half of 44 NECs reviewed did not fully meet space needs because personnel levels had exceeded the originally built office space. Post management officials had dealt with space limitations by converting spaces such as conference rooms into offices, but four posts that GAO reviewed—Abuja, Nigeria; Beijing, China; Kathmandu, Nepal; and Berlin, Germany—retained off-compound space “for staff [who] could not fit in the NECs.” Department officials stated that it was difficult to predict changing foreign policy priorities that could affect personnel levels and that the process for planning NECs had been unable to fully account for these changes. GAO found that the Department had taken some actions to improve NEC sizing but that the Department did not have sufficient flexibility in its staffing projection and design processes to better address sizing challenges. GAO did not make any recommendations regarding physical security in its July 2010 report.

(U) Work Related to Internal Controls

(U) OIG performed steps to assess the adequacy of internal controls related to the areas audited. For example, OIG verified with post officials whether the NECs and NCC at overseas posts had taken corrective steps to ensure prompt audit resolution of findings from audits and other reviews. In addition, OIG asked post officials about any control deficiencies they had identified. Work performed on internal controls during the audit is detailed in the Audit Results section of the report.

(U) Detailed Sampling Methodology

(U) OIG selected, for site visits and review, four NECs and one NCC at overseas posts that had high terrorism and/or political violence threat levels. OIG used a non-statistical sampling method known as judgment sampling. Because this method uses discretionary criteria to effect sample selection, OIG was able to use information garnered during its preliminary work to aid in making informed selections.

(U) A prime consideration in selecting the five sites, which are highlighted in Table 1, was the date on which each NEC or NCC was constructed. OIG also considered the political importance of the country to the United States. The geographical distribution of the posts was another factor—OIG selected a maximum of two posts from three regions. The criteria for selection of posts also included logistical considerations.
(U) The criteria used while conducting the physical security compliance review at the selected New Embassy Compounds and the New Consulate Compound are described in Table 1.
Outline for Action Reports

Dear Mr. Ambassador:

Enclosed for your review and action is a copy of the final report Outline for Action: Physical Security Concerns at [Redacted]. This report is part of an overall audit of Department of State compliance with physical security standards and measures taken to address threat levels at selected overseas posts.

Based on your response to the report, the Office of Inspector General (OIG) considers seven recommendations (Nos. 2, 3, 5–7, 9, and 10) closed and three recommendations (Nos. 1, 4, and 8) resolved, pending further action. Actions taken or planned are subject to followup and reporting in accordance with the enclosed compliance response information.

OIG incorporated your comments as appropriate within the body of the report and included them in their entirety as Appendix A. This report will be included as an appendix in the final report on selected overseas posts’ compliance with physical security standards.

OIG appreciates the cooperation and assistance provided by embassy staff during this audit. If you have any questions, please contact Evelyn R. Klemstine, Assistant Inspector General for Audits, at (202) 663-1300 or by e-mail at Evelyn.Klemstine@state.gov or Regina Meade, Director, Division of Security and Intelligence, at (703) 284-1300 or by e-mail at Regina.Meade@state.gov.

Sincerely,

Harold M. Geisel
Deputy Inspector General

Enclosures: As stated.

cc: OBO – Lydia J. Muniz
    DS – Eric J. Boswell
[Redacted] (b) (5), [Redacted] (b) (7)(F)
[Redacted] (b) (5), [Redacted] (b) (7)(F)
Appendix A

Embassy of the United States of America

September 14, 2012

Mr. Harold W. Geisel
Deputy Inspector General
Office of Inspector General

Dear Mr. Geisel:

In regards to the Outline for Action included in the security audit report provided by the Office of Audits of the Office of Inspector General (OIG), please find attached Embassy response to the physical security areas of concern outlined in the report.

If you have any questions or concerns, please contact Regional Security Officer at or at @state.gov.

Sincerely,

Enclosure
Dear Mr. Ambassador:

Enclosed for your review and action is a copy of the final report Outline for Action: Physical Security Concerns at [Redacted] (b) (5), [Redacted] (b) (7)(F), [Redacted] (b) (6). This report is part of an overall audit of Department of State compliance with physical security standards and measures taken to address threat levels at selected overseas posts.

Based on your response to the draft report, the Office of Inspector General (OIG) considers four recommendations (Nos. 1–3 and 5) closed and two recommendations (Nos. 4 and 6) resolved, pending further action. Actions taken or planned are subject to followup and reporting in accordance with the enclosed compliance response information.

OIG incorporated your comments as appropriate within the body of the report and included them in their entirety as Appendix A. This report will be included as an appendix in the final report on selected overseas posts' compliance with physical security standards.

OIG appreciates the cooperation and assistance provided by embassy staff during this audit. If you have any questions, please contact Evelyn R. Klemstine, Assistant Inspector General for Audits, at (202) 663 [Redacted] (b) (6) or by e-mail at [Redacted] (b) (6) @state.gov or Regina Meade, Director, Division of Security and Intelligence, at (703) 284 [Redacted] (b) (6) or by e-mail at [Redacted] (b) (6) @state.gov.

Sincerely,

Harold W. Geisel
Deputy Inspector General

Enclosures: As stated.

cc: OBO – Lydia J. Muniz
    DS – Eric J. Boswell
[Redacted] (b) (5), [Redacted] (b) (7)(F)
[Redacted] (b) (5), [Redacted] (b) (7)(F)
September 03, 2012

Dear Harold:

I would like to provide you now with our responses to the given recommendations. My office continues to aim for full compliance as a top priority. Our Senior Regional Security Officer (SRSO), [Redacted], will maintain dialog with the Office of Audits to ensure we have fully addressed each recommendation.

Sincerely,

[Redacted] (b) (5), [Redacted] (b) (7)(F), [Redacted] (b) (6)
United States Department of State and the Broadcasting Board of Governors
Office of Inspector General

Dear [Redacted] (b) (5), [Redacted] (b) (7)(F), [Redacted] (b) (6)

Enclosed for your review and action is a copy of the final report Outline for Action: Physical Security Concerns at [Redacted] (b) (5), [Redacted] (b) (7)(F) Based on your response to the draft report, the Office of Inspector General (OIG) considers Recommendations 1 and 2 closed, Recommendations 3 and 6 resolved, and Recommendations 4 and 5 unresolved. Please provide your response to the report and information on actions taken or planned for the open recommendations within 30 days of the date of this letter. Actions taken or planned are subject to followup and reporting in accordance with the enclosed compliance response information.

OIG incorporated your comments as appropriate within the body of the report and included them in their entirety as Appendix A. This report will be included as an appendix in the final report on selected overseas posts' compliance with physical security standards.

OIG appreciates the cooperation and assistance provided by your staff during this audit. If you have any questions, please contact Evelyn R. Klemstine, Assistant Inspector General for Audits, at (202) 663-[Redacted] (b) (6) or by e-mail at [Redacted]@state.gov or Regina Meade, Director, Division of Security and Intelligence, at (703) 284-[Redacted] (b) (6) or by e-mail at [Redacted]@state.gov.

Sincerely,

Harold W. Geisel
Deputy Inspector General

Enclosures: As stated.

cc: OBO – Lydia J. Muniz
    DS – Eric J. Boswell
[Redacted] (b) (5), [Redacted] (b) (7)(F)
Dear Mr. Geisel,

I have carefully reviewed the recommendations provided to us in the OIG Outline for Action: Physical Security Concerns memorandum, dated August 16, 2012. Attached to this letter you will find our responses for your review. We believe the recommendations have been resolved except for two, which require additional action to be taken by the Regional Security Office and Management Office. I have instructed my staff to keep you properly informed of their progress while resolving these recommendations.

Should you have any questions regarding our responses, please contact RSO [redacted] via email [redacted] or [redacted].

Sincerely,

[Redacted]

Enclosure
[Redacted] (b) (5), [Redacted] (b) (7)(F)
Dear Mr. Ambassador:

Enclosed for your review and action is a copy of the final report Outline for Action: Physical Security Concerns at [Redacted]. Based on your response to the draft report, the Office of Inspector General (OIG) considers Recommendations 1, 3, 7, 9 and 10 closed and Recommendations 2, 4-6, and 8 resolved. Please provide your response to the report and information on actions taken or planned for the open recommendations within 30 days of the date of this letter. Actions taken or planned are subject to followup and reporting in accordance with the enclosed compliance response information.

OIG incorporated your comments as appropriate within the body of the report and included them in their entirety as Appendix A. This report will be included as an appendix in the final report on selected overseas posts' compliance with physical security standards.

OIG appreciates the cooperation and assistance provided by your staff during this audit. If you have any questions, please contact Evelyn R. Klemstine, Assistant Inspector General for Audits, at (202) 663-____ or by e-mail at [Redacted] or Regina Meade, Director, Division of Security and Intelligence, at (703) 284-____ or by e-mail at [Redacted].

Sincerely,

Harold W. Geisel
Deputy Inspector General

Enclosure: As stated.

cc: OBO – Lydia J. Muniz
    DS – Eric J. Boswell
(Redacted) (b) (5), (Redacted) (b) (7)(F)
MEMORANDUM

To: Harold Geisel, Deputy Inspector General

From: [Redacted] (b) (5), [Redacted] (b) (6), [Redacted] (b) (5)

Subject: Response to the OIG Outline for Action: Physical Security Concerns

REF: Geisel - [Redacted] (b) (7)(F), Letter of September 10, 2012

Oct 22, 2012

Thank you very much for your letter dated September 10, 2012, and for providing me with an Outline for Action regarding physical security concerns at Embassy [Redacted] (b) (5), [Redacted] (b) (7)(F). Please be assured that our Mission takes matters of security seriously and that we are in the process of addressing all of the OIG's concerns. In light of the tragic events in Benghazi, we are all more cognizant than ever of the importance of physical security. I am pleased to report that most of the recommendations have already been completed and that Post has set the goal of completing the rest by the end of February 2013. The following responses are keyed to the recommendations provided in the Outline for Action:

[Redacted] (b) (5), [Redacted] (b) (7)(F)
[Redacted] (b) (5), [Redacted] (b) (7)(F)
Dear Mr. Ambassador:

Enclosed for your review and action is a copy of the final report *Outline for Action: Physical Security Concerns at* .

Based on your response to the draft report, the Office of Inspector General (OIG) considers Recommendations 1 and 3–6 resolved and Recommendation 2 unresolved. Please provide your response to the report and information on actions taken or planned for the open recommendations within 30 days of the date of this letter. Actions taken or planned are subject to followup and reporting in accordance with the enclosed compliance response information.

OIG incorporated your comments as appropriate within the body of the report and included them in their entirety as Appendix A. This report will be included as an appendix in the final report on selected overseas posts’ compliance with physical security standards.

OIG appreciates the cooperation and assistance provided by your staff during this audit. If you have any questions, please contact Evelyn R. Klemstine, Assistant Inspector General for Audits, at (202) 663- or by e-mail at , or Regina Meade, Director, Division of Security and Intelligence, at (703) 284- or by e-mail at .

Sincerely,

Harold W. Geisel
Deputy Inspector General

Enclosure: As stated.

cc: OBO – Lydia J. Muniz
    DS – Eric J. Boswell
(Redacted) (b) (5), (Redacted) (b) (7)(F)
October 12, 2012

Mr. Harold W. Geisel
Deputy Inspector General
U.S. Department of State
SA-3, Room 8100
2121 Virginia Ave. N.W.
Washington, D.C. 20037

Dear Deputy Inspector General Geisel:

Thank you for your letter dated September 10, 2012, which outlined a number of recommendations regarding physical security. The protection of my staff is my highest priority. I want to thank you and your team for their visit, which will allow us to further enhance the security at our facilities. I understand that the issues identified by your team revolve around regulations that have changed since.

Following is a review of the status of the items identified by your team as requiring immediate action. Most of them will require involvement and/or funding from the Bureau of Overseas Building Operations (OBO). My team will work closely with OBO and all other partners involved in the outlined issues for prompt resolution.
Again, I want to thank you and your team for conducting the survey and for their detailed findings. As stated, protecting people is my highest priority. My team of RSO, ESO, and FM will continue to work with OBO to remedy these matters.

cc.  
DCM  
RSO -- [Redacted]  
OIG -- Evelyn R. Klemstine
Appendix D

Statutes of Recommendations for Outline for Action Reports

The Office of Inspector General, based on the respective bureaus’ and embassies’ responses to the recommendations presented in all five of the Outline for Action reports, has listed the statuses of the recommendations in Figure 1 of this appendix. The status designations are defined as follows:

**Unresolved Recommendation.** A recommendation is considered unresolved when there is no management decision and the designated action office has not taken any of the following actions:

- Management has not responded to the recommendation or has failed to obtain clearance of its response by the offices identified by OIG as participants in the compliance process.
- Management has failed to address the recommendation in a manner satisfactory to OIG.
- Management has indicated its disagreement with the recommendation in whole or in part and an impasse decision has not been issued.

**Resolved Recommendation.** A recommendation is considered resolved, pending further action, when one of the following actions occurs:

- The designated action office agrees with the recommendation but has not presented satisfactory documentation that it has implemented the recommendation or some other acceptable course of action that satisfies the intent of the recommendation.
- The action office informs OIG that it disagrees with all or part of the recommendation, and OIG agrees to accept partial compliance or noncompliance.
- Impasse procedures have led to a positive or negative final management decision.

**Closed Recommendation.** A recommendation is closed when one of the following actions occurs:

- OIG acknowledges that the designated action office has provided satisfactory evidence that the recommendation has been implemented.
- OIG acknowledges to the action office that an alternative course of action to that proposed in the recommendation will satisfy the intent of the recommendation, and satisfactory evidence showing that the alternative action has been completed is provided to OIG by the action office.
- OIG agrees that partial implementation is acceptable and has been completed or that noncompliance is acceptable.
- Department or BBG management has issued a positive decision, and implementation of the recommendation has been completed or a negative decision has been reached through impasse procedures.
MEMORANDUM

TO: OIG – Harold W. Geisel

FROM: DS – Gregory B. Starr, Acting


(U) The Bureau of Diplomatic Security (DS) appreciates the opportunity to review and provide comments on the subject draft audit report. DS welcomes cooperation with the Office of the Inspector General (OIG) in order to improve our operations and ensure that we provide our diplomatic and development professionals the best possible security around the world. Constructive and timely feedback from OIG inspections and audits is a useful tool in managing our security programs at the 275 U.S. missions for which we are responsible.

(SBU) DS acknowledges the deficiencies identified in the subject draft report and notes that the responses from the audited posts show prompt and proper attention from Regional Security Officers (RSOs) to correct identified issues. DS also notes, however, that some deficiencies are minor and have a minimal impact on posts’ overall security postures. Moreover, DS does not believe that a random, non-statistical sampling of posts, such as formed the basis for this report, provides sufficient justification for action by RSOs worldwide. Our RSOs perform a large number of priority security functions; 12 FAM 422 identifies more than 35 distinct responsibilities. As such, DS is reluctant to task them further, as recommended in this report, to conduct reviews that are otherwise done through more routine means such as physical security surveys, DS post security program reviews, program management reviews by our Office of Overseas Protective Operations (OPO), and OIG inspections.
(SBU) DS does not concur with recommendations 1, 4, 5, 13-16, 20, and 21. RSOs, whether as part of one of the processes noted above or simply in the course of their daily business, already identify areas in which their posts’ physical and/or procedural security postures do not fully comply with Overseas Security Policy Board (OSPB) standards or are not appropriate to their respective threat environments. As the draft report implicitly recognizes, almost none of the audit’s findings in this regard came as a surprise to RSOs or post management at audited posts. RSOs routinely take corrective actions to address procedural security lapses with post personnel and to report critical physical security deficiencies. This reporting informs physical security upgrade projects managed by posts and the Bureau of Overseas Buildings Operations (OBO), as well as DS-provided technical security upgrades. In addition, DS security engineering personnel routinely inspect the functionality of physical security features and make all possible repairs to maintain them in good working order. Finally, only a handful of these recommendations properly account for the key role that OBO plays in correcting instances of non-compliance with OSPB standards.

(SBU) DS does not concur with recommendations 8 and 9 for similar reasons. DS disagrees that there is a need to task RSOs worldwide with the actions noted in these recommendations, as they occur on a regular basis. When deficiencies are identified, they are corrected immediately.

(U) DS concurs with recommendations 18, 19, and 22, and our more detailed responses are attached.

(SBU) DS remains willing to meet with you or members of your staff to discuss ways in which we can increase the utility for our programs of future audits and/or inspections.
Attachments:
Tab 1 – DS Response to Recommendation 18
Tab 2 – DS Response to Recommendation 19
Tab 3 – DS Response to Recommendation 22
Tab 4 – Recommendations with which DS does not Concur
Audit of Department of State Compliance With Physical Security Standards at Selected High Threat Level Posts, Report Number AUD-SI-13-XX, April 2013

[Redacted] (b) (5), [Redacted] (b) (7)(F)
Audit of Department of State Compliance with Physical Security Standards at Selected High Threat Level Posts
OIG Report Number AUD-SI-13-XX, April 2013

Recommendations with which the Bureau of Diplomatic Security does not Concur

[Redacted] (b) (5), [Redacted] (b) (7)(F)
TO: OIG – Mr. Harold W. Geisel
FROM: OBO/RM – Jürg F. Hochuli
SUBJECT: Draft Report on Audit of Department of State Compliance With Physical Standards at Selected High Threat Level Posts

The Bureau of Overseas Buildings Operations (OBO) appreciates the opportunity to provide comments to the subject draft report.

Attached are OBO’s written comments to recommendations 2, 3, 6, 7, 10, 11, 12, and 17 which require OBO’s action. The comments are in bold text for ease of reference.

Attachments:
1. Comments on the draft report.
2. Maintenance Alert issued to post FMs.
[Redacted] (b) (5), [Redacted] (b) (7)(F)
MEMO FOR OFFICE OF THE INSPECTOR GENERAL

FROM:

SUBJECT: Reply to the Audit of Department of State Compliance with Physical Security Standards at High Threat Level Posts

clears in draft this audit report with the exception of recommendation #23. The issue raised is a broader issue for the department and touches upon rightsizing and Chief of Mission authority.

You may want to have a discussion with M/PRI and consider how that fits. The bulk of the audit is DS/OBO action – we defer to them.
Major Contributors to This Report

Regina Meade, Director
Division of Security and Intelligence
Office of Audits

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

CONTACT THE OFFICE OF INSPECTOR GENERAL HOTLINE TO REPORT ILLEGAL OR WASTEFUL ACTIVITIES:

202-647-3320
800-409-9926
oighotline@state.gov
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